

SOUTH AUSTRALIAN ROYAL COMMISSION INTO EARLY CHILDHOOD EDUCATION AND CARE

ARACY SUBMISSION

About ARACY

ARACY - Australian Research Alliance for Children and Youth catalyses change by bringing people and knowledge together for the benefit of children and young people in Australia. We achieve this by advocating for evidence-based policy and practice, focusing on prevention and early intervention. Our consultations with over 4000 children and young people, their families, and experts have shown us what wellbeing means to them: to be loved, valued, and safe; to have material basics; to be physically and mentally healthy; to be learning; to be participating; and to have a positive sense of identity and culture. These six domains form ARACY's wellbeing framework for children and young people — the Nest.

ARACY - Australian Research Alliance for Children and Youth thanks the Royal Commission for the opportunity to provide input into their inquiry. ARACY commends the Commission's recognition of the importance of education and the link between developmental vulnerability and socio-economic status.

Australian Research Alliance for Children & Youth





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What is the core purpose of early childhood education and care for 0-3 year old children?

ARACY supports the Royal Commission's position on the purpose of early childhood education and care (ECEC), as outlined in the Interim Report (April, 2023): 'that the purpose of providing universal three-year old preschool is to support every South Australian child's healthy early development and learning, so that they can thrive, now and in the future' (p.120). Similarly, ARACY sees early childhood education and care in all its forms from ECEC centres, long day care, maternal and allied health and community programs for children aged 0-3 as sharing the same core purpose: supporting healthy early childhood development and wellbeing. To support children's holistic wellbeing across all services that interact with children and their parents and carers in the first 1000 days of life, ARACY recommends utilising a common framework and way of working that ensures consistent language and the implementation of best practice approaches.

ARACY recognises that not only does ECEC in itself represent a complex social system, but it interfaces with multiple other complex systems. This is recognised in the Terms of Reference, which explicitly covers "The extent to which South Australian families are supported in the first 1000 days of a child's life, focused on opportunities to further leverage early childhood education and care to enable equitable and improved outcomes for South Australian children."

ARACY proposes that the most effective frame to apply to the complex system of ECEC and its interfaces with the other systems with which it interacts is that of "systems stewardship". Systems stewardship as a concept has developed from both systems thinking more generally, and the related (but narrower) concept of "market stewardship", which seeks to shore up shortfalls in market theory where this is insufficient to meet the needs of a universal population.

System stewardship presents an opportunity to address failings of market-based human services against the backdrop of increasingly complex societal needs. In the context of early childhood, research suggests the market-based model is challenged by limitations to family choice, a highly diverse range of operating models, difficulty understanding quality or outcomes for children, and balancing a demand-driven market with societal benefits of participation in early childhood education (The Front Project, 2022).

Recommendation 1: Use the Nest Wellbeing Framework and Common Approach across all South Australian Early Childhood Education and Care service providers.

ARACY's wellbeing framework for children and young people — the Nest provides accessible language across six wellbeing domains to include in a vision statement, strategy and framework about holistic child wellbeing. It has been adopted by government and non-government organisations across Australia and New Zealand in education, health and community settings. In addition, the City of Helsinki, in Finland, approached ARACY to adopt the Nest and The Common Approach across its entire district after researching for high quality, evidence-based, holisitic and



universal child and youth wellbeing frameworks and practices world-wide. It has been in use across the city since 2021 with 700 practitioners trained to date.

The Nest is based on consultations with over 4000 children, young people, parents and carers reflecting Australia's diverse population, and was synthesised with contemporary early childhood development research.

The below statements from the Nest should be qualified with an equity statement which declares that all South Australian children have the right to holistic wellbeing, regardless of their background, socio-economic status, where they live and their abilities. These wellbeing statements include:

- Children are valued, loved and safe
- Children have access to material basics
- Children have their physical, mental and emotional needs met
- Children have access to learning within their early childhood education and care setting, home and community
- Children participate and have a voice in decisions that affect them in the family and community
- Children have a positive sense of identity and culture.

The Nest's practical application, The Common Approach, provides all professionals working with children and their families with a shared language and way of working that prioritises holistic wellbeing, and child-centred, strengths-based and collaborative practices.

By implementing universal, preventative approaches in the first thousand days such as the Nest and The Common Approach, more impact can be made earlier, to ensure all South Australian children's holistic needs are met before requiring intervention or impacting development.

This is aligned with The Royal Commission's Interim Report (2023) Recommendation 20: that the State Government provide access to the following supports and resources in all settings: a. Evidence-based tools for improving pedagogical approaches (per Recommendation 6), and c. Professional learning for early childhood educators and teachers on early childhood development (per recommendation 8) (p. 124).

Recommendation 2: Adopt a "systems stewardship" approach to the ECEC system in South Australia, and advocate for and influence a systems stewardship approach to ECEC nationally

Stewardship as a concept involves responsible management and supervision, exercising care and consideration. In a policy context, all models of stewardship involve taking responsibility within a context of constrained resources and for a set of defined beneficiaries (Moon et al. 2017).

System stewardship is a holistic approach to governance. It acknowledges the complex and adaptive nature of developing policy and delivering human services in a systems context (The Front Project, 2022).

The role of steward is a collective one, in which each actor understands their own role and how this interacts with the role/s of other actors within the system. Each carries out their roles to best contribute to the overall health and performance of the system, guided by a shared vision and with a joint commitment to iterative learning and improvement. System stewards do not act only for the



benefit of themselves or their own organisation, but take responsibility and accountability for the health of the system overall, including, and especially, its beneficiaries.

The concept of system stewardship developed from recognising the complex environment in which policy plays out – from designing policy through to providing varied services to a range of people with unique needs and preferences. Systems are constantly evolving, whether by design or by consequence. Systems stewardship allows for actors within a system to take active responsibility for steering the system towards more desirable outcomes.

While systems stewardship is an emerging field, there are several factors that are agreed to be essential to successful stewardship (The Front Project, 2022). These include:

- A clear and unified purpose
- Rich and transparent information
- Strong governance
- Appropriate devolution
- Agility and adaptability

System stewardship is a collective effort carried out at all levels of a system and requires responsibilities to be distributed across multiple stewards, rather than a single entity. In nation-wide markets such as health and education, the research on implementation suggests bringing on board a national level steward to address funding, policy setting and regulatory decisions. Where national markets consist of a collection of interconnected local markets, stewardship at the local level is equally important. For example, Malbon et al. (2020) found that local disability markets in the National Disability Insurance Scheme (NDIS) functioned significantly better due to knowledge about local market conditions being informally disseminated by local area coordinators.

The unique features of complex human service systems do not mean that market forces will not create positive outcomes for all beneficiaries and actors, but it becomes increasingly important to judge when and where these outcomes are unlikely to be achieved. Stewards must acknowledge that the system requires careful monitoring, adjustments and in some cases intervention to reach the desired outcomes. This is one of the key components of system stewardship (The Front Project, 2022).

Systems stewardship as a concept and a way to achieve outcomes in complex systems if gaining traction in Australia, but there is a long way to go. The Front Project's 2022 paper, The Case for System Stewardship in Australia's Early Childhood Education and Care System, give a comprehensive overview of the opportunities and pathway to how a systems stewardship model might be achieved in Australia. There is an opportunity for South Australia to lead the way in understanding the benefits of systems stewardship and committing to this approach as part of the Royal Commission's outcomes. Systems stewardship is iterative and committed to continuous improvement, it is inclusive and seeks to expand the most successful outcomes of any system to all its actors and beneficiaries.



What are the secondary, but still important, purposes of ECEC for 0-3 year old children?

High quality ECEC, coordinated early years service delivery, and positive relationships between parents/carers and their early years service providers is a potential facilitator of strong family home learning. Home learning environments describes activities such as talking, reading, singing, and playing within the family context (Fox et al, 2015). Parents and carers are children's most important teachers and have the largest impact on the wellbeing and development of their children (Melhuish et al, 2008). Parents and carers can be supported to enrich their child's life at home by a responsive, flexible, place-based ECEC system, by learning about brain development in the first 1000 days and by accessing support services early when needed (The Front Project, 2021; Dundas & Depers, 2023; Fox et al, 2015).

The ECEC and broader Early Years sector can support this by implementing a State Government coordinated public awareness campaign about the importance of the first 1000 days and practical ways to boost brain development.

Recommendation 3: Develop a coordinated approach to improving parental awareness a about the importance of the first 1000 days

Evidence based recommendations emphasise the need for policy and program initiatives to promote parenting knowledge, and that parents need a basic understanding of infant and child developmental milestones, norms and parenting practices to optimise children's development (Breiner et. al, 2016).

Parental knowledge of child development is positively associated with quality parent-child interactions and the likelihood of parents' engagement in practices that promote their children's healthy development (Breiner et. al, 2016). However, there is tremendous variation in parent's knowledge about child development (Breiner et. al, 2016), with some studies suggesting that parents with a higher education level tend to have more knowledge about child development. Research also indicates that parents with knowledge of evidence-based parenting practices, especially those related to promoting children's physical health and safety, are more likely than those without such knowledge to engage in evidence-based parenting practices. (Breiner et. al, 2016).

All parents and carers and the wider community should understand the significant brain development occurring in the first 1000 days. Raising Literacy Australia and the <u>0-3 Task Force</u> are well underway in South Australia in achieving this goal, particularly the <u>Words Grow Minds campaign</u>. ARACY endorses these organisations and the strong evidence base and best-practice background they provide, along with other Australian-based awareness campaigns such as <u>Thrive by Five, Deadly Brains</u>, <u>Better Beginnings</u>, <u>First Five Forever</u>.



Recommendation 4: Coordinate a digital platform of information and services to support parents to have a rich home-learning environment

Current digital platforms already exist in Australia to support parents to have rich home-learning environments for optimal child development. The South Australian Government should coordinate and promote quality information and service providers about early childhood development, such as:

- Bright Beginnings created by Thrive by Five an app which helps parents have 'brain building' moments each day with suggested activities adjusted for a child's age. Activities are accessible throughout daily routines regardless of socio-economic status or background. Activities are based on The Harvard Centre for the Developing Child app Vroom, which provides 'brainy background' explanations for each activity suggestion, and how evidence has shown these interactions impact brain development. Bright Beginnings bring these activities into an Australian context and include national parenting resources and services.
- Raising Children Network created in collaboration with the Department of Social Services, Parenting Research Centre, Murdoch Children's Research Institute and the Royal Children's Hospital for Community Child Health. Raising Children Network is an Australian parenting website that provides ad-free parenting videos, information and links to other resources, backed by Australian experts for children and young people from conception to 24, and in a variety of community languages.

What is, or should be, the role of ECEC in redressing disadvantage (if any)?

ARACY supports the Royal Commission's Interim Report statement that the ability of early childhood education and care to disrupt disadvantage is important. Targeted service provision will always be necessary to address the unique needs of certain groups and individuals. Investing in preventative and universal measures earlier should mean the demand on tertiary intervention is smaller, but in turn, these interventions can be of a higher quality with a reduced demand.

ARACY supports with the Royal Commission's Interim Report Recommendation 2a (p. 120): that Early childhood education and care should be universal but not uniform and should reflect the different needs of different communities and families.

ARACY supports the Royal Commission Interim Report's Recommendation 18.c - that place-based integrated service hubs be commissioned in areas of high developmental vulnerability. ARACY recommends that this be the starting point for a broader universal roll-out of integrated service hubs as a preventative measure.

Recommendation 5: Increase funding for evidenced intensive individual support plans for families with additional needs

ARACY recommends that the South Australian Government funds individualised support plans to achieve Recommendation 2.b: Taking active steps to ensure full participation of all children in ECEC.

ARACY recommends Goodstart's Intensive Individual Support Plans (IISPs) program as a successful and evidence-based approach. This program assigns a dedicated educator with additional training in trauma-informed and attachment-based practices to work one-on-one with a child under the



guidance of a family practitioner. This educator is not included in the centre's educator ratios, allowing fully dedicated one-on-one time with the child. This allows the child to be included within their current ECEC service with appropriate supports put in place.

The University of Adelaide's evaluation of the program demonstrates impressive outcomes for child development and inclusion (Karpetis, 2020). Please refer to the <u>University of South Australia's recent evaluations of the IISPs</u> for evidence of their effectiveness in addressing inclusion, access and child development outcomes.

Recommendation 6: Consider funding intensive Early Years Education Programs in areas of extreme disadvantage.

The Early Years Education Program (Tseng et. al, 2019) trial and evaluation from University of Melbourne is an example of a high quality, targeted and purpose-built ECEC service aimed at redressing disadvantage. Children with significant vulnerabilities and risk factors aged under 36 months were enrolled in this program for 50 weeks per year for two years and received centre-based early years education and care. All children and families participating in the program had existing engagement with family and child protection services, and had two or more risk factors including family violence, parent alcohol and drug use, parent mental illness, attachment/relationship issues, harsh, inconsistent discipline and neglect or abuse (Tseng et al., 2017).

Key features of the Early Years Education Program were high staff/child ratios, qualified and experienced staff, inclusion of an infant mental health consultant as a member of the team, and a rigorously developed curriculum. After 24 months, children who participated in this program significantly increased their IQ scores, resilience and protective factors and social-emotional development (Tseng et. al, 2022). Parents and carers also reported decreased levels of distress. Intensive, wrap-around programs such as the Early Years Education Program are essential to provide the level of support needed to make significant change to the most vulnerable children.

Recommendation 7: Incentivise ECEC workers to take up work in rural or remote areas

There is a growing gap between the quality and accessibility of services in the most and least disadvantaged areas of Australia as illustrated by *Deserts and Oases: How accessible is childcare?* (Hurley, Matthews & Pennicuik, 2022). Outer regional Australia and remote/very remote Australia have conditions knows as 'childcare deserts' where there can be more than three children for each individual childcare place. More than 60% of outer regional, remote and very remote Australia are in childcare deserts where there is extremely limited supply of childcare. Approximately one million Australians have no access to childcare at all (Hurley, Matthews & Pennicuik, 2022). ARACY encourages the South Australian Government to include an incentivising financial enabler such as programmatic funding (The Front Project, 2023) for ECEC staff to work in outer regional, remote and very remote areas, similar to incentives for teachers working in these locations. We also encourage the Government to support the financial establishment of extra ECECs in childcare deserts through block funding (The Front Project, 2023).



Recommendation 8: Incentivise ECECs to enrol children from vulnerable groups for example First Nations, children with disabilities, children involved with the child protection system, children from low socio-economic backgrounds

Major cities generally have childcare 'oases' with many services for families to choose from. However even within major cities, there are suburbs with fewer childcare options and lower quality rated services. These suburbs generally have a greater relative disadvantage or higher proportion of culturally and linguistically diverse populations (Hurley, Matthews & Pennicuik, 2022).

There are concerning correlations between childcare access and socio-economic status. Areas with the highest general childcare fees also have the highest level of childcare accessibility and places available, which may incentivise more centres to start up in already-established childcare 'oases' and more ECEC staff to work at these centres if there is correlating higher pay (Hurley, Matthews & Pennicuik, 2022).

ARACY recommends the South Australian Government specifies outcome or needs based funding for early childhood education and care centres as an incentive to enrol children from vulnerable groups as outlined in the Front Project's funding models and levers (The Front Project, 2023).

Recommendation 9: South Australian Government listens to the Aboriginal community regarding the first 1000 days and ECEC for 0-3 year olds

In line with the Royal Commissions' Interim Report Recommendation 17, ARACY advocates for the South Australia Government to work with the Aboriginal community, including South Australia's First Nations Voice to Parliament and the South Australian Aboriginal Education and Training Consultative Council, to identify the best ways to support Aboriginal families in the first 1000 days and to leverage and optimise child development outcomes, through ECEC and other integrated service provision.

What services could be co-located or integrated for families of children 0-3 years of age within ECEC settings (including during pregnancy)?

ARACY supports the Royal Commission's Recommendation 2.g: that the South Australian Government should embrace the role early childhood education and care can play as 'backbone' universal infrastructure for early child development. Further to this, we encourage the South Australian Government to develop integrated child and family hubs, starting with areas of disadvantage, and then scaling up to a universal offering.



Recommendation 10: Develop place-based integrated child and family hubs

Currently, the early years system is incredibly difficult to navigate, as demonstrated by Figure 1 (Goldfeld et. al., 2013).

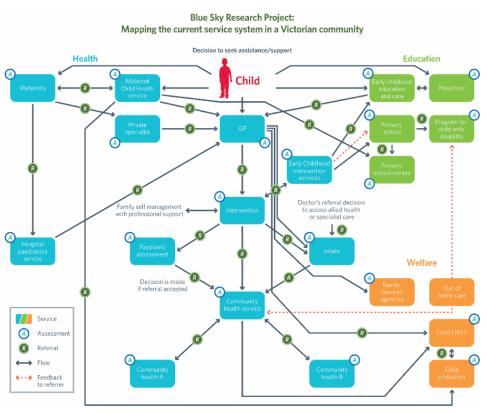


Figure 1 - Diagram from Goldfeld et. al. (2013)

Families need to work with a variety of services that operate in silos. Families use great amounts of time to identify what services exist, how to access them and the independent requirements for each service. Ideally ARACY would like to see the system changed to a holistic, universal platform with consistent requirements and robust data sharing, as shown in Figure 2 (Goldfeld et. al., 2013).



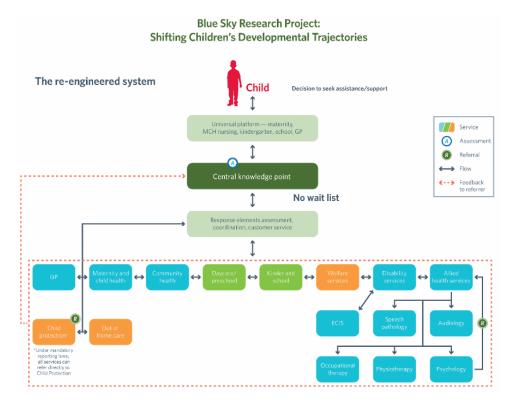


Figure 2 - Diagram from Goldfeld et. al. (2013)

Creating a universal platform of services for infants, toddlers and pre-schoolers, comprising early intervention services, playgroups, maternal nurse home visiting and free, quality early childhood care will best support the sector to address holistic wellbeing and remove silos. Robust evidence has supported this type of systems-change as an effective intervention and prevention for intersectional disadvantage (Fox et al., 2015).

ARACY encourages the Royal Commission to advocate for locally coordinated approaches to early childhood development in disadvantaged communities as outlined in *Starting Better – A Guarantee* for young children and families report (Centre for Policy Development, 2021).

In the absence of complete system change, ARACY advocates for the South Australian Government to employ community navigators for vulnerable families. Community navigators (as proposed in <u>Starting Better – A guarantee for young children and families</u> (Centre for Policy Development, 2021) support families experiencing vulnerability to access ECEC, subsidies, health systems and provision of materials in a variety of languages. They can provide culturally appropriate additional support and are essential enablers for vulnerable families to access services that could support their child's development.

Integrated Child and Family Hub provides a 'one stop shop' where families can access a range of supports that improve child development as well as child and family health and wellbeing (Honisett et al. 2023). Integrated Child and Family hubs have two critical roles:



- A service hub improving access to a range of health, education, and social services using a family centred approach; and
- A social hub providing opportunities to build parental capacity and for families to create social connections (Honisett, et al. 2023).

Integrated Child and Family Hubs can be located in early years centres, primary schools, primary health care, Aboriginal Community Controlled Health organisations, community/non-government organisation and virtual settings. The location of these hubs should be chosen based on the unique context of the community. Place-based approaches have a strong evidence-base for creating social change that can reduce intergenerational disadvantage (Harris et al. 2023). Many integrated child and family centres in Australia are funded by a mix of state, territory, commonwealth government and philanthropic investors and use existing resources and services (Australian Government, 2023).

What does high-quality ECEC service provision for children 0-3 years deliver? What are the markers of optimal program delivery?

We agree with the Royal Commission's Interim Report Recommendation 6: for the state government to identify, evaluate and provide evidence-based tools for improving pedagogical approaches in preschool, and that this be extended to 0-3 early childhood education and care. In addition, to achieve high quality education and care, it is vital that the ECEC workforce wages and conditions drastically improve.

Recommendation 11: Use evidence to build high quality early childhood education and care

Early learning needs to be high quality if it is going to have an impact. Specifying quality ECEC as a fundamental outcome and right of all South Australian children is vital. Evidence shows that poor quality ECEC can have negative developmental impacts, specifically on children from vulnerable backgrounds (Melhuish et al, 2015) and there are currently concerning trends in Australia linking lower quality ECECs with lower-socio-economic regions (Hurley, Matthews & Pennicuik, 2022). Two years of high-quality early years education before starting school has a high impact and is particularly positive for children from low-income families (Melhuish et.al, 2013).

'Quality' means policy and practice needs to be neuro-informed within ECEC. This translates into educators, all ECEC staff, policy makers, and decision makers understanding the relevant neuroscience. This includes understanding the biological, social and environmental core story of brain development and how this can be used to support children and families. It encompasses understanding the impacts of stress, adverse childhood experiences and trauma on the developing brain and how children can be supported to recover. It also considers the development of children's executive functioning and how they can be supported to demonstrate the skills that will hold them in good stead for the rest of their lives.¹

ARACY calls on the Royal Commission to use the best quality evidence to define a vision of what quality ECEC looks like. This evidence must be rigorous, regularly reviewed and

¹ This information has been synthesized from the Thriving Queensland Kids and ARACY partnership to develop and deliver the 'Understanding Brain Development' course through Emerging Minds due to be launched in June 2023.



context specific, and importantly, easy to understand by service providers. International resources such as Evidence for Learning's <u>Early Childhood Education Toolkit</u> (2023) provide robust indicators of what constitutes quality early learning, but that evidence needs to be put into practice across the system.

Supporting practitioners to access, understand and then put the latest evidence into practice through professional learning and other capability-building resources, tools and supports is important to improving practice, and thus learning and development outcomes for children.

Recommendation 12: Increase ECEC workers' pay and conditions to achieve universally accessible and quality ECEC

The Royal Commission should prioritise investment to boost wages, retain existing ECEC staff, attract new staff and reduce the wage gap between ECEC educators and primary school educators.

The delivery of quality ECEC requires a capable and valued professional workforce (OECD, 2020). Yet the ECEC workforce in Australia is in crisis, with attrition and vacancy rates running much higher than they were pre-pandemic.

The 2021 strategy, <u>Shaping our Future</u> (Education Services Australia, 2021) was developed when the workforce issues were less pressing than they are now as reported by Goodstart Early Learning, and was not backed with significant new funding commitments from the Commonwealth to the States to support the workforce.

To address the workforce crisis, ARACY asks that the Royal Commission advocate for:

- a substantial wage rise for early childhood educators, noting that in the longer term, wages and conditions should be increased to be comparable with rates payable in the rest of the education sector (i.e. schools)
- 2. improving the pipeline for new educators by:
 - a. Introducing Free TAFE courses and additional funding for traineeships for educators;
 - b. Expanding places in Early Childhood Teaching courses at universities supported by scholarships;
 - c. Developing accelerated pathways for experienced Diploma qualified educators to progress to Early Childhood Teaching qualifications within 1-2 months, supported by funding arrangements and mentoring support to cover up to 80 days of practicum teaching placements.
 - d. Including early childhood teachers and educators on migration priority lists and address unnecessary hurdles and delays on visa applications.
- 3. In the longer term, enhancing the professional recognition and support for early childhood teachers and educators with more emphasis on the importance of pedagogy and learning, building on the actions in the 2021 National ECEC Workforce Strategy.

Recommendation 13: Include children's voices in Early Years Reform.

Participation is a core component of wellbeing. The United Nations Convention on the Rights of the Child states children have a right to be active participants in all matters affecting their lives. ARACY recommends that Royal Commission incorporate opportunities for consultation with children to have a say about what is important for the early years. Young children are competent and capable of making meaning about their lives when supported by developmentally appropriate questions and



response options (Sparks, 2020; Harris & Manatakis, 2013; Lansdown, 2005). This is consistent with the National Quality Standard Quality Area 1, Supporting agency: involving children in decision-making and the Early Years Learning Framework.

What are the current barriers for families in accessing early education and care support in the first 1000 days of a child's life?

At present, the early years system is disjointed and complicated to navigate. There is not a shared system of data or information about families. Various service providers in the first 1000 days work in isolation, and the childcare subsidy entitlements are confusing and complicated.

Recommendation 14: Provide community navigators

ARACY encourages the Royal Commission to recommend the provision of community navigators for families experiencing vulnerability and advocate for the federal government to remove the activity test for childcare subsidies, placing the entitlement with the child and not the parents/carers.

Community navigators, as proposed in <u>Starting Better – A guarantee for young children and families</u> <u>2021</u> and referenced in Recommendation 9 above, support families experiencing vulnerability to access ECEC, subsidies, health systems and provision of materials in a variety of languages. They can provide culturally appropriate additional support and are essential enablers for vulnerable families to access services that could support their child's development.

Recommendation 15: Remove the activity test for childcare subsidy to early childhood education and care

ARACY recommends that the Royal Commission advocate for the federal government to revise the Childcare Subsidy Activity Test to increase the affordability of ECEC regardless of a parent's workforce participation. Currently, children whose parents are not in the workforce have limited access to subsidised care and this is a significant barrier to accessing early childhood education and care. This measure puts the adult at the centre of decisions about access rather than the child. This affects our most vulnerable children's access to quality education and care that could greatly improve their developmental outcomes (Dundas & Depers, 2023; Centre for Policy Development, 2021).

In Australia, one in five children start school developmentally vulnerable, and for children who do not receive early childhood education and care, this figure is two in five (Centre for Policy Development, 2021). Families not participating in the workforce are among the most vulnerable and financially strained community members, and it is their children who would benefit the most from high quality ECEC (Dundas & Depers, 2023; Melhuish et al, 2015; The Front Project 2021).

It is also important to note that some families actively choose not to participate in the workforce during their child's earliest years, for either cultural, wellbeing, philosophical or study reasons, and this choice should be equally valued. ARACY recommends that the child be the owner of that entitlement so that their ability to access high quality ECEC is not compromised by their parents' workforce participation. This would also reduce the administrative burden for the ECEC sector.



-ENDS-

May 2023

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