



The Hon Julia Gillard AC
Commissioner
Royal Commission into Early Childhood Education & Care
GPO Box 11025, Adelaide SA 5001
E: royalcommissionecec@sa.gov.au

30 January 2023

Dear Commissioner

RE: Submission on the delivery of universal three-year old preschool

Thank you for the invitation to provide a submission as part of the public consultation on the Royal Commission into Early Childhood Education & Care in South Australia. This submission focuses on the guiding questions relating to the purposes and aims of three-year-old preschool, quality practice, and workforce considerations.

About ACECQA and the National Quality Framework (NQF)

The Australian Children's Education and Care Quality Authority (ACECQA) is the independent national authority established under the Education and Care Services National Law¹ to guide the implementation and administration of the National Quality Framework (NQF). The NQF is the national system for regulating education and care services, setting standards for safety and quality so that all children who attend long day care, preschool/kindergarten, outside school hours care and family day care are supported to have access to high quality early education and care. The NQF is jointly governed by the Australian Government and all state and territory governments as a means of driving continuous improvement in the quality of these services and realising the efficiency benefits and cost effectiveness of a unified national system.

Quality education and care provides children in Australia with the best possible start in life

Children's early education and care is an integral part of the Australian education system and sets the foundations for lifelong learning and skill development. The benefits of quality early education and care are broad. Contemporary research demonstrates that high quality early childhood education and care leads to better health, employment, and educational outcomes, providing significant return-on-investment for governments²³. Exploring how best to deliver education and

¹ The National Quality Framework (NQF) operates under an applied law system, comprising the Education and Care Services National Law and the Education and Care Services National Regulations, except Western Australia which has a corresponding law. The National Law is not a Commonwealth law.

² Heckman, J. Invest in early childhood development: Reduce deficits, strengthen the economy, published December 2012.

³ OECD, Starting Strong V: Transitions from Early Childhood Education and Care to Primary Education, June 2017.

care in a way that will set children up for life is extremely worthwhile and I am pleased the Royal Commission is undertaking this important work. While the Royal Commission's focus is on South Australia, this inquiry has the potential to influence and benefit all states and territories as the federated model of a national framework allows the knowledge and experience of one jurisdiction to be shared for the benefit of all jurisdictions. One of the significant advantages of the national framework is the enablement of equity and improved quality for children across Australia.

Children should be able to access quality, NQF regulated services

ACECQA recommends that all children aged from birth to five years, across Australia, should have equitable access to quality, NQF regulated education and care services. Based on international research into the aspects of quality that make a difference to children and improve outcomes, the NQF is sophisticated and recognised as a world-leading model. The NQF offers strong compliance and monitoring and quality improvement mechanisms that support children to have the best start in life.

The objectives and guiding principles of the NQF⁴ promote quality and equity, and support the role of families. A fundamental aspect of the NQF is the assessment and quality rating of all education and care services against the National Quality Standard (NQS). The NQS includes seven quality areas that contribute to quality service provision and improved outcomes for children:

- Educational program and practice
- Children's health and safety
- Physical environment
- Staffing arrangements
- Relationships with children
- Collaborative partnerships with families and communities
- Governance and leadership.

The NQS encompasses components of both 'structural' quality (for example, educator qualifications, educator to child ratios, approved learning frameworks, and professional development and support) and 'process' quality (for example, interactions between educators and children). The NQS also increases the focus on educators' pedagogical practice, including:

- intentional and responsive teaching
- inclusive practice and respect for diversity
- assessment for learning and quality improvement planning
- critical reflection
- continuity of learning and transitions
- professional collaboration, standards and development.

The NQS drives continuous improvement and has successfully improved the quality of education and care for children across Australia. Sustained improvements in quality across all areas of the NQS can be seen in the data collected since the introduction of the NQF in 2012. When quality ratings were

⁴ Section 3 of the [Education and Care Services National Law](#)

first published in 2013, 57 per cent of rated services met or exceeded the standard. In 2022, more than 88 per cent of services now meet or exceed the standard⁵.

Families should be provided with choice

Quality education and care improves outcomes for children and enables workforce participation. However, these aims can only be achieved if families are able to *access* education and care services. Families should be provided with options to be able to find services that suit their circumstances, and information to help them choose which service(s) and service types to use.

The variety of service types captured under the NQF (long day care, family day care, stand-alone or school-based preschools/kindergartens), provide families with choice. Provision needs to be flexible to ensure services are accessible, reasonably located and available for the hours required to support family circumstances and workforce participation. Family day care services, for example, often provide education and care to children and families during non-standard hours and in regional and remote areas where centre-based services might not be viable.

Models of education and care which remove preschool from the mixed market offerings of NQF services and providers could have unintended consequences for NQF services and the children that attend them. Embedding preschool in long day care models enables long day care providers, for example, to offset the higher cost of providing education and care to birth – two-year-old children. Removing preschool from these models could make these services less viable and potentially remove choice for families seeking education and care of younger children.

Children and families can benefit from choices that enable multiple children of different ages to be educated and cared for in the same environment. These options can support families to build strong relationships and partnerships with educators across one service. Further, mixed age choices enable family groupings, benefiting siblings who can spend time together during their days, and provide children with opportunities to either learn from older children or to model learning and behaviour to younger children. Families may also prefer mixed age groupings for practical reasons, such as reducing the time spent during pick-ups and drop-offs which supports workforce participation and work-life balance.

Information helps families to make choices. One of the objectives of the NQF is to improve public knowledge, and access to information, about the quality of education and care services. Families can use ACECQA's [Starting Blocks](#) website to find education and care services in their area, along with details about the quality of the services, supporting them to choose services that best suit their child and family circumstances.

Access and equity should drive the supply and design of education and care

Improved access to and attendance at quality education and care services is key to achieving equity. Access to affordable education and care supports more immediate social and economic goals, including increased workforce participation for primary caregivers. However, attendance at high quality early childhood education and care services has significant benefits for children's learning

⁵ [ACECQA Occasional Paper 8: The first decade of the NQF](#)

and development (including cognitive, physical, emotional and social skills development⁶), supports successful transition to school, and increases the likelihood of future academic and career success⁷. Children from disadvantaged backgrounds gain the most from high quality education and care⁸ and, because of this, enabling vulnerable children to access high quality education and care and improving inclusivity more broadly, should be a primary consideration when designing models of preschool. Ensuring children from disadvantaged backgrounds can access and attend quality education and care is important in reducing the gap between advantaged and disadvantaged children. If attendance at high quality education and care increases for some children but not others, there is the potential to widen the gap between those who attend and those who do not.

A highly skilled workforce underpins quality

As you may be aware, ACECQA, on behalf of all governments, project led the development of [Shaping our Future](#), the national ECEC workforce strategy which responds to persistent workforce concerns around recruiting and retaining high quality educators and teachers.

Higher educator qualifications are strongly associated with improved child outcomes, as educators are better able to involve children, stimulate positive interactions, and use a range of strategies to extend and support their learning. In addition, there is growing evidence linking structural mechanisms in staff workforce development and working conditions to higher quality and more consistent staff-child interactions, as well as to overall gains in child development, learning and well-being⁹.

A key feature of the NQF is the requirement for a highly skilled workforce through mandatory requirements for formal qualifications. Since its introduction in January 2012, the NQF has progressively introduced higher qualification requirements, most notably improved educator to child ratios, a requirement to employ an early childhood teacher in all relevant services, and a requirement for at least half of educators included in relevant ratios to hold, or be actively working towards, an approved diploma level (or higher) qualification.

The important competencies for teachers and educators delivering quality programs are reflected in the two nationally approved learning frameworks (which have recently been reviewed for currency and contemporary application). Jurisdictional initiatives to increase participation in early education and care underway in many jurisdictions will increase demand for services and, subsequently, impact the demand for service providers and the children's education and care workforce. Therefore,

⁶ Trudgett, M., & Grace, R. (2011) Engaging with early childhood education and care services: the perspectives of Indigenous Australian mothers and their young children. *Kulumun, Journal of the Wollotuka Institute*, 1(1), 15–36.

⁷ Webster–Stratton, C., Jamila Reid, M., & Stoolmiller, M. (2008) Preventing conduct problems and improving school readiness: evaluation of the incredible years teacher and child training programs in high-risk schools, *Journal of Child Psychology and Psychiatry*, 49(5), 471–488. doi:10.1111/j.14697610.2007.01861.x

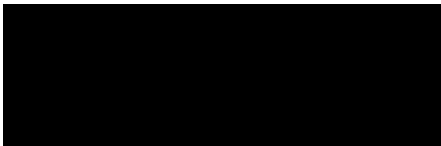
⁸ [Melhuish E, Ereky-Stevens K, Petrogiannis K, Vaharis Penderi E, Rentzou K, Tawell A, Broekhuizen M and Leseman P \(2015\) A review of research on the effects of early childhood education and care \(ECEC\) upon child development. CARE project: Curriculum Quality Analysis and Impact Review of European Early Childhood Education and Care \(ECEC\).](#)

⁹ OECD, Supporting quality early childhood education and care through workforce development and working conditions, in *Engaging Young Children: Lessons from Research about Quality in Early Childhood Education and Care*, March 2018.

ACECQA recommends that any future design of three-year-old preschool in South Australia incorporates strategies specifically targeted at improving the recruitment and retention of early childhood teachers and educators, to ensure the successful delivery of this initiative.

In summary, ACECQA strongly recommends that the provision of three-year-old preschool in South Australia be achieved within NQF settings to support all children to access high quality education and care and to provide families with choice. Access and equity should drive the supply and design of this initiative, and strategies to alleviate the known significant workforce challenges which underpin the provision of quality education and care should be incorporated. I trust that this information is of assistance in informing this important review. If you would like to discuss our response, or would like further information please contact me [REDACTED] or Michelle Edwards, A/General Manager, Policy and Regulatory Systems [REDACTED].

Yours sincerely

A large black rectangular redaction box covering the signature area.

Gabrielle Sinclair
Chief Executive Officer