



# Royal Commission into 3-year-old Preschool for South Australia

Submission to the Commission  
February 27<sup>th</sup>, 2023

The Early Childhood Australia **South Australia (ECA SA) Executive Committee** welcomes the opportunity to share the perspectives of our members with the Royal Commission into 3-year-old Preschool for South Australia.

Building on the roundtable submission (2<sup>nd</sup> Feb 2023), this paper captures the long-standing position of ECA on the provision of universal high quality early childhood education and care as well as the specific feedback from our members (highlighted below) in response to the call for submissions about the development of universal 3-year-old Preschool.

The targeted member consultation process took place in February 2023, focusing on the following key questions informed by the Commission's consultation questions.

1. Thinking about the commitment to universal 3-year-old Preschool for South Australia, what are the key challenges that will need to be addressed to fulfil this aspiration?
2. Thinking about the commitment to universal 3-year-old Preschool for South Australia, what are the key enabling factors needed to support this aspiration?
3. From your perspective and based on your role in the sector, what three actions or strategies will need to be in place to ensure that 3-year-old Preschool for South Australia enables children to thrive?

Overwhelmingly our members support the right of all children, including 3-year-olds, to access high quality, affordable and accessible early childhood education, the central aim of which is articulated in our vision statement: that every child is thriving and learning. However, operationalising this vision is a complex task that requires comprehensive short and long-term planning and ample resourcing that enables professionals, alongside families and their children, to develop programs that meet local needs and equip children to be active citizens now and into the future.

## Response

### Purpose and aims

The Royal Commission into Early Childhood Education and Care Guiding questions  
*What are our aspirations for 3-year-old Preschool for South Australia?*

ECA suggests the following aspiration for SA children: *Every child, from the age of three, participates in a high quality preschool program that supports them to thrive and continue to become confident, curious, lifelong learners.*

The 3-year-old preschool program has the potential to contribute to building a strong foundation for all young children across South Australia to grow and thrive. To achieve that, the program must be aligned with the principles, practices and outcomes articulated in the newly updated Early Years Learning Framework, founded on the Early Childhood Education and Care National Quality Framework, and informed by both research and practice expertise.

An equitable funding model is needed to ensure that every child - regardless of their geographic location, household income, parental or workforce participation – can access a high-quality preschool. The funding and policy framework will need to be sustainable, provide stability for early childhood teachers and educators and allow additional support to be freely available to children with special rights (needs); this is key to meeting quality standards and driving continuous quality improvement.

Essential to promoting equitable access, so that all children can be nurtured to realise their potential, is ensuring that high quality programs are delivered in every community – including rural, regional, and remote communities. Also, that all programs are culturally responsive and inclusive and educators recognise and build on who children already are and what they bring to an early childhood setting. This relies on addressing workforce shortages, improving stability and ongoing support for professional learning and particularly support of inclusive practice.

### Defining key terms

The Royal Commission into Early Childhood Education and Care Guiding questions  
*What does universal Preschool look like to you / your organisation?*  
*What does a commitment to universal 3-year-old preschool change for South Australia?*

South Australian families and children will have access to high quality culturally appropriate early childhood education and care in a setting of a parent's choice, with early intervention for all children maximised. The State will make an ongoing commitment to a fully costed, appropriately funded, well-resourced, sustainable system of 3-year-old and 4-year-old Preschool with wrap-around services. This is central to ensure exceeding or excellent standards are implemented, and outcomes for all children are improved.

In addition, this commitment means that South Australia joins with numerous other countries and jurisdictions globally to respond to the overwhelming evidence that investment in high quality early childhood education for our youngest children delivers positive outcomes now and into the future.

### **Universal Integrated Approaches**

The Royal Commission into Early Childhood Education and Care Guiding questions

*What does universal Preschool look like to you / your organisation?*

*What does a commitment to universal 3-year-old preschool change for South Australia?*

ECA believes that the best model for 3-year-old Preschool is universal – meaning that every family can access a program that suits their needs – it should be free or affordable and easy to access (close to home or work, preferably within walking distance). There is value in providing a range of flexible options for families, to support both working and stay-at-home parents through both full-day services and half-day options.

We believe that the best model is one that provides wrap-around supports to children and families - encouraging family and extended family involvement in decision making without placing additional demands on caregivers. A holistic, integrated approach to the lives of 3-year-old children will offer the greatest flexibility and will maximise on connection with family culture while drawing on well researched and agreed upon quality practice from a range of professionals.

Effective partnerships with family's culture and community are essential. Free and easily accessible wrap around universal services can support all families in their valuable role. For example, playgroups, counselling, community development, immunisation, parenting classes (particularly Circle of Security) and dental hygiene. More support can then be offered to children with additional or diverse needs, including developmental concerns or disabilities, including early intervention from speech pathologists, occupational therapists, psychologists, and physiotherapists. It also facilitates earlier pathways to support systems through NDIS as well as the ability to utilise NDIS funding during the programmes. (Note: currently, services using NDIS funding cannot occur on preschool sites).

Universal platforms encourage access across the population and normalise programs such as 'preschool' while also allowing for additional resources to be targeted or allocated proportionally based on need. For example, while all children may qualify for some programs additional hours or additional programs can be offered to children at higher risk of disadvantage, including children under Ministerial Guardianship, Aboriginal and Torres Strait Islander children, children from non-English speaking backgrounds and children who experience trauma, neurodiversity, or disability.

Given that enrolment and attendance at Preschool is voluntary it is crucial to encourage uptake through community information campaigns, community outreach and consultation with families to understand and reduce barriers. The provision of transport to and from Preschool is necessary in some areas and for some family or community cohorts.

### **Program Delivery Models**

The Royal Commission into Early Childhood Education and Care Guiding questions

*What does universal Preschool look like to you / your organisation?*

It is clearly important that funding for 3-year-old Preschool does not reduce funding for 4-year-old Preschool; while there may be efficiencies in expanding services to more children, additional

investment is required. A funding formula that is equitable across settings and calculated based on national quality standards should also be informed by best practice globally (e.g. early childhood education in Scandinavian countries and the Reggio Emilia centres in Italy). Equitable approaches to funding are not one-size-fits-all; program delivery costs may be higher due to geographic or demographic factors.

Expanding the delivery of preschool programs runs the risk of exacerbating disadvantage if it does not ensure equitable access for all young children, across the State. Extending access to SA Government funded preschools delivered through children's centres for early childhood development and parenting, rural integrated preschool and childcare centres and preschools may be the primary mechanism to extend preschool access in Department for Education sites. There is also the potential to expand preschool delivery in public, catholic and independent services as well as the Long Day Care services eligible for Child Care Subsidy. However, it is important to note that Mitchell Institute analysis suggests there may be a shortage of vacancies in long day care in the outer suburban areas of Adelaide and most of rural/regional and remote regions of South Australia<sup>1</sup>. Other models, including Connected Beginnings<sup>2</sup> (currently delivered in Ceduna, Salisbury/Playford and Port Augusta), and preschools delivered by Aboriginal Community Controlled Organisations (ACCOs) should also be a very important part of program expansion with connections to the Closing the Gap agenda.

The issues for rural, regional, and remote communities warrant particular attention. The early childhood development gap between metropolitan and regional Australia is unacceptably high. Across all areas of early childhood development, children in our cities fare better than children in regional, rural, and remote Australia. In their first year of school, children in very remote regions are assessed as 'developmentally vulnerable' at more than twice the rate as children in major cities.<sup>3</sup>

Educators with high level early childhood qualifications and experience will lead 3-year-old Preschool and design learning opportunities that maximise outcomes for each child. In addition, in consultation with parents adhering to well-established national and local guidelines, the educators will make local financial, management and educational decisions for place-based delivery of the 3-year-old Preschool.

Systems will need to be implemented to ensure that taxpayer's money will be utilised to benefit future generations and ensure that the funding is not used for profit making. Implementation of this system will need to be simple to ensure it does not add a cost in time for departments or services to administer. It could require a simple budget with accountability through an acquittal of how funds were used.

Additional funding will be available to provide increased hours for children if their families are in financial or emotional crisis. Trust will be placed in directors, informed, and supported by doctors,

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<sup>1</sup> Mitchell Institute (2022) *'Deserts and oases: How accessible is childcare in Australia? And interactive data map, accessed on 30/01/2023 from [www.vu.edu.au/mitchell-institute/early-learning/childcare-deserts-oases-how-accessible-is-childcare-in-australia](http://www.vu.edu.au/mitchell-institute/early-learning/childcare-deserts-oases-how-accessible-is-childcare-in-australia).*

<sup>2</sup> Find <https://www.education.gov.au/child-care-package/community-child-care-fund/connected-beginnings>

<sup>3</sup> Australian Early Development Census. (2019). *Australian Early Development Census National Report 2018: A Snapshot of Early Childhood Development in Australia*. Canberra.

allied health professionals or counsellors, to make decisions for additional service provision based on their knowledge of family circumstances.

Funding adequately factors in all of the additional expenses for documentation, reflective practice, consultation, collaboration, accountability, and additional support, including one on one or small-group support for children who require it.

Implementation, standards, and funding will be embedded into the state systems to ensure ongoing commitment to 3-year-old Preschool at a high standard.

## Quality and Innovation

The Royal Commission into Early Childhood Education and Care Guiding questions

*What does high-quality 3-year-old early learning look like?*

*What are the markers of optimal program delivery?*

Regardless of the setting, the benefits of investing in preschool programs will not be realised unless the programs delivered are consistent in quality. This means that every program must meet or exceed the National Quality Standard (NQS) as required of preschools currently providing programs to 4-year-old children. This has implications for expanding the capacity of the quality rating and assessing to encompass all service types and settings. The high proportion of waivers in place because of workforce shortages also needs to be addressed.

The utilisation of the existing National Quality System (NQS) in the delivery of 3-year-old programs will ensure services identify areas for improvement and resource these areas to maximise positive outcomes for children regardless of age, culture, or ability. Essential to the success of quality and innovation for all children in South Australia is for the Regulatory Authority to work in a supportive educational manner to enable educators and services to learn and grow. This would complement and be in addition to standard regulatory compliance requirements and require additional funding.

Of particular importance to SA ECA members is a commitment to preschool programs underpinned by age-appropriate, play-based pedagogy. It is critical that 3-year-old programs are not redefined as an extra year of school readiness but rather honour children's learning and development in the here and now.

The recently updated Early Years Learning Framework, 'Belonging, Being, Becoming' (EYLF 2022 V2) provides guidance on this, including principles, practices and outcomes that must form the basis of South Australia preschool programs. Children learn through play utilising intentional teaching to provide flexible, supportive curriculum delivery. Learning experiences are based on each child's strengths and interests and are designed to take each child to the next step of learning. Building on best practice in Australia for 4-year-old Preschool, programs need to be universally accessible, culturally responsive, and inclusive for children with a disability, neurodiversity, trauma, behaviour or developmental concerns. The stability of staff, access to additional resources and professional development can all make a significant difference to the inclusion capability of services and the experience of families.

Clarity about what is culturally, developmentally, and individually appropriate for 3-year-olds will be a foundation of assessment. Measurement of progress will be individualised, holistic and utilise

observation and effective pedagogical documentation based on children's involvement and engagement. It will be cognisant that during early childhood, development is not linear and that learning to be, belong and become are key foundations to essential life skills.

### *Infrastructure*

The provision of 3-year-old Preschool programs across South Australia will require consideration of the necessary infrastructure to ensure that delivery is of high quality. Current infrastructure (buildings and outside learning environments) may require significant upgrades to accommodate the increased number of children. In some cases, additional infrastructure will need to be built to ensure that every 3-year-old is able to access a service.

Preschool programs warrant high-quality facilities with both indoor and outdoor learning environments. Environments that are welcoming to families with reception areas, office and meeting spaces, consulting rooms and group rooms to offer space for wrap-around services similar to those found at the South Australian Children's Centres for Early Childhood Development and Parenting and The Lady Gowrie Child Centre.

Adequate funding provision and logistical support will be required to ensure the infrastructure supports this policy initiative.

### *Affordability*

*The funding for children attending Preschool needs to improve. We see other states being heavily funded and supported in the programs they provide, but what we receive in South Australia isn't enough.*

*ECA member*

The affordability of 3-year-old Preschool programs across South Australia must also be a key consideration moving forward. Existing affordability pressures on families and providers are well documented<sup>4</sup> and require reliable and comprehensive funding platforms to ensure accessibility for every child.

As provision models are proposed, some requiring significant changes to operating structures, consideration must be given to potential unintended consequences. Integrated sites, for example, where families opt for funded Preschool programs for their 3-year-old will impact the viability of other programs offered at the site, for example, long day programs funded through CCS. This may have particularly negative consequences for services located in rural and remote areas of South Australia.

### *Quality for vulnerable children and their families*

The Royal Commission into Early Childhood Education and Care Guiding questions  
*How) does quality differ for different cohorts of children?*

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<sup>4</sup> Noble, K. & Hurley, P. (2021). Counting the cost to families: Assessing childcare affordability in Australia. Mitchell Institute, Victoria University. Melbourne

*The impact of an extra 15 hours per week of Preschool for the most vulnerable children will mean very little unless there is intensive support around families. Let's not make the children responsible for poor social planning and support.*

*ECA SA Member*

Reducing educational disadvantage and improving outcomes for cohorts of children that are at risk of disadvantage is a long-held priority for ECA Australia. The rights and best interests of all children are inherently linked to those who experience vulnerability and disadvantage. Quality provision based on an equity model (each child and family receives support according to need) remains the most direct pathway to quality for different cohorts of children. Early childhood services and the professionals who work in them understand this well but continue to be challenged by inadequate funding, cumbersome application processes, long waiting lists and patchy service support. 3-year-old Preschool for South Australia must include comprehensive supports that cater for the diverse needs of children and their families.

Early Childhood Australia has developed position papers in collaboration with key peak bodies, including SNAICC, that detail policy suggestions for a more equitable early childhood education and care system.

## Workforce

The Royal Commission into Early Childhood Education and Care Guiding questions  
*What else should South Australia do in addition to workforce supply initiatives already underway?*

*Staffing challenges are extreme, and we are continuing to see a push for higher occupancy but not able to support with quality team members. Workforce teacher shortage trained and skilled educators.*

*ECA member*

*Learning from Victoria is a key consideration and should mean consulting the Universities that are partnered with the Victoria Government about the 'quality' of teacher candidates. However, pointing out that the main gap we have in SA is the lack of recognition by the TRB to register B-5 ECTs, we run into a problem of attracting pre-service candidates and experienced teachers from other areas (such as other states where the B-5 degree is recognised).*

*ECA member*

The stability of qualified early childhood educators and teachers in the sector is clearly linked to the quality of preschool programs primarily because young children's learning occurs in the context of relationships with educators and teachers. Increased remuneration and improved working conditions are required for all educators working in early childhood settings to sustain the skilled workforce necessary to implement 3-year-old Preschool. Consideration should also be given to advisory roles including those within the South Australian regulatory body, so as to attract suitable staff at all levels to ensure 3-year-old preschool delivery meets high quality standards.

Addressing workforce issues in the sector is also critical to ensuring equity of access beyond metropolitan locations. Strategies to attract qualified and experienced teachers and educators into regional, rural and remote areas of the State need to be identified and implemented. Recognition of the B-5-degree teacher qualification would assist with this issue. Often, the barriers to working in these communities are beyond pay and conditions. Access to affordable housing and support with relocation costs may be needed.

To support the transition to 3-year-old Preschool, ECA recommends that the SA Department for Education provide relevant professional learning and quality resources, including relevant, current, and ongoing research, to all educators and teachers in early years settings – similar to approaches in other jurisdictions such as Victoria.

The Royal Commission into Early Childhood Education and Care Guiding questions  
*What are the most important competencies for the people delivering 3-year-old Preschool?*

Alongside other mechanisms supporting the provision of high-quality 3-year-old programs must be the availability of targeted, funded and evidence-based professional learning to support the workforce in embracing the changes to early childhood education and care provision. Both the cost of professional learning and time to participate should be funded. These strategies will ensure that key competencies are utilised effectively by the educators, including:

- Critical reflective practice
- Building respectful relationships and responsive engagement with children's families and other professionals
- Cultural responsiveness and a commitment to equity and diversity
- Assessment for learning and development
- Integrated teaching and learning approaches.

Reference to the suite of supports offered in other State and Territory justifications, for example, Victoria and ACT, will provide a useful starting point.

Victoria: [www.education.vic.gov.au/childhood/Pages/three-year-old-kinder](http://www.education.vic.gov.au/childhood/Pages/three-year-old-kinder)

ACT: [www.education.act.gov.au/early-childhood/set-up-for-success-an-early-childhood-strategy-for-the-act/quality-early-childhood-education-for-three-year-olds](http://www.education.act.gov.au/early-childhood/set-up-for-success-an-early-childhood-strategy-for-the-act/quality-early-childhood-education-for-three-year-olds)

## Recommendations for the delivery of 3-year-old Preschool

The Commission's guiding questions invited responses in relation to purpose, quality, and workforce, as well as general delivery and administration.

By way of summary, the South Australian Early Childhood Australia Executive Committee and our members have identified several recommendations (noting barriers and enabling strategies) that must be considered to ensure the successful delivery of funded and universal 3-year-old Preschool.

### Strategic Policy Planning

Development of a broad-ranging strategic policy plan outlining details about how universal 3-year-old Preschool will be implemented across South Australia, including funding models, timelines, workforce proposals, resource allocation and infrastructure expansion.



This Strategic Policy must include the development of a robust long-term legislated funding model, available across sites and sectors that ensures access to quality 3-year-old Preschool as part of the existing provision of early childhood education and care in the years before school.

### **Provision of qualified and skilled workforce**

Development of a comprehensive workforce strategy that ensures appropriately qualified early childhood teachers and educator teams are in place to provide the programs for the children in 3-year-old Preschool. This strategy must be developed with the sector (pre-service, approved providers, peak bodies, and professional organisations) to identify short- and long-term actions that support educators' training, recruitment, retention, and professional development. The range of workforce incentives and innovations currently being delivered in Victoria provide a useful starting point. [www.education.vic.gov.au/Policy Paper: Working Together to Build Victoria's Early Childhood Education Workforce](http://www.education.vic.gov.au/Policy%20Paper%3A%20Working%20Together%20to%20Build%20Victoria's%20Early%20Childhood%20Education%20Workforce)

### **Provision of fit-for-purpose teaching and learning facilities**

Provision of funding and project management to plan, build, expand and improve early years infrastructure to ensure appropriate infrastructure is available for the delivery of 3-year-old Preschool across the State with particular emphasis on rural and remote locations and areas of disadvantage. Developing a comprehensive infrastructure plan with investments that enable multiple projects to be completed as 3-year-old Preschool is rolled out, would assure the community that there will be high quality developmentally appropriate learning spaces and add on services for all children. The Children's Centres for Early Childhood Development and Parenting provides a useful example and starting point as does the Victorian Government Infrastructure Strategy [www.education.vic.gov.au/Building blocks 3YO infrastructure strategy.pdf](http://www.education.vic.gov.au/Building%20blocks%203YO%20infrastructure%20strategy.pdf).

### **Support for children with special rights (needs)**

Upholding the rights of children with diverse needs is of paramount importance. The availability of easily accessible funded, early intervention supports from allied health professionals at a service level must accompany the provision of 3-year-old Preschool to ensure that all children have access to quality early childhood education. Evidence-informed fully funded professional learning for educators and families should match these efforts to bolster the delivery of inclusive programs.

Integrated Inclusive Preschool Programs and Preschool Speech and Language Programs already exist in some South Australian preschools. These provide a good foundation that could be expanded to mainstream Preschool. Adequate, timely support for children with additional rights improves outcomes for children, strengthens partnerships with their families and ensures educators do not experience stress and potential burnout.

Providing additional wrap-around services, such as those offered in most South Australian Children's Centres for Early Childhood Development and Parenting, provides a useful operational model to inform the rollout. These services not only support children and educators but are crucial in providing parents with support and advice when required. For example, the Children's Centres for Early Childhood Development and Parenting across the State could be called on to offer practice expertise and operational guidance as support for 3-year-olds in a universal expansion model is realised.

### **Ongoing resourcing and access to quality professional learning**

Provision of targeted and ongoing funding that offer teachers and educators access to evidence-informed and relevant professional learning opportunities. Practice experience across Australia confirms that education initiatives and operational changes require comprehensive professional learning opportunities in order to build confidence and consistency. The professional learning provision could include access to programs that address the following:

- Engaging with the new Early Years Learning Framework
- Play-based curriculum design
- Developmentally appropriate learning programs
- Transitions
- Inclusive practice
- Working with families
- Change management
- Educational leadership
- Culturally responsive practice

### **Working with families and the community**

Development of a consultation and engagement strategy for families and the community, especially the Aboriginal community, will be essential to ensure that the 3-year-old Preschool is culturally responsive and upholds children's rights. Community elders, alongside the early childhood professional community, have deep relationship connections and expertise with the families in their local communities and should engage in progressing a shared approach to the roll out of 3-year-old Preschool across the State.

Development of an accessible communication strategy aimed at families and the community that outlines the benefits and features of 3-year-old Preschool. Access to a range of tools (tip sheets, infographics, videos etc.) will support professionals to communicate shared messages that address myths and concerns as well as promote a contemporary understanding of early childhood education and care. The approach used in Victoria to support family and community engagement may be a helpful starting point alongside existing communication materials [www.vic.gov.au/Give your child the best start in life](http://www.vic.gov.au/Give_your_child_the_best_start_in_life)

### **Evidence-informed pedagogical approaches**

Commitment to and articulation of the pedagogical approach underpinning the provision of 3-year-old Preschool in South Australia will be essential to building professional confidence in the initiative. Confirming the status of the Early Years Learning Framework and the requirements of the National Quality Standard as a central expectation for the implementation of quality programs for 3-year-olds will ensure that all children have the opportunity to learn and thrive.

**Early Childhood Australia SA Executive Committee and members are committed to collaborating with the Royal Commission, the South Australian Government, and our colleagues more broadly to release the potential of high-quality early childhood education for all children. To this end, we have also made a significant contribution to a paper funded by Educators SA, offering a submission with agreed perspectives from a number of Early Childhood organisations. We look forward to future opportunities.**

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## About Us

Early Childhood Australia (ECA) has over 3,500 members, it is a not-for-profit, membership-based organisation that was first incorporated in 1938. Our membership includes early childhood professionals, services, schools, and organisations that share a commitment to the rights and wellbeing of young children.

ECA's vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school. Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight. ECA particularly acknowledges the rights of Aboriginal and Torres Strait Islander children and their families and the past and current injustices and realities for them around Australia.

Early Childhood Australia SA Executive Committee is organised by an active group of Early Childhood professionals who volunteer their time to advocate for young children and families and provide leadership in the early childhood education and care profession. The committee includes members from the community and various organisations, including the education, care, TAFE, University, Government, private and community sectors.

As a peak early childhood organisation, government and non-government agencies seek advice from our committee to contribute to and comment on, early childhood issues and policies that affect young children and their families in South Australia. We are represented on 14 boards and committees. Our priorities are growing early childhood leadership and supporting early childhood education services to strengthen their quality and advocacy on key issues, including reconciliation and social equality for children and families at risk of disadvantage.

We are deeply committed to First Nations Children. The ECA SA Executive Committee members are actively involved in consultation and advocacy, independently and with our national organisation and other South Australian organisations.

Find out more at: [www.earlychildhoodaustralia.org.au](http://www.earlychildhoodaustralia.org.au)

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