

Royal Commission into Early Childhood Education & Care

UNIVERSAL THREE-YEAR-OLD PRESCHOOL SUBMISSION

February 2023

We're for children, not profit.



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EXECUTIVE SUMMARY

Goodstart Early Learning (Goodstart) welcomes the Malinauskas Government's commitment to introduce universal access to two years of preschool and to improving outcomes across the first 1000 days of a child's life through the Royal Commission into Early Childhood Education and Care (ECEC).

We are grateful for the opportunity to participate in this important work and commend the Commission for the comprehensive and collaborative approach it has taken to engaging with families, the sector and relevant experts to date. We particularly welcome the Commission's commitment to the inclusion of First Nations families and perspectives.

This is an incredibly exciting time for South Australia – the introduction of an additional year of preschool for 3-year-olds will support all children to build the foundations they'll need to thrive in school and life. Our aspiration is that every 3-year-old and especially the most vulnerable – has the support they need to access at least three consecutive days of high-quality, inclusive preschool in a setting that suits their needs, and the needs of their family.

Leveraging the long-daycare (LDC) preschool model will provide the most efficient way for South Australia to reach this ambition, with extensive experience across jurisdictions confirming this can be achieved with investments in:

- **Ongoing operational funding** for all approved preschool programs that is sufficient to guarantee the supply of a quality ECT with pay and conditions similar to those enjoyed in the school sector.
- **Fee relief** to reduce gap fees for children and families likely to be vulnerable.
- **Workforce** including in the attraction and retention of teachers to LDC settings.
- **Increasing quality** and improving its regulation.
- **Capital** to expand capacity and address areas of low supply, using alternative models (e.g., school-based delivery) where the LDC model is not viable.

And we are not starting from scratch, more than 60% of South Australian children already attend early learning programs in long day care (LDC) centres like Goodstart. The implementation challenge for Government is how quickly can we build on this base, increase our supply of early childhood teachers, and how can we engage the 40% of children who are currently not participating.

As South Australia's largest provider of early childhood education and care for birth to five-year-olds, and Australia's largest not-for-profit social enterprise, we bring unique insights as the only provider of preschool programs in every state and territory with an explicit social purpose. As such, our submission will focus on key questions from the discussion paper with a particular focus on:

- **Dose** – looking at both the existing evidence base and current patterns of attendance in determining how much is enough to make a difference.
- **Inclusion** – underpinned by the principle of proportionate universalism, and exploring the key inclusion supports that should exist across the system to ensure all children can participate.

- **Quality** - and the need to improve the performance of the South Australian regulator and introduce a proactive program to drive quality and continuous improvement as prescribed under the National Quality Framework (NQF); and
- **Workforce** – how to rapidly expand the supply of early childhood teachers (ECTs), improve retention and ensure that every approved preschool program has access to an ECT.

Ultimately, the Commission is an opportunity to refresh the way we think about early learning and care. The separation between 'care' that supports workforce participation and early childhood education no longer exists within a long-day-setting thanks to the successful implementation of both the National Partnership Agreement on Universal Access to Early Childhood Education (NPUA) and the National Partnership Agreement on the National Quality Agenda since 2009. Children across Australia are now able to receive high quality early education with a seamless transition into 2-year preschool programs in a fully integrated environment and through this work and the Productivity Commission Inquiry also commencing this year, the opportunity now exists to ensure that preschool policy and funding models in South Australia and nationally are updated to reflect this.

Recommendations

Design considerations for a two-year preschool program

1. Provide an entitlement to at least 3 days of high-quality inclusive preschool in the two years before school to all children, in a setting that suits their needs and supports their family's workforce participation. Children who would benefit from more days, including those experiencing vulnerability and disadvantage should have access to up to 5 days.
2. Inclusion must be a priority focus with adequate resources allocated and the following features at a systems level:
 - a) Access to above ratio educators for children that need it to meaningfully participate, including leveraging the Commonwealth Government Inclusion Support Program which partially meets these inclusion costs in Long Day Care settings
 - b) Access to in-service developmental screening, and fast access to allied health and early intervention for children that need it
 - c) Expanded use of community-based 'linkers' or warm referral models to help families whose children are not currently attending preschool, through a combination of outreach and support to navigate the service system (noting Goodstart has developed a successful model for this support)
 - d) Targeted investments to address barriers faced by particular cohorts, e.g., children who are not eligible for Commonwealth Child Care Subsidy based on Visa status, or children's whose access to CCS is inadequate to support their participation.

3. The Royal Commission should work with the Australian Government to:
 - a) Extend the preschool exemption from the CCS activity test to cover the two years before school in first instance; and
 - b) Increase the preschool exemption to at least 72hrs of CCS a fortnight. These changes are required immediately to support state government preschool reforms and will need to continue until longer term structural reforms are clear.

Regulation and driving quality improvement

4. Improve the quality assessment and rating cycle to ensure that services are rated at least every 3 years, with Working Towards services to be reassessed every twelve months. Funding for the Education Standards Board will need to be increased to clear the backlog, and assessor procedures and training need to be reviewed to ensure that assessments and ratings in South Australia are nationally consistent.
5. Introduce and adequately fund a pro-active program of quality improvement for 'working towards' services.

Workforce

6. Ensure preschool funding is sufficient for long day care providers to match State preschool rates for teachers and then require them to do so (for example through an Enterprise Agreement). Providers already paying above award rates, should receive commensurate investment to continue to pay above award. This should include at a minimum:
 - a) Matching wage rates paid in State Government preschools for teachers;
 - b) Providing at least additional 2 weeks non term leave in addition to 4 weeks annual leave;
 - c) Providing at least 4 hours non-contact time each week for teachers;
 - d) Providing at least 2 days of paid leave each year for professional development.
7. That the South Australian Government partner with higher education providers to develop innovative, intensive birth to five years initial teaching courses that recognise and build on the skills and experience of diploma qualified educators.
8. That the Teachers Registration and Standards Regulations be amended to allow that the qualifications for registration as a teacher include an approved teacher education, degree, diploma or other qualification recognised by the National Authority under Division 7 of the Education and Care Services National Regulations.

9. That the South Australian Government offer scholarships of up to \$25,000 to support students to complete early childhood teaching qualifications, and also offer a program of mentoring and networking support for student and graduate teachers.
10. That the South Australian Government develop initiatives to support and grow the early childhood educator workforce including:
 - a) Continuing free VET courses in ECEC;
 - b) Expanding access to school-based traineeships in ECEC;
 - c) Supporting centres to take on more traineeships;
 - d) Offering scholarships and incentives to people to become educators, particularly in regional and hard to recruit locations; and
 - e) Developing a campaign to promote careers in the sector.

Delivery & Administration

11. That the South Australian Government leverage the LDC preschool model in rolling out two-year preschool programs, with capital investments to increase capacity where needed to ensure equitable access across the state. This will need to be complemented in thin markets where long day care provision is not viable either with expansion of State run preschools, or ongoing subsidisation of long day care (or mixed setting) services.
12. That fee relief for a two-year preschool program leverage Australian Government investments in the Child Care Subsidy and be set at a rate to ensure families on a 90% CCS rate can access free or very low-cost preschool with an indexation approach that ensures affordability is maintained over time. Implementation of this recommendation should include a review of the current rate of payments for 4-year-olds.
13. Partner with the sector on an evaluation and monitoring framework to drive continuous improvement, potentially building on the BE BEOLD datalink – noting Goodstart can be a first test case to link data from non-government ECEC providers.
14. Outside school hours care for children in preschools on school sites should, as far as possible, be offered as an extension of the preschool program in place, with educator-child ratios and relationships maintained as much as possible to support children's transitions.

About Goodstart

Goodstart is a not-for-profit social enterprise and is the largest provider of early childhood education and care in the nation with more than 660 centres located across every state and territory.

South Australia is an important part of our network, with 50 centres and South Australia chosen as the launchpad for key national innovations including: investments in inclusion; longitudinal research partnerships with University of Adelaide, Better Start Health and Development Research project leveraging the Better Evidence, Better Outcomes, Linked Data (BEBOLD) platform and whole-of-state implementation of child outcomes measures using the Early Years Toolbox. Goodstart is the largest provider of birth-three services in South Australia which provides a strong foundation for our relationships with 4,720 families in the preschool years.

Our purpose is to ensure all Australia's children have the learning, development and wellbeing outcomes they need for school and life. All children should be supported to participate in quality early learning and care, regardless of where they live in Australia, their family circumstances, their inclusion support needs, or their early learning setting. We believe in working in partnership with the sector, Governments and the community to improve outcomes for all children – not just the children who attend a Goodstart service.

In 2022 our centres supported 5,530 children in SA alone, across diverse communities including around 36% of our services in low SEIFA communities. We support more than more 63,600 children from 53,700 families nationally.

We employ more than 15,000 people across the country with around 1,260 in SA. We are also a highly feminised workforce. Like our national profile, in SA our workforce includes qualified educators (Certificate III and Diploma), bachelor qualified teachers and inclusion professionals, including speech pathologists, occupational therapists and child and family practitioners. Our workforce is:

- 97% women
- 33% part-time
- 44% full-time
- We also have a substantial casual workforce.

IF YOU WOULD LIKE TO DISCUSS ANY PART OF THIS SUBMISSION PLEASE CONTACT:

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1. Purpose & aims

This section responds to the following questions in the discussion paper:

- What should be the central aim of 3-year-old preschool? What are important but secondary aims?

A guaranteed entitlement to a two-year, high-quality preschool program would reduce attainment gaps for children in vulnerable circumstances and benefit all children

The evidence is clear that children who have attended high-quality preschool programs in the two years before school are less likely to start school behind, and effects are greatest for children facing vulnerability. But children from low-income families are 13% less likely to access approved early learning and care in Australia, with children from South Australian low-income families 31% less likely.¹

However, for preschool to make a difference, programs have to be high quality. Evidence shows services in disadvantaged communities are more likely to not meet the National Quality Standards than those in the most advantaged areas, particularly in outer regional and remote areas.²

The central aim of three-year-old preschool should therefore be to ensure that all children in South Australia can access at least two years of a high quality, inclusive preschool program that at least meets minimum quality standards, including a particular focus on addressing inequality for children in vulnerable circumstances

A second, important aim for 3-year-old preschool should be to maximise the benefits to the South Australian economy in the short term through supporting greater productivity and participation in the workforce, particularly by women and workers in highly casualised industries (e.g. retail and hospitality).³ Meeting the needs of these groups has been a driving factor in New South Wales and Victoria's increase to preschool entitlements in the year before school where we are seeing the provision of generous fee relief already leading to families increasing the number of days they are enrolled and the number of days they are able to work.

Focusing on the youngest South Australians will also deliver long term productivity benefits to the economy through improving achievement at school, which in turn affects school completion rates and levels of educational attainment which are strong predictors of earnings and higher taxes over a lifetime.⁴

¹ 2023 Report on Government Services (ROGS), Table 3A.11, <https://www.pc.gov.au/ongoing/report-on-government-services/2023/child-care-education-and-training/early-childhood-education-and-care>

² ACECQA NQS Snapshot Dec 2022.

³ Wood, Danielle. "Cheaper Childcare is a Win-Win Policy." The Sydney Morning Herald, 4 July 2002; accessed online <https://www.smh.com.au/business/the-economy/fix-the-economy-it-s-as-easy-as-child-s-play-20220704-p5aytd.html>

⁴ The Front Project, 2019, "A Smart Investment for a Smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia, accessed online https://www.thefrontproject.org.au/images/downloads/ECO_ANALYSIS_Full_Report.pdf

2. Design considerations for a 2-year preschool program

This section responds to the following questions in the discussion paper:

- What should every 3-year-old child in South Australia be entitled to in terms of early learning?
- What does universal preschool look like to you / your organisation? Does a universal program mean the same program design and service is offered to everyone? How would you define universal?
- What does high-quality look like in terms of the amount of time spent in preschool?
- (How) does quality differ for different cohorts of children?

The design must meet the needs of modern families, noting the trend towards families choosing a longer day and more flexible options to help them balance work, raising young children and other responsibilities

Under South Australia's mixed-market model of preschool, 90% of South Australian children enrolled in the year before school in 2021, above the national average (but down from 93.8% in 2019). Around 42% of children attended preschool in a school setting, 3% attended a non-government preschool, 22% attended an LDC and 22% attended multiple settings.

This shows families are accessing preschool in a setting which best suits their needs, with a slight trend towards the longer days of early learning and care that is provided in the long-day-care sector – even where this may be paired with school-based programs (44% total). Nationally the trend towards longer days is stronger, particularly where investments have improved quality and teacher retention in the Long Day Care sector.

Since 2015, the proportion attending Government preschools exclusively has dropped from 52% while the proportion attending multiple settings has increased from 17% to 22%, again reinforcing the critical importance of ensuring high-quality across all settings.⁵

When we have asked our families what is driving their decisions about preschool, feedback includes:

“My husband and I are both full time workers and it's just that flexibility of the hours that the centre is open for, means that we can share the drop offs and the collection, but we all just know that she is really enjoying herself and having such a great time here. It all just makes you feel like you are doing the right thing and makes you feel comfortable working full time” - Nicole, Goodstart Parent

“It's really reassuring to know that we can drop our kids off. They're in good hands. We can go to work and do what we need to do and know that they will always be looked after while we are not here” - Simon, Goodstart Parent

“I looked at a lot of places before enrolling Maggie at Goodstart for preschool. I was looking for the way the educators interacted with the children. I just wanted to

⁵ 2023 ROGS, Table 3A.17

know that she was nurtured and not just looked after. The Goodstart centre really suited us because it offered long days and I knew that Maggie was well cared for and that she would be stimulated through the whole day” - Jackie, Goodstart Parent

“For us the best part has been how easy it has been to transition her through the rooms...it been really lovely with all of her little friends moving up together” - Melody, Goodstart Parent

“I’m a high school teacher and I have a shift-working wife. Goodstart has provided the afterhours care that we’ve needed. When Mason comes here, knowing that Ms Nicole is here, it makes his day You can see the kids are really inspired by what she does” - Peter, Goodstart Parent.

Every 3- and 4-year-old child should have access to at least 3 days of high-quality preschool in a setting that suits their needs and supports workforce participation

The evidence is clear about the benefits of accessing quality preschool programs over two years but is less clear about an optimal, minimum dose per week for all children. The relatively stubborn rates of developmental vulnerability across Australia and over-representation of some cohorts (e.g., low SES, First Nations) among the developmentally vulnerable suggest the current 15-hour dose, delivered primarily as either two days per week or a five-day fortnight in the year before school is not enough for many children. Multiple studies show that children who are disadvantaged benefit from higher dosage.⁶ Yet 35% of children in the year before school from the most disadvantaged income quintile are not attending preschool in South Australia for even the universal minimum of 15 hours a week.

For these children, higher intensity programs (i.e., more than 15hrs) are likely to be beneficial. Research from the UK, France and the USA suggests 3-year-old children benefit from programs involving twenty or more hours per week whereas programs of a lower dosage may not promote significant gains, particularly for children from disadvantaged backgrounds.⁷

⁶ van Huizen, T and J Plantenga (2018). “Do children benefit from universal early childhood education and care? A meta-analysis of evidence from natural experiments.” *Economics of Education Review*, vol 66, pp206-222; Li, W., G. Farkas, G. J. Duncan, M. R. Burchinal and D. L. Vandell (2013). “Timing of High-Quality Child Care and Cognitive, Language, and Preacademic Development.” *Dev Psychol* **49**(8): 1440-1451. Barnett, W. S. (2011). “Effectiveness of Early Educational Intervention.” *Science* **333**(6045): 975-978.; Yazejian, N., D. Bryant, K. Freel and M. Burchinal (2015). “High-quality early education: Age of entry and time in care differences in student outcomes for English-only and dual language learners.” *Early childhood research quarterly* **32**(Jan): 23-39; Cornelissen, T., C. Dustmann, A. Raute and U. Schönberg (2018). “Who benefits from universal childcare? Estimating marginal returns to early child care attendance.” *The Journal of political economy* **126**(6): 2356-2409.

⁷ Lee, R., F. Zhai, J. Brooks-Gunn, W.-J. Han and J. Waldfogel (2014). “Head Start Participation and School Readiness: Evidence from the Early Childhood Longitudinal Study-Birth Cohort.” *Dev Psychol* **50**(1): 202-215; Warren, D., M. O’Connor, D. Smart and B. Edwards (2016). *A Critical Review of the Early Childhood Literature*. Melbourne, Australian Institute of Family Studies.

It is worth noting that the 15 hours per week /600 hours per year benchmark in Australia came from the United Kingdom's Effective preschool, primary and secondary education (EPPSE) studies, which also found that children from disadvantaged backgrounds benefit from higher dosages, with impacts lasting well into high school.⁸ Other studies show similar benefits from a longer duration of exposure from ages 2 to 3 years (Sylva, Melhuish et al. 2004, Sammons, Sylva et al. 2012, Li, Lv et al. 2015).

At Goodstart we have made significant investments in addressing cost and non-cost barriers to ensure vulnerable children attend enough to make a difference. We know that the more days a child attends, the less likely the child (and the family) are to drop out of early learning. Vulnerable children that have an entitlement of at least three days of early learning tend to participate and stay in early learning at a rate comparable to their more advantaged peers, whereas children with an entitlement of less than three days are around 33% more likely to drop out of early learning.⁹ A three-day attendance pattern across the year also provides more opportunities for children to achieve a minimum dose across the full year and provides more opportunities to promote continuity of learning. Children who would benefit from more days, including those experiencing vulnerability and disadvantage should have access to up to 5 days. The Centre for Policy Development has also outlined the detailed case for a minimum entitlement of at least three days of early learning for all children, and potentially more for the most disadvantaged.¹⁰

When considering optimal dose for children, it is also important to acknowledge existing patterns of attendance which are largely driven by the current rates of workforce participation by parents of young children. While models of provision should always be child centric, it is important to consider the unintended consequences in setting a minimum dose that is less than the average days children attend – in particular, the inefficiency this drives in the system and the potential detrimental impact on overall program quality and sustainability. We see these impacts in South Australia in the 4YO preschool program where only a small proportion of children – approximately 30% – attending preschool with Goodstart receive funding from the South Australian Government, and this is only to support 2 days when 54% of our four-year-olds attend 3 or more days. Unlike stand-alone preschools, our model is not optimised around the availability of preschool funding in South Australia. While we are committed to providing high-quality preschool to all 4YOs we are currently only funded for part of the time that part of a group attends which directly contributes to pressures on the supply of ECTs and the growing gap in wages between ECTs in our sector and schools over time.¹¹

⁸ Sammons, P., K. Sylva, E. Melhuish, I. Siraj-Blatchford, B. Taggart, D. Draghici, R. Smees and K. Toth (2012). Influences on students' development in Key Stage 3: Social behavioural outcomes in Year 9, Faculty of Social Sciences.

⁹ Goodstart internal data, available on request.

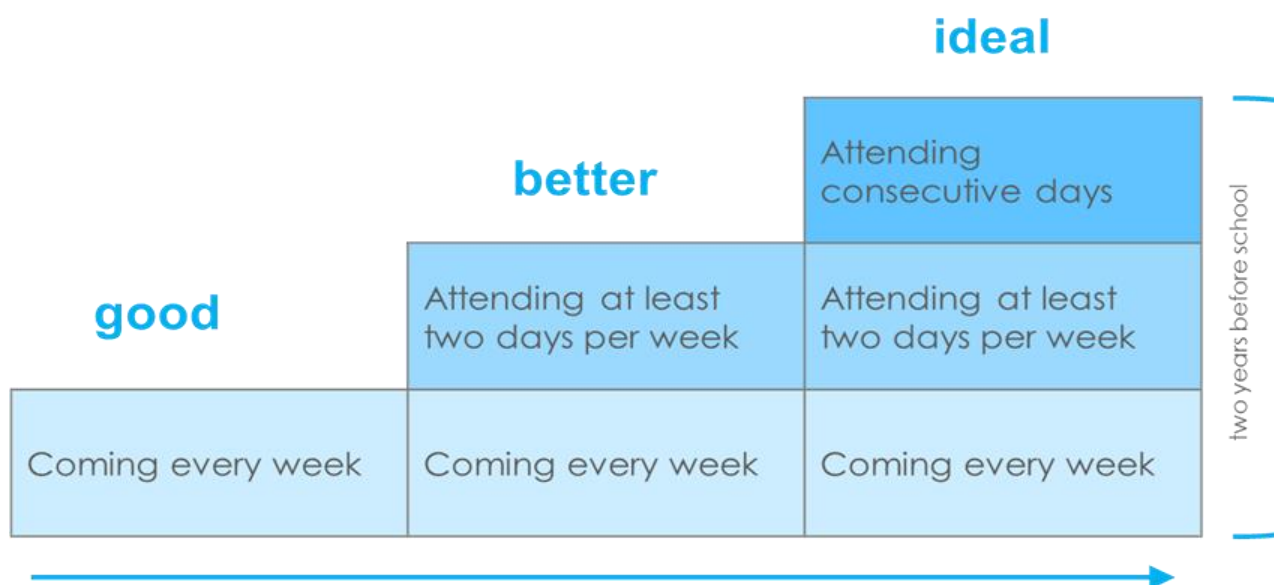
¹⁰ Centre for Policy Development (2021) "Starting Better: A Guarantee for Young Children and Families" ANU, Canberra

¹¹ In 2022, Goodstart was unable to provide a teacher in 3/50 of our centres on average each term.

Average weekly hours in long day care centres have steadily increased from 28.3 hours in 2016 to 31.9 hours in 2022, reflecting increases in maternal workforce participation.¹² This suggests that many (probably most) children in long day care are already receiving a dose of at least 3 days, but often it is the more disadvantaged cohorts that are attending for fewer days or not at all.¹³ And many families are managing multiple settings and transitions over 4 and 5 days as they try to reduce costs by accessing shorter days of free school-based preschool, even though this may not be optimal for children's attachments learning outcomes, or workforce participation.

In response to practice evidence from our teachers and our international pedagogical experts, Goodstart also prioritises consecutive days to ensure children, and especially children who are in vulnerable circumstances attend enough to make a difference. That's why Goodstart's approach to measuring dose goes beyond the standards set under the National Partnership on Universal Access to Early Childhood Education (NPUA). Our internal KPI for dose instead measures the proportion (%) of children who attend two consecutive days a week for at least 40 weeks per year in each of the two years before starting school.

Table 1 – Goodstart’s approach to measuring dose



Ultimately, the Royal Commission and concurrent Inquiries being conducted by the Australian Competition and Consumer Commission and Productivity Commission are an opportunity to reset policy and funding arrangements for integrated early learning and care from birth with seamless transitions into high-quality, two-year preschool programs for all 3- and 4-year-olds.

As with the leading countries in the OECD, all children should have a right to high-quality, inclusive universal programs for as many days as they and their families need at low or no

¹² Dept of Education Child Care Statistics March Qtr 2022 table 6.1. South Australia's average hours at 28.4 are well below the national average.

¹³ Average days of attendance for 3YO children in South Australia at Goodstart is currently 3.07 days per week.

cost, and all approved preschool programs should be provided with the funding they need to attract and retain qualified ECTs. This would significantly improve the capacity of our sector to attract and retain teachers and deliver consistent, high-quality preschool to all children that reduces transitions between multiple preschool services. A second benefit would be removing workforce participation barriers and simplifying the early years system for families with young children.

RECOMMENDATION 1 – Provide an entitlement to at least 3 days of high-quality, inclusive preschool in the two years before school to all children, in a setting that suits their needs and supports their family’s workforce participation. Children who would benefit from more days, including those experiencing vulnerability and disadvantage should have access to up to 5 days.

Proportionate universalism is needed to achieve South Australia’s aims

In designing a two-year preschool program for South Australia, the scale and intensity of program design and services should also be proportionate to the degree of need (proportionate universalism). This means that while all children must have access to a minimum quality standard and dose, some children should have access to more fee relief, more hours, different staff ratios and multi-disciplinary professionals to provide the same access and opportunities. It also means actively addressing barriers to access and participation. Cost, location, transport, parent workforce status, visa status and cultural safety should not be barriers to access.

Additional attention needs to be paid to participation of children who are likely to be vulnerable. A primary focus must be on the 37% of three-year-olds who are not currently engaged in early learning, the 5% of very hard to reach families who have never been engaged in 4YO preschool and also the cohort of disadvantaged children who are participating but are not receiving the full dose. These include many of the most vulnerable children in our community, such as children from low-income families, children at risk of abuse or neglect, children from non-English speaking backgrounds, children in regional areas and children with additional support needs.

As the Royal Commission’s literature review confirmed, these are the children most likely to benefit from a high-quality preschool program, so implementation to improve access and quality should start as soon as possible in the communities with high proportions of these children. Goodstart would be pleased to support this approach.

Inclusion needs to be a priority focus and must be adequately funded by all governments

In a market-based delivery model, there can be multiple financial disincentives for providers to enrol children with additional needs, largely arising from the higher cost of service delivery. Accessing support can be time-consuming and unnecessarily complex for families and providers, particularly due to the challenges in receiving formal diagnoses or other evidence for very young children. However, as a not-for-profit social enterprise

committed to the inclusion of all children, Goodstart has a wealth of evidence and experience about what works and where system improvements should be made.

There are key benefits to Governments partnering with large not-for-profit providers like Goodstart as we can leverage our size and scale to efficiently meet our mutual inclusion objectives, particularly in relation to building workforce capability and collecting evidence about what works for which cohorts. We can also leverage the Australian Government's investment in the Inclusion Support Program to partially fund additional out-of-ratio educators. We provide greater detail in **Appendix 1** about our approach to inclusion, with examples of effective, systems-level responses for particular cohorts including:

- Children with **disability or additional developmental needs** may benefit from a higher dose of preschool – hence the need for an entitlement of up to 5 days – and may require a higher level of support or higher educator-to-child ratios. Unfortunately, significant gaps persist in federal financial assistance for children with additional inclusion needs. As a result, support entitlements are often inadequate to match the child's days of enrolment and does not cover the additional educator's wages. For example, an additional educator may only be funded for 25 hours a week when the child attends 40 hours per week.

To support the inclusion of these children and address the existing gaps in the system, Goodstart currently delivers a range of inclusion supports that may be taken to scale in South Australia. These include our Intensive Individual Support Plans (IISPs), the Health 2 Go Trial with Flinders University¹⁴, Targeted Allied Health Services, Tier 2&3 Support via our Helpdesk and Upskilling educators via our Inclusive Practices Program.

- A higher proportion of **Indigenous children** are now participating in preschool programs in South Australia owing to considerable effort in recent years. However, First Nations children continue to have worse outcomes across most AEDC domains and throughout their schooling. First Nations children may benefit from up to 5 days entitlement in culturally safe and responsive settings where there are Indigenous educators and strong relationships with families and community.

Goodstart has made significant investments in our cultural learning and reconciliation journey. We invest in Arrilla Cultural Competency training for all staff and are proud that all of our centres nationally – including all our centres in South Australia – have either published a Reconciliation Action Plan (RAP) or are on the journey towards publishing their RAP.¹⁵ We also support calls by SNAICC to grow the First Nations workforce using direct wage subsidies and to implement a longer-term plan for more community-controlled ECEC organisations. Our Aboriginal and Torres Strait Islander Community of Practice, Cultural Liaisons also support centre teams build their cultural

¹⁴ For more information on the Health 2 Go trial see - <https://blogs.flinders.edu.au/caring-futures-institute/2022/05/24/new-partnership-strengthening-developmental-screening-in-childcare/>

¹⁵ Examples of specific actions in each centres RAP journey include growing connections to local Elders and community leaders, embedding the Acknowledgement of Country, and use of key words in community language.

knowledge. Specific investment to support cultural learning and cultural safety should be a specific priority as part of the implementation.

- **Children from CALD communities, and particularly from NESB** also require culturally safe services and proactive outreach to address persistent under-representation in preschool services. Unfortunately, some children are not entitled to any CCS because of their citizenship status and additional state funding will be required to bridge this gap, as is the case with the existing 4YO preschool program.

Specific Goodstart activities that can be taken to scale here include our Increasing Access and Participation (supported referral pathways) and Family Connections training, which is our foundational social inclusion professional development program.

- **Children under child protection orders or in out-of-home care** have some of the worst outcomes at school and throughout their lives. Many of these children are also entitled to 5 days of free ECEC under the Additional Child Care Subsidy (ACCS) but the gaps between state and federal policy and service delivery mean that many children still miss out. This is especially the case for children in residential care.

These children and their carers often need supported referral pathways and assistance to navigate the complex state and federal subsidy systems, particularly where evidence of their vulnerability is required. Goodstart has a universal and targeted service system aimed at supporting these children, this includes our Increasing Access and Participation Program, Intensive Individual Support Plans, Inclusive Practices Program, partnership meetings for enrolment, orientation and settling, and an 'at scale' national Practice and Inclusion Helpdesk, as well as a suite of professional learning activities to provide effective support for these families.

- Other very hard to reach groups of children include **children whose families have chosen not to immunise**. These children are not able to access preschool in any setting in SA, even schools. The Commission may wish to consider the impact of the 'no jab, no play' policy and how early learning opportunities can be safely supported for children who are excluded because of their parent's immunisation decisions.

RECOMMENDATION 2 - Inclusion must be a priority focus with adequate resources allocated and the following features at a systems level:

- a) Access to above ratio educators for children that need it to meaningfully participate, including leveraging the Commonwealth Government Inclusion Support Program which partially meets these inclusion costs in Long Day Care settings**
- b) Access to in-service developmental screening, and fast access to allied health and early intervention for children that need it**
- c) Expanded use of community-based 'linkers' or warm referral models to help families whose children are not currently attending preschool, through a combination of outreach and support to navigate the service system (noting Goodstart has developed a successful model for this support – see page 16)**
- d) Targeted investments to address barriers faced by particular cohorts, e.g., children who are not eligible for Commonwealth Child Care Subsidy based on Visa status, or children's whose access to CCS is inadequate to support their participation.**

Goodstart's Increasing Access and Participation Program provides effective pathways into early learning for vulnerable families

The Increasing Access and Participation (IAP) Program was introduced to enhance outcomes for children in vulnerable circumstances. Under this model, a Family and Community Engagement Worker works within the local service system to support families to address barriers to access and create a warm entry point for families who may otherwise never connect with early learning. The Family and Community Engagement Worker supports children and families with:

- **Enrolment** into our centres, including outreach to assist families, advocating for the benefits of early learning and care, registering for childcare subsidies with Services Australia / Centrelink and matching child and family cultural and other needs to a centre
- **Partnership** with referring agencies, the family and the centre to strengthen relationships and collaboratively plan learning, development and wellbeing goals specific to the child's needs and ensure the ongoing provision of evidence to support access to Australian Government subsidy
- **Commencement** support for the child, family and centre for six weeks to ensure a smooth transition into early learning, review support strategies, and build relationships between the family and centre
- **Ongoing** inclusive approach with support and funding pathways identified to ensure the child and family stay connected to early learning, including direct access to our Individual Intensive Support Program (IISP) (See **Appendix 1**)

The IAP currently operates in South Australia, Victoria, New South Wales and Queensland (with some government funding). The main costs associated with the IAP program are related to employing the Family and Community Engagement Worker, with most participating children eligible for up to 5 days free ECEC the Commonwealth Additional Child Care Subsidy.

At present one worker is delivering the IAP program across South Australia and supporting referrals into Goodstart Centres. In 2021-22, a total of approximately 185 children were referred to IAP in South Australia, of these 129 were supported into placements and are - attending, and a further 25 are working towards enrolment. However, the program is oversubscribed in some locations and Goodstart is not able to offer a place to all families.

We would be pleased to provide detailed case studies and further information about the IAP on request.

Despite recent progress, gaps between State and Commonwealth preschool policy and funding settings need to be addressed in the short-term

In designing its two-year preschool program, South Australia must join other states to ensure that CCS legislation supports preschool programs in the short-term while longer term structural reforms are considered as part of the Productivity Commission Inquiry.

For example, there is currently an exemption from the activity test for a child attending 4-year-old preschool, which provides a minimum of 36hrs a fortnight to 4yos. With state governments now implementing two-year preschool programs this exemption needs to be reviewed.

At a minimum, the exemption needs to be extended to 3-year-olds and it should also be increased to support at least 3 days attendance, which would require 72hrs of CCS per fortnight to support the roll out of South Australia's two-year preschool program from 2026.

It is important to note that while the overwhelming majority of children attending Long Day Care Settings (approximately 93.5% of Goodstart enrolments) will have enough CCS hours to support 3 days a week (CCS 72 or 100 hours), a small but critical proportion of children likely to be vulnerable (e.g. low-income families and Health Card Concession holders) will have their entitlement capped at 24 hours of CCS per fortnight because their parents do not meet the CCS Activity Test.¹⁶ Leveraging the Australian Government investment in the Child Care Subsidy will allow the SA Government to maximise the impact of its investment.

It's also important to note that there are promising signs the Australian Government is considering further changes to the activity test to improve access for children, in addition to the increase for First Nations children commencing in July this year.¹⁷ We anticipate that the upcoming Productivity Commission inquiry will recommend significant changes to the activity test and entitlements for children ahead of South Australia's 2026 implementation date. In the event South Australia wants to move earlier, a targeted exemption approach could be explored with the Australian Government or access for children could be funded by the South Australian Government (See also Recommendation 12).

RECOMMENDATION 3 – The Royal Commission should work with the Australian Government to:

- a) Extend the preschool exemption from the CCS activity test to cover the two years before school; and**
- b) Increase the preschool exemption to at least 72hrs of CCS a fortnight. These changes are required immediately to support state government preschool reforms and will need to continue until longer term structural reforms are clear.**

¹⁶ Impact Economics and Policy "Childcare Subsidy Activity Test: Undermining Child Development and Parental Participation" August 2022 <https://www.impacteconomics.com.au/home/education>

¹⁷ From 1 July 2023, all First Nations children will have a minimum entitlement to 36hrs of CCS per fortnight.

3. Quality & Innovation

This section responds to the following questions in the discussion paper:

- What does high-quality 3-year-old early learning look like? What are the markers of optimal program delivery?
- What are the most important competencies for the people delivering 3-year-old preschool?

The State must be a stronger steward for quality and child development

The evidence is very clear that preschool programs only improve child outcomes if they are high quality. While investments in delivering universal access are crucial to this reform, the return on that investment will be sub-optimal if South Australia does not adequately resource and commit to ensuring that all three-year-old preschool programs are high-quality.¹⁸ Low quality provision should be unacceptable in any funded preschool program.

Structural quality is underpinned in Australia by the National Quality Framework (NQF), which applies equally to long day care and sessional preschool settings. The NQF has been successful in driving quality improvements particularly in relation to minimum quality standards for staff-to-child ratios and educator qualification requirements. Quality ratings for long day care have improved significantly over recent years. Between 2013 and 2022, the proportion of long day care centres nationally assessed as meeting the National Quality Standards rose from 51% to 89%, while preschool ratings rose from 81% meeting to 96% meeting.¹⁹

It appears that the provider management type makes a difference. While 8% of government run preschools and 7% of NFP long day care services are assessed as Working Towards, 13% of privately operated long day care services are assessed as Working Towards.²⁰ Larger providers tend to have better quality ratings than standalone operators.

Table 2. Quality ratings Q4 2022 South Australia²¹

	Exceeding	Meeting	Working Towards
Preschools	299 (74%)	98 (24%)	8 (2%)
Long day care	159 (38%)	194 (47%)	62 (15%)
- NFP	82 (40%)	99 (49%)	23 (11%)
- Private	59 (30%)	115 (49%)	46 (21%)
- Govt	4 (29%)	5 (36%)	5 (36%)

Quality also continues to be worse in low SES communities – nationally 14% of ECEC services in the most disadvantaged communities are assessed as Working Towards compared to just 8% of services in the most advantaged communities.²² The South

¹⁸ Brinkman, Sally (2023) Rapid Review of the literature and results of an academic pulse survey to determine the evidence behind preschool for 3-year-old children, University of South Australia, accessed online: <https://www.royalcommissionecec.sa.gov.au/documents/University-of-South-Australia.-Rapid-Literature-Review-and-Academic-Pulse-Survey.pdf>

¹⁹ ACECQA NQF Snapshot Dec 2022 DR2

²⁰ ACECQA NQS National Snapshot Dec 2022 Table OR9

²¹ Ibid

²² Ibid Table OR7

Australian trend was a little worse – 19% of long day care centres in the most disadvantaged decile (and 22% in the second most disadvantaged decile) were assessed as Working Towards.

South Australia's quality ratings have been deviating from other states in recent years. Of the 46 long day care centres assessed in South Australia 2022, none received an Exceeding rating, and 22 (48%) received a Working Towards rating. South Australia had the highest level of Working Towards ratings of any jurisdiction. Of the 55 long day care services assessed in 2021, just one received an exceeding rating, and 26 (47%) received a working towards rating. These results not only suggest that further investment is needed to raise the quality of LDC services, but also that the consistency and comparability of quality ratings in South Australia compared to other states may warrant further investigation.

Table 3 – Long Day Care Centre Quality Assessments in 2022²³

	Exceeding no.	Meeting No.	Working Towards No.	%	% of centres assessed
NSW	60	353	89	17.7%	15%
VIC	89	239	27	7.6%	19%
QLD	19	171	27	12.4%	12%
SA	0	24	22	47.8%	10%
TAS	3	6	3	25.0%	9%
WA	1	50	10	16.4%	8%
ACT	5	8	8	38.1%	12%
NT	3	9	7	36.8%	21%
National	180	860	193	15.7%	14%

In a mixed ECEC market, there is a role for Government and the regulator to invest in supporting the sector to improve quality standards. The Education Departments in the three largest states have long had support programs in place to work with services assessed as Working Towards to improve their quality post-assessment, often through professional development programs and support services for centre teams. Investments in the workforce in other states have also reduced turnover which, in turn, supports the achievement of minimum quality standards. In scaling up preschool delivery the New South Wales Government is currently investing in targeted support and intervention for preschool services not meeting the NQS. Given these services are more likely to be in lower SES areas, partnering to improve quality will lead to better outcomes for children than more punitive approaches that may limit funding for services not meeting the NQS.

Since the Australian Government ceased funding the National Partnership on the National Quality Framework in 2018, states have had to increase investment to maintain a timely assessment and ratings cycle. Unfortunately, this is an area where South Australia's regulator has fallen well behind other States. Two thirds (66%) of ECEC services in SA had assessments that were more than 3 years old in Dec 2022, and nearly half (46%) had assessments more than 5 years old. By contrast, just 6% of NSW centres, 13% of Victorian centres, 25% of Western Australian centres and 1% of Northern Territory centres had

²³ Ibid

assessments over 5 years old.²⁴ In December 2022, Goodstart had 25 centres (50%) in South Australia that had not been assessed in more than 5 years.

Quality ratings that are out of date undermine public confidence in the ratings system. Parents cannot rely on out-of-date ratings that no longer reflect the quality of practice in a centre. Public officials cannot rely on out-of-date assessments to tie funding of programs based on 'quality.' The backlog for assessment and ratings is now so long that substantial investment in A&R teams is warranted, along with investment in programs to improve quality.

Goodstart also supports an improved cycle to lift quality more rapidly in conjunction with appropriate capacity building and support for under-performing providers featuring 12 monthly assessments for centres rated as working towards, and 3 years for centres rated as meeting or exceeding.

RECOMMENDATION 4 – Improve the quality assessment and rating cycle to ensure that services are rated at least every 3 years, with Working Towards services to be reassessed every twelve months. Funding for the Education Standards Board will need to be increased to clear the backlog, and assessor procedures and training need to be reviewed to ensure that assessments and ratings in South Australia are nationally consistent.

RECOMMENDATION 5 – Introduce and adequately fund a pro-active program of quality improvement for 'working towards' services.

A more stable and capable early childhood educator workforce is needed to ensure process quality is maintained in preschool programs

The greatest risk to maintaining and improving quality in South Australian ECEC services is the lack of a sustainable workforce as evidenced by the current workforce crisis which is seeing unprecedented rates of turnover across the sector. Investment in workforce initiatives do make a difference, and this is most dramatically shown by the rate (%) of centres with staffing waivers in South Australia because they cannot meet the qualifications requirements of the NQF. In December 2022, 18.5% of South Australian long day care centres required a staffing waiver, compared with just 3.1% of Victorian centres.

It is incredibly challenging for centre teams in South Australia to maintain quality when the workforce is in turmoil. The staffing waiver rate in South Australia in December 2022 was twice what it was in December 2019 (9.3%), reflecting the absence of an effective workforce strategy to support centres both to meet the 2020 NQF ratio changes for teachers, and the ongoing workforce shortages across the education sector more broadly.²⁵

²⁴ ACECQA NQS Snapshot Dec 2022

²⁵ On 1 January 2020 the National Law changed to require that all LDCs and preschools have to have a second early childhood teacher when 60 or more children preschool aged or under are being educated and cared for. In many cases the additional ECTs are delivering approved preschool programs to 3yos.

Under Goodstart's Enterprise Agreement, beginning teachers are paid wages close to school rates, although other school conditions (such as holidays and pupil free days) are not met. We have found it extremely difficult to attract and then to retain qualified teachers in competition with the school's system. In the last year, the attrition rate for teachers in our SA centres has been 35%, compared to 26% in the eastern states. A quality preschool program cannot be delivered without teachers. Reducing the financial incentive for teachers to move from the long day care sector for the schools' sector and growing the pipeline of new teachers need to be essential elements of the preschool reform agenda (See Section 4 on Workforce).

The quality of children's experiences and opportunities depends on the competencies of the adult ECEC workforce²⁶

While qualified and competent teachers are an important element of structural quality, what they do in the classroom is even more important and a focus on process quality is essential. This can be enhanced by supporting teachers to improve practice through ongoing professional development, networking, support and time for programming and reflection.

One strategy for lifting the teacher practice and children's outcomes is in-service professional development. The Fostering Effective Early Learning (FEEL) Study conducted in New South Wales and completed in 2018 provided substantial evidence that targeted, evidence-informed, in-service professional development can lead to significant positive increases in the ECEC learning environment and cognitive and socio-behavioural outcomes for children.²⁷ Compared to a control group, children's outcomes included:

- Double the growth in children's verbal comprehension;
- 23% more growth in early number concepts; and
- 28% more growth on early numeracy assessment.²⁸

Goodstart currently provides practice support for teachers delivering our preschool programs noting different developmental needs of children and we use evidence-based tools to drive practice uplift across the 3-5 cohort (Early Childhood Environment Rating Scale – Extended (ECERS-E), Sustained Shared Thinking and Emotional Wellbeing (SSTEW) Scale).

Based on our extensive experience delivering socially inclusive programs we believe that key competencies for Early Childhood Teachers delivering two-year preschool programs in South Australia should include:

- Specific expertise in the birth to five age range with very strong understanding of child development including how to assess children's progress, identify children's next learning steps and intervene early if development is not on track

²⁶ <https://education.nsw.gov.au/content/dam/main-education/early-childhood-education/whats-happening-in-the-early-childhood-education-sector/media/documents/5854-Feel-Study-VFA4-Accessible.pdf>

²⁷ Ibid

²⁸ Ibid

- Play-based, relational pedagogical knowledge and competence in teaching strategies, planning and assessment approaches suitable for the early years
- Knowledge, skills and demonstrated ability to implement inclusive practices for children from diverse backgrounds with differing and unique early life experiences
- Trauma-informed knowledge and practice
- Cultural competency

Our recommendations for supporting and improving teacher competencies are included in the following section.

4. Workforce

This section responds to the following question in the discussion paper:

- *What are the highest value interventions to improve workforce supply in South Australia?*

Long term investment to grow the workforce is required, including investment in the attraction and retention of teachers to LDC

South Australia has not been producing enough early childhood teacher graduates to meet the State's need for some time and the shortage of early childhood teachers impacts the provision of preschool. In December 2022, 18.5% of long day care services in South Australia had waivers, mostly because they did not meet the ECT requirements of the National Quality Framework.²⁹ Attracting and retaining ECTs in long day care centres will be essential in the roll out of two-year preschool programs.

South Australia needs to address the acute shortage of early childhood teachers with a comprehensive plan to improve retention by:

- a. better matching remuneration paid in funded ECEC preschool programs with schools, and
- b. improving the pipeline with scholarships and new course offerings to support more students (particularly diploma and certificate qualified educators) to become early childhood teachers.

LDCs play a critical role in delivering preschool programs that meet the needs of working families, led by degree-qualified early childhood teachers (ECTs). However, it is extremely difficult for long day care centres to match the salary and conditions offered in government preschools and in schools (See Table 4).

Direct subsidies could be used in South Australia to establish wage parity between ECT rates in LDCs and schools. These have been successful in other jurisdictions. A retention bonus of \$5,000 could also be provided to ECTs delivering preschool programs for three- to five-year-olds in LDCs if they work for their employer for the full 40 weeks of the school year. Continuity of teachers for cohorts of children should be seen as crucial to maintaining the quality of preschool programs. While this is an ongoing challenge in our

²⁹ ACECQA [NQF Annual Performance Report 2022](#) p. 43

sector, targeted investments in other jurisdictions have been shown to make a positive difference.

Table 4: Wage rates for educators and teachers in long day care setting and Government schools and preschools in SA

Classification	Long day care award rate (p.a.)	SA Education Dept rate ¹	Difference %
Educator Cert III commencement	\$49,095	\$59,522 ²	21%
Educator Cert III after 3 years ¹	\$52,386	\$65,575 ²	25%
Teacher 4-year trained graduate	\$66,385	\$74,769	13%
Teacher 4-year trained proficient	\$72,572	\$82,482 ³	14%
Teacher 4-year trained maximum rate	\$85,440	\$108,441	27%
Weeks of leave	4 weeks	12 weeks	-

¹From 1/5/2022; ²Early Childhood Worker Level 2; ³Graduate with 2 years' experience

The Victorian Government in 2016 agreed to match the wage rates and conditions for early childhood teachers to school rates in community kindergartens (but not in most long day care centres). The South Australian Government should ensure that preschool funding is sufficient to allow long day care preschool programs to match school rates and some conditions and then require providers to do so. This would go a considerable way towards ensuring quality is delivered in preschool programs by ensuring a more stable and secure workforce.

RECOMMENDATION 6 – Ensure preschool funding is sufficient for long day care providers to match State preschool rates for teachers and then require them to do so (for example through an Enterprise Agreement). Providers already paying above award rates, should receive commensurate investment to continue to pay above award. This should include at a minimum:

- a) Matching wage rates paid in State Government preschools for teachers;
- b) Providing at least additional 2 weeks non term leave in addition to 4 weeks annual leave;
- c) Providing at least 4 hours non-contact time each week for teachers;
- d) Providing at least 2 days of paid leave each year for professional development.

Initial teacher training is out of step with the rest of Australia

South Australian initial teacher education for early childhood teachers is out of step with the rest of Australia in that it does not include specialist birth to 5 degrees. In all other states, universities offer such degrees, which are particularly attractive to Diploma

qualified educators wanting to upgrade to teaching qualifications to work within a Long Day Care context.

More recently, universities in Victoria, Queensland and New South Wales have approved more intensive and accelerated birth to 5 years courses that recognise the skills and experiences of experienced Diploma qualified educators and support them to become teachers within two years.³⁰ These courses are recognised by ACECQA and in New South Wales and Victoria, they are also recognised by the relevant teacher registration body. There is huge demand from educators for such pathways, with 1,330 scholarships for these courses being offered in Victoria.³¹ Given the acute shortage of teachers in South Australia, it makes sense to partner with the higher education sector to develop similar innovative birth to five teaching courses that also recognise and build on the skills of experienced diploma qualified educators.

Recognising that senior diploma qualified educators have skills that should be acknowledged in future teacher education would also serve gender pay equality objectives. The Fair Work Commission in the recent Aged Care Work Value case recognised that:

“Gender-based undervaluation of work in Australia arises from social norms and cultural assumptions that impact the assessment of work value. These assumptions are impacted by women’s role as parents and carers and undertaking the majority of primary unpaid caring responsibilities. The disproportionate engagement by women in unpaid labour contributes to the invisibility and the under recognition of skills described as creative, nurturing, facilitating or caring skills in paid labour.”³²

Giving better and due recognition of the skills and experience of diploma qualified educators who have been leading learning programs in their rooms for many years would help to address the ‘invisibility and under recognition’ of their skills. It would also create a stronger pipeline to address teacher shortages in South Australia and improve career pathways in early learning.

RECOMMENDATION 7 – That the South Australian Government partner with higher education providers to develop innovative, intensive birth to five years initial teaching courses that recognise and build on the skills and experience of diploma qualified educators.

³⁰ <https://www.vic.gov.au/innovative-early-childhood-teaching-courses>;
<https://www.unisq.edu.au/study/degrees/graduate-diploma-of-early-childhood-education-and-care>;
Wollongong <https://coursefinder.uow.edu.au/information/index.html?course=bachelor-education-the-early-years> New England <https://www.une.edu.au/study/courses/bachelor-of-education-early-childhood-teaching>

³¹ Media release Ingrid Stitt 2/1/2022

³² Statement by the Fair Work Commission President 4/11/2022
<https://www.fwc.gov.au/documents/consultation/presidents-statement-segregation-gender-2022-11-04.pdf>

The recognition of early childhood teacher qualifications by the Teacher Registration Board of South Australia is out of step with the other states and should be adjusted

The recognition of early childhood teacher qualifications by the Teacher Registration Board of South Australia (TRBSA) is out of step with the other states which is creating additional barriers to teacher attraction and recruitment in the early years in South Australia.

ACECQA conducts a detailed assessment of proposed courses to see if they meet the requirements of the National Quality Framework. The teacher registration bodies in Victoria, New South Wales, and Western Australia now accept ACECQA's assessment and register teachers who have completed a course approved by ACECQA.³³ Queensland is currently reviewing its position in light of current workforce challenges. We would argue that South Australia's rules for teacher registration should be modified to bring them into line with the other states by recognising qualifications approved by ACECQA. This would then allow the innovative birth to five qualifications emerging in other States to also be developed in South Australia and increase the potential pool of teachers for the early years within South Australia.

RECOMMENDATION 8 – That the Teachers Registration and Standards Regulations be amended to allow that the qualifications for registration as a teacher include an approved teacher education, degree, diploma or other qualification recognised by the National Authority under Division 7 of the Education and Care Services National Regulations.

Scholarships, flexible funding and mentoring support is needed for students and graduate teachers

The completion rates for teaching degrees are often lower than for other qualifications and need to be improved. Educators working fulltime and studying part-time can find completion a real challenge, especially recognising that working in ECEC is a physically and emotionally demanding job and many educators have children and family responsibilities themselves. The requirement to undertake up to 80 days of practicum teaching experience outside of ratio is a particular challenge. Many educators have had to use their annual leave or work leave without pay to meet the practicum requirement.

Goodstart has supported hundreds of educators to upgrade their qualifications to teaching courses. Our experience – and the work of others working in the field such as The Front Project – is that students are more likely to succeed when:

- Practicum does not require them to use up their annual leave. This can be addressed if universities allow some of the practicum to occur with their employer (in ratio), or where Governments provide scholarships to allow educators to be back filled when they are on practicum (as Victoria and New South Wales do)
- Students are provided with time off the floor to study
- Students are offered mentoring support during their course (for example in small groups) to discuss and address challenges

³³ See for example Victorian Education and Training Reform Act 2006 section 2.6.12C

- Universities offer support to students to successfully transition into tertiary study.³⁴

The Victorian Government and the New South Wales Government offer scholarships of up to \$25,000 towards early childhood study as well as mentoring and networking support for new teachers.³⁵

Goodstart is committed to supporting those studying and newly employed teachers throughout their career. It is widely recognised that by providing a positive induction into a teaching role, life-long professional engagement and growth prevails. Ongoing professional development and support is also needed to support teachers and educators and prevent burnout and high levels of attrition in our sector. This in turn has an impact on ensuring high quality outcomes for children and families.³⁶

To this end, we have developed the following two programs to support our ECTs:

- **Teacher Mentor Program (Goodstart Funded)** which is a structured program tailored to support teachers to move from provisional to full registration to meet the requirements in accordance with the TRBSA
- **Teacher Professional Program (Goodstart Funded)** offering contemporary and high-quality induction and professional learning to support teachers to meet the professional learning requirements and maintenance of registration as stipulated by the TRBSA

We would be pleased to provide more information about these programs on request.

RECOMMENDATION 9 – That the South Australian Government offer scholarships of up to \$25,000 to support students to complete early childhood teaching qualifications, and also offer a program of mentoring and networking support for student and graduate teachers.

An expansion of preschool will also require an expansion of the educator workforce in South Australia

Systemic workforce shortages and historic underinvestment means that a multifaceted long-term strategy is required to attract, retain and grow the certificate and diploma educator workforce needed to deliver preschool programs, and quality ECEC programs more broadly.

South Australia has some strong foundations to build on. Investment in free VET qualifications in ECEC are an important initiative that needs to continue for several years.

³⁴ <https://www.thefrontproject.org.au/research/upskilling-in-early-childhood-education>

³⁵ See <https://www.vic.gov.au/make-difference-early-childhood-teaching>; and <https://education.nsw.gov.au/news/latest-news/major-incentives-to-boost-the-early-childhood-education-and-care>

³⁶ J Hattie, 'Teachers make a difference: what is the research evidence?' paper presented to Australian Council for Educational Research Annual Conference, Melbourne, 19 – 21 October 2003.

We would also advocate the expansion of access to school-based traineeships in ECEC beyond the technical schools' initiative. We would like to see the State partner with the sector to support a substantial increase in centre-based traineeships. Unfortunately, current workforce shortages mean that many centres are not able to successfully supervise and support trainees, and consequently, additional investment is likely to be required for mentoring and backfill to ensure trainees are successful.

The State should also consider a scholarships program for aspiring educators similar to those offered in Victoria, particularly in regional and hard to recruit locations.

There is also an opportunity to capitalise on the Governments investments in ECEC and develop a media and social media campaign promoting the careers and courses in ECEC to school leavers and the workforce more broadly. Such a campaign would have the dual benefit of elevating the value of the early years across the community.

Goodstart would also urge the South Australian Government to advocate to, and work with the Australian Government to secure a funded wage rise for educators.

RECOMMENDATION 10 – That the South Australian Government develop initiatives to support and grow the early childhood educator workforce including:

- a. Continuing free VET courses in ECEC;**
- b. Expanding access to school-based traineeships in ECEC;**
- c. Supporting centres to take on more traineeships;**
- d. Offering scholarships and incentives to people to become educators, particularly in regional and hard to recruit locations;**
- e. Developing a campaign to promote careers in the sector.**

5. Delivery & Administration

This section responds to the following questions in the discussion paper:

- What is needed to support 3-year-old preschool? (What would you/your organisation need to do to be able to deliver 3-year-old preschool?)
- How should demand for 3-year-old preschool be modelled? What assumptions should be made? What evidence could support these assumptions?
- (How) should 3-year-old preschool differ to ECEC currently provided to 3-year-olds

Children in long-day-care preschool are more likely to achieve 600hrs and Goodstart is ready to support more children access preschool programs

Despite high levels of enrolment, not all children are getting 600 hours of preschool per year. In 2021, just 54% of children enrolled for 600 hours in standalone preschools in the year before school in Government preschools also attended for 600 hours, compared to 100% of children enrolled in long day care programs. 35% of children in the least advantaged quintile attend preschool for less than 15 hours a week, compared to 18% of children in the most advantaged quintile.³⁷

Table 5 – Children enrolled and attending preschool in South Australia in the year before school, 2021³⁸

Preschool setting	Enrolled 600 hours per year	Attending 600 hours per year	% Attending 600 hours
Government preschool	8,251	4,486	54.4%
Community preschools	166	108	65.1%
Non Govt school preschools	396	320	80.8%
Total preschools	8,850	4,927	55.7%
Total attending preschool and long day care	4,209	4,182	99.4%
Total centre-based day care	3,685	3,790	102.8%
Total children in a preschool program	16,738	12,902	77.1%

The ABS data also shows that 4,209 children who attended preschools also attended long day care centres. Feedback from our centres suggests that many of these families struggle to juggle the 'third day' offer in preschools, which is typically a half day or full day every second week. As working parents, they cannot manage this pattern and long day care centres currently receive no preschool funding to support these families.

Children may also be more likely to receive 600 hours or a full dose in a long day care setting because our services are open for up to 52 weeks a year, with qualifications requirements required to be met for that full period under the NQF (i.e., a teacher is present all year).

This represents an opportunity for the Government to enhance the offer for children facing disadvantage to provide additional early learning opportunities beyond the 40-week

³⁷ ABS Preschool Education Australia 2021 tables 17

³⁸ ABS Preschool Education Australia 2021 Table 28

school term. There is a substantial body of research showing that learning can 'fade' over the summer months, particularly for disadvantaged children.³⁹ Ensuring children can continue to access early learning over the full year rather than just the 40-week school year can help ameliorate this effect.⁴⁰ This is a unique strength of the LDC preschool model.

The New South Wales and Victorian Governments have recognised this opportunity and now provide operational subsidies and fee relief over the full year. Goodstart would advocate that South Australia also consider this approach.

When it comes to 3-year-olds, 63.7% are already attending LDC programs providing a strong foundation to build on

When considering options for preschool delivery and modelling these - it is important to have an accurate understanding of the baseline participation rate in ECEC for the target cohort. The Commission's Terms of Reference indicated that only 15% of three-year-olds currently participate in preschool programs in South Australia, but according to the latest ROGs, 63.7% of three-year-olds are already attending LDC programs in South Australia.⁴¹

Looking at Goodstart's internal data on our 3-year-old enrolments in 2022, 92% of all our 3-year-old enrolments were for 2 or more days, meaning that if these children attended for a full year, they would reach 600 hours. And 65% of our 3-year-old enrolments were for 3 or more days.⁴² Average days of attendance for Goodstart's 3-year-olds is currently 3.07 days.

Thanks to the National Quality Framework, many 3-year-olds have access to a teacher led program now, in either a 3-year-old room or a combined 3-5 room

The National Quality Framework includes requirements for services to have early childhood teachers, with the current Preschool Reform Agreement providing financial incentives for at least one of those teachers to be dedicated to delivering the 4-year-old preschool program.

However, the NQF requirement for a second ECT to be employed from 2020 for larger centres means that many 3-year-olds in South Australia are already in rooms where their early learning program is being delivered by a degree qualified teacher. However, within South Australia there are currently no financial or regulatory incentives for teachers to

³⁹ Cooper H, Nye Bm Charlton K, Lindsay J, Greathouse S (1996) "The Effects of Summer Vacation on Achievement Test Scores: A Narrative and Meta-Analytic Review" Review of Educational Research v 66 no 3 227-268 <https://doi.org/10.3102/00346543066003>; Quinn, D; Tien Le, Q (2018) "Are we trending to more or less between-group achievement inequality over the school year and summer/ Comparing across ECLS-K cohorts" AERA Open Dec 2018 Vol 4 no 4 pp 1-9 <https://doi.org/10.1177/2332858418819995>

⁴⁰ Indeed, few children attending preschool over 40 weeks are likely to access the full 600 hours preschool entitlement once student-free days, public holidays and child and teacher absences are accounted for.

⁴¹ ROGS 2023 table 3A.18

⁴² Please note this is based on total 3YO enrolments of 1783 across 2022 and includes casual bookings and children who did not complete a full year (either enrolled late or left early).

deliver the program for 3-year-olds and in some services the 'second' teacher is delivering programs in the nursery or toddler room, or the teacher holds another role such as the Centre Director or Educational Leader. The Commission's data collection will provide a clearer picture of the current teacher baseline.

Victoria's 3-year-old preschool implementation approach is leveraging the existing teacher workforce to create incentives for teachers to deliver the 3-year-old preschool program and is complemented by significant investments in growing their ECT supply. They now have the highest number of ECTs in 3-year-old rooms nationally.

In the Goodstart network, some services are configured so that three- and four-year-olds share a single room – via a 36-to-72-month age banding on the room. This means that when 3-year-old children attend alongside 4-year-old children, they have access to a preschool program delivered by a degree qualified early childhood teacher.

Approximately 36% or 649 of our 3-year-old children accessed a preschool program in 2022 in this way, although many did not complete a full year. Combined with high levels of 3-year-old attendance at LDC programs (63.7% of all 3-year-old children), this provides South Australia with a considerable baseline to build on in rolling out a two-year preschool program.

The most efficient and cost-effective way to roll out 3YO preschool is to build on the existing approach leveraging LDC-based delivery

Victoria, which is starting from a base of just 51% of 3-year-olds attending programs, is partnering with the long day care sector to provide most of the places it needs for three-year-olds, with new capacity for preschools focused on areas where supply is not yet met.

Queensland, when it faced the need to rapidly expand its preschool offer in 2008-2010, also chose to utilise long day care settings where most children were already attending (now 70% of enrolments in Queensland) while funding new preschools in areas of demonstrated unmet demand, particularly thin markets where long day care services were unlikely to be viable. This was seen as the most cost-effective means of meeting demand, utilising Commonwealth funding streams for operating costs, private financing for capital expenditure to meet future demand and supporting families as maternal workforce participation grew. This approach was also found to be the most efficient in the 2020 review of the NPUA.⁴³

Benefits of this approach include:

- leveraging legislated demand driven Australian subsidies to reduce out-of-pocket costs for families;
- maximising efficiency of state and commonwealth investment in meeting dual child development and workforce participation objectives; and

⁴³ <https://www.dese.gov.au/download/12146/uapn-review-final-review-report/23063/uapn-review-final-review-report/pdf>

- providing greater flexibility in how additional state investment is targeted to deliver on SA specific objectives.

A similar approach leveraging LDC delivery within a mixed market will provide the most efficient and cost-effective model for expanding 3-year-old preschool in SA.

However, long day care provision is not financially viable in thin markets, such as small rural towns. In such locations, the Government will need to fund either the building and operating of State preschools, or heavy capital and operational subsidisation of small, long day care centres (or mixed settings) to ensure that all children can access preschool.⁴⁴

RECOMMENDATION 11 – That the South Australian Government leverage the LDC preschool model in rolling out two-year preschool programs, with capital investments to increase capacity where needed to ensure equitable access across the state. This will need to be complemented in thin markets where long day care provision is not viable either with expansion of State run preschools, or ongoing subsidisation of long day care (or mixed setting) services.

Fee relief that reduces gap-fees after Australian Government Child Care Subsidy is a highly efficient and effective way of removing cost barriers for low-income and vulnerable families

The Australian Government's Child Care Subsidy rules now clearly allow state-based fee relief for preschool programs to be applied to the 'out of pocket cost after subsidy'. The provision of fee relief to preschool children to cover the gap between the CCS and their fees is a highly efficient and effective way of removing cost barriers for low-income and vulnerable families.

South Australia currently provides targeted fee relief of \$1,890 p.a. for children that are likely to be experiencing vulnerability (e.g., low-income families including Health Card Concession holders, Aboriginal children, humanitarian visa holders) who attend long day care programs in the year before school. This program makes a positive difference for families, but the acquittal and administrative process could be improved, and in the long-term an indexation approach is needed to ensure the payment retains value over time.

This year, NSW and Victoria moved beyond targeted fee relief and are now offering up to \$2110 fee relief to all families accessing 600 hours of preschool, with Victoria offering this subsidy for all children in the two years before school. Importantly, this fee relief is being applied across the full year in line with the long day care participation patterns by families. Goodstart strongly supports this approach as an effective way to improve affordability for

⁴⁴ Mixed provision would be where families could access either short (6 or 7.5 hour) preschool sessions or full long day care (10-12 hour sessions) with the provider able to access either funding model. The Victorian Government has facilitated this approach, for example, in our Jindi centre at Mernda, offering families shorter preschool sessions or extended care depending on their needs.

all families, however, we would prioritise increased fee relief for vulnerable cohorts if required.

There are a small number of children likely to be experiencing vulnerability for whom the CCS entitlements will not provide enough hours or subsidy to remove cost barriers for at least 3 days a week (CCS 24 and 36hrs families).⁴⁵ Ideally, changes will be made to the Australian Government CCS Activity Test to provide a minimum entitlement of 72hrs to all children in the two years before school (See Recommendation 3).

However, noting this is outside the powers of the South Australian Government, the Victorian Government has effectively addressed this issue by offering Early Start Kindergarten funding of \$6,630 per child to remove cost barriers to eligible children.⁴⁶ Similarly, Tasmania's Working Together for 3-year-olds initiative offers covers the full cost of two days of free early learning for eligible children.⁴⁷

In the first instance, we recommend that the Targeted Fee Relief be immediately increased to \$3105 pa. from 2024 to ensure that children in the year before school (4YO preschool) are able to access a free or near free preschool program in long day care settings.⁴⁸ An interim program could also be established to extend Targeted Fee Relief to 3-year-olds likely to be experiencing vulnerability. This would restore Fee Relief to its full value and ensure that cost is removed as a barrier for disadvantaged children to access preschool over the three years until 2026. Goodstart would be pleased to work with the Commission to provide detailed modelling on effective fee relief for 2024 and beyond

Learning from current experience in NSW and Victoria, it is also recommended that IT systems, including interfaces with third party software providers, are upgraded well in advance so that fee relief can be paid to providers based on actual enrolments at the beginning of each quarter (or every six months). This will ensure that the fee relief can be applied to families' accounts in each billing cycle and reduce reconciliation issues for providers at the end of each period.

RECOMMENDATION 12 – That fee relief for a two-year preschool program leverage Australian Government investments in the Child Care Subsidy and be set at a rate to ensure families on a 90% CCS rate can access free or very low-cost preschool with an indexation approach that ensures affordability is maintained over time. Implementation of this recommendation should include a review of the current rate of payments for 4-year-olds.

⁴⁵ This arises from the complex interplay between the activity test, hourly fee cap, and session lengths which have led to many children with lower CCS entitlements (CCS24 or 36 hours) dropping out altogether. For more information about how this works see Impact Economics and Policy, August 2022, "Childcare Subsidy Activity Test: Undermining child development and parental participation, <https://www.impacteconomics.com.au/home/project-four-3376n>

⁴⁶ <https://www.vic.gov.au/early-start-kindergarten>

⁴⁷ <https://www.decyp.tas.gov.au/working-together/>

⁴⁸ Assumes that a family has a minimum CCS entitlement of 90%/ 36hrs a fortnight and can access 9-hour sessions of care.

Evaluation and monitoring should be used to drive continuous improvement

For South Australia to meet its objectives for a two-year preschool program, a robust evaluation and monitoring framework should be designed from the outset and used to drive continuous improvements.

This should include the national data repository and outcomes measurement tools currently being developed under the Preschool Reform Agreement for 4yos and making sure these can also be applied to 3yo preschool to measure and support child development and build the contemporary evidence base for South Australia and all jurisdictions.

South Australia is also in the fortunate position of having a world-class longitudinal data linkage research project to help build the early learning Australian evidence base. Led by Professor John Lynch with Dr Rhiannon Pilkington at the University of Adelaide, the Better Evidence, Better Outcomes, Linked Data (BEBOLD) platform includes data on all children born in South Australia since 1991 on:

- Perinatal and Births
- Child Protection outcomes including notifications, investigations, substantiations and child removals
- Government preschool attendance and time spent in preschool
- Developmental vulnerability at school entry as measured by the Australian Early Development Census
- Academic achievement as measured by NAPLAN
- School attendance outcomes
- School behavioural outcomes
- Wellbeing & Engagement. Information about how young people (children in years 4 to 12) think and feel about their experiences, both inside and outside of school
- Hospital admissions. For children and their parents/carers
- Emergency department presentations. For children and their parents/carers
- Homelessness service engagement from government funded homelessness programs.
- Public Housing applications or tenancies provided by the SA government Housing Authority
- Welfare support for parents/carers

Goodstart is excited to be one of the agencies contributing data to this project, which holds the potential to form the basis of an evaluation framework for South Australia's two-year preschool programs.

Recommendation 13 - Partner with the sector on an evaluation and monitoring framework to drive continuous improvement, potentially building on the BE BEOLD datalink – noting Goodstart can be a first test case to link data from non-government ECEC providers.

Outside School Hours Care for children aged 3-5 years needs to meet the NQF staffing AND qualifications requirements for the age group

The Commission needs to carefully consider the nature of OSHC services being added onto preschools. OSHC provision for preschool aged children should not be exempt from the staffing ratio and qualification requirements of the NQF for birth-5-year-olds.

In a long day care setting, key educators are also available for children across the entire day, with some starting early and some finishing late. An extended day of learning (i.e., extended preschool) with continuity of educator relationships deliberately rostered is one of the great advantages of a long day care setting. But this is unlikely to be replicated when the OSHC component is offered by another set of educators. This model also diminishes the opportunities for parents to connect regularly with teachers and educators.

The Commission should aim for 'best practice' in OSHC in preschool:

- There should be no relaxation of NQF ratio or qualifications requirements for preschools where extended hours (i.e., OSHC) is offered.
- The extended hours care should be an extension of the preschool program for the centre, offered in the same familiar place in a seamless transition with a strong emphasis on maintaining educator child relationships.
- The preschool and OSHC learning programs should be fully integrated to ensure that children continue to benefit from quality play-based learning.

RECOMMENDATION 13 – Outside school hours care for children in preschools on school sites should, as far as possible, be offered as an extension of the preschool program in place, with educator-child ratios and relationships maintained as much as possible to support children's transitions.

APPENDIX 1 – Goodstart’s Social Inclusion Programs

Goodstart Early Learning: How we are delivering upon our social purpose

1.0 About Goodstart Early Learning

1.1 We are for children, not for profit

Goodstart Early Learning (hereafter Goodstart) is Australia's largest not-for-profit social enterprise and Australia's largest Early Childhood Education and Care (ECEC) provider, with 671 centres located in all states and territories, caring for more than 70,700 children from 59,200 families.

Our purpose is to ensure all Australia's children have the learning, development and wellbeing outcomes they need for school and life.

It is our view that all children should be supported to participate in high quality, inclusive early learning and care, regardless of where they live in Australia, their family circumstances, their inclusion support needs, or their early learning setting. We believe the best way to do this is to ensure all children have access to at least two days of high-quality early learning in the two years before full-time school. There is a wealth of international evidence that shows that two years of kindergarten has more impact than the one year that Australian currently provides, and this was confirmed in the *Lifting our Game Report*⁴⁹.

In 2021, one in four children were developmentally vulnerable in one or more domains of the Australian Early Development Census⁵⁰, with increases in the percentage of children developmentally vulnerable in four out of five of the domains since the AEDC commenced in 2009 (NB a slight decrease since 2009 was observed in the communication skills and general knowledge domain).

Unfortunately, children who start school behind frequently don't catch up, but we know that participating in a high quality, inclusive early learning program in the two years before school offers significant educational, social and economic benefits.

1.2 Representation of vulnerability in Goodstart

As an inclusive organisation, all children, families and educators are welcome at Goodstart. Our centres and teams of educators work in partnership with thousands of families across Australia to deliver high quality, inclusive and community connected early learning programs to benefit all children and their learning, development and wellbeing. We actively support all children to participate in our services, irrespective of their abilities, developmental capabilities or life circumstances.

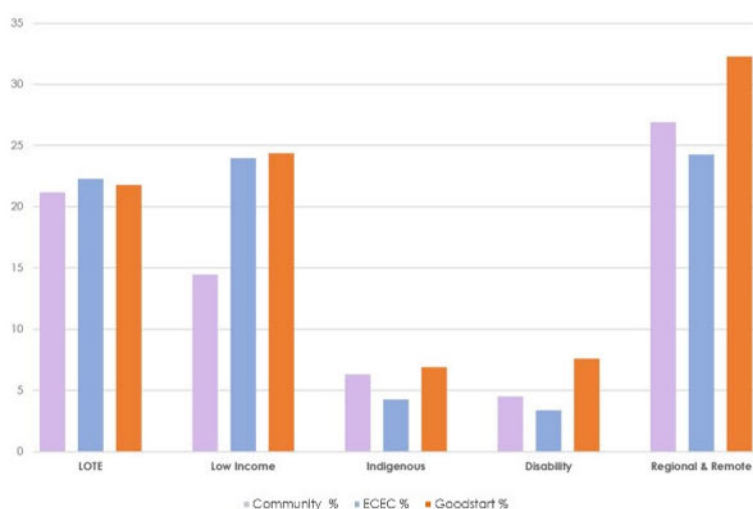
Across Australia, 38% of children attending our services have at least one indicator of vulnerability. Over 4,700 children attending Goodstart have a disability or developmental

⁴⁹ Lifting our Game 2017 - <https://earlychildhood.qld.gov.au/aboutUs/Documents/lifting-our-game-report.pdf>

⁵⁰ https://www.communityservices.act.gov.au/_data/assets/pdf_file/0004/1466545/CSD_AEDC_WCAG.pdf

delay, which is 6% of all children at Goodstart and is proportionately higher than other ECEC providers. The table below demonstrates our higher representation of children likely to be vulnerable compared with community and the sector.

We welcome and include a diversity of children and families and compare favourably to the ECEC sector and community



We have a slight increase in the proportion of children with a disability attending Goodstart centres from 6.2% last year to 7% in May 2022 and higher rates compared with the community and the ECEC sector.

At 6.9%, we have a slightly higher proportion of First Nations children than the community, up from 6.7% in May 2021 and 5.6% in May 2019.

For children with a Language other than English (LOTE) we are tracking higher than the community prevalence and slightly lower than the ECEC sector.

Our regional footprint also remains higher than the community and ECEC sector.



Data from Report on Government Services. Variations exist in available source years.

Consistent with the best evidence about vulnerability and additional needs, our focus is on children:

- with a disability, developmental delay, condition, or additional need
- of Aboriginal and/or Torres Strait Islander descent
- from low socio-economic backgrounds
- from culturally and linguistically diverse backgrounds, especially those newly arrived and/or from refugee or humanitarian backgrounds
- at risk of abuse or neglect
- experiencing or who have experienced trauma
- with multiple risk factors

1.3 Beyond Goodstart

Our social purpose is to support all of Australia's children, not just all children in Goodstart centres. We are committed to advocating on behalf of children and explaining the importance of quality, inclusive early learning and other policy issues that benefit children and families, including early childhood education, workforce participation, welfare, disability support, mental health and wellbeing as well as social inclusion and equity.

We work closely with The Early Learning and Care Council of Australia, Early Childhood Australia, the Australian Council of Social Services, United Voice, the Australian Childcare Alliance, the Australian Research Alliance for Children and Youth, and our Founding Members on early learning and care policy issues.

1.4 Digital connections

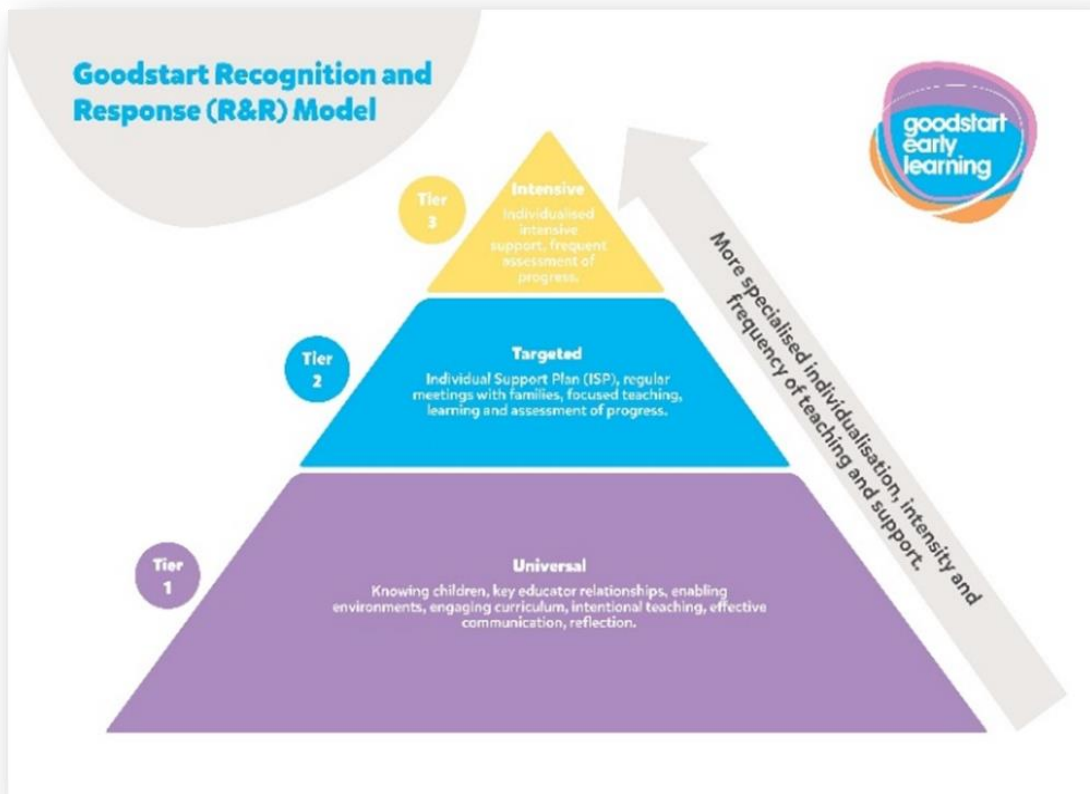
Goodstart@Home provides families with high-quality, pedagogically approved learning content direct to their homes. This has been especially important during the COVID-19 pandemic and provides continuity of learning experiences when families decided to keep their children home.

Presently, there are 26,000 families subscribed to Goodstart@Home providing Goodstart with the opportunity to offer blended in-centre and digitally enabled in-home learning. By better enabling access and increasing the frequency and duration of early learning, Goodstart will drive even better outcomes for children.

2.0 Inclusion and early intervention at Goodstart

2.1 Social inclusion at Goodstart

Inclusive practice is a fundamental part of our way of working. As an inclusive organisation, all children, families and educators are welcomed at Goodstart. Quality, inclusive early learning begins with secure, nurturing relationships between educators and children⁵¹. Each and every day, our centres and teams of educators work in partnership with thousands of families across Australia to deliver high quality, inclusive and community connected early learning programs to benefit all children and their learning, development and wellbeing activating our tiers of support outlined in our Recognition and Response Model below.



⁵¹ Sims, Margaret (2015), 'The role of staff in quality improvement in early childhood', available [here](#).

We actively support all children to participate in our services, irrespective of their abilities, developmental capabilities or life circumstances. We provide a national support structure that assists with accessing funding support, additional staff training and enrolling children needing additional support. We try to maximise all available funding and support, so a child can fully participate in early learning but, sometimes, there are administrative delays that risk the child not having the support they need. As a not for profit and in line with our social purpose, we often fund inclusion support until government funding is approved. However, red tape and funding delays often mean that, in other services, children are being excluded.

To truly support social inclusion, we fund additional educators (outside ratio) to support children with additional needs, we work hard to ensure our early learning environments are suitable for children of all abilities and we continuously develop and invest in our educators to enable them to offer the best possible care and education for all children. Our key initiatives that support vulnerable children across the country are outlined below.

2.2 Programs and practice

Understanding a child's strengths and skills, authentically partnering with families and collaborating with other early childhood professionals, such as allied health practitioners, is critical to the successful inclusion and participation for children with a diagnosed disability, developmental delay and/or additional needs within an early childhood education and care setting. Listed below are some of the programs we have implemented to make sure all children and families feel a sense of belonging and feel safe, nurtured and valued.

At Goodstart, inclusive practice is supported by a network of social inclusion coordinators and access to an Inclusion Support Helpdesk and support continuum, which highlights the elements and considerations of inclusive practice.

1) *Enhancing Children's Outcomes (EChO)*

EChO centres offer enhanced services over and above the universal base of education and care. We invest in proportionately disadvantaged communities using our unique EChO model to enhance learning, development and wellbeing outcomes for very vulnerable children, along with supporting their families and building their communities.

Services include additional teachers, child and family practitioners, speech pathologists, occupational therapists and social inclusion coordinators. We also offer playgroups, visiting service providers, food rescue and re-distribution, referral and support in the local community and scholarships for eligible children. Importantly, educators and allied health professionals work together in the centre creating practice uplift to deliver high quality, inclusive early learning.

2) *Allied Health Services*

Building on Goodstart's enhancing children's outcomes approach we are now scaling an affordable service model to better support children facing disadvantage to achieve the learning, development and wellbeing outcomes they need for school and life. A feature of the model is early identification and intervention via the delivery of targeted allied health support to children with developmental delays and disabilities. There are many services in our network with children who can benefit from provision of early intervention supports whilst attending ECEC. The demand on early intervention services Australia wide is

unprecedented, far outstripping supply. Consequently, children are not receiving the supports they need to make progress. Centres can support their children and families by offering Allied Health Services in their early learning environment, supporting their NDIS plan goals, and supporting families through the Early Childhood Approach to access the most appropriate supports to improve child outcomes and development. Our continued analysis shows that many children are on or are eligible for funding through the Early Childhood Approach billable through the NDIS. This service aligns with the NDIA objective of children with developmental delays and disabilities having the opportunity to thrive in the settings where they usually spend time and provides families with an accessible, convenient service that aligns with family life and workforce commitments.

3) *Family Connections program*

At the heart of our social inclusion strategy is our foundational social inclusion professional development program, *Family Connections*. We have partnered with allied health professionals and other support agencies to develop and deliver this unique program to enhance outcomes for children and their families in vulnerable circumstances. It is delivered over a 12-month period to centre directors and educators and includes a monthly face-to-face professional learning session, additional on-the-floor coaching in centres, facilitated centre team meetings and mentoring for centre leaders.

Family Connections aims to strengthen practice and relationships between educators, children and families by focusing on their strengths, resources and aspirations to generate improved child outcomes. Importantly, the program supports centres in building connections with community services. The program covers topics such as leading change for children, attachment-based practices, enhancing communication, social, emotional, sensory development and play, partnerships with families and community links.

3) *Inclusive Practices Program*

The Inclusive Practices Program is a reflective learning experience to enhance educator knowledge and skills to better support children with additional needs and ensure they have the learning and outcomes they need for school and life. The program consists of a series of interactive webinars offering professional development for educators working directly with children with additional needs and covers topics on autism, communication delays and disorders, developmental delays, children at risk and provides tools to support inclusion, early identification and early intervention.

The program aims to support educators to increase understanding and knowledge of working with children with a range of additional needs, providing practical strategies to better support children in early learning settings.

The program was developed in response to the national inclusion consultation at Goodstart where educators told us they would benefit from and welcome professional learning, tools, and resources to assist them to better support children.

4) *Intensive Individual Support Plans (IISP)*

For children with the highest need for support to ensure their inclusion, Goodstart offers an Intensive Individual Support Plan for a period of 12 weeks to work on specific goals. Typically, these plans will be approved for children who experience barriers to inclusion due to complex needs or disabilities and/or complex trauma related behaviours. An IISP includes:

- Case management and close monitoring of progress
- Centre wide training specific to the child's and centre's needs (for example trauma, attachment, sensory processing etc)
- An out of ratio 1:1 educator working directly with the child
- Weekly mentoring for the educator by the Allied Health Lead

Goodstart supports up to 90 IISP's per year at a cost of \$10K per plan on average. In all cases where an IISP has been implemented, children have been successfully included in their early learning program.

5) Increasing Access and Participation

The research tells us that the children who would benefit most from early learning are also the ones most likely to miss out. We also know that children who start behind, stay behind. To support some of our most vulnerable children, Goodstart employs Family and Community Engagement Workers (FCEWs) in Victoria, SA, NSW and Queensland (with some government funding) to support children and families to access early learning. Our FCEWs, address barriers to access and create a warm entry to early learning for families who may otherwise never connect. They provide outreach for families, connect with external services, support social inclusion and upskill existing centre teams around the support needs of the child and family.

Through this program, centre teams are working closely with very disadvantaged families around their child's needs, and have engaged medical and allied health professionals to support development and wellbeing, where required. Families are also supported to access Child Care Subsidy, Additional Child Care Subsidies and other support funding.

6) Early Learning Fund (ELF)

Goodstart and Uniting NSW along with The Benevolent Society have partnered together to establish the ELF to help improve access to quality early childhood education and care by removing cost as a barrier and supporting children's participation early learning.

The ELF offers scholarships to Indigenous children, refugee and humanitarian entrants, families in hardship and children at risk of abuse and neglect. In 2022, the ELF supported over 900 children to access early learning. A recent evaluation demonstrated statistically significant results demonstrating the children receiving the ELF enrolled for more days, attended more regularly and had significantly less early exits than comparison children not receiving the ELF.

3.0 Supporting Aboriginal and Torres Strait Islander children at Goodstart

1) Reconciliation

We are deeply committed to reconciliation, and we are focused on creating employment opportunities and forging stronger employment pathways for our First Nations Peoples. In July 2014, we partnered with Reconciliation Australia to develop our inaugural Reconciliation Action Plan (RAP). Since then, 100% of our centres have started their

journey to develop a Reconciliation Action Plan for their own communities and nearly half of these are published by Narragunnawali. We also now have a Goodstart Stretch RAP 2020 – 2023.

2) *Internships*

In 2015, Goodstart partnered with CareerTrackers, a non-profit organisation established to support Aboriginal and Torres Strait Islander university students to successfully complete their tertiary education. The non-completion rate of tertiary education for First Australians is significantly higher than that for non-indigenous Australians. CareerTracker's aim is to significantly increase rates of qualification completion and support Aboriginal and Torres Strait Islander Peoples into sustainable employment.

Goodstart is the first education organisation in Australia to offer these internships in partnership with CareerTrackers and we have grown our intern pool from 3 to 20 interns since its inception. The program has multiple elements, providing support and professional growth to students. Goodstart provides a workplace where students can gain experience in early childhood teaching roles as well as roles in other disciplines within centre support teams.

3) *Community of Practice*

A key part of our inclusive practice is creating culturally safe and welcoming environments. We have implemented an Engaging Aboriginal and Torres Strait Islander Educators Community of Practice program at Goodstart. The Community of Practice aims to increase workforce participation by Aboriginal and Torres Strait Islander people and overcome barriers to Indigenous children participating in early learning. The model enables solutions to be created and addressed locally, aiming to create culturally safe and competent early learning centres, strengthening local community connections and relationships.

We also support cultural safety in our services by training educators, centre support staff and central office staff in cultural competency, using the Arrilla platform.

4) *Fitzroy Crossing educator secondment and cultural immersion program*

In 2016, at the invitation of the Marninwarntikura Women's Resource Centre and the Baya Gawiy Early Learning Unit in Fitzroy Crossing (WA), Goodstart Early Learning entered into a partnership to establish an Educator Secondment and Cultural Immersion Program.

This program is a two-way cultural learning program, which involves Goodstart providing two qualified educators each school term (8 educators per annum) to work at the Baya Gawiy Early Childhood Learning Unit alongside local educators. This enables the Centre to operate with consistent staffing and deliver a high-quality early learning program, to support access for highly vulnerable children and families within a remote, disadvantaged community.

The program in Fitzroy Crossing also highlights the critical importance of two-way learning and reconciliation. For each 12-week period, the participating teachers and educators have a unique opportunity to live, work and become immersed in an Aboriginal community, with the aim of enhancing cultural understandings and practice that can be applied when they return to their own communities.

Over the 7 years of the partnership program:

- Baya Gawiy has maintained consistent child numbers through continuous, qualified staffing.
- The two-way cultural exchange has enabled Goodstart educators to authentically embed practice in their home Centre, strengthen community connections and relationships in their local community and progress their own, and their Centre's reconciliation journey.
- Baya Gawiy educators have gained professional development opportunities through shared collaboration on educational practice and engaged in external professional learning programs, otherwise unachievable due to staff shortages.
- We have demonstrated the power of genuine community partnerships in responding to and delivering on community aspirations for children.