27 February 2023



Dear Commissioners,

Nazareth Early Childhood Centre (ECC) would like to thank the Royal Commission into Early Childhood Education and Care for the opportunity to comment on the recent development of universal 3-year-old preschool. We hope that the following submission supports the Commission in building a detailed and successful model which enables every child and family to thrive.

OUR CONTEXT

Nazareth ECC is part of the wider Nazareth Catholic Community which engages with families – connecting across the whole-of-life journey from newborns and pre-schoolers, to students and into adulthood and the senior years. We are a licensed long day care service which educates and nurtures 100 children a day from the age of 6 months to school age. Our service attracts a financial contribution to support the delivery of our preschool program for children in the year before school. We are currently the only long day care service in South Australia to hold the ACECQA Excellent Rating which recognises the exceptional standard of education and care we provide, and our commitment to strong outcomes for children and families.

The ECC is in a unique place with industry-leading practices. Since 2019 we have amalgamated our preschool and 3-year-old programs to develop what is known in our context as the '3-5 Neighbourhood'. The 3-5 Neighbourhood comprises of two learning spaces, each with 30 children of composite ages from 3 to 5-years-old. We employ a large team of Early Childhood Teachers within each space to deliver high-quality programs; subsequently, our 3-year-old children access two years of a preschool program. We are therefore delighted by the opportunity to share with the Royal Commission our experiences and implications for the delivery of universal 3-year-old preschool.

Furthermore, collaboration is a key priority within our service. All staff at the ECC were provided with the opportunity to reflect upon the guiding questions provided by the Royal Commission. Fundamentally, it was evident that the staff of Nazareth ECC are supportive of universal 3-year-old preschool. This submission encompasses their collective voice and offers various provocations for the Royal Commission to take into consideration.

PURPOSE AND AIMS

We believe that every child should be entitled to access early learning which;

- recognises children as competent and capable beings with rights
- fosters, encourages and nurtures individual strengths
- values children's cultural backgrounds and existing knowledge
- recognises children as global citizens
- supports a strong sense of belonging and wellbeing





Early learning must be delivered using play as the primary vehicle. The Royal Children's Hospital National Child Health Poll (2022, p. 2) shows that over a quarter of Australian children aged 1 to 5-years-old currently use a digital device when playing indoors. Additionally, less than half of Australian children are engaging in daily outdoor play (RCHNCHP 2022, p. 2). As educators, we know that play is critical to development; these current statistics raise cause for concern.

Concern also grew when the rapid review of literature and results (Howells et al. 2022) were examined; particularly when noting the 19 references to 'school readiness'. It is not our role to mass produce children ready for school. Rather, schools must be ready for children. After all, children are entitled to access high quality education that is 'respectful of, and responsive to, their existing competencies' (ECT Research Group 2011, p. 3). By placing emphasis on school readiness, we believe this increases the risk of preschool becoming a top-down approach where education is done to children, not with children; where academics and achievement standards take precedence; where we expect 3-year-old children to be 4-year-old children, and 4-year-old children to be 5-year-old children, etc. Viewing children's early education and care experiences as preparation for school risks losing the value of play. Consequently, we urge the Royal Commission to ensure play pedagogies are embedded the program design for 3-year-old preschool.

The purpose of 3-year-old early learning must be to enhance children's learning, development, and wellbeing so that each individual can thrive and reach their fullest potential. We would argue that a large amount of research displays evidence of improved outcomes for children following participation in high quality early learning and care programs, and that the earlier gains begin to reduce during primary and later education (Howells et al. 2022, pp. 20-24, 34, 39, 52). We invite the Royal Commission to reflect upon this; if these initial points of growth and positive outcomes diminish during the primary years, is that because of early childhood education and care efforts, or rather, is it the result of the formal education schooling system?

It is imperative that the central aims of 3-year-old preschool are grounded by the importance of fruitful relationships as we know that healthy attachments support optimal learning, development, and wellbeing (AGDE 2022, p. 14). Furthermore, we recommend that the preschool aims support children's physical and social and emotional needs. We are advocating that educational programs for 3-year-olds must have a focus on executive functioning and self-regulation as these skills are critical for making healthy choices and impact on positive behaviours (Harvard University 2023). We pair this recommendation with the importance of focusing on physical learning experiences as research highlights the benefits of large body movements and the positive influence it can have on a person's health and mind as it enhances thinking, learning and judgement skills (World Health Organization 2022).

WORKFORCE

We know that there is a strong correlation between highly skilled professionals and the quality of ECEC programs (Manning et al. 2017, p. 10). However, it is no secret that the Early Childhood Education and Care (ECEC) sector is in dire need of workforce reforms. As one educator shared, "we have to address the shortage first before we can deliver 3-year-old preschool."

The National Quality Framework (NQF) Annual Performance Report (ACECQA 2022, p. 11) indicates that in June 2022 15% of long day care services held a staffing waiver, and most of

these were in relation to the challenge of employing an early childhood teacher. Before 3-yearold preschool is delivered, there must be exponential growth in wages; as one staff member communicated, pay is a "big factor."

As an Excellent service, we recognise that the current Children's Services Award and Educational Services (Teacher) Award do not sufficiently remunerate educators. We therefore provide generous, above-award conditions. However, when reflecting upon the industry we note that 58% of all paid staff receive the award wage (ACECQA 2022, p. 35). Thus, it becomes highly disadvantageous to be employed as a teacher under the Educational Services (Teacher) Award. For a newly graduated teacher in their first year of employment, a few current industry salaries are:

•	Catholic Education South Australia (2020, p. 98)	\$77,165
•	Department for Education South Australia (2022)	\$74,769
•	Educational Services (Teacher) Award (Fair Work Commission 2022)	\$66,396

This displays a minimum disparity of \$8,373! Likewise, as experience and levels increase the gap continues to grow larger. Should 3-year-old preschool be delivered universally and across the variety of ECEC services, the Royal Commission must give attention to the consequences this may have for some ECEC settings. Statistics show that the majority of early childhood graduates continue to seek employment in schools (ACECQA 2022, p. 43). To add to the concern, we could easily envision that should job opportunities increase to support the 3-year-old preschool initiative, teachers will leave the long day care setting in preference for stand-alone preschools as they often remunerate more favourably.

Along with this issue, high value must be placed on amending the current South Australian Teachers Registration Board (SA TRB) protocols and the way they recognise approved teacher education programs. An anecdote from our own service experience proves that unnecessary challenges have led to feelings of invalidation; one employee at Nazareth ECC recently completed their Bachelor of Early Childhood Education (Birth to Five Years) through the Australian Catholic University. Despite her qualification and successfully receiving a contract as an early childhood teacher, SA TRB are currently unable to provide her with her teaching registration. Rather, they require her to submit registration in another state, first receive approval, and then apply for registration within South Australia; two registration process, two separate costs, and completely unnecessary barriers.

Should this be a shared experience of other aspiring early childhood teachers, South Australia will increase the risk of inability to attract and employ early childhood teachers. We implore the Royal Commission to take this into consideration, whilst simultaneously reviewing why Birth to Five Year programs are not valued within our state.

This year, Nazareth ECC has taken a proactive approach to enhancing staff professional knowledge by providing financial support to educators seeking to complete their Diploma of Early Childhood Education and Care. This initiative was enacted after some educators communicated their aspiration to engage in further study, however cost was a personal barrier. Whilst we appreciate that the course is currently supported by the Government of South Australia, we encourage the Commission to consider further support or financial relief for those seeking to engage in a Bachelor of Education which relates to Early Childhood.

DELIVERY AND ADMINISTRATION

The NQF Annual Performance Report (ACECQA 2022, p. 5) highlights 51% of services as 'private for profit'. This statistic increases when specifically reflecting upon long day care services with more than two-thirds of providers falling under this category (ACECQA 2022, p. 4). We believe that the federal government should primarily be responsible for the costs associated with 3-year-old preschool. However, should this come to fruition, the way in which 3-year-old preschool is delivered must give consideration to equitable access for all children in ECEC. If most long day care services are privately owned and operate for profit, we pose the risk of children aged 0-2 years being unable to access ECEC as older children may be prioritised given the assumption that funding will be attracted. To avoid this, we encourage the Commissioners to reflect upon Carla Rinaldi's time as the Adelaide Thinker in Residence and her recommendations for re-imagining childhood; specifically, the recommendation towards developing an integrated early childhood system from birth to age 6 (Rinaldi 2013, p. 43). Ten years ago, Carla Rinaldi (2013, p. 44) challenged us to think differently and redesign learning groups for children 0 to 3 and 3 to 6-years-old in order to create a sense of belonging and promote continuity of learning. Unfortunately, we have not seen great reforms in this space; the development of 3-year-old preschool provides us with a new opportunity to stimulate change.

In reference to 3 and 4-year-olds, the review of literature and results states, 'they grow from being highly dependent on adults to becoming active participants' (Howells et al. 2022, p. 6). We encourage the Royal Commission to avoid affirming this deficit image of the child when developing the 3-year-old preschool program design. A young child is not merely a passive being; and if we believe they are, then at what age does one 'qualify' to be considered as an active participant?

Children actively seek to understand the world around them from the moment they are born. They have the right to do so. Furthermore, Article 12 of the United Nations Convention on the Rights of the Child (UNICEF n.d.) reminds us that 'children have right to give their opinions freely on issues that affect them'. It is therefore imperative that we gain children's perspectives on the provision of 3-year-oild preschool to inform future directions. In doing so, this supports our belief of the competent, capable child as an active citizen.

Whilst this comment within the review stimulated robust conversation, we do agree and acknowledge that developmental milestones between 3 and 4-year-old children differs greatly. To support these varying needs the delivery of 3-year-old preschool must force the government, regulatory authorities, and organisations to reflect on current ratio requirements.

Within our own context, since the conception of the 3-5 Neighbourhood we have noticed a significant increase of children with continence care needs as a growing number of children aged 3-years-old and above require ongoing nappy changes and 1:1 toileting support. Whilst this can be developmentally appropriate, 'most health professionals recommend toilet training a toddler between 2-3 years of age' (Continence Foundation of Australia 2022). Thus, when a child embarks on this journey at a later age, it can cause strain to educators and have negative impacts on the delivery of the educational program. The Australian Government Department of Education (2020) also outlines toileting requirements as a barrier to inclusion, yet currently it does not independently qualify for additional funding.

Whilst we believe the Royal Commission should place emphasis on staffing to support continence care, the delivery of a 3-year-old preschool program must also account for appropriate infrastructure and equipment. As a non-for-profit service, we made the investment to engage cabinet makers to create a purpose-built change table area fit for children with lengthier bodies as store-bought options were often marketed at young infants and toddlers and posed risks to children and staff manual handling processes. Whilst we independently made this decision, we are conscious of the latest reports which highlight that the most frequently breached sections and regulations of the National Law and Regulations continue to relate to the upkeep of premises, furniture, and equipment (ACECQA 2022, p. 10). The upkeep of these things requires financial investment. If services are already struggling to maintain the resources they already have, the Royal Commission needs to consider who else will be primarily responsible for funding the infrastructure required to accommodate 3-year-old preschool.

CONCLUSION

The United Nations Convention on the Rights of the Child (UNICEF n.d.) clearly states, 'every child has the right to an education'. We therefore strongly advocate for universal 3-year-old preschool and look forward to the great possibilities and outcomes such an initiative may offer children and families. We hope that our submission has provided the Royal Commission with an understanding of the current climate and actions needed to ensure a fruitful commencement of 3-year-old preschool in 2026.

Yours sincerely, Natasha Walc



On behalf of Nazareth Early Childhood Centre

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