



**Early Childhood Australia**  
A voice for young children

Submission to the Education and  
Employment References Committee  
Inquiry on Quality and Safety of Australia's  
Early Childhood Education and Care System

Early Childhood Australia

October 2025

EVERY  
YOUNG  
CHILD IS  
THRIVING  
AND  
LEARNING



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VISION:  
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## About us

Early Childhood Australia (ECA) is a not-for-profit, membership-based organisation that was first incorporated in 1938. As the national peak body for young children, we work nationally and locally, with active State and Territory Committees in each Australian jurisdiction and a National Board of Directors.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school. Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight.

ECA acknowledges the unique place of Aboriginal and Torres Strait Islander peoples in our society, the past and current injustices and realities for Aboriginal and Torres Strait Islander peoples across Australia, and the enduring strength of their cultures and identities. We commit to being at the forefront of achieving a reconciled nation that values, respects and celebrates Aboriginal and Torres Strait Islander ways of knowing and being.

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

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## Acknowledgement of Country

Early Childhood Australia acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land and community. We pay our respect to them and their cultures, and to the Elders both past and present.

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# 1.Executive Summary

Early Childhood Australia (ECA) thanks the Committee for this opportunity to contribute to the *Inquiry on Quality and Safety of Australia's Early Childhood Education and Care System*. As the national peak for early childhood, and with a vision of *every young child thriving and learning*, we are well-positioned to provide commentary on the current state of early childhood education and care (ECEC) in Australia. We would welcome the opportunity to provide more expansive comments, as is helpful, drawing further upon our excellent State and Territory Committees and our national membership that includes educators, service leaders, provider organisations, training providers and researchers.

The paramountcy of children's safety, rights and best interests as agreed by Australian Education Ministers at the recent Education Ministers Meeting provides a powerful lens by which to guide and interrogate proposed early childhood reforms.<sup>1</sup> ECA believes that there are considerations in how this paramountcy can be actioned across the sector. ECA's proposed *provider commitments to quality and safety* is one such example, whereby such a mechanism could better articulate and provoke positive change and rebalancing of the provider mix and their obligations, particularly in the presence of a system steward.<sup>2</sup>

Presently we do not have a coordinated system of early childhood education and care, instead we have a 'market' that has relatively low entry requirements, no control over supply and a regulatory framework that has not been able to keep pace with sector growth and technological change. While there are very high-quality services in the market, there has also been market failure with too many young children experiencing harm due to poor practice.

In a paper written to inform how we renegotiate who provides early childhood education and care in a mixed or hybrid sector where many of the providers are for-profit, Professor Paul Leseman recommends creating a social market with an overarching social mission, goals and required corporate responsibility, collaborative network behaviour and professional performance.<sup>3</sup> Essentially this means changing who can operate in the market to ensure only organisations or companies that commit to values-based governance, transparency and a genuine commitment to quality (including capped or moderate surplus or profit taking) are given a social license to operate subsidised service delivery.<sup>4</sup>

We are cognisant of our early childhood colleagues who work within the current arrangements. ECA continues to champion the early childhood profession, the professional status of early childhood educators and leaders, the importance of their work, and genuine improvements to pay and conditions to bring long awaited parity with similarly qualified colleagues in other parts of the education system (such as primary and secondary educators). The early childhood workforce is key to quality, key to children's safety and effective safeguarding, and in the provision of ECEC that enables positive outcomes for children's learning,

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<sup>1</sup> Clare, J. et al. (2025). *Press conference, Sydney*. [Transcript]. <https://ministers.education.gov.au/clare/press-conference-sydney-6>

<sup>2</sup> Early Childhood Australia (ECA). (2025, August 8). A commitment to put children first – Putting the rights of children first in all decision making within early childhood service provision [unpublished]. ECA.

<sup>3</sup> Leseman, P. (2021). Governing a privatised marketized 'hybrid' ECEC system: Risks and opportunities of a social market approach to educational governance. Utrecht University for Goodstart Thought Leaders.

<sup>4</sup> Early Childhood Australia (ECA). (2025, September). *Submission - Inquiry into the Children (Education and Care Services National Law Application) Amendment Bill 2025*. <https://www.parliament.nsw.gov.au/lcdocs/submissions/92123/03%20Early%20Childhood%20Australia.pdf>

development and wellbeing. We must back the early childhood workforce, many of whom feel deeply the betrayal of trust to the children and families affected.

A genuine concern for ECA is that the sector continues to lose knowledgeable and experienced early childhood professionals, but this is further escalated by the current narrative of poor practice and the loss of public confidence. While Australian governments and the sector work through changes, the way in which the sector is spoken with, and about, is important. The language used by government, the media, and others does matter, and it matters to current and prospective early childhood professionals. Acknowledging the excellent work that occurs every day in quality ECEC services across the country, and of different provider and service types, is important also for recruitment and retention of our early childhood workforce. This of course, does not preclude the instatement of changes that better keep children safe, and build durable capability and quality in every part of the current sector. ECA puts forward the *How to talk early childhood education and care* resource as an example of a positive intervention to shift the negative discourse so impacting our early childhood colleagues. This revised resource having been championed by the NSW Department of Education, and the accompanying *How to talk outside school hours care* by NOSHA, now has the endorsement by Australian governments as a preferred terminology guide.<sup>5</sup>

Please note the revised addition is not yet publicly available, but attached as an appendix to this submission.

Early Childhood Australia (ECA) is deeply committed to continuing to work with Australian governments and the early childhood sector to address gaps and shortcomings in the arrangements currently in place, as we move towards the early childhood education and care system Australia's children and families deserve. Please find commentary addressing the Inquiry Terms of Reference to follow.

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<sup>5</sup> Early Childhood Australia (ECA). (2025). *How to talk early childhood education and care*.  
<https://www.earlychildhoodaustralia.org.au/our-work/how-to-talk-about-ecec/>



## 2. Response to the Terms of Reference (TOR)

### 2.1 Health and Safety of Children in Service Settings

Early Childhood Australia (ECA) assert that the health, safety and wellbeing of children is fundamental to any provision of early childhood education and care services. The recent Wheeler Report from the New South Wales Parliamentary Inquiry, the Victorian Rapid Child Safety Review, and the agreement at the recent Education Ministers' Meeting have articulated a paramountcy for children's safety, rights and their best interests in early childhood settings.<sup>6 7 8</sup> ECA supports this paramountcy, having completed some early work on what this may look like as a commitment for providers, from governance to everyday practice, where consideration of children's safety, rights and best interests are foregrounded in every decision.

What we have seen reported in the recent and devastating stories of child harm, maltreatment and alleged child sexual abuse, is completely unacceptable. Every child should be safe within early childhood settings, and families and the community should be able to reasonably expect that children's safety and wellbeing is assured, not by chance, but with systematic, consistent guardrails. Confidence in the sector has been shaken amongst families, community and members of the public. It is fair and reasonable to expect:

- that effective, consistent and vigilant safeguarding is in place for children in every service and provider type across the sector, regardless of geographies,
- that children's learning, development and wellbeing is positively impacted through their engagement in high quality early childhood education and care (ECEC), and,
- that the people who are entrusted with children's education and care, from governance to sandpit, right through from provider, service, to within the learning environment and working with and alongside children, are appropriately qualified, skilled, principled, ethical, and understand and enact their obligations, always ensuring that children's safety and wellbeing is not compromised.

ECA acknowledges the targeted measures announced by Education Ministers, including: A national educator register, mandatory national child safety training for the early childhood workforce, a national trial of CCTV in up to 300 services, more unannounced spot checks, and other responses.<sup>9</sup> ECA in its advocacy is keenly focussed on strengthening quality and safety across the early childhood sector, with particular emphasis on supporting professional practice and recognising the role of educators in keeping children safe. We would like investment in higher staffing levels, resources to help services embed the Child Safe Standards and better access to professional learning in child safeguarding. We support a National Register for Educators and strengthening the working with children screening mechanisms as important steps to preventing child sexual abuse perpetrators from gaining access to young children. At the same time, we recognise that

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<sup>6</sup> Wheeler, C. (2025, May). *Early childhood education and care regulation in NSW independent review*. [https://education.nsw.gov.au/content/dam/main-education/about-us/strategies-and-reports/media/documents/Final\\_Report\\_-\\_Early\\_Childhood\\_Education\\_and\\_Care\\_Regulation\\_in\\_NSW\\_Independent\\_Review\\_-\\_May\\_2025.pdf](https://education.nsw.gov.au/content/dam/main-education/about-us/strategies-and-reports/media/documents/Final_Report_-_Early_Childhood_Education_and_Care_Regulation_in_NSW_Independent_Review_-_May_2025.pdf)

<sup>7</sup> Weatherill, J. & White, P. (2025, August). *Rapid child safety review*. State of Victoria (Department of Premier and Cabinet). <https://www.vic.gov.au/sites/default/files/2025-09/Rapid-Child-Safety-Review-2025.pdf>

<sup>8</sup> Clare, J. et al. (2025, August 22). *Press conference, Sydney*. [Transcript]. <https://ministers.education.gov.au/clare/press-conference-sydney-6>

<sup>9</sup> Clare, J., & Walsh, J. (2025, September 1). *More information for parents on their children's child care centres*. [More information for parents on their children's child care centres | Ministers' Media Centre](#)

ensuring safety within services lies in adopting good practice and equipping educators with the skills they need to work effectively in teams.

We acknowledge the majority of early childhood professionals who are dedicated to the children and families they work with every day, and the quality providers who demonstrate their commitment to children through high-quality policy and practice. We continue to platform practical ways that can back in support for the early childhood workforce across service types, and thoughtful systemic reform that addresses gaps and vulnerabilities with current regulatory arrangements.

The vast majority of early childhood professionals working with children and families are ethical and principled. We also know that there is a need to build capability in parts of the sector to ensure that every educator understands not just their responsibilities and obligations, but also feels able and confident to advocate for, and work to ensure, children's safety, rights and best interests, and respond effectively when these are put at risk. We are interested in engaging in discourse around, and contributing to, establishing and sustaining child safe culture in all early childhood services, and further exploring proposed measures such as the trialling of CCTV and what this means in-service for children, families, early childhood professionals, services and providers.

In our work to support capability uplift, we brought together experts we know and trust to form the ECA Rapid Response Taskforce to produce resources for educators and service leaders.<sup>10</sup> Expert partners in the Taskforce include: Act for Kids, Bravehearts, the National Centre for Action on Child Sexual Abuse, Samantha Dellamarta, Nicole Talarico, and Catharine Hydon. ECA is cognisant of where there are specific vulnerabilities or knowledge and practice gaps in the early childhood workforce. This may include new leaders working up, graduates, trainees, student educators, and early childhood professionals without access to reliable and current professional learning and training. Such an example was provided by an ECA Member who told us that,

*'As a TAFE assessor, I visit many services. I am noticing high proportions of trainees and an increasing number of services with mainly working towards educators. Students are not being mentored/supervised by adequately qualified and experienced persons which is compromising the safety of children.'*

ECA is keen to undertake further work to better define reasonable expectations of student educators and trainees so that there is clarity on what sort of responsibility as they progress towards being qualified; and that they are not positioned where they may inadvertently cause harm to themselves or others, most particularly the young children who they work with.

ECA's State and Territory Committees reinforce the importance of responsive and well-resourced inclusion support, including professional learning and capability uplift to ensure that every ECEC service, including those non-centre-based are inclusive settings with a preparedness. More specific professional learning and support around individual child needs was also highly valued.

Additionally, ECA Committees expressed that:

- New regulations for centres in the ACT for outdoor space are a good start in ensuring children have access to nature and space to support health and development.

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<sup>10</sup> Early Childhood Australia (ECA). (2025). *Children's safety and safeguarding in early childhood settings*. <https://learninghub.earlychildhoodaustralia.org.au/childrens-safety-and-safeguarding-in-early-childhood-services/>

- There would be value in looking the at process of engaging with inclusion support to make it more accessible and user-friendly. Current set up often creates a barrier, which is the opposite of what we need for children's health and safety.
- Consideration of group (or classroom) sizes to support better relationships, supporting health and safety [is important].
- Health and safety (Child Protection, Wellbeing, Nutrition, Movement) needs to be part of all qualifications to work in ECEC, and done before going on placements.
- In the Outside School Hours Care sector, most providers work on a minimum 2-person with eyes on each child model – this should be mandatory across services.

## 2.2 Effectiveness of the Regulatory System

Early Childhood Australia (ECA) has long advocated for better resourcing for the regulatory authorities. Additionally, ECA believes that costing comprehensive and effective regulation would better enable an informed understanding of the quantum of funding required by Australian governments to more adequately resource regulatory authorities.

ECA understands that in areas of oversupply, regulatory authorities are undertaking their regulatory activities across steadily increasing numbers of ECEC services, thus stretching the regulatory resources (i.e. the number of children may be much the same, but they may be dispersed across a larger number of services). This also impacts the capacity of the regulatory authority to undertake its activities, and the nature and frequency of interaction with ECEC services. ECA would argue that a relational and educative approach with frequent touch points with ECEC services would be ideal, particularly when coupled with the powers of the regulatory authorities. The assessment and rating process should capture the actual everyday practice of services, and with regular interactions, and the notion of a service 'borrowing' a rating from a previous provider or staffing mix, could be better addressed.

An ECA Member speaking of the regulatory authority in their jurisdiction said that,

*'I believe [the regulatory authority] work hard to monitor the sector, in [jurisdiction] they make a commitment to enter every service, every year to complete a 'spot check' which is promising. That said they are considerably behind on the A&R process, some services have not been accessed in 6+ years which is concerning. In addition, I do question sometimes what an 'assessors' idea of what 'quality' is some of the stories I hear and from my own experience there is much inconsistency in this space. In addition, were approved providers are not at least 'meeting' the standard in their current services how can they pass the test of 'fit and proper' to open more services. The regulatory authority needs to have greater powers to withhold service approvals.'*

Additionally, ECA's State and Territory Committees told us that,

- Greater resourcing is needed so that the system can be more supportive and collaborative in maintaining and improving quality.
- Canberra's strong professional relationship with the regulator serves as a model for sector-wide collaboration and quality improvement in early childhood education and care. Regular sector meetings, where providers, educators, and regulators come together, play a critical role in sharing expertise, discussing real-world challenges, and fostering best practice across the ACT. Further detail of this model can be provided on request.



## 2.3 Provider Compliance

Early Childhood Australia (ECA) believes that it is reasonable that providers demonstrate not just compliance with the quality standards and legislative requirements, but also a commitment to continuous quality improvement and good practice. One of the challenges in regulating for quality is ensuring that minimum compliance requirements are not adopted as 'standard practice' but rather serve as a safeguard below which we should never drop.

As an example, the staff-to-child ratios in the National Law and Regulations should not be taken as a guide to the staffing footprint, but instead a minimum compliance level that must not be breached while regular staffing levels should be higher. Varied interpretations mean that in services, we can see vastly different practices, which deliver varied experiences for children, their safety, and learning, development and wellbeing outcomes, all while 'complying' or appearing to 'comply' with the National Law and Regulations. Clarification is needed to assert that active and effective supervision that supports children's learning as well as their safety relies on staffing above minimum ratio requirements. The 'under roof ratios' was a flexibility afforded to services in recognition that educators need to be able to take short breaks and work across the service – it was not intended that this would be used to under staff services and leave groups of children with an educator working alone.

Through ECA's input into the consultation for the Service Delivery Price (SDP) Project, we have put forward the view, as with many others in the sector, that this work should look to cost high quality provision in different provider and service types, and different geographies – that the 'standard' costed should be Exceeding the National Quality Standard. We suggest that the Project should work to cost not the 'market' we have, but the 'system' we are working towards, and no less than children, families and communities deserve.

ECA members said that additional guidance at provider and service level was important regarding what information and data could be reasonably provide, without breaching workplace laws and regulations, and associated protections granted to the individual. An ECA Member shared,

*'Safety of children is obviously our highest priority...As an organisation, when we receive requests for information on Team members, which we can supply "voluntarily" our lawyers insist that we do not provide any info unless we get an official s215 notification. If we do not get this, and we provide information about team members, then [the provider] could be in breach of the laws around Privacy and Confidentiality. We urge all Providers to consider this in their work with [the regulatory authority]. The power imbalance often causes a quick and stressed response, and this is not within the law.'*

Another ECA Member expressed that,

*'There are serious concerns here...When out in the sector I witness non-compliance in many areas, in particular hygiene, adequate supervision and inappropriate discipline. The lack of quality is clearly visible with many prioritising profit over quality, for example one large provider complete a number check every 15 minutes in order to release staff to minimise expenses. The loophole in the regulations of 'actively working towards' qualifications also impacts as technically 50% of the workforce can be working towards Diploma and 50% working towards cert III which technically means that you can legally operate a service which basically only has half the staff cert III qualified which is a huge concern.'*

## 2.4 The Impact of Employment Practices

The employment practices of service providers have an impact on quality and safety within their own service settings but also across the sector as a whole. While the National Law and Regulations set out provider obligations, there are of course differing interpretations and approaches of this and how ECEC is provided to children, families and communities. Where we see stable staffing teams, a strong footprint of knowledge and experience in leadership and practice positions, effective induction procedures and accompanying workplace practices, including professional learning and upskilling, we are more likely to see a durable culture of child safety. This does not preclude however the necessity for an everyday vigilance to be foregrounded into the operation of ECEC services from its effective governance, right through to careful rostering and supervision practices that set the tone for children's safety and a culture of safeguarding where children's safety is everyone's business.

Where ECEC services are stood up as 'incubators' for investment and subsequent turnover, or where a frequency in turnover is evident, higher staffing churn is likely, and together this works against quality and children's safety. It also increases the work for the regulatory authorities with the necessity to respond to what can be red flags. Conversely where we see ECEC services operating with stability, good back-end support, and adequate resourcing where viability is an enduring issue (such as regional, rural and remote services), we see ECEC services able to build and layer capability over time. For regional, rural and remote services, additional complexity exists, where even quality providers and employers can face significant and enduring challenges to quality provision as they operate with tenuous viability. Factors such as the additional cost of delivery, lower or fluctuating numbers of children, lack of qualified educators, and a lack of affordable housing for rent or purchase are all examples. ECA would be very happy to provide more expansive commentary here.

When we asked our ECA State and Territory Committees around quality and safety, they also told us that:

- All prospective employees in education and care should undergo a police check prior to employment, as mandated under national and state legislation for working with children in Australia. Including explicit safeguarding questions at both pre-screening and interview stages creates a culture of vigilance and places child safety at the centre of recruitment practices. Reference checks further verify an individual's suitability and safeguarding questions should be included to verify suitability to be working with children and this should be a person that has previously managed the applicant (e. g. To your knowledge has the applicant been involved in any investigations/mandatory reporting concerns?).
- The introduction of a national child register managed by ACECQA is a significant development, and it will be closely watched by the sector to see how effectively it enhances safeguarding in early childhood education and care. The aim of such a register is to improve tracking and oversight of critical safety and wellbeing information about children, supporting early intervention and consistent protection across all services.
- Employment practices most definitely have an impact on quality and safety – lower ratios, smaller class sizes, higher qualifications all been shown to have benefits to quality and safety.
- ECTs in the 0-3 space – we keep speaking about the importance of these years for brain development but still insist the most qualified staff are with pre-schoolers. Why is this?

## 2.5 Remuneration and Workload

ECA has long advocated for improved pay and conditions, professional status and career pathways for early childhood professionals. While improving, remuneration levels remains an enduring deterrent to attract and retain early childhood professionals – particularly for those with Diploma and Degree qualifications. Where comparisons are made to education professionals working into other education contexts, such as primary and secondary schools, we see not only significant differences in pay and conditions, but also professional recognition and status. If we want to attract and retain high quality early childhood professionals, we simply must provide parity. The investment into current initiatives to improve educator pay and conditions across the sector is welcome, such as the Worker Retention Payment and the Gender Undervaluation Priority Review of Fair Work Australia.

ECA encourages Australian governments to continue working to a system view, where the whole ECEC ecosystem is considered, and the remuneration and conditions of early childhood professionals better reflect the complexity and responsibilities of their work, their qualifications, knowledge, expertise, and experience. ECEC is both education and care, and early childhood professionals do important work in the education sector, that provides, with the home learning environment, the foundation for what follows for Australian's children.

Recognition of early childhood professionals who are qualified as Early Childhood Teachers with nationally consistent teacher registration and access and support to achieve Highly Accomplished and Lead Teacher (HALT) status with its financial recognition should remain a priority. An ECA member said that,

*'An anecdotal issue I see is that the quality teachers often move up into roles out of the classroom as career progression – having similar compensation for roles within the classroom would support keeping quality teachers with children.'*

Consideration should also be given to the design of the National Educator Register in what it can afford and deliver as a return to early childhood professionals, performing the dual functions of an important safeguarding mechanism and also as a mechanism to support upskilling and career progression.

In addition, recent examples of educators perpetrating alleged abuse of children in early childhood settings has highlighted examples of people working across multiple providers and moving on quickly when questions are raised. There have also been allegations of services opting not to report concerning behaviour to reportable conduct schemes or deeds with non-disclosure clauses to move people on without risk of industrial action. This does not serve the sector overall or the profession, or protect children across settings. ECA believes there is value in supporting employers to engage more effectively with systems to prevent potential perpetrators from remaining in the profession. There may also need to be Fair Work exemptions that support employers to act on the basis of risks posed to children.

ECA's State and Territory Committees put forward additional commentary around pay, conditions and professional recognition:

- Uncertainty around the Worker Retention Grant beyond the two year timeframe is concerning. Services have had to operate with a capped period for fee increases. The government's worker retention payment scheme, offering a 15% wage increase over two years (10% in the first, an additional 5% in the second), was intended to support educator pay while limiting fee growth for families. Concern in the sector after the two years and the impact on staff and families.

- The Worker Retention Grant's slow approval process and lengthy application forms have contributed to staff discord in early childhood education settings across Australia. Many providers report significant delays in grant approvals, resulting in anxiety and frustration among educators who are waiting for promised wage increases and support payments. The complexity and time-consuming nature of application paperwork has also placed additional administrative burdens on services, diverting resources from core staffing and educational activities.
- Prolonged uncertainty around these payments not only affects morale and workforce stability but risks undermining recruitment and retention at a time when the sector is already struggling with staff shortages. Streamlining application processes and improving communication about approval timelines would help restore confidence and support a more positive and stable working environment for early childhood professionals.
- Recent revelations about safety concerns in early childhood education and care have highlighted the urgent need to address how educators, especially those working with vulnerable children are compensated and supported. Research consistently shows that higher pay, better working conditions, and robust professional development are directly linked to safer, more stable, and higher-quality care environments.

## **2.6 Potential Role for Incentives**

Early Childhood Australia (ECA) is not adverse to incentives for quality private not-for-profit providers, most particularly where the not-for-profit provider may be best suited to delivering high quality ECEC into unserved and underserved communities. However, due diligence must still be undertaken to ensure that incentivised NFP activity into persistently unserved and underserved communities is sustained, high quality provision that meets the needs and aspirations of children, families and communities.

Concerns from ECA members were cited where workforce incentives were used to attract a prospective workforce; that where applied, retention could still be poor once the terms of the incentive had concluded. This particularly the case for regional, rural and remote. There was an endorsement for also investing in the local workforce with consideration of additional supports specific to the context, such as lack of and/cost of housing. ECA would be happy to provide more comprehensive commentary as required.

## **2.7 Transparency, Information and Data Sharing**

Early Childhood Australia (ECA) supports greater visibility for families to better enable their decision-making about the ECEC provision that they choose and maintain for their children. Current, up to date and accessible information is needed including recency in the assessment and rating of compliance and quality. Families need to be able to trust in the accuracy and completeness of publicly available information, and we argue that there is work to be done also in asserting the authority of this information above other less reliable or dubious sources, such as alternative rating schemes made available through unverified online platforms and apps.

ECA believes that timely and accurate information around non-compliance is important, particularly where compliance breaches are serious and have, or have the potential to put children at risk of harm. That said, the privacy of children and families should never be compromised, and early childhood professionals should be allowed the process afforded to them by the National Law and Regulations, and relevant industrial and workplace law and protections. As a guide, ECA believes that any additional release of information into the public domain should particularly not do further harm to children, and their families, and again the paramountcy of children's safety, rights and best interests should be the guide.

There are concerns from ECA's members around whether greater access to the plethora of information and data available, may confuse or obscure what warrants the greatest attention. Potential unintended impacts also on what transparency may look like have been raised. One ECA member said,

*'I'm supportive of additional transparency as long as it is clear which Provider was in charge of a service at the time of a breach, for example. When OSHC services change hands at the end of a contract with a school, it is critical that their record of breaches stays with them and is not transferred to the new Provider (like the A&R result is transferred currently and is 100% not reflective of the work that the new Provider achieves with children) It has a new team, new management and new systems and policy and practices. This is VERY important.'*

## 2.8 Suitability and Flexibility of the Financing Model

Early Childhood Australia (ECA) is happy to expand on commentary provided here, but essentially, ECA has concerns around a lack of coordination and stewardship compounding issues of supply and demand which impact viability of services, and often have very real impacts of workforce, quality and subsequently children's safety. This is particularly evident in areas of over- and under-supply such as areas of high growth in ECEC services, high growth corridors, and regional, rural and remote areas.

In building a Universal System of early childhood education and care, we believe that the following changes to financing are desirable:

- Funding should better reflect the cost of delivery – including the differential costs associated with providing services to children across age cohorts (birth to 3 years is more expensive than 3-6 years or school age provision).
- Funding needs to be both demand driven (to provide an entitlement of access) and supply driven where the number of children is low or variable and services are not sustainable without some form of ongoing operational support.
- Relationships with providers should be long-term and durable – recognising that ECEC is essential social infrastructure - like schools and hospitals.
- Funding should be responsive to community diversity – recognising that communities have different needs and preferences and that costs vary across contexts (eg remote service delivery and high cost housing markets).
- Some children cost more to support – inclusion needs to be baked into service capability but also funding is needed to allow or require services to be responsive to the individual needs of children and families.

It is our strong and considered assertion that where we see persistently unserved and underserved cohorts and communities, a different approach should be carefully considered. Across regional, rural and remote Australia we see well-documented barriers to access, affordability, and viability. It is the view of ECA that greater flexibility in policy and funding, and possibly also regulatory settings should be considered for specifically defined and persistently communities where ECEC remains out-of-reach. High quality provision and effective child safety and safeguarding should not be compromised, but we would suggest that in these specific communities, perhaps quality provision could look somewhat different to meet child, family and community need, whilst still delivering on high early childhood education and care.

An ECA member remarked that,



*'The funding model works for urban services or large regional towns, anything smaller than that doesn't work because 1: we can't find educators to work, 2: there are not enough children attending the services to make them financially viable. I suggest block funding to ensure sustainability of the service, regardless of how many children are attending, and ALWAYS having a minimum 2-person model, then CCS can be used to ensure the quality of that service. The funding needs to be easily secured according to data that already exists, and managed in a way that ensures long term, secure and high-quality relationships can be built with children and their families.'*

## 2.9 Choice and Flexibility

Early Childhood Australia (ECA) holds a view on the mix of models that could be required to better cater for children and families. We know that in areas of greater supply, there is often some choice available to families, however whether this provides an array of provider and service types is not a given. Where we see over supply, impacts on the viability of services are often evident, undermining quality.

ECA has supported and advocated for effective stewardship to ensure that the early childhood ecosystem of different provider and service types, enables and supports the provision high quality early childhood education and care provision. The Productivity Commission's *A path to universal early childhood education and care – Inquiry* report, particularly spoke to the value of a coordinated and systematic approach to where and how ECEC is offered.<sup>11</sup> ECA's work with key stakeholders over time has affirmed the importance of careful and intelligent system stewardship, whether this is the work an ECEC Commission or through another mechanism. What matters most is that provider and service types are complementary to one another, that the location and mix of services does not see a competition for viability in a race of diminishing returns. Instead, we would suggest that careful mapping and stewarding toward an ECEC system and away from the ECEC market, is an imperative. We suggest that opportunities for Australian governments to work through a stewardship agenda should be prioritised, whether this is through a new and more expansive National Partnership Agreement, or as a separate piece of work.

As is well documented, the reality currently for some families is that there is no provision, or an ECEC provision that is not affordable, accessible, consistent, or high quality. For many of these families, it is not yet a question of choice, instead it is a question of securing even one quality option that meets the needs of children, families and communities. We suggest that fixing supply in persistently unserved or underserved communities needs to remain a focus through the national reform agenda. It is particularly in these communities where community consultation cannot be underestimated, and where the 'wrong' or an 'ill-fitting' solution to a dearth of ECEC provision, can delay or preclude the 'right' or a 'better' solution.

System stewardship can enable a rebalancing of the provider and service mix where it is most needed and allow for an informed and responsive approach by Australian governments, which delivers on quality, children's safety and legitimate choice for families.

## 2.10 Any related matters

Early Childhood Australia (ECA) firmly believe that there are a number of mechanisms effectively working in concert to strengthen child safety and safeguarding across the sector, but that the value of qualified, highly

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<sup>11</sup> Australian Government Productivity Commission. (2024, June 28). *A path to universal early childhood education and care – Inquiry report*, Volume 1. Report no 106. <https://www.pc.gov.au/inquiries-and-research/childhood/report/>

effective, and stable education teams are at the frontline of keeping children safe. Investment in the early childhood workforce is a critical piece. Discussions around the value of the use of CCTV, its ethics around the rights of young children and early childhood professionals, potential issues around data safety, and the value of CCTV are very live conversations across the sector, and most certainly by ECA's membership.

An ECA Member commented,

*'When considering child safe practices why are we not ensuring every child receives 'protective behaviours education' this would be a pro-active approach which prevents children from becoming victims of abuse. Protective behaviour training should be the standard for all Educators and should be refreshed regularly. CCTV and child protection are valuable but are reactive strategies, Educators need to know how to empower children to uphold their rights.'*

Careful consideration of quality and safety in different service types (such as in home care, family day care, mobile preschool, preschool/pre-kinder, distance education, hybrid and integrated models, as well as outside school hours care (OSHC or OOSH) is needed. We know that not all ECEC provision takes place in centre-based services, and even where centre-based ECEC does exist there is huge variance in what this looks like 'on the ground'. Working closely with the sector, including peak bodies and providers of all types, and representation by early childhood leaders and professionals, families and their children, communities and their stakeholders, is important to ensure that quality and safety is uplifted in all parts of the early childhood sector, and we do not leave anyone behind.

### 3. Closing Comments

Early Childhood Australia (ECA) is grateful for the opportunity to contribute to the Inquiry. Our vision, *every child thriving and learning*, with our strategic priorities, continues to underpin and guide our work as the national peak body for early childhood. We stand ready and focussed to work with Australian governments and the early childhood sector to bring about positive change where it is most needed, and to acknowledge also the high-quality work of quality providers and the professional early childhood workforce who are of great importance as partners in this work. We would respectfully encourage the Committee to consider how the sector can be engaged with and alongside, as the commitment to children and families is deeply embedded in a strong and proud history of early learning, the dedication of the work today, and the aspiration of a high quality, universal system.

ECA as a national peak for early childhood, with reach across the country, including active, knowledgeable and expert State and Territory Committees, is well-positioned to assist, consult, and as appropriate advise, towards the important work by Australian governments to strengthen the provision of high-quality early childhood education and care across Australia.