

Productivity Commission Inquiry into Early Childhood Education and Care
Level 8, Two Melbourne Quarter
697 Collins Street Docklands Vic 3008

14 February 2024

Re: Submission in Response to Draft Report: “A path to universal early childhood education and care”, Productivity Commission Inquiry into Early Childhood Education and Care (2023)

Dear Commissioners,

Parkville Institute (PI) welcomes the opportunity to provide a submission in response to the Productivity Commission Inquiry into Early Childhood Education and Care’s draft report: “A path to universal early childhood education and care” (‘Draft report’).

PI is an innovative research and practice institute established by Associate Professor Brigid Jordan AM and Dr Anne Kennedy as a not-for-profit organisation in 2021. Parkville Institute’s purpose is to improve the life trajectories of young children living with significant social disadvantage and family stress.

PI is very encouraged by the draft report’s insights and recommendations to build the system of quality ECEC for all children. We commend the report’s focus on the importance of quality ECEC for those children living with significant social disadvantage and family stress, and the importance of addressing the barriers to accessing ECEC that many families face. We fully support the draft report’s recommendation that all children aged 0-5 are able to attend quality ECEC for up to 30 hours a week.

Introduction

Children who encounter extreme adversity in the early years are at risk of compromised developmental, learning and wellbeing outcomes. Deficiencies in cognitive and social skills before the age of five are likely to persist into later life and become the basis of problems such as low educational attainment, unemployment, teenage pregnancy, homelessness, and involvement in crime and an increased risk of physical and mental health problems (Shonkoff, 2012; Campbell et al; 2014). ECEC programs with the capacity to redress significant developmental, learning and wellbeing deficiencies for highly vulnerable children require a new funding approach and a different model of education and care than can be found in current ECEC provision. As the Draft report indicates, mainstream services “may not always be adequate or appropriate for the child” (p. 170).

For children living with significant and multiple vulnerabilities and risk factors, there is powerful evidence of the need for a targeted 'intensive care' ECEC model nested within universal provision, where the structural and process quality elements and the dosage and duration of the intervention are able to redress harms, overcome the effects of trauma, reduce toxic stress levels and enable children to learn in partnership with their families and communities (Shonkoff, 2012). Programs that are designed to provide for the specific needs of children and families experiencing significant family stress and hardship may prevent and reverse children's compromised learning and development and address barriers to their engagement with universal services (Leseman & Slot, 2020; Lord, Southcott, & Sharp, 2011).

There is a tendency in the literature to generalise the benefits of universal ECEC for all children, when the evidence indicates that there are gaps in our understanding of the benefits and outcomes from participation in universal services for both advantaged and disadvantaged children and especially for very young children. Interrogating and interpreting the evidence with rigour is essential for making informed policy and practice decisions (Baker, 2011; Leseman & Slot, 2020).

The Australian ECEC program with the highest quality evidence and most positive outcomes to date, is the Early Years Education Program (EYEP), which was undertaken as a multi-disciplinary Randomised Control Trial by a team from The University of Melbourne's Departments of Economics, Paediatrics and Education and the Melbourne Institute, commencing in 2011 and concluding in 2018 (Jordan et al., 2014; Tseng et.al. 2019). The program was the first of its kind in Australia. The trial and achieved remarkable developmental and learning outcomes for children who received the intervention in the trial, including large and statistically significant impacts on outcomes relating to children's cognitive development (IQ), language skills and social and emotional development.

EYEP was initiated by Kids First, previously the Children's Protection Society (CPS), an independent not-for-profit child and family services organisation based in the north-east of Melbourne which was founded in 1896. The program was designed and implemented by CPS in collaboration with Associate Professor Brigid Jordan and Dr Anne Kennedy.

Associate Professor Brigid Jordan AM and Dr Anne Kennedy established Parkville Institute as a research and practice institute in 2021 and now serve as the Executive Director and the Interim Board Chair, respectively.

The model is analogous with a neonatal intensive care unit (NICU) in the child health service system, and:

- Provides a targeted intervention for a specific cohort of children until they have the developmental and educational capacity to take advantage of the universal ECEC system.
- Requires highly trained, specialist, well supported and committed staff working as a multidisciplinary team to provide optimal education and care for the children and their families.

- Requires a higher level of investment than usual or universal care but the long-term benefits for the children outweigh the initial cost of investment.

PI believes that children who need it should have access to this “intensive care” level of support for the duration required so that the children can transition to universal ECEC or to school, with improved life trajectories as a matter of equity and social justice.

PI is currently funded by the Australian Government, Victorian Government and philanthropy to replicate EYEP with our service partners in three centres, now operating in Wendouree, Victoria, Richmond, Victoria and Strathpine, Queensland. The replication phase, based on implementation science aims to:

- Apply the model in different contexts to test the original findings.
- Evaluate the effectiveness of Parkville Institute’s support to the ECEC centres replicating the model to ensure fidelity, with evaluation being conducted by Melbourne Institute, University of Melbourne who also evaluated the original RCT.
- Identify challenges and enablers of implementation of the model.
- Provide data to inform recommendations for stepped scaling up.

PI is also partnering with Cullunghutti Child and Family Services, NSW, SNAICC - National Voice for our Children and Social Ventures Australia and to co-develop, trial and evaluate an evidence-informed intensive early childhood education and care program, for Aboriginal and Torres Strait Islander children. The co-developed model aims to:

- Build the evidence on Aboriginal community-controlled programs that support strong outcomes in learning and development for Aboriginal and Torres Strait Islander children.
- Inform Federal and State governments on culturally responsive and appropriate policy and funding for Aboriginal and Torres Strait Islander early childhood education and care services.
- Strengthen leadership and workforce capacity in Aboriginal community-controlled services.

Overall Recommendations

The focus of our responses below are based on our experience with a cohort of children and families living with significant social disadvantage and family stress. Evidence from our program shows that there are challenges and barriers to vulnerable children’s enrolment and sustained participation in ECEC services at the interface between government policy and the realities for these families, which we highlight below. We have also commented on universal services at certain times, as that’s where the children in our programs will transition.

1. Funding model

PI advocates for:

- A funding model of “targeted within universal” in which targeted programs exist within the ECEC system. The system should facilitate organisations with expertise and evidence of quality to reach out to disadvantaged groups and provide children from these groups with

compensating high-quality education. We commend and agree with the Draft report goal of universal access and that “universal, however, does not mean uniform. In a universal system, some form of ECEC would be available to all children regardless of where they live, but the mode of provision could differ depending on location and the needs of children.”

- The provision of increased, sustained block funding for Aboriginal Community Controlled Organisations.

2. CCS and ACCS changes

PI recommends changes to CCS and ACCS for children to attend quality ECEC including:

- Removing the activity test.
- Ensuring families with annual income at or below \$80,000 are eligible for a subsidy rate of 100% of the fee, up to the hourly rate cap.
- Using a stewardship model to develop non-siloed approaches between government departments to support families to find and enrol and participate in quality ECEC programs.
- Increasing flexibility in the funding model for services who are working with families living with significant social disadvantage and family stress.
- Extending the interval of time to 52 weeks before services are required to reapply for the ACCS (Child Wellbeing).
- Ensuring Aboriginal and Torres Strait Islander families are eligible for a CCS subsidy rate of 100% of the fee and for the application process to be reviewed and modified to ensure easier and culturally safe access for Aboriginal and Torres Strait Islander families.
- Modifying communication pathways between service providers and Services Australia (as the administrator of CCS) so that service providers can more easily support families to enrol and participate in CCS.

3. Workforce

PI supports recommendations to:

- Grow the number of qualified educators and EC teachers.
- Fund opportunities for professional development and training available to educators.
- Improve the working conditions for educators, especially those working with children living with significant social disadvantage and family stress, including funding for lower ratios and non-contact hours.

Further response continues on following pages

Responses to Draft Report Findings and Recommendations

(in order from draft report, beginning page 61)

ECEC is positive for many children but those who would benefit most are least likely to attend

<p><i>Draft report finding</i> 2.2</p>	<p><i>Children who would benefit most from ECEC are less likely to attend</i></p>
<p>PI acknowledges and commends the Draft report’s focus on children living with disadvantage and the evidence that indicates this cohort is the least likely to be participating in and benefiting from quality ECEC programs.</p> <p>PI notes from our considerable RCT and replication trial experience working with highly disadvantaged families, providing ECEC at no or very low cost for families will not on its own ensure that these families and children will enrol and sustain their participation in ECEC.</p> <p>The families eligible for our program experience:</p> <ul style="list-style-type: none"> • Housing insecurity and mobility due to moving often because of protective orders or getting access to public housing and moving to new location with new community. • Daily challenges with everyday tasks or functioning because of significant health, welfare, mental health, addiction, economic, social problems. • Difficulties engaging in universal ECEC services for a range of reasons including experiencing prejudice or bias from other families and staff, staff lacking experience to respond to their complex issues, language difficulties, staff time constraints. • Food insecurity, which can lead to child malnutrition and lifelong health issues if not addressed by an evidence- informed, fully funded daily nutrition program. <p>PI recommends changes to the referral and support pathways for children to attend, including:</p> <ul style="list-style-type: none"> • Developing non-siloed approaches between government departments for children at risk and with complex needs so that they can attend targeted ECEC programs (for example: stronger networks and communication between government departments of justice, health and wellbeing, family services, education). • Flexibility in the funding model to allow children and families experiencing significant social disadvantage and family stress to build up to full participation in the program (for example: more absences allowed for CCS funding in first six months of program participation). Ensuring sustained participation in ECEC settings for children from families living with the challenges of adversity and persistent distress involves sophisticated, trauma-informed engagement skills and can take many months of work. Sustained participation is essential in order to achieve the intensity and duration of dosage that is needed to redress harms (therapeutic elements) and to educate (pedagogical elements). 	

All children should have an ECEC entitlement

<i>Draft report finding 5.1</i>	<i>All children aged 0–5 years should be able to attend up to 30 hours or three days of quality ECEC a week for 48 weeks per year</i>
<p>PI supports the Draft report’s finding that all children aged 0–5 years should be able to attend up to 30 hours or three days of quality ECEC a week for 48 weeks per year. PI would emphasise the importance of the quality of the ECEC program, and note that poor quality childcare was found to produce deficits in language and cognitive function for young children (Productivity Commission 2014). The PI model provides for participation 5 days a week, and our evidence supports that this builds family and child confidence and capacity to make the commitment to attend, which is important for future school attendance.</p>	

Availability gaps will have to be tackled to achieve universal access

<i>Draft report recommendation 5.1</i>	<i>Support universal access in persistently thin markets via supply-side funding</i>
<p>PI supports the Draft report’s recommendation that the Australian Government should provide additional support in markets, including specific arrangements for Aboriginal Community Controlled Organisations to be co-developed with Aboriginal and Torres Strait Islander communities in partnership with state and territory governments through a stewardship model and in shared commitment to equity of outcomes. Through the process of partnering with SNAICC - National Voice for our Children, Social Ventures Australia and Cullunghutti Child and Family Services, NSW, to co-develop, trial and evaluate an evidence-informed intensive early childhood education and care program, for Aboriginal and Torres Strait Islander children, PI has created a framework to guide as a resource for future co-development projects.</p>	

Availability can only improve if workforce challenges are resolved

<i>Draft report finding 3.2</i>	<i>Accelerated qualifications will help lift early childhood teacher numbers</i>
<p>PI supports identifying accelerated pathways for educators to obtain qualifications. When developing these accelerated pathways, PI would urge the PC to consider the risk that accelerated programs may result in teachers without professional experience within services and ensure that professional experience requirements are included within accelerated programs.</p> <p>PI recommends a national internship approach for EC teacher training with the provision of mentorship and coaching in partnership with ECEC providers in order to support transitioning from student teacher status to becoming a fully accredited or registered teacher.</p>	

<i>Draft report recommendation 3.5</i>	<i>Improve pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications</i>
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PI supports improving pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications. In our experience with the co-developed model, service providers struggle to find appropriate qualified Aboriginal educators, which results in not being able to enrol eligible children to the program. We would recommend that a co-developed process is used when identifying the pathways and solutions for this issue.

<i>Draft report recommendation 3.6</i>	<i>Contribute to professional development for the ECEC workforce</i>
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PI supports the Draft report’s recommendation for Australian and state and territory governments to provide support for the ECEC workforce to undertake professional development activities, including coaching, mentorship and scheduling staff to have non-contact time.

PI’s model is focused on workforce training and professional development with evidence to support these strategies have impacted and improved outcomes. PI believes that professional development, training, mentorship and coaching should be in place to support:

- Highly skilled multidisciplinary senior leadership team with the capacity and time to engage in outreach strategies to families—working with child protection and other family and child agencies and professionals in a community.
- Senior leadership team support staff to be responsive to every family and child.
- Highly skilled EC teachers and educators with the capacity to support family and children’s engagement and enjoyment through a relational pedagogy approach.
- A primary educator model with lower ratios which supports the creation of a ‘safe’ place, and a strong sense of belonging for every family and child.

PI supports scheduled reflective supervision rather than ad-hoc advice to be available to all ECEC workforce. Regular reflective supervision and clinical coaching can teach educators’ frameworks and concepts to understand emotional development, child responses to stress, and the skills to apply these concepts to the individual child. In addition to being taught how to identify behaviours of concern, educators also need support to reflect on how their own interactions with children will increase or reduce the risk of mental health problems, and how they can employ purposeful interactions with a child tailored to assist them to regulate their emotions and behaviour.

PI’s supports the Draft report’s focus for professional development to be targeted at areas where there is clear community benefit in improving workforce capability, such as trauma-informed practice. PI believes that while all teachers and educators need to be educated about the impact of traumatic events on very young children, the training needs to be effective and involve infant mental health input into the individualised pedagogy and curriculum for the child. There has been an explosion in the offering of short (e.g. 2 - 5 days intensive) training ‘packages’ teaching a single intervention method, often imported from overseas. When these are delivered by clinicians with limited skills or experience in child mental health and/or early childhood education, the impact on practice will be limited.

<i>Draft report recommendation 3.7</i>	<i>Improve the ECEC Workforce Strategy</i>
<p>In PI's experience, the lack of suitably trained and experienced workforce is a barrier to centre operations and enrolling children. At some of our centres, there are eligible children waiting to be enrolled, and the centre cannot recruit sufficient qualified educators to meet demand. PI supports improving the working conditions for educators, especially those working with children living with significant social disadvantage and family stress, including funding for lower ratios and non-contact hours. Continuity and consistency of staff is critical for children's mental health and wellbeing especially when they have compromised attachment histories and are experiencing complex home environments.</p>	

Affordability and complexity should not be barriers to ECEC access

<i>Draft report recommendation 6.2</i>	<i>Modify the Child Care Subsidy to improve affordability and access</i>
<p>PI supports the Draft report's recommendation for the Australian Government to modify the Child Care Subsidy to allow:</p> <ul style="list-style-type: none"> • all families to access up to 30 hours or three days of subsidised care per week without an activity requirement • families with annual income at or below \$80,000 should be eligible for a subsidy rate of 100% of the fee, up to the hourly rate cap. <p>PI strongly believes that cost should not be a barrier for the families and children to participate in targeted interventions for children who would significantly benefit from access to high quality ECEC.</p>	

<i>Draft report recommendation 6.3</i>	<i>Make information about CCS eligibility easy to find and understand</i>
<p>PI's experience supports the finding that complex subsidy arrangements can be a barrier for access and in addition, requires significant staff time and resources to support families to navigate the subsidy system.</p> <p>PI supports the Draft report's recommendations for streamlining CCS processes and would support including the Additional Child Care Subsidy (Child Wellbeing) in this work. Our service partners work with families to support them through the CCS application processes, which under the current system can take up to 2-3 hours per family, depending on family's circumstances, language barriers, and other factors.</p> <p>PI supports:</p> <ul style="list-style-type: none"> • Extending the interval of time to 52 weeks before services are required to reapply for the ACCS (Child Wellbeing). Children participating in the PI programs receive ACCS funding in 52-week intervals, which reduces the administrative burden on services and referring 	

agencies. In our evidence, the significant risk factors faced by children are persistent and do not disappear in 13 or 26 weeks. We would advocate that the administrative expenses to reapply for ACCS could be more efficiently allocated to providing high quality ECEC programs for children.

- Maintaining a child’s eligibility for subsidised ECEC when their guardian changes, whether it be permanently or temporarily, for example through family separation or when a parent dies. For Aboriginal and Torres Strait Islander children, informal kinship carers should be recognised carers under the ACCS (Grandparent).
- Reviewing and updating the eligibility of families to access CCS who are currently ineligible due to their visa status.
- Modifying communication pathways for service providers and Services Australia (as the administrator of CCS). Service providers working directly to support families can be a resource to families if there are barriers to enrolment in CCS and when any issues arise. Service providers should be recognised and funded for this type of support and the communication protocols should be modified so that service providers and Services Australia (as the administrator of CCS) can more easily work together to enrol families and work through issues when they arise.

A universal ECEC system has to be inclusive of all children

<i>Draft report recommendation 2.3</i>	<i>Amend eligibility requirements for inclusion funding</i>
<p>PI supports broadening the definition of inclusion to include child factors and family/carer factors, including disability, developmental delay, neuro-diversity, chronic, serious health conditions, risk of serious abuse and neglect, refugee status, childhood trauma, family violence, addiction, serious mental health issues.</p> <p>PI further supports that children living with significant social disadvantage and family stress can be best supported as a targeted cohort within the universal ECEC sector.</p>	

ECEC services should be flexible and responsive to the needs of families

<i>Draft report finding 7.1</i>	<i>ECEC services cater to many children and families, but some families need additional support</i>
<p>PI supports the Draft report finding that while the current system caters for many families, others may require or prefer different approaches to meet their needs or address barriers to access, and some may require additional support beyond ECEC.</p> <p>Evidence from various reports have been used to make the argument for universal childcare for the whole population. PI would urge caution with this approach and refer to research on universal versus targeted approaches. The evidence suggests targeted or cohort-based programs, which have defined quality and processes, seem more effective relative to the costs. Costs-benefits</p>	

analyses reveal a high return on investment of targeted programs. The more targeted (i.e. the higher the risk status of targeted individuals), the higher the return (Reynolds et. al., 2011). PI advocates for an approach of “targeted within universal” in which targeted programs exist within a universal ECEC system. The system should facilitate organisations with expertise and evidence of quality to reach out to disadvantaged groups and provide children from these groups with compensating high-quality education and care. Further, value-based targeted equity policy within a universal ECEC system seems to work as an effective regulator to ensure that compensatory extra quality is provided to those who need it most (Leseman & Slot, 2020).

PI refers to the Draft report: “The benefits from ECEC programs can be greatest for children experiencing disadvantage or vulnerability, while extending more broadly. Services that are accessible to children from a wide range of backgrounds may, as well as reaching more children, be more conducive for the learning and development of each child who does attend.”

PI would disagree based on our experience, research and feedback from families. PI’s model allows for families to participate in the ECEC program as a cohort in a specialised, stand-alone program. Families in our program report they appreciate and see value of this type of customised, specialised, stand-alone program, and further share they felt stigmatised while participating previously in other universal programs. Some of the children in our programs have been excluded from universal programs. This evidence would support continuing to fund cohort-based models for children living with significant social disadvantage and family stress with the aim of transitioning the children into quality universal programs when the harms have been redressed and the children are confident learners.

One of the reasons why PI was established as research and practice institute is to build the replication evidence for targeted programs, and to build understanding of what it takes to go from proof of concept to effective interventions for children living with significant social disadvantage and family stress. This goal is also supported by the Royal Commission into Early Childhood Education and Care Report in South Australia recommendation: “to work with the Commonwealth and other partners, such as philanthropic bodies and research institutions, to trial and deliver intensive therapeutic supports for at-risk children in early childhood education and care, including any further trialling of EYEP model.” (Royal Commission into Early Childhood Education and Care Report South Australia August 2023)

Many Aboriginal and Torres Strait Islander families prefer Aboriginal Community Controlled Organisations

<i>Draft report finding 7.3</i>	<i>ACCOs are well placed to provide early years and family services – but face funding challenges</i>
PI is working with Cullunghutti Aboriginal Child and Family Centre in Nowra, NSW, SNAICC – National Voice for our Children and Social Ventures Australia (SVA) to co-develop, implement and evaluate a new intensive ECEC model for Aboriginal and Torres Strait Islander children. The program is called ‘Boori Milumba’ which means Growing up Strong in the local Aboriginal	

language. The program is evidence-informed, culturally grounded, holistic and responsive to community strengths, aspirations and need. Along with our partners, we have designed the co-development process to acknowledge Aboriginal leadership, expertise and the extraordinary work that Aboriginal and Torres Strait Islander early years services do in developing and implementing high quality, holistic ECEC models for their children, often with insufficient funding to sustain the high-quality standards required to improve outcomes for every child. ACCOs are a trusted and safe resource for ECEC in the local community. We would support increased, sustained, block funding for ACCOs.

In regard to CCS funding, our evidence and experience suggests that some Aboriginal and Torres Strait Islander families find the language confronting and inappropriate, fear of children being taken away by Government if they register and the processes to be culturally unsafe. We have received feedback that some Aboriginal and Torres Strait Islander families in other programs are paying full fees rather than apply for CCS. PI would advocate for Aboriginal and Torres Strait Islander families to be eligible for a CCS subsidy rate of 100% of the fee and for the application process to be reviewed and modified to ensure easier and culturally safe access for Aboriginal and Torres Strait Islander families.

Quality is paramount to achieving the benefits of ECEC

<i>Draft report recommendation 8.4</i>	<i>Incentivise quality provision in new ECEC services</i>
<p>PI supports the Draft report’s insights regarding quality in ECEC at the systems level and would recommend focusing on:</p> <ul style="list-style-type: none"> • Greater focus on Assessment and Rating as a support, and a capacity-building, ethically focused system, and not as a punitive, limited technical approach to achieving quality standards. • Adding more resources to undertake the monitoring and support with a national framework underpinning the application of the Assessment and Rating system. • Reviewing why waivers are tending to become ‘norm’ rather than exception and making appropriate modifications. • Elevating standards given the system has been in place since 2009 but standards remain at a similar level. Raising the quality thresholds supports improved outcomes for children (Burchinal et. al., 2016). • Ensuring standards can be responsive to context (e.g. ATSI services, remote or rural). • Closing gaps in structural quality standards, especially requirements for group size. • Generating quality, robust ‘local’ evidence on the dynamics between structural and process quality elements. • Helping families understand the quality system and how the quality system is enacted in their child’s centre. • Enhancing cultural safety and cultural competence in NQS. 	

- Working with service providers to identify improvements to workforce issues that make achieving quality very difficult (e.g. lack of continuity of staff; over reliance on casual/agency staff; limited access to PD for staff; staff wellbeing compromised; loss of experienced leaders; graduates not ready for role and responsibility).

PI would support additional ‘cohort’ funding (or a Quality subsidy for social inclusion) to be linked services with the following factors:

- NQS rating of exceeding;
- centres run by non-profit organisations;
- a guarantee by the centre not to raise fees beyond cost-of-living rise (or some other appropriate definition); and
- identification of commitment and capacity to engage with and support vulnerable children and families.

A substantial body of research supports that high-quality ECEC is comprised of structure and process elements interacting dynamically. PI would recommend the following criteria guide decisions around funding and building quality ECEC services:

- sufficient learning time;
- low child-teacher/educator ratios;
- well-prepared and well-supported teachers and educators;
- research-based, developmentally, culturally appropriate early learning standards and curricula;
- assessments that contribute to instructional and program planning and which provide evidence of each child’s progression as a learner;
- meaningful family engagement; and
- high quality of buildings and environments.

(Meloy, Gardner, & Darling-Hammond, 2019)

In the PI model, educators have 2-3 hours per day of non-contact time for planning, meeting with families, consulting with multi-disciplinary team members, reflective supervision and professional development. Our evidence supports that this non-contact time drives quality programming and results in improved children’s outcomes.

PI recommends that the ECEC sector would benefit from more focus on what quality means for children under 3 years old, and the provision of training to increase quality of education and care for this age group.

New coordination mechanisms will support universal access

<p><i>Draft report finding</i> 9.1</p>	<p><i>A one-size-fits-all funding model would not be efficient or effective</i></p>
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PI strongly supports a mixed approach to funding that includes providing specific cohorts with additional expenditure targeted to enabling participation among those with higher needs.

Draft report finding 9.3

System stewardship is a missing part of the policy puzzle

PI supports a systems stewardship model, guided by shared responsibility, collective effort, clear understanding of purpose, transparent information, agility, cyclic approach (design, delivery and improvement) (Productivity Commission 2017). PI recommends the goals of the stewardship model to be:

- Remove or reduce barriers to meaningful participation in community.
- Improve choices for individuals and families.
- Acknowledge and learn from evidence related to people’s lived experience of the/ a system.
- Co-design and co-develop new models or systems with people who have experience of the system.
- Provide for shared responsibility across stakeholders.
- Focus on the beneficiary/ies within the system.
- Support jurisdictions to better coordinate and deliver quality ECEC services, reduce siloed approaches and to be accountable as system stewards.

Draft report recommendation 9.1

Improve policy coordination and implementation

PI supports the recommendation for a new National Partnership Agreement (NPA) on ECEC, using a ‘stewards of the system’ approach. National approaches are the strongest foundation for equity in a system. PI would recommend that Services Australia be a key steward/actor in the system given their authority to implement the CCS and ACCS funding models.

Draft report recommendation 9.2

Establish an ECEC Commission

PI supports the recommendation for the establishment of a new ECEC Commission, with appropriate legislative power to drive national systems change and research.

Draft report finding 1.2

There is more to learn about how ECEC programs can best improve children’s outcomes

PI supports the development of a National Research Agenda to identify evidence gaps, identify quality standards in evidence and commission research where it is difficult to attract research funding from usual sources. PI further supports AERO as a key steward in the system. PI recommends the research agenda should be led by ECEC Commission results, and a co-development approach should be used to determine the research agenda for ACCOs which adheres to data sovereignty principles.

Further investment is needed to:

- translate policy into practice;
- understand the impacts of legislative and policy changes;
- identify and redress unintended consequences;
- develop shared narratives relating to equity and ethics of implementation and reforms;
and
- establish mechanisms for shared data and data linkage across different systems to inform policy development.

PI welcomes the opportunity to engage with the Productivity Commission in future consultations to further elaborate on the recommendations canvassed in our response.

Yours Sincerely,

Anne Kennedy EdD, M.Ed., B.Ed. (EC)
Interim Chair of the Board, Parkville Institute

Brigid Jordan AM, PhD, BSW
Executive Director, Parkville Institute

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Royal Commission into Early Childhood Education and Care REPORT South Australia August 2023

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