



Senator Marielle Smith South Australia

Productivity Commission
4 National Circuit
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To whom it may concern,

Thank you for the opportunity to contribute to the draft report, "A Path to Universal Early Childhood Education and Care." On Thursday, 1 February 2024, I held an Early Childhood Education and Care forum in the South Australian electorate of Sturt, to seek participants feedback and input on the draft report. The forum was attended by a range of participants that included local educators, leaders and representatives of childcare centres, a director of educational consultants and a researcher in early childhood and education.

From our discussions, I provide the following feedback:

1. **Universal access:** Universal access should not be equated with uniform access and funding allocation should follow the child rather than the service a child attends. Participants felt access to early childhood education would be improved if its funding was framed as a right to education rather than as part of a model of care.
2. **Inclusion support:** Mirroring the findings of the draft report, participants noted issues around subsidy inclusion funding, including that it does not cover the costs of employing an additional educator. However, overall, participants went further than the draft report, suggesting that a total rethink of inclusion support was required. Participants hoped that the final report would cover more ground on inclusion support as they felt that the inclusion support program should address challenges beyond disability or diagnosis and encompass the diverse needs encountered in practice "on the floor" in service settings. Play spaces should be inclusive and welcoming to all children, with acknowledgement of First Nations children and their families.
3. **Infrastructure constraints:** Further to the issue of universal access and inclusivity, participants noted the impact that infrastructure constraints can have on creating environments that are inclusive of children's individual stages of development. Many centres lack adequate facilities for children between the ages of one to three, including sufficient space for sleep and changing areas. In practice, participants noted that there are more presentations of three-year-olds that are not toileting. Some centres are also constrained by their physical locations without the capacity for expansion.

4. **National consistency:** Participants agreed that jurisdictional differences create confusion for both educators, employers and regulatory bodies and national consistency or stewardship is required to streamline processes and standards. Participants also suggested that better coordination was required across the public and private sector to ensure new parents are aware of available supports and services in early childhood.
5. **National Quality Framework (NQF) assessment:** While participants recognised the importance of a framework, they noted that would always necessitate a level of personal interpretation and were concerned that the NQF assessment does not adequately emphasise the importance of educators' relationships with children. It was suggested that this was particularly felt during the height of the covid-19 pandemic. Participants noted that some centres also reported a 'disheartening' decline in exceeding NQF ratings, which they believe is due to time constraints on assessors. Anecdotally, one Director told us that their centre had not been assessed in over seven years.
6. **Workforce and Staffing:** Participants broadly noted universal issues facing centres in the search for quality candidates for vacant positions. Reference was made to the pressures faced by educators and management during COVID-19 that participants felt had contributed to particular shortages and staff turnover within the industry.
7. **Child-Care Subsidy (CCS):** The CCS system is complex and challenging for families to navigate. While the administrative burden of the activity test is in itself a barrier to access ECEC, it also entrenches disadvantage by tying a child's ability to participate in ECEC with their parent's level of activity. This results in some parents having to pay full fees until the activity test is resolved. Educators often find themselves assisting families with guidance through the system which takes away from their core work. Participants suggested that the activity test should be abolished and ECEC better funded as a right to education as opposed to a care model.

I trust that this feedback will assist in informing the final report and I thank you for the opportunity to provide this input.

Yours sincerely,

Marielle Smith
Senator for South Australia