

Productivity Commission

Response to consultation

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Thank you for the opportunity to respond to the Productivity Commission Inquiry - Inquiry into Early Childhood Education and Care.

In the following pages, you will find information relating to the National Nutrition Network, a summary of key points, responses to recommendations, and problems.

About NNN-ECEC

The National Nutrition Network – Early Childhood Education and Care’s (NNN-ECEC) mission is to promote healthy sustainable food environments within ECEC settings to positively impact the developmental and health outcomes for children.

Given the high volume of children who attend ECEC settings, there is an ideal opportunity to translate evidence for policy and practice to foster healthier and more sustainable food environments for the children accessing these services. This is particularly important given the ECEC sector must now maintain national standards established by the Australian Children’s Education and Care Quality Authority (ACECQA).

The Network has 36 strategic members from the research, intervention/implementation, and government departments. To support the sector, the Network was formed as a mechanism to build collaboration between key stakeholders to impact systems.

This response is a compilation of member's contributions and was compiled by:

- ❖ Dr Ros Sambell, Edith Cowan University, WA
- ❖ Associate Professor Rebecca Byrne, Queensland University of Technology, Qld
- ❖ Professor Amanda Devine, Edith Cowan University, WA
- ❖ Dr Penny Love, Deakin University, Vic
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Summary

Quality is paramount to achieving the benefits of ECEC. However, children cannot reap the benefits of high-quality ECEC without adequate nutrition.

There is an opportunity to provide more strategic actions to improve the food environment in ECEC by fostering a quality workforce, thus nurturing the health and developmental outcomes of children aged 6 weeks-5 years, these include:

1. **Affordability and Accessibility:** Prioritise nutrient-rich meal provision, establish minimum requirements for universal access, ensure geographic accessibility of ECEC centres, and enhance access through community-led childcare initiatives.
2. **Workforce Support:** Provide training in nutrition and mealtime environments for educators, incorporate evidence-based best practices into certification requirements, upskill the workforce through micro-credentialled modules.
3. **Inclusivity:** Integrate ECEC providers and Dietitians/Registered Nutritionists into care teams for children with disabilities, improve transparency in communication regarding inclusion funding requirements, and strengthen support for ECEC programs lacking access to nutrition professionals.
4. **Quality Improvement:** Enhance food provision assessment, upskill staff in Quality Area 2 which includes nutrition, clarify the National Quality Framework regarding nutrition environments, acknowledge outstanding performance, and provide professional development for authorising officers.
5. **Coordination Mechanisms:** Address disparities in access to support services across states, rectify inadequacies and inequities in current support structures, and ensure consistent support for policy implementation and standards adherence.

These recommendations aim to create a more inclusive, accessible, and high-quality ECEC system that supports children's development and reduces barriers to workforce participation.

More details on specific actions to further support the ECEC food environment can be located in the following policy and evidence briefs that were attached to the submission:

- **Policy Brief 1** - *Achieving Equality and Equity in the Provision of Food and Nutrition Support in Early Childhood Education and Care Settings* [click here](#)
- **Evidence Brief 1** – [click here](#)
- **Policy Brief 2** - *A case for mapping Food Provision across jurisdictions and ECEC services and settings* [click here](#)
- **Policy Brief 3** - *A call to update the National Get Up & Grow guidelines and associated resources* [click here](#)

In addition, a summary of the “Policy Brief Launch – Flyer with Summary” is also attached and can be accessed by [clicking here](#).

Response to recommendations

Expanding the availability of ECEC will require governments to prioritise the workforce challenges facing the sector. The pay and conditions offered to the ECEC workforce – which are critical for recruitment and retention – may be improved through processes arising out of recent changes to the Fair Work Act. But more work is required to improve career and qualification pathways within and into ECEC professions. p2

The NNN fully supports improving pay and conditions offered to the ECEC workforce and the career and qualification pathways within and into ECEC professions. The NNN staunchly advocates for the enhancement of remuneration and conditions within the ECEC workforce, underlining the imperative to recognise the indispensable contributions of cooks and chefs responsible for food provision in long daycare services. It is paramount to acknowledge that a robust workforce encompasses all roles within ECEC settings. To this end, decisive actions are imperative, including the establishment of precise guidelines for minimum qualifications, the allocation of additional TAFE placements to fortify workforce capacity, and the formulation of a comprehensive national competency framework encompassing menu planning, food safety, and food preparation standards. These measures are not only desirable but imperative to ensure that our ECEC workforce is adequately equipped to meet the evolving needs of our children and families.

ECEC services should be inclusive of all children, including those with disability and those from diverse cultural backgrounds. However current government support fails to reach many children who require it. The Australian Government should significantly increase funding for the Inclusion Support Program and streamline the requirements of the program to expand its reach.

A critical aspect of inclusivity in ECEC services pertains to addressing the diverse dietary needs of children, particularly those with disabilities and from diverse cultural backgrounds. The ECEC workforce, comprising educators and cooks, must be equipped with the necessary training to recognise and effectively respond to these varied dietary requirements. Moreover, nutrition professionals, notably Dietitians, possess the expertise to support children, families, and the broader ECEC workforce in ensuring that the food provided in these services aligns with diverse nutritional needs. However, the current landscape reveals a troubling disparity in ECEC having access to support services across Australia, with only NSW, Victoria, and Tasmania funding and delivering programs such as Munch and Move, the Healthy Eating Advisory Service, and Move Well – Eat Well. This unequal distribution underscores the urgent need for nationwide action to rectify disparities and ensure equitable access to essential support services in ECEC settings.

Quality is paramount to achieving the benefits of ECEC – but the regulatory system that is part of the National Quality Framework is not always resourced to deliver timely assessments of service quality or take sufficient action to tackle persistently poor quality.

To address these shortcomings, it is imperative that the National Quality Framework undergoes significant enhancements, particularly in defining a method to review the quality of the food environment in a comprehensive way that does not overburden the ECEC service staff and the regulatory unit. This entails establishing clear benchmarks encompassing both the type of food provided (the “what”) and the “how” the food is being provided. By doing so, officers tasked with assessing service quality will have a guide to work with, thereby facilitating more accurate evaluations and targeted interventions where necessary and ECEC staff will have a clear understanding of expectations. Such enhancements are essential to ensure that ECEC services consistently meet the highest standards, ultimately optimising the benefits for children and families alike.

Australian, state, and territory governments should sign a new National Partnership Agreement on Early Childhood Education and Care, which would outline their respective roles and responsibilities as stewards of the system, as well as the objectives all governments seek to achieve in ECEC.

Furthermore, the National Nutrition Network (NNN) advocates strongly for the development and implementation of a national best practice food environment guide for ECEC to promote consistent best practices across Australian states and territories. There is also strong evidence that well-established professional role and identity statements is an enabling factor for improved food provision quality. This guide and role delineation is indispensable in fostering coherence and standardisation within the ECEC sector, ensuring that high-quality standards are uniformly upheld regardless of geographic location. By championing the establishment of a guide, the NNN aims to facilitate a more cohesive and effective approach to ECEC provision, ultimately benefiting children, families, and educators across the nation.

Response to problems

Affordability and availability gaps need to be addressed to achieve universal access.

- Children need a nutrient rich diet to grow develop and thrive. Therefore, meal provision needs to be a foundational requirement of ECEC services ¹⁻⁶. This is even more important when considering vulnerable children who may not be able to access healthy food at home or be food insecure ⁷, therefore it would be important to remove the activity test for low-income families in the immediate future.
- Figure 9 of the draft report highlights that services in more remote and lower socioeconomic areas are less likely to meet the NQS. Thorpe et al. ^{1,8} also shows that services in remote and lower socioeconomic areas are less likely to provide food. This means that families are required to bring food from home in lunch boxes but maybe least equipped to do this due to lack of food availability and cost. Services in these areas need financial support to be able to provide nutritious meals to children while remaining affordable for families.
- A minimum requirement of universal access should meet the national average of current attendance of 30 hours per week, and in highly disadvantaged areas should be available for up to 60 hours per week (12 hours x 5 days).
- Ensure centres are accessible to families, that is, the number of child places reflects at least 50% of children aged 0-5 years in a 20km radius. Where these numbers fall below a viable number travel reimbursement is available to families.
- Improve access through community-led childcare, utilising the supports that already exist (e.g., schools, gyms, community centres), where there is no current ECEC infrastructure in the short term.
- Where information is shared with services, written information should be targeted at or below grade 5 reading level, and pictorial information should be made available where possible.

Availability can only improve if workforce challenges are resolved.

- Children need a nutrient-rich diet to grow develop and thrive ³⁻⁵. Therefore, educators need training in nutrition, mealtime environments, food provision, sustainable practices ⁹, and food safety.
- Requirements for certificate and university-qualified ECEC must include evidence-based nutrition and mealtime environment training and a whole-of-service approach to healthy food environments. This requires funding for development.
- Upskilling the current workforce in line with the best practice guide (which requires development ¹⁰ for the food environment can be done through micro credentialled modules. These would be associated with a university to ensure quality control and access. Continued professional development (CPD) points, as an incentive would be explored to ensure relevancy with the workforce. Additional support or programs for Aboriginal staff and paid training would increase workforce capacity and cultural relevance in an area of great need. ECEC being part of "job search" or specific programs to support Aboriginal staff members such as the AHP model where on-the-job training exists would again create pathways to jobs and sustained employment in the ECEC space.
- Wellbeing of the ECEC workforce: i.e., organisational supports to enable ECEC staff to eat with the children and role model healthy eating behaviours, and also have access to food themselves given food insecurity is a current issue for some staff and children ¹¹⁻¹³.
- Support and mentoring for new early childhood teachers (Draft Report (DR) 3.4), including mentoring specifically for Aboriginal staff members would build capacity and capability.

A universal ECEC system must be inclusive of all children.

- NDIS is difficult to navigate, ECEC providers and Registered Nutritionists/Dietitians need to be a key part of care teams for children with disability to support ECEC services to support children with a disability.
- Transparent communications of requirements for inclusion funding (DR 2.3) for children who are on the NDIS, especially for respite care, is required.

ECEC services do not consistently respond to family needs.

- Children need a nutrient rich diet to grow develop and thrive. Long Day Care (LDC), Family Day Care (FDC) and OSCH centres may contribute a significant amount of food from a child's diet. Many LDC, FDC and OSCH programs do not have access to Dietitians/Registered Nutritionists to provide adequate support for the nutritional quality of the food they provide, facilitating ECEC services to engage nutritional expertise is paramount ^{3,4,7}.
- Integrated service access needs to include allied health including Dietitians to support families and educators with clinical advice for complex children. Dietitians/Registered Nutritionists can also support the implementation of their overall nutrition policy for the nutrition environment ^{14,15}. Integrated services would enable families to access appropriate healthcare in the context that it is needed - this would support both families and the ECEC sector.

Quality is paramount to achieving the benefits of ECEC.

- More detailed assessment of food provision ¹⁶ in ECECs including Long Daycare (LDC) ¹⁷, Family Daycare (FDC) ^{18,19}, OSHC ²⁰ would likely improve the nutrient quality of food these settings can provide. This would include information about specifically what foods or practices should be changed ^{3,5,21}.
- Upskilling staff in specific quality areas such as nutrition would enhance the quality of service as seen in Sambell ²² PhD thesis.
- See the point below. The NQF needs to clearly state what a good nutrition environment includes. More clarity for assessors - and families - so they know what to look for. Moving beyond just what food is provided.
- Acknowledgment of outstanding performance in quality areas such as nutrition would assist in increasing enthusiasm for quality.
- Inclusion of professional development (PD) for authorising officers on nutrition, to help define what constitutes an optimal nutrition environment. Moving beyond WHAT children eat to also HOW and the environment is another important consideration that impacts a child's relationship with food and eating patterns across the life course. This needs to be captured and included - but unless those assessing quality know what to look for, it is difficult for them to assess. PD around these topics of WHAT and HOW need are targeted approaches and should be included in all resourcing and support (National Nutrition Network – ECEC, 2024 – personal communications).

New coordination mechanisms will support universal access.

- Some states have free on the ground content support/guidance available relating to quality areas including nutrition that is not available to all states, thus an inequity of support to ensure quality of food environments nationally ^{23,24}.
- There is current inequity in on-the-ground free support (currently only three states provide this) that leaves the workforce feeling unsupported, in addition to affecting the quality of ECEC.
- It is inadequate and inequitable nationally. Services need support for the establishment and implementation of policies/standards - but this support differs nationally ^{23,24}. The commission also needs support structures embedded.

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