



Australian Childcare Alliance Queensland

16 February 2024

The Honourable
Steven Miles MP
Premier and Minister for the Olympic and Paralympic Games
Via email: PQKFconsultation@premiers.qld.gov.au; premier@ministerial.qld.gov.au

CC: Minister Di Farmer & Minister Lance McCallum

Dear Premier Miles,

Congratulations on your appointment as Premier of Queensland. You have had a flying start. We welcome your enthusiasm, response to emergent issues, and particularly, the holistic concepts in *Putting Queensland Kids First*.

The Australian Childcare Alliance Queensland (ACA Qld) has provided a comprehensive response to *Putting Queensland Kids First*, utilising the knowledge, skills and lived experience of our 940+ member services, operating around 1,100 Early Childhood Education and Care (ECEC) services across Queensland.

We support our members, and the approximate 17,300 Early Childhood Educators/Teachers, who educate and care for around 198,000 children of 261,000 parents in Queensland. Our member services are geographically dispersed from Far North Queensland, west of Mt Isa and south to the New South Wales border.

Our eight tangible solutions set out in the response can create better outcomes for children and families and are centred on two pillars – Children’s Wellbeing and Universal Access; and the intrinsically linked, Unprecedented Workforce Shortages.

Unprecedented workforce shortages in our sector reached new heights in 2023. Across a week in February 2023, more than two-thirds of 627 childcare services nationally, confirmed enrolments had been capped, which means 16,300 early childhood education places were cut off from Australian families¹.

In March 2023, the Australian Children’s Education and Care Quality Authority (ACECQA) reported that nearly a quarter of early learning (long-day care) services in Queensland had to apply for staffing exemption waivers, indicating they could not find appropriately qualified staff. And a second national survey of 442 centres in May 2023, revealed that — again, more than half of Early Learning (long day care) Services had been forced to cap enrolments due to the ongoing workforce shortages².

There are a range of factors contributing to workforce deficiencies, one of which, is the oversupply of ECEC services and the disconnect between large-scale, multifaceted attraction and retention workforce initiatives.

¹ ²Workforce crisis the biggest issue in Early Childhood Education and Care sector: Australian Childcare Alliance. November 2023.



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Nationally, the sector expanded rapidly over the past decade and service numbers grew by 25% in the 10 years to Q1 2023. The number of approved places rose by nearly 50% to over one million throughout Australia³.

ACA Qld has found there to be an intrinsic link to the unprecedented workforce shortages and the development approval policies impacting oversupply.

We wrote to Mr Graham Fraine, Director-General from the Department of State Development Infrastructure in February 2024 about the development approval processes resulting in an excess of ECEC services. We also wrote to the Local Government Association Queensland (LGAQ) raising the same issue and have written individual letters to 80% of the Councillors and Mayors who make up the LGAQ Policy Executive, plus the Mayors of Brisbane, Gold Coast, Logan, Toowoomba, and Ipswich.

The workforce shortages and condensed oversupply within small geographic areas are heavily obstructing existing services' ability to access early childhood educators/teachers (staff) and operate at the highest child-to-educator ratio required to operate an Early Learning (long day care) Service.

ECEC development in Upper Coomera (inclusive of Coomera, Pimpama, and Willow Vale) has seen 100 Early Learning (long day care) Services developed. Since 2019, 13 new services have opened between Milton/Bardon to Toowong/Auchenflower, offering 1,400 childcare vacancies. We have evidence that one centre in Auchenflower was operating at 38% occupancy in September 2023. Townsville has 102 early learning services compared to 120 services throughout the entire Sunshine Coast.

Putting Queensland Kids First is timely – particularly with the current workforce shortages and with the completion of the Australian Competition and Consumer Commission, and the Productivity Commission investigations.

To support the collaborative effort that's required, we continue to advocate for a concerted approach in the Government's response to the investigations and to the overarching issues the sector is experiencing through an Early Childhood Education and Care Summit.

The purpose of the Summit is to bring together the Sector including Universities, Vocational Education providers, Early Learning (Long Day Care) service providers, and government agencies that have service delivery directives that influence the sector.

The Summit would allow Government agencies and stakeholders to properly plan for the future, and to implement initiatives that are complementary to each other and the changing ECEC landscape in Queensland.

³ A Path to universal early childhood education and care. Draft report: The Australian Government, Productivity Commission. November 2023.



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I have carbon-copied, Minister Di Farmer, and Minister Lance McCallum into this correspondence, to represent my continued eagerness to discuss the sector and the matters here within. I welcome too, Premier Miles an opportunity to meet with you to represent our sector and the 940+ member services located across Queensland.

I am in Townsville but frequently travel to Brisbane and can meet whenever is convenient.

I look forward to hearing from the Miles Government – acaqldpresident@childcarealliance.org.au and 0410526136

Yours faithfully,

Majella Fitzsimmons
President
Australian Childcare Alliance Queensland



Consultation Response:

We welcome the Government's consultation opportunity of *Putting Queensland Kids First* and strongly agree with the intention of all guiding questions.

As participants and leaders in the Early Childhood (EC) sector, the Australian Childcare Alliance Queensland (ACA Qld) see the benefit of our services on children and Queensland families daily. Similarly, we see (and experience) the direct impact of the policies and decisions made by the government on Queensland children, Queensland families and the workforce.

We acknowledge that other than a focus on kindergarten, the current government has a lot of work to do, including large-scale initiatives that improve the health and well-being of children aged 0-5. This need is evidenced in the Snapshot of existing early intervention and prevention initiatives on page 8 of the Consultation Draft, where the initiatives void comprehensive, far-reaching services that promote the health and well-being of a very important cohort - 0-5-year-olds.

The 2021 Australian Early Development Census (AEDC) collected information on approximately 65,000 children across the state (representing 98.4% of eligible children) and determined their readiness to transition to their first year of school in five domains.

The report illustrated that just over half of Queensland children are developmentally on track. And only 33.8% of Aboriginal and Torres Strait Islander children are developmentally on track.

There must be a focus on supporting children before entering primary school and we applaud your consultation approach on this.

The below sets out eight focus areas, each with simple solutions represented by the knowledge and experience of the 940+ members of the ACA Qld.

Prevention and Early Intervention

Our core principles are centred on the enabling factors which support children's well-being. To us, this means equipping the early childhood workforce with the knowledge and capacity to support healthy behaviours and providing an environment that encourages primary prevention activities.

Our approach would consider:

1. Targeted initiatives that focus on **early intervention and developmental support in all EC settings and geographic locations**. Including but not limited to:
 - Micro-credentialling within the entire workforce in trauma-informed practices (neurodevelopment) and strengthening workforce knowledge and capacity to identify



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and address learning and behavioural difficulties (especially in terms of altering participation in primary and secondary education and youth justice outcomes).

In our January 2024 Member Survey, 70.3% of member services reported requiring additional training around behavioural management and socio-emotional support and 57% required additional training to support children with additional needs.

- Expanding the availability of community hearing clinics and considering mandatory auditory screening tests conducted on every child in the year between turning two and three years of age.
- Offer early intervention allied health programs for all children in all ECEC settings to undertake ear, eye, speech, and occupational therapies to assess developmental learning.

The Department of Education previously delivered an initiative that identified a disproportionate number of developmentally vulnerable First Nation children in a program called Be Well Learn Well. This program delivered allied health therapies to address learning and social development.

- Financially support or further subsidise Allied Health costs so 0-5 developmental checks can occur and be addressed in EC Approved Provider Services.

Connection to Country, Community and Family

The ACA Qld strongly agree with all aspects of inclusivity – in our January 2024 survey, **47.5% of our members said they need more knowledge about culturally inclusive education.**

Our approach would consider:

2. Strengthening knowledge and knowledge translation with the skills and **readily available tools to support culturally inclusive teaching practices.**
 - This might include reviewing and updating Bachelor and Diploma Early Childhood courses to embed First Nation people, cultures, and practices within their teaching.
 - Tools, resources, and financial support that enable ECEC services to build relationships and connect with First Nation people, Elders, or Culturally and Linguistically Diverse communities.



Protective Factors

The ACA Qld strongly agrees with the approach of protective factors and believes early intervention is important in ensuring children remain well and on track to live a life of choice, not chance.

Access to education is a protective factor and ensuring all children have access to an additional year of kindergarten will bolster quality engagement in learning, school readiness and further support families.

Our approach would consider:

3. **An immediate review of the Inclusion Support Program (ISP)** administered by the Australian Government, Department of Education. ISP does not appropriately reflect the actual costs incurred by EC providers to suitably support children with additional needs.

The fund must increase, at the very least to the rate of additional ISP educators to ensure alignment with a Certificate III Level 3.2 casual rate plus super. The current rate is \$23 compared to the actual cost of \$33.86. Not only is the funding insufficient, but the current ISP portal is an administrative barrier to services accessing and further supporting children with additional needs. A review and an increase in ISP will assist providers in enabling all children to participate in ECEC meaningfully.

4. **Offering universal access to three-year-old kindergarten with fee relief to families.** This would **allow children to participate in two years of kindergarten** – not just one. It enables greater access opportunities and can help lift developmental, social, and academic achievement.

Access to a high-quality kindergarten program is one of the few proven strategies for lifting outcomes for all children, and evidence suggests that two years has more impact than one, especially for the children most likely to be developmentally vulnerable⁴.

- This policy would include 15 hours a week for three-year-olds and the provision to expand four-year-old kindergarten to 30 hours. The three-year-old program needs to be delivered by a 'suitably qualified' Early Childhood Teacher. This mirrors sector leadership already introduced by Victoria, New South Wales, South Australia, and most OECD15 countries.
5. **Providing ECEC Educators with tools and resources that strengthen and support communication skills with children and families under an Employee Assistance Program.** Having important and difficult conversations with children and families sometimes comes at a risk to the ECEC Educators and can have harmful impacts on staff well-being and is a contributing factor to retaining the workforce.

⁴ Two years are better than one. Kindergarten programs in Queensland: Mitchell Institute 2016.



Putting Queensland Kids First – Access to education, training, and employment

Children and family needs can only be met if there is a workforce – and the EC sector simply does not have the workforce to meet the demand for child places, whilst also remaining compliant with the educator ratios.

The safety and well-being of children and early childhood educators/teachers (staff) are of the utmost importance to providers and the unprecedented workforce shortages can compromise quality. Before we can advance the well-being of Queensland children, we need to make sure there are adequate, appropriately qualified, and trained staff.

The ACA Qld have been working with the Queensland Department of Education for 12+ months on the Early Childhood Workforce Strategy. This Strategy brings several new initiatives, including the Qualifications Pathways Program released for tender in November 2023. This is a significant investment to increase the workforce through scholarships and wrap-around support. We look forward to the official announcement and implementation of this initiative, as well as the other identified plans within the Strategy.

In addition to EC scholarships, the ACA Qld advocates for:

6. Delivering comprehensive workforce strategies (beyond what the Department of Education are delivering) to focus on **attracting and developing local and global talent into the sector**. Delivering diverse and positive media campaigns that promote Queensland and the EC sector and **focusing on providing quality international student and workplace experiences, visa relaxations and expediting international processes, and an emphasis on meeting regional EC demand**.
7. **Policy initiatives that allow small businesses access to professional development subsidies**, so we can invest in our workforce and their careers. The narrative around joining and participating in the ECEC workforce should be positive and the public opinion of Educators is important in illustrating their value. Team learning is a process that contributes to and leads to effective teamwork.
 - We suggest, **a commitment of two dedicated, pupil-free days annually (with CCS contribution) or at a very minimum, 15.2 hours backfilling – to enhance service delivery and workforce retention**. Unlike the public education system, the private ECEC workforce is not afforded the same dedicated government-funded pupil-free days that allow professional and curriculum development to occur collectively. This practice is central to supporting best-practice childhood learning and care and enables the full workforce to participate in professional development together – reducing the current practice of fragmented learning.



Working Together

The investigations by the Australian Competition and Consumer Commission, the Productivity Commission, and the finalised South Australia's Royal Commission, should see the landscape and delivery of early education in Queensland change.

- 8. We are advocating for a collaborative approach to address the above-mentioned investigations and our concerns with the current development approval processes impacting oversupply.** Our approach aligns with the vision of *Putting Queensland Kids First* and would see various government agencies, peak bodies, and universities participate and work together through the recommendations and industry learnings in a Queensland Early Childhood and Education Summit.

As the Miles government has identified, problems do not exist in isolation and are linked through various socio-ecological aspects that entwine and interconnect.

We would like the government to take holistic and comprehensive action together, to enable greater achievement in *Putting Queensland Kids First*. As the peak body representing nearly half of the early learning centres in Queensland, we would like to assist in any way the Miles Government sees fit in ensuring the Summit is realized.

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