

The Hon Anthony Albanese MP
Prime Minister
25 April 2025

A plan to deliver a safe high quality early childhood education & care system

Dear Prime Minister,

The Community Child Care Association and Community Early Learning Australia have developed an actionable effective plan to ensure all children can access safe high quality education and care services (Attachment A).

Your government has listened to families, educators and services, prioritising major reforms in your first term that have established the foundations for universal early childhood education and care. We are already seeing the benefits of these landmark reforms.

We now must ensure that universal access to education and care means universal access to high quality services. A safe system is based on high quality, but quality does not happen by chance.

Australia has a world class quality framework through the National Quality Standard. However, improvement is needed across state and federal regulators to consistently uphold these standards using effective assessment, rating and compliance levers.

Families, educators and services all want a system that is based on high quality. The Australian Government must play a leadership role in solving the policy and regulatory barriers that are creating quality and safety issues in education and care services. Without national leadership, more children will be put at risk.

CCC and CELA have demonstrated our steadfast commitment to supporting major education reform in partnership with governments and educators, with a strong focus on effective implementation and communication.

We encourage you to adopt our plan to create the education and care system that children and families need.

Regards,



Julie Price
Executive Director

Community Child Care Association



Michele Carnegie
CEO

Community Early Learning Australia

Cc: The Hon Jason Clare MP – Minister for Education; The Hon Dr Anne Aly MP – Minister for Early Childhood Education; caucus MPs and Senators

Attachment A: A plan to deliver safe high quality education and care services for all children

A plan to deliver safe high quality education and care services for all children

Our plan provides an actionable effective approach to:

- demonstrate leadership with a robust plan that will garner influential cross sector support
- implement the Productivity Commission's recommendations from its 2024 Child Care Inquiry Final Report, harnessing its deep consultation with families and across the sector and removing the need for further reviews
- secure state and territory support for effective regulatory and compliance reform in a meaningful timeframe.

High quality means safety for children

The evidence is clear. Safe high quality education and care services for children do not happen by accident. They are based on:

- a provider structure that prioritises quality over profit, with good governance and educational leadership informed by expert pedagogy
- small group sizes and exceeding minimum staff ratios to provide better supervision and care
- a stable workforce (i.e. high retention of staff as well as low use of casuals and waivers), ensuring children can maintain consistent attachments with educators and teachers
- a qualified experienced workforce with ongoing professional development
- a National Quality System that has effective assessment, rating and compliance levers.

These factors should be present in all government funded education and care services. This is the basis for delivering an effective return on government investment, delivering the full benefits of early childhood education and care for children, families and our broader community.

A plan to deliver a safe high quality education & care system

The Australian Government's plan to embed quality and safety in all education and care services should be based on the following four reform pillars:

1. Empower ECEC Regulators to remove consistently underperforming service providers

- Establish new mechanisms for urgently intervening with services to ensure the safety of children, or with services that do not demonstrate improvement.
- Examine funding required for state governments to deliver assessment and rating programs that meet the objectives of the National Quality Standard.
- Negotiate a new intergovernmental National Partnership Agreement on early childhood education and care to coordinate service delivery between federal, state and territory governments.
- Continue to fund ACECQA appropriately to deliver a nationally consistent quality system for early childhood education and care services.

2. Create a robust nationally consistent child protection system

- Establish consistent national requirements for minimum mandatory child protection training for education and care staff.
- Extend the proposed National Early Childhood Teacher Registration Scheme to include educators for early learning and outside of school hours care.

3. Establish an independent ECEC Commission

- Establish an independent ECEC Commission to assist governments to achieve their intended outcomes for education and care.

4. Support the growth of high quality not-for-profit services

- Commit to a target for the growth of the small and community education and care services by 2030.
- Undertake funding reform to deliver a universal high quality affordable system, replacing the current Child Care Subsidy funding, fee setting rates and family income levels.
- Grow new community managed services in areas where the education and care market cannot deliver viable options.

Establishing a mandate for timely effective reform

We recommend National Cabinet establishes a Reform Committee for Early Childhood Education and Care to drive an urgent uplift in quality and safety across the sector. This approach will provide the mandate for delivering safety and quality reform pillars across federal, state and territory governments.

The ECEC Reform Committee should be supported by a taskforce of federal, state and territory officials with expertise in education and care policy and regulation, supported by an advisory council of leaders from across the sector.

The work of the Reform Committee and taskforce will:

- support urgent necessary quality and safety reforms
- define the scope and responsibilities of the ECEC Commission within broader quality and safety reforms
- support the establishment of the ECEC Commission.

Using the National Cabinet ECEC Reform Committee and supporting taskforce will allow first ministers to demonstrate progress on quality and safety reforms within a meaningful timeframe. This will be a more timely, effective and risk-based approach than tasking major reforms to the ECEC Commission while it is stood up.

Timeline: 2025 - 2026

- Establish the National Cabinet ECEC Reform Committee and taskforce.
- Continue to fund ACECQA appropriately to deliver a nationally consistent quality system for education and care services.
- Establish new mechanisms for urgently intervening with services to ensure the safety of children, or with services that do not demonstrate improvement.
- Examine funding required for state governments to deliver assessment and rating programs that meet National Quality Standard objectives.
- Scope a new intergovernmental National Partnership Agreement on early childhood education and care.

Timeline: 2026 - 2030

- Establish the ECEC Commission to commence from 1 January 2028.
- Establish consistent national requirements for minimum mandatory child protection training for education and care staff.
- Extend the proposed National Early Childhood Teacher Registration Scheme to include educators for early learning and outside of school hours care.
- Negotiate a new intergovernmental ECEC Partnership Agreement to coordinate service delivery between federal, state and territory governments.
- Commit to a target for the growth of the small and community education and care services by 2030.
- Undertake funding reform to deliver a universal high quality affordable education and care system, replacing the current Child Care Subsidy funding, fee setting rates and family income levels.
- Grow new community managed services in areas where the education and care market cannot deliver viable options.

Early Childhood Education & Care – Quality & Safety Pillars

The following section outlines the key reforms to embed quality and safety in all early childhood education and care services across four pillars.

1. Empower ECEC Regulators to remove consistently underperforming service providers

Current Issues

- State based regulators have limited means to enforce provider assessment and compliance with the National Quality Standard.
 - Cancellation of a provider's license is challenging for regulators, with direct evidence required that continued provision poses unacceptable risks to the safety, health or wellbeing of the children at a service.
 - Regulators are loath to remove providers from the sector due to the immediate negative impacts on children and families.
 - Services that repeatedly fail to meet minimum standards are still allowed to operate, sometimes for more than a decade.

Key Reforms

National Cabinet ECEC Reform Committee & Taskforce

- Establish new mechanisms for urgently intervening with services to ensure the safety of children, or with services that do not demonstrate improvement including:
 - new Federal Government compliance actions against existing providers with egregious and continued breaches including removing Child Care Subsidy funding and removing their ability to operate in other care sectors
 - new proactive compliance and enforcement options for state regulators to manage consistently underperforming providers
 - creating an 'administrative option' to install an alternative approved provider at a service when an underperforming provider is removed, minimise impacts from the removal of underperforming providers on children and families.

- Examine funding required for state governments to deliver assessment and rating programs that meet National Quality Standard objectives including:
 - assessing all services at least every three years, prioritising services rated as Working Towards or Meeting the National Quality Standard
 - improving the frequency of spot checks
 - prioritising new service approvals for higher rated providers over those with lower existing service ratings
 - requiring providers wishing to expand services to demonstrate a capacity to consistently meet or exceed minimum quality standards.
- Develop nationally consistent and legislated minimum standards for the outside school hours care sector including qualifications standards in line with the current QLD requirements.
- Scope a new intergovernmental National Partnership Agreement on early childhood education and care covering:
 - the coordination of high quality service delivery between federal, state and territory governments
 - increased assessment, compliance and enforcement actions by state and territory regulators.

Federal Government

- Continue to fund ACECQA appropriately to deliver a nationally consistent quality system for education and care services.

Outcomes

- These reforms will ensure:
 - federal, state and territory governments can adopt effective nationally consistent regulatory changes that drive a national uplift of quality and safety in a meaningful timeframe
 - the impact of non-compliance rests with the service provider and not with families who rely on services to remain operational
 - providers will be subject to consistent and regular assessments that are necessary to maintain safe high quality services
 - families will have the information they need to compare services and maintain trust in the early childhood education and care sector.

2. Create a robust nationally consistent child protection system

Current Issues

- The current national child protection system is fragmented and under resourced, missing opportunities to prevent and identify issues in education and care settings.
 - Mandatory reporting is not consistent for early educators and teachers in different jurisdictions, leading to under reporting of neglect and abuse.
 - Education and care staff do not have access to appropriate training that can help create a child-safe culture in services.
 - Working with Children Checks are not nationally consistent, creating gaps that allow unsafe individuals to work in education and care settings.

Key Reforms

National Cabinet ECEC Reform Committee & Taskforce

- Establish consistent national requirements for minimum mandatory child protection training for education and care staff.
- Extend the proposed National Early Childhood Teacher Registration Scheme to include educators for early learning and outside of school hours care.

Outcomes

- The education and care workforce are the foundation for a national uplift in quality and safety, supporting prevention and early intervention when children are at a critical stage of development.
- Nationally consistent staff registration and child protection training will ensure:
 - directors can embed a child-safe culture in their service, ensuring compliance with relevant quality and safety regulations, and prioritising child protection in all decision making
 - educators and teachers will understand their legal and professional requirements, helping them to identify safety risk factors, create child-safe environments and use trauma-informed practices.

3. Establish an independent ECEC Commission

Current Issues

- The early childhood education and care sector is hamstrung by conflicting policy objectives.
 - Outdated distinctions between 'care' and 'education', the ages at which these happen, and who bears constitutional responsibility, are limiting the impact of government investment at all levels.
 - This confusion of purpose is contributing to a system that is expensive, difficult to navigate and fails to meet its full potential for social and economic impact.
 - It is also exacerbating supply and workforce shortages, creating internal competition for staff and leading to families utilising multiple services to reduce costs.
- As a result, children, families and our broader economy are not reaping the full benefits from government investment in education and care.
- Delivering universal access while maintaining quality and sustainability of government investment will require long term leadership and accountability from all levels of government in partnership with the sector.

Key Reforms

National Cabinet ECEC Reform Committee & Taskforce

- Establish an independent ECEC Commission to assist governments to achieve their intended outcomes for education and care including supporting:
 - policy coordination to deliver an efficient high quality affordable universal education and care system
 - joint stewardship of the early childhood education and care sector across governments, providers, workforce and families
 - nationally consistent outcomes under the National Quality Standard by providing advice and direction to ACECQA and state regulators
 - ongoing research and policy development, including monitoring progress towards national and intergovernmental objectives
 - national workforce supply and development for all service types
 - monitoring the cost and supply of services to inform needs-based planning.

- The ECEC Commission should not replicate or replace the functions of ACECQA.
 - ACECQA should continue to be responsible for supporting state regulators and services to maintain and improve nationally consistent quality standards.

Outcomes

- With advice and support from an independent ECEC Commission, federal, state and territory governments can deliver the full range of education benefits by creating a system that:
 - prioritises high quality and safety for all children
 - maximises the impact and efficiency their investment in education and care
 - is simple for families to access
 - values the work of early educators and teachers
 - is viable for providers.

4. Support the growth of high quality not-for-profit services

Current issues

- The introduction of fee subsidies and the removal of operational subsidies to the community sector has led to a disproportionate growth in private for-profit provision of early childhood education and care.
- Governments receive less return on their investment in for-profit providers because subsidies must support profit as well as service delivery.

Key Reforms

Federal Government

- Undertake funding reform to deliver a universal high quality affordable system, replacing the current Child Care Subsidy funding, fee setting rates and family income levels.
- Commit to a target for the growth of the small and community education and care services by 2030.
- Grow new community managed services in areas where the education and care market cannot deliver viable options through a Local Champion model, with support from the Building Early Education Fund.
- Establish administrative and governance support through a Community Managed Early Childhood Education & Care Business Hub to ensure services can focus on high quality service delivery.
- Commission research on the consistent indicators of high quality care and efficient service provision.
- Provide targeted multi-year funding to assist small and community employer peak bodies to support the implementation of major education and care reforms by building capacity with their member services, staff and families.

Outcomes

- Growth in community managed services is the most effective investment in government funded education and care because they:
 - consistently deliver high quality education and care for lower fees, particularly in areas of greatest need
 - reinvest all funds into high quality service provision

- are more likely to provide services in areas that are less advantaged or have populations of children with disability or complex needs
- are more likely to invest in better wages and conditions for staff.
- By growing not-for-profit services, governments will be able to:
 - create a balanced market, creating genuine choice for families
 - target the goals, priorities and workforce needs of outer metropolitan, regional and rural communities
 - grow sustainable services that reflect the values, cultural identity and needs of local children, families and communities
 - support thousands of parents to return to work full time or increase their working hours
 - promote economic growth in outer metropolitan, regional and rural communities from increased workforce participation and new education and care jobs.
- Families can enjoy the full benefits of early childhood education and care reforms if the education and care sector is operating at its full potential.