



SKILLSIQ

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Submission to the Royal Commission into Early Childhood Education & Care

Prepared by SkillsIQ Ltd

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Contact person: Yasmin King, CEO
Phone: +61 2 9392 8100
Email: yasmin.king@skillsiq.com.au
Address: Suite 201, Level 2, 117 York Street, Sydney, NSW 2000
Website: skillsiq.com.au

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Introduction

SkillsIQ is pleased to be able to contribute to this important Royal Commission. The recently released Interim Report (April 2023) and associated materials present the **opportunities and complexities in achieving universal outcomes in a diverse sector** which is characterised by a myriad of social, ethical, economic and community perspectives of policy. The Report also highlights how South Australia is positioned to embark on an innovative trail in these contexts. This submission is focussed on providing insights and recommendations in relation to **workforce requirements** and, in particular, the opportunities to strengthen skills and work pathways to address workforce capacity issues which impact the quality of education and care outcomes for children.

About SkillsIQ

SkillsIQ is an independent, not-for-profit organisation that is committed to the transparency and quality of training and education. We are passionate about the role that skills and training play in addressing industry needs. SkillsIQ's expertise and experience includes:

- Workforce planning (including policy and strategy)
- Workforce development (including the development of industry skills forecasts)
- Vocational Education and Training (VET) Training Package development
- Industry engagement
- Research (including conducting annual skills surveys and developing Discussion Papers on topical training and workforce issues).

For the seven years (2016 – 2022 inclusive) SkillsIQ was contracted to the Commonwealth Government to act as a Skills Service Organisation (SSO) to support 19 Industry Reference Committees (IRCs), including Children Education and Care (CEC). In this role SkillsIQ supported the Commonwealth Government, the VET sector, and a range of industries in VET training product development projects to ensure skills training standards aligned to the current and future needs of workplaces. We are now continuing with our work on developing international standards, supporting employers and State/Territory and Federal Governments in industry engagement and workforce development.

During our time as an SSO, a major project undertaken at the direction of the IRC was the review and update of six (6) nationally recognised qualifications with associated skill sets and Units of Competency (i.e. Training Package products) for the CEC sector. The project covered three key segments of the CEC sector: Early Childhood Education and Care (ECEC), School Based Education Support and Outside School Hours Care (including vacation care)/School Age Care. Many of the issues and themes currently being explored by the Royal Commission (i.e. accessibility, quality of education, workforce supply etc.) were also investigated in this project, with the findings outlined in the following section.

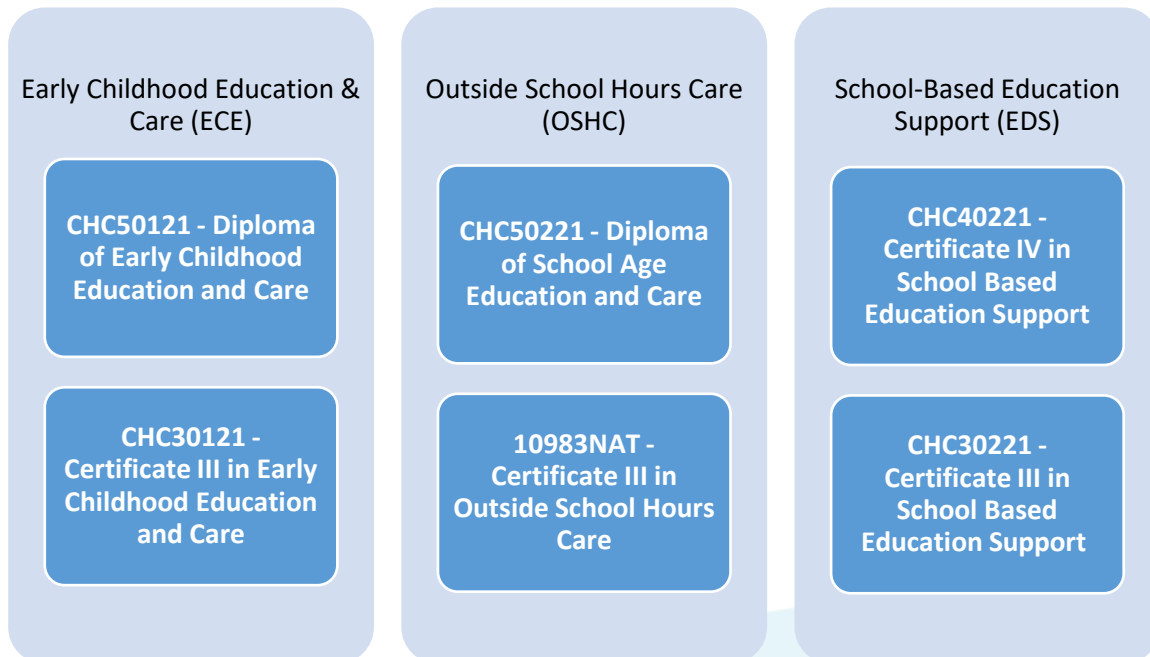
About this submission

SkillsIQ has approached this submission from the perspective and expertise of VET and workforce development and the role these play in supporting the CEC sector in addressing the Terms of Reference set out by this Royal Commission. We agree in principle to the three main Terms (i.e. first 1000 days of life, OSHC and workforce) and our commentary is focussed on OSHC and the workforce, specifically workforce quality, supply and distribution.

We congratulate South Australia on embarking on this investigation. We believe the state is well placed to take innovative steps to addressing issues, as it can break down highly complex national issues into “manageable chunks” for policy development and implementation.

Vocational Education and Training (VET) and the Children’s Education and Care (CEC) sector

The VET sector offers five (5) nationally recognised qualifications, one (1) national Accredited Course, 62 Units of Competency and three (3) Skill Sets which specifically apply to training the Children’s Education and Care workforce:



Skill Sets

- CHCSS00118- School-Based Education Support Work Skill Set
- CHCSS00119- Out of School Hours Care Skill Set
- CHCSS00144 - Supporting Children and Families with Complex Needs

Source: *Training.gov.au*

As outlined earlier, the VET qualifications recently underwent an in-depth review which involved extensive consultations with a range of stakeholders across the country. The review of the qualifications was initiated to address the outcomes of an Australian Skills Quality Authority (ASQA) National Strategic Review *Training for early childhood education and care in Australia*,¹ the findings of which were released in 2015.

SkillsIQ research, including surveys of employers, educators and training organisations, established that any update to the two (2) qualifications specific to early childhood, which had been the focus of the ASQA Strategic Review, would also need to consider other qualifications incorporating early childhood Units of Competency, specifically the School Age Care and Education Support sectors.

¹ Australian Skills Quality Authority (2015) Training for early childhood education and care in Australia. Australian Government: Canberra [Retrieved from: https://www.asqa.gov.au/sites/default/files/Strategic_Review_2015_Early_Childhood_Education_Report.pdf]

The Training Package update explored the current and future skills needs of the sector to ensure the Training Package products were updated to reflect the sector's skills needs in the context of various compliance and regulatory frameworks, including the National Quality Framework (NQF). There were challenges in conducting a review with such a broad and diverse group of stakeholders, with a range of competing views and issues throughout the duration of the project. The level of engagement in the consultative process for the project was evidenced by participation of 1400 registered attendees at face-to-face workshops or webinars and receipt of 3084 individual pieces of written feedback from 1200 individual stakeholders nationally. The organisations were a combination of employers, peak bodies, RTOs and government or government agencies.

Many of the issues in that project have been characteristic of the sector for some time and are due in part to the breadth of coverage and the diverse and heterogeneous nature of services available, in the context of national and state jurisdictional frameworks. The Royal Commission in the "Final Call for Submissions" notes that work is already underway as part of the *Shaping Our Future: National Education and Care Workforce Strategy 2022 – 2031*.² This work includes finding resolutions to structural issues with the well-established networks within the sectors which provide continuity of experience to the perspectives which are of most relevance to them.

As outlined in the introduction, this submission focuses on workforce issues associated with the planning for 3-year-old preschool from 2026. It incorporates three (3) fundamental aspects, in understanding the complexity of policy settings in the sector and how they affect the purpose and aims of the Royal Commission. These can be generally stated as follows:

- **The sector is not an economic market** nor is it a mini social welfare state. Determining how the economic, social, community welfare and equity aspects of its role in society can be best integrated to achieve outcomes needs to take into account a broad context of all of these aspects.
- There is consensus regarding the benefits behind brain development in early childhood and linkages with life opportunities however, **not everyone agrees on how universal access can work**. This is due in part to the differing expectations of individual families, as well as broader stakeholder groups, about what education is and when it should start in a formal and structured setting. Questions are raised, for example - is universal access to preschool for 3-year-olds an extension of the school system or is school or long day care merely an issue of the setting?
- There can be **ambiguity in the application of existing workforce qualifications across related sectors**. There are significant, unique, fundamental aspects in the job roles, workforce challenges, relevant work contexts and skills requirements. In addressing the minimum standards in the *Certificate III in Early Childhood Education and Care* and strengthening the alignment to the requirements of the regulatory framework, issues were created for using the qualification in other sectors, including School Age care. There were legacy issues from when the architecture of the qualifications was derived from the pre-regulatory "children's services" era, with a lot

² Education Services Australia / Education Ministers Meeting (September 2021). *Shaping Our Future A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022–2031*. Education Services Australia: Canberra [Retrieved from: <https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>]

less emphasis, data and understanding of the education component of early childhood settings.

The Royal Commission's Interim Report (April 2023) includes examples that highlight these dilemmas and some that were also experienced during the Training Package review are summarised below:

- **The sheer diversity within the sector**, both in terms of Australia's geographical scale and individual circumstances of families
- **The difficulty in balancing flexibility** with appropriate minimum standards – this was a particular challenge and is at the heart of the issue of quality
- **The complexity in policy settings** due in part to the interaction of different “buckets” of funding responsibilities and the historical demarcation between education and care and the role of services
- **The need for definition** without being overly prescriptive
- **The impacts of funding and incentives** particularly where the models are across sectors
- **The goodwill of a range of stakeholders** grappling with these challenges to achieve the best outcomes for children
- **A wariness of unintended consequences** of well-meaning or individually targeted policies – in particular, there can be a real risk of jeopardising arrangements which are working without necessarily improving outcomes.

The Early Childhood Education and Care (ECEC) workforce

The Royal Commission's Interim Report includes a focus on the critical role of Early Childhood Teachers (ECTs) and challenges with the supply of this workforce to enable the successful implementation of the universal access for 3-year-old pre-school. The VET sector is an important pathway to higher qualifications including degrees, and consideration in addressing workforce issues should be viewed as a “whole of workforce” pipeline, rather than an either/or option. People can enter the ECE sector at a certificate level and as they gain confidence and experience decide to progress to tertiary qualifications such as ECT degrees. Many factors can influence this including cost, stage of life and personal factors. It can be argued that with the updated qualifications in the VET Training Package **there is an opportunity for the pathway(s) to an ECT degree to be better structured and articulated to play a more significant role in addressing the skills shortages** being experienced now and forecast to be exacerbated in the future.

The latest enrolment data shows that, in South Australia, nearly 3,500 students were enrolled in the *Certificate III in Early Childhood Education and Care* in 2021 and an additional 2,210 students were enrolled in the *Diploma of Early Childhood Education and Care* (see Table 1). Both qualifications equip individuals with the skills and knowledge to work as ECEC educators as required by the NQF.³ Qualifications supporting the OSHC workforce were less popular, reflecting the fact that there are no national mandated qualifications for staff working in these services and the broad range of skills and qualifications aligned to the variation in activities, as well as the challenges in finding a suitable staff workforce. The enrolments in the school-based education support roles are included in the table below as these roles are part of school

³ Australian Children's Education & Care Quality Authority (ACECQA) [online] Qualification requirements. [Retrieved from: <https://www.acecqa.gov.au/qualifications/qualification-requirements>] [Viewed 9 May 2023]

settings and requirements are determined in the state and territory jurisdictions. Approximately 95 students enrolled in the *Diploma of School Age Education and Care* in 2021 in South Australia.

Table 1: Total number of enrolments (Total VET Activity [TVA]) by selected nationally recognised Children's Education and Care Training Package, by State/Territory of delivery location – 2021

Program Name	NSW	VIC	QLD	SA	WA	TAS	NT	ACT
CHC30113 - Certificate III in Early Childhood Education and Care*	26,045	11,755	16,165	3,400	4,565	680	550	885
CHC30121 - Certificate III in Early Childhood Education and Care	190	25	55	90	3,555		10	-
CHC50113 - Diploma of Early Childhood Education and Care*	13,105	16,100	13,630	2,210	2,885	655	425	740
CHC50121 - Diploma of Early Childhood Education and Care	105	10	25	-	-	-	5	-
CHC30213 - Certificate III in Education Support*	5,230	5,620	7,440	570	260	265	80	5
CHC40213 - Certificate IV in Education Support*	3,335	4,325	5,500	315	2,755	5	95	265
CHC40221 - Certificate IV in School Based Education Support	5	20	-	-	310	-	-	-
CHC50213 - Diploma of School Age Education and Care*	240	410	715	95	5	-	-	15

Note: * Represents superseded qualification. ^D represents deleted from the CHC Community Services Training Package 30 December 2022)

Source: NCVER 2022, Total VET students and courses 2021: program enrolments DataBuilder, Total, State/territory of delivery location, Training package, Program name by Year

Over the last five reported years, enrolments in South Australia have been increasing steadily for the *Certificate III in Early Childhood Education and Care*, whereas enrolments in the Diploma have been falling (see Table 2). The significance of these figures and trends is that they **represent a current supply channel of workers for the sector** and an important avenue for consideration to address accessibility and quality of preschool education and OSHC for the state. VET establishes important pathways to support the sector and continued pathways into higher education and SkillsIQ recommends, specifically, linkages with study requirements for ECT degrees be explored and established (see Diagram 1).

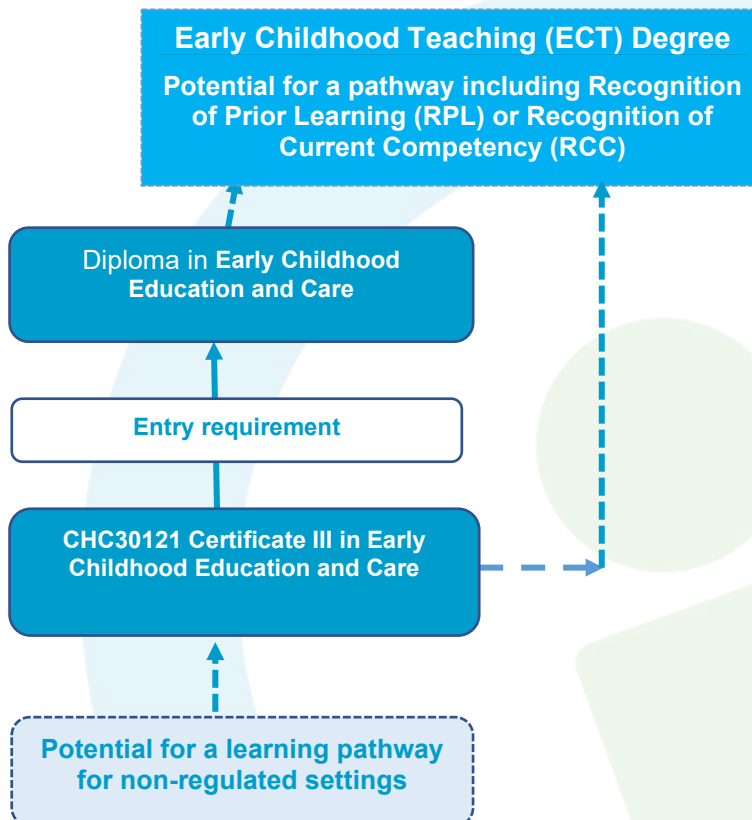
Table 2: Total number of enrolments (Total VET Activity [TVA]) by selected nationally recognised Children's Education and Care Training Package, by **SA delivery location** – 2017 – 2021

Program Name	2017	2018	2019	2020	2021
CHC30113 - Certificate III in Early Childhood Education and Care*	2,550	2,755	3,130	3,040	3,400
CHC30121 - Certificate III in Early Childhood Education and Care	-	-	-	-	90
CHC50113 - Diploma of Early Childhood Education and Care*	2830	2410	2360	2340	2210
CHC50121 - Diploma of Early Childhood Education and Care	-	-	-	-	-
CHC30213 - Certificate III in Education Support*	675	640	665	650	570
CHC40213 - Certificate IV in Education Support*	135	100	145	140	315
CHC40221 - Certificate IV in School Based Education Support	-	-	-	-	-
CHC50213 - Diploma of School Age Education and Care*	40	20	20	35	95

Note: * Represents superseded qualification. ^D represents deleted from the CHC Community Services Training Package 30 December 2022)

Source: NCVET 2022, Total VET students and courses 2021: program enrolments DataBuilder, Total, State/territory of delivery location, Training package, Program name by Year

Diagram 1: Potential to structure training pathways in VET and to higher education – CEC sector with current (2021 released) qualifications



The CEC sector involves interactions with children, a vulnerable group in society where protective measures to safeguard rights, privacy and well-being are necessary. There are significant responsibilities that apply to the work contexts in early childhood, school-based education support and school age care.

An important consideration for the Royal Commission in determining what universal access means and what options will be acceptable for implementation is what the qualifications for educators working outside of regulated services and outside the requirements of the NQF should be. This will involve weighing up the evidence being presented in relation to the preschool setting and in particular:

- Long Day Care (LDC)
- Schools, especially in regional and remote areas where alternative LDC services may not be available (i.e. a childcare desert)
- Out of School Hours Care (OSHC).

From a workforce perspective, this will have implications for the skills that are valued and the pathways (including learning and work pathways) to exist. The following quote from the Interim Report includes this acknowledgement on page 75:

One of the most challenging questions under consideration by the Commission is how flexible to be with the definition of preschool.

The Commission is mindful that if there is a strict requirement that preschool comprise a formal learning program led by a qualified teacher, a number of children might be excluded from accessing the program altogether.

Focusing on preschool for 3 and 4-year-olds, an agreed state-based curriculum can be the same in either the LDC or school setting, BUT there will be variation in the following:

- Who designs it
- Who delivers it versus who is available to deliver it
- What the physical location and features of the environment in terms of space, who else is there, resources. It is clear that the needs of 3 and 4-year-olds differ from older children in the school environment.

The Out of School Hours Care (OSHC) workforce

OSHC is a separate service and traditionally a different operating and sometimes ideological model to ECEC and school. This can be a fundamental challenge in addressing OSHC issues. The dilemmas are whether the service is an extension of the school day or whether it is recreation and leisure. To what extent can this depend on the expectations of families? For example, some families may expect their child to complete homework while attending OSHC. These services may be perceived as part of a school service however, as highlighted in the hearings before the Royal Commission, they are a separate service. Recent research has focussed on the aspects of transitions from school to OSHC, including where a child has specific education support available to them at school and then not at OSHC and no handover process between the two. These factors all have an impact on the available physical spaces, resources and set up of OSHC services and a direct effect on the experience of the children.

In the context of this Royal Commission, it is relevant to **consider the extent to which the demand for OSHC is derived from the work or study commitments of families.** This can be tricky. As presented in the evidence, a school and OSHC service may be the only option available to some families (i.e. LDC and FDC are not available). The OSHC setting has also been noted as a safe place for some children with complex home environments.

While OSHC services can operate under the NQF **there are no national mandated qualifications which apply to the sector** and there are significant state and territory jurisdictional differences and challenges with this. In all states, OSHC qualifications and potential sources of labour supply have been broader than in early childhood due in part to the recreation and leisure aspects of the role. In recent years however, with the recognition of national learning frameworks and the NQF, examples of mature workers with various qualifications are often quoted (including in the evidence to this Royal Commission).

A particular challenge in finding staff in this sector is the nature of the work pattern, with split shifts not being attractive to many cohorts. Services are able to trade-off the desire for a stable and long-term workforce for suitably qualified students and others that the work pattern suits. While this satisfies the need for staffing it doesn't necessarily promote the sector as a career choice or longer-term personal development opportunity. It should be noted that the staff mix doesn't have to be one or the other – its more about the professional profile of the sector and staff attraction and retention. It does mean, however, that employers need to adapt their induction programs for different staff and/or for different times of the year. In relation to 3- and 4-year-olds, the staff skills requirements become more complex in terms of safety and the environment, as well as supervision. The age group in OSHC could mean 3-year-olds sharing space with 12-year-olds and all ages in between.

In the evidence being presented to the Royal Commission it is clear that **how a service is run is very much leadership-driven** and where associated with a school in a community, can be largely dependent on the relationship between the school leadership and the OSHC service. This can influence everything from the physical attributes and resources of the service to informal wrap-around supports and community value. There is a reality that there are some areas where a OSHC service attached to a school is the only accessible option for some families outside of school hours (i.e. no LDC is available).

The role of minimum qualification standards

Opportunities exist to really get this right. **The need for an increase in the workforce supply of ECTs and potentially other suitably qualified staff needs to be balanced with the application of appropriate minimum standards to maximise quality.** This is true for skills and qualifications recognised in skilled migration arrangements, as well as domestic labour markets. “Not just anyone” can work with children and minimum standards are part of safeguarding their safety and wellbeing and controlling known risks. Qualifications are not “red tape” but it does mean that course entry requirements, screening procedures and work placement support and mentoring can be more definitive than in other sectors.

Similarly “not just anyone” can deliver qualifications, or even accredited and unaccredited training, effectively. In providing incentives to attract people to courses, training organisations are also attracted. Many can be experts at compliance but poor providers in terms of student screening and support. In some cases the training organisation may not be adequately resourced to properly support the volume of students signing up for the course. Some courses and some students are not suited to online delivery.

For those settings providing early childhood services outside the NQF, skills development programs for staff can be considered in the context of broader based skill sets or qualifications combining community service or health aspects with those specific to early childhood. As investigated in this Royal Commission, there are childcare deserts in many geographic areas which can be, but are not exclusively, in regional and remote areas. This situation can be exacerbated by a desert of other services that can impact socio economic advantage and family health.

It would be useful to look closely at this in terms of funding and subsidies that are available/are potentially feasible in South Australia. There could be valuable lessons to be learnt nationally. The advantage of considering these issues in South Australia is that it is a more “manageable chunk” than a national approach. **There is a real opportunity to consider how minimum standards can be applied and what pathways can be recognised, prioritised and funded, as well as any extra needed microcredentials facilitating those pathways.** In national qualifications it is not possible to address the requirements of different cohorts, however with targeted pathways there is greater flexibility with this, particularly where people might be coming to formal education for the first time or after some time, reskilling or upskilling.

The analysis fits with Closing the Gap strategies and related Aboriginal and Torres Strait Islander education and support models, as well as other cultural community initiatives. There also appears to be an important role for Local Government in this analysis, as well as health services. COVID did see some communities strengthened and enabling roles identified. Integral to this was the trust, understanding and respect of the local community.

Pathway Opportunities

In the VET sector, the *Certificate III in Early Childhood Education and Care* is currently an entry requirement for the Diploma. The Units of Competency were substantially rewritten to align with the NQF and to provide a solid foundation for people looking to start their career in CEC. **It is recommended that universities and their employer partners in the sector consider this qualification as a pathway to an ECT Degree.**

With this opportunity for integration between VET and higher education pathways, South Australia could be well positioned to develop, implement and trial an innovative model. The content delivered in the Certificate III is currently positioned as the entry point to the sector. Throughout the VET qualification review and in every state and territory, employers noted that access to high quality graduates was of significantly greater importance than access to large numbers of graduates with inferior skills and knowledge, which was a factor of significant risk.

This pathway will require broader thinking than that experienced to date. The state can be instrumental in driving course demand through its funding arrangements and student incentives. Often the flexibility that is available in the VET system with contextualisation and employer partnerships is underestimated and overlooked.

A particular example was in respect to a new accredited course, supported by employers, for a *Certificate III in Outside School Hours Care*. As a nationally accredited course, this was coordinated by the National Outside School Hours Services Alliance (NOSHSA) to meet the needs of the sector, following the changes made to the early childhood qualifications. It was an opportunity to address concerns with the challenges in having a stable workforce and being able to attract people under traineeship arrangements. However, the recognition and funding for the course at a state level has proven to be an onerous process.

RTOs want a certainty of funding/subsidy before they make the application to put the qualification on scope. This is due to the significant costs associated with adding a full qualification to their scope. Certainty of funding/subsidy provides an assurance that they will have sufficient enrolments for the qualification to be viable to deliver. In some states and territories however, RTOs need to have the qualification on scope before they can access funding/subsidies. **There is a need to work with RTOs and the wider VET sector to support and facilitate the implementation and offering of training.**

Recognition of Prior Learning (RPL) Processes

Part of a workforce strategy to support the model could address the mystery and misconception that often surrounds discussion of RPL processes. RPL processes are often dismissed as unnecessarily onerous or an additional inconvenience. There is scope in this area to facilitate an effective RPL process. At a state level, common resources and frameworks may be possible however they need to be mindful that RTOs and higher education providers are a service partner not “the industry”, a role that is often confused and to the detriment of quality training outcomes.

With strengthened partnerships between universities and VET, there could be scope for direct credit transfer.

In the interests of skills quality there must be assessment against something as the minimum standard – regardless of whether people have experience or other attributes.

It should also be noted that not everyone who works in the sectors wants to be an ECT. For others who do there may be additional support (including financial) required. An employer in the Training Package project voiced in the consultation in respect to the OSHC consultation that “we need a national workforce strategy that recognises the challenges of split shifting and

how work is arranged....we have fantastic people in the state that do not want to be teachers, they might be interested in the operational running of the service or other aspects..”

Qualifications suited to Australian Traineeships or Apprenticeships

Traineeships are a significant employment option in the ECEC sector with an average of over 7,800 trainees enrolled in the Certificate III and nearly 3,000 enrolled in the Diploma in 2021 (Australia).⁴ Traineeships can be effective in progressively addressing the practical application of skills and knowledge throughout the course as well as the workplace development and assessment requirements. Traineeships can enhance customisation to organisational and workplace policies and procedures and promote mentoring opportunities within the workplace which many employers see as an advantage. A fully inducted and qualified employee is a valued outcome of traineeships and the continuity of staff is a benefit to children as an important component to establishing relationships and other critical aspects in their early childhood development. Employer awareness of traineeships as well as assistance and support in the administrative aspects and mentoring support for the students can strengthen strategies to encourage traineeship enrolments.

VET in Schools

There are also **arrangements for structured school-based programs** where students are able to achieve statements of attainment during their final years of study. These programs are administered by the state and territory jurisdictions and ensure school curriculum requirements are met.

During the Training Package review project, stakeholder views varied about the suitability of some of the Units of Competency for school delivery however there was a general consensus that **carefully structured and supervised programs were of value**. For OSHC there was more flexibility in the kind of program that could be applied on the OSHC setting. For example, students involved in sport and physical education type qualifications were employed in OSHC services. It was also highlighted that an introduction to the early childhood education and care sector is a useful way to clarify the nature of the work and the reality of the depth of study.

Regional & Remote Communities

Challenges in recruiting and retaining appropriately qualified staff and access to training are magnified in regional and remote communities. Housing availability, cost of living factors relative to potentially low wage rates as well as geographic distances and costs of travel have an impact on attraction and retention of the workforce. Identified challenges in facilitating both learning and work pathways for people within regional and remote communities include access to quality training providers, difficulty in fulfilling work placement requirements and assessment requirements.

It is useful to note again here that in other submissions and in hearings before this Royal Commission, evidence has been presented to show that the childcare deserts and broader access issues associated with that have been found to be not exclusive to regional and remote communities or specific cultural groups.

⁴ NCVET DataBuilder. Total VET students and courses 2021: program enrolments DataBuilder [Viewed 9 May 2023],

Conclusions

Workforce issues being highlighted as part of the Royal Commission provide opportunities to pilot innovative approaches to solutions. **Consideration of learning and career pathways is justified in meeting the needs of the whole of the sector** and will be possible in the mixed delivery approach to services being considered. Appropriately skilled and trained staff is a critical enabler of quality in different settings and therefore has a direct impact on children.

Although the funding and subsidy issues for services are complex, **there is a universal backbone available in relation to skills development pathways in the OSHC and ECE environments consistent with the NQF**. There is scope to complement this with additional microcredentials to facilitate pathways as well as consider implementation strategies to better serve the needs of the sector and address issues of volume and distribution of workforce supply and retention in particular. It is important that **employers are included in the design of this** as many invest significantly in accredited and unaccredited training to upskill their current staff. Consideration can also be given to what is expected in the identified job roles in different kinds of services with the formal qualifications and best practice staff induction. Professional development can also include skills related to the layered supports which could be health or community aspects of roles.

The mixed approach to delivering 3-year-old pre school recommended in the Interim Report can be designed to:

- Draw on the strengths of each of the LDC, school and OSHC
- Enhance the potential to integrate education and care in broader settings and services to maximise the ‘reach’ of universal preschool for 3-year olds
- Discourage competition for staff between regions and sectors

It is important not to duplicate or erode national minimum standards particularly those which are embedded and understood in the NQF.

It is also important to ensure pathways can facilitate progressive learning outcomes and set people up for success in various learning environments.

SkillsIQ has provided insights from our experience with the sector in relation to a national project which we hope is useful. We would be happy to further discuss or clarify anything in relation to this submission.