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Committee Secretary
Education and Employment References Committee
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[Senate inquiry into the quality and safety of Australia's early childhood education and care system](#)

The National Catholic Education Commission (NCEC) welcomes the opportunity to provide a short submission to the Education and Employment References Committee (committee) regarding the quality and safety of Australia's early childhood education and care system.

[About Catholic Education](#)

NCEC is the peak body for Catholic education in Australia and is responsible for the national coordination and representation of Catholic schools and school authorities. Our role is to ensure the needs of Catholic education, and the hundreds of thousands of Australian families who entrust the education of their children to our schools, are served through funding, legislation, and policy.

Catholic education is the major provider of education outside of government. Australia's 1,755, mostly low-fee, Catholic schools educate one in five, or 820,000, students and employ more than 112,000 staff. Catholic schools are not-for-profit and inclusive; open to all families who seek a Catholic education. Australia's low-fee Catholic schools give families the choice of a holistic, balanced, and affordable education.

Catholic education in Australia is associated with, runs and administers early childhood and preschool as part of its offering for families. The NCEC represents thousands of children and their families in our early childhood and learning centres, with 693 approved services under the National Quality Framework including 417 early childhood education and care (ECEC) services (including centre-based care, occasional care and family care, excluding OHSC). The almost 700 Catholic early childhood services are run under varying different governance models, all of which require clear and accountable safety measures for the protection of children.

As not-for-profit organisations providing services in numerous communities across Australia, Catholic schools, early childhood services and school systems have a significant interest in the systems which protect the safety of our children and young people, manage regulation and facilitate the effective engagement of appropriate staff and volunteers.

[The current consultation](#)

The NCEC has looked at the inquiry's Terms of Reference (TOR) and offers a submission in relation to compliance (TOR c), suitability and flexibility of funding (h), choice of care (TOR i) and related matters (TOR j).

The NCEC acknowledges that this inquiry takes place alongside current consultation by Treasury which seeks feedback on options for worker screening in the care and support economy (including ECEC) as

well as work by the Standing Council of Attorneys-General to improve the safety of the ECEC sector across state and territory jurisdictions.

NCEC strongly supports a national approach to the Working with Children Clearance and processes that facilitate information sharing and continuous verifications which are timely, reliable and (as far as possible) automated.

[\(c\) Early learning providers' compliance with quality standards and legislative requirements, including compliance with workplace laws and regulations.](#)

The greatest impediment to effective regulation and compliance with standards is the variation between state and territory jurisdictions. While acknowledging that the Australian Children's Education and Care Quality Authority (ACECQA) provides a national framework for standards, the regulatory landscape in which funding is provided, services are established and connection to educational providers is regulated is state-based and thus inconsistencies can make compliance difficult.

From the perspective of a national peak body, advocacy and support of our early childhood providers to ensure compliance is complex when navigating various state systems of regulation and legislative requirements. A focus on consistent regulation would be of benefit to the whole sector and level the playing field particularly in the instance of early childhood services in line with educational offerings on a co-located or adjacent school site.

In calling for greater coherence, the NCEC recognises the work of both Federal and State Government to better align policy, regulation and funding for ECEC with those for schools. This alignment is essential to ensure a smoother transition, enable a more effective early intervention and a consistent learning experience for children.

[\(h\) The suitability and flexibility of the funding of early education and care across Australia.](#)

The suitability and flexibility of funding impacts providers and families. For ECEC providers, existing funding models are inconsistent and do not clearly incentivise investment in preschools.

The NCEC seeks the partnership and support of State and Federal Governments in providing a nationally consistent approach, which may include:

- Sector-neutral funding programs to allow for rapid, cost-effective expansion of early childhood education centres, co-located on school premises.
- A review of the infrastructure regulatory environment, particularly around using school funds to establish ECEC services on school grounds.
- Sector-neutral funding, policies and regulation focused on priority equity cohorts, to ensure early childhood education services are provided in the areas of greatest need.
- A review of the Child Care Subsidy (CCS) model to ensure greater equity of access for all families.
- Regulatory reform and funding approaches to support more people to gain early childhood education qualifications, with a focus on equity cohorts.

Families have expressed concerns that high out-of-pocket costs can significantly limit their access to services, given cost of living pressures. Additionally, the current CCS model is seen as complex and difficult to navigate, leading some families to miss out on the subsidies to which they are entitled.

Catholic school families have told us:

- In regional and remote areas, limited options and a lack of early learning services can lead to high stress and costs for families.
- Families with children with disabilities, especially those under two, face significant challenges due to exclusionary practices.
- Aboriginal and Torres Strait Islander families are looking for culturally safe and inclusive services, yet many existing models lack cultural sensitivity.
- Culturally and linguistically diverse families can struggle with language and cultural differences, further complicating access.

Many families, especially those experiencing disadvantage, require comprehensive support to meet their needs.

Catholic school authorities have a depth of experience in providing educational support to students across diverse cohorts. With greater investment in early childhood services, Catholic schools can be pivotal in offering and planning early childhood education that meets the needs of every child in their care.

The NCEC welcomes the changes to the Minister's CCS rules, allowing Outside School Hours Care (OSHC) services for preschool-aged children. This change improves access to wrap-around care, helping meet families' needs. It also enables Catholic early learning services to use existing facilities and resources within Catholic schools, enhancing efficiency and reducing costs for OSHC services.

Targeted government funding and regulation focused on equity cohorts, along with review of the CCS model may ensure greater equity of access for all families.

NCEC supports the Productivity Commission's recommendation to create an ECEC Development Fund, which would provide support favouring not-for-profit providers in thin markets. This should include schools. Block-based funding could be implemented to sustain small, regional areas, where the service is essential, but economies of scale are challenging, due to lower enrolment levels or limited use. This approach ensures a minimum level of access, particularly in underserved areas, aligning with the ECEC's goal of fostering universal partnership and equitable service availability.

[\(i\) The choice of care options available to parents and families.](#)

One of the great strengths of the Australian educational model is an eco-system of government, non-government, faith-based, secular, single-sex, co-educational, selective, comprehensive and differentiated fee models of schooling. These all facilitate a system where parents can select the education that is right for their child. A multi-sector response to ECEC, including Catholic Education, will provide parents and carers with greater choice and significant benefits to Government, including:

- Outsourcing the delivery of preschool infrastructure: Catholic Education is experienced in building schools with fast turn-around, partnering with architects, builders, and industry experts to deliver high-quality building projects to tight deadlines. Estimates developed by States and Territories show significant cost-efficiencies can be gained by outsourcing the infrastructure development to Catholic education.
- Achieving a greater geographical reach: Catholic Education has schools that operate in metropolitan, rural, regional, and remote communities right across Australia.
- Improving equity: existing relationships with families from all equity cohorts: Catholic schools are already established in areas of high vulnerability, and in 'childcare deserts' across the country.

- Integration into established education settings: Equitable access for every student to a teacher and school curriculum will improve the experiences of school transition and educational outcomes. Existing wrap around support structures including allied health and before and after school care can extend to families using preschool services providing efficient and equitable access.

(j) Related matters – Co-location on school sites.

Catholic education is proudly the major provider of education outside of government. Our long and proud history in education makes us perfectly placed to leverage the human resources, physical facilities, learning approaches and family care in the early education sector.

The NCEC believes there is enormous scope for growth, by leveraging existing land, infrastructure and resources to provide preschools, co-located on school sites. Co-location not only allows a rapid and cost-effective approach to scale, it also provides enormous benefits to students, families and educators.

A preschool and primary school co-location model strengthens the connection between early learning and primary education, helping children develop essential life skills and learning abilities. This model provides parents and carers with increased choice and flexibility, particularly in areas with high educational needs. By situating preschools within existing schools, children are better prepared for their first year of schooling, reducing the stress of multiple drop-offs for families and offering greater support to working parents dealing with cost-of-living pressures.

Co-location ensures continuity in children's learning, giving them opportunities to engage with the school community through participation in school events, programs, and visits to key facilities like the local church or school assemblies.

Existing wrap around support structures including allied health and before and after school care can extend to families using preschool services providing efficient and equitable access.

These experiences are part of a structured transition process that familiarises children with the school environment and builds connections with teachers. Additionally, it promotes collaboration between preschool and primary educators, leading to smoother transitions and improved knowledge sharing to support student development.

Preliminary analysis led by the Catholic sector indicates that the operating costs of running preschools co-located on Catholic school sites are lower and have the potential to leverage existing staff, facilities, maintenance and operational costs at a saving for the government. When extrapolated nationally, this potentially represents significant cost-savings to Australian taxpayers.

There are already several examples where governments are co-investing with Catholic education. For example, Melbourne Archdiocese Catholic Schools secured government funding to open new early childhood education and care centres to meet growing demand in Melbourne's targeted growth corridors.

Catholic Education can partner at a national and state level, to identify and address specific areas of need in one state (e.g. delivering ECEC in Regional/Rural communities) and apply the learnings across our system nationally.

The Catholic education sector is uniquely placed to be able to quickly and cost-effectively expand our preschool capacity, co-located within schools across Australia. The Building the Education Revolution

(BER) program serves as a clear example of how targeted investment in educational infrastructure can lead to tangible benefits for schools and communities. This funding model could support the construction and refurbishment of early learning facilities, with the potential for federal and state partnerships, grants and community contributions.

Catholic schools are located in regional, rural and remote areas, densely-populated metropolitan areas, and high-growth areas where current offerings cannot meet current, or future demand.

Government intervention through policy, regulation and funding to enable the provision of services in 'childcare deserts,' where the demand for preschool places exceeds availability is required. The NCEC welcomes the Government's Building Early Education Fund and looks forward to exploring the opportunity to maximise the offering for our youngest learners.

The NCEC is not purporting that investing in infrastructure and regulatory reform is the only answer to early childhood education needs in Australia. The issues of safety and quality are exacerbated by the workforce crisis.

Practitioners trained in early learning have qualifications and capacity for 3 years old to Year 3 students and so co-location and/or integration of an ECEC within a school offering could potentially provide a professional workforce from early years education through early primary.

Beyond co-location, a fundamental shift to define the national offering of school from 4 years of age would facilitate a funding, regulatory, staff and compliance model that leverages the well-established, understood and managed school system in Australia. While acknowledging this is a bold move, the NCEC purports that this would reduce duplication between the ECEC and school sector, streamline funding, extend developed safety approaches and enhance compliance with regulation. Most importantly it would provide an equitable, safe, transitioned and pedagogically sound education that gives children the best start in life.

Should you have any further questions in relation to this submission, please contact me via phone 02 8229 0808 or via email jacinta.collins@ncec.catholic.edu.au.

Yours faithfully



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