



**Early Childhood Australia**  
A voice for young children

**OUR  
VISION:  
EVERY  
YOUNG  
CHILD IS  
THRIVING  
AND  
LEARNING**

## Streamlining Early Childhood Education and Child Care Approval Processes across Jurisdictions

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COAG Consultation Regulation Impact Statement November 2020

**Early Childhood Australia**

**January 2020**

### **About us:**

Early Childhood Australia (ECA) is a not-for-profit organisation that has been a voice for children since 1938. We have a federated structure with branches in every state and territory in Australia and our membership includes individual professionals, early childhood services and schools, as well as public, private and not-for-profit organisations that share a commitment to young children.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school.

Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight. ECA specifically acknowledges the rights of Aboriginal and Torres Strait Islander children and their families, and the past and current injustices and realities for them around Australia.

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## 1. Executive Summary

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ECA welcomes the opportunity to provide feedback on the COAG Consultation Regulation Impact (CRIS) – *Streamlining Early Childhood Education and Child Care Approval Processes across Jurisdictions*.

ECA recognises it is important and beneficial to regularly review early childhood education and child care systems and processes to improve experiences for both providers and government agencies.

ECA considers approval processes to be an important and necessary step in safeguarding the integrity of the National Law. ECA understands that the approval processes and service eligibility criteria were designed to strengthen the government's compliance framework and ensure the effective management of subsidy, including the increased emphasis on the approved provider and matters related to fitness and propriety, financial management, payment integrity and compliance history.

In our submission to the Senate Inquiry into the Effect of Red Tape on Childcare (Early Education and Care) in 2018<sup>1</sup>, ECA recommended that the administrative burden and cost on both services and families arising from the new child care subsidy arrangements be monitored and assessed. ECA does not support any reduction of regulation that would compromise the quality of services provided to children.

ECA's submission to the CRIS focusses on the importance on ensuring the best interests of children are the paramount consideration.

In developing this submission, ECA has consulted with ECA Branches located in each State and Territory.

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<sup>1</sup> 2018, ECA submission, Senate Red Tape Committee, The Effect of Red Tape on Childcare  
[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Red\\_Tape/Childcare/Submissions](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Red_Tape/Childcare/Submissions)



## Key considerations

ECA considers strong and efficient approval processes to be essential to support families to access quality early education and care. In considering the CRIS and the three reform options, ECA provides the following comments.

- **Integrated and aligned processes** – ECA acknowledges the benefits of applicants submitting a joint application and supports the final decision making being retained by the State Regulatory Authority for the NQF and the Australian Government for the CCS, to ensure robustness of the system. ECA recognises the benefits in streamlining, sharing information and cross checking of applications through an improved NQA ITS.
- **National consistency** – consistency across jurisdictions is an important issue that must be regularly reviewed and addressed. Inconsistent approaches to tests and interviews undermine the intent of the National Law to provide a nationally consistent and robust approach.

Safeguards must be put in place to ensure unscrupulous applicants are not being coached by other applicants/providers in order to meet approval requirements.

- **Timeframes** – ECA supports a thorough, considered decision making process rather than one that is subject to strict or pressured timeframes. The application process is the key opportunity to 'gate keep' the sector from unscrupulous providers.

ECA suggests further clarity be provided around approval timeframes to support sector planning and to manage expectations of applicants. Additionally, consideration should be given to prioritising applications for new services in identified areas of need. This could be done in consultation with local government authorities.

- **Improved system integrity** – non-compliance practices since the commencement of the National Law should be carefully reviewed to inform changes to the approval process. Different service types and risk levels should be carefully considered in balancing risk and strengthening processes.

ECA supports joined up fitness and propriety checks, increased information sharing and intelligence that protect the best interests of children and families, and the integrity of the system.

## Conclusion

ECA has considered the three reform options put forward in the CRIS and supports *Option 2 – Fully Joined-up Approval Processes*.