



Queensland University of Technology (QUT) is pleased to submit this response to the Productivity Commission's findings and recommendations presented in the draft report *A path to universal early childhood education and care (ECEC)*.

QUT has a rich history in early childhood education, with more than 110 years preparing specialist early childhood teachers and leading transformational research to inform early childhood policy and practice. We offer a suite of early childhood teacher education programs, at both Bachelor and Master levels, preparing teachers to work with young children from birth to 8 years in prior-to-school ECEC settings and the early years of school (Prep to Year 3). We also offer postgraduate programs that address priority topics in early education (including educational leadership, First Nations education practices, trauma-aware education) and a range of research-informed professional learning programs for teachers and educators in ECEC settings.

We have a strong track record of interdisciplinary and collaborative research, which is undertaken in close partnership with the sector. QUT is home to the Australian Research Council [Centre of Excellence for the Digital Child](#), which is dedicated to creating positive digital childhoods for all Australian children. The QUT [Centre for Child and Family Studies](#) draws together researchers with interdisciplinary expertise in childhood, parenting and the childhood workforce (educators, health professionals, community and other professionals), recognising the need for holistic approaches to support young children and their families.

This submission was developed by colleagues in the School of Early Childhood and Inclusive Education, within the Faculty of Creative Industries, Education and Social Justice (See Appendix 1). The submission has been informed by our teaching, research, sector engagement and participation in recent policy consultations in early childhood education and initial teacher education.

Early Childhood Teacher Education

QUT is a member of the Queensland Council of Deans of Education (QCDE) and has contributed extensively to its submission. We are supportive of the recommendations made by the QCDE in relation to early childhood teacher education. In this first section, we offer a summary of key points, with reference to QUT programs and priorities.

3.1 Reduce barriers to upskilling including accelerated pathways, funding and support

- QUT supports the exploration of accelerated pathways into teaching in ECEC as a short to medium-term workforce strategy. However, this support is subject to further research and evaluation. We are currently working with education sector partners to co-design, deliver and evaluate accelerated programs for primary and secondary teachers (e.g., Queensland's Turn to Teaching – Internship program) and have a successful articulation pathway from the Diploma of ECEC into our Bachelor of Education (Early Childhood). While we see great value and benefit in leveraging prior study and experience, it is crucial to recognise that accelerated programs intensify the study experience, demand significant time and energy from students, and are not appropriate in all circumstances. To respond to the needs of diverse preservice teachers, we advocate for both funding and support across a range of pathways into teaching, including part-time study options for educators who are combining work and study.

- QUT strongly endorses targeted funding and support for vocationally qualified educators to enhance their qualifications and transition into roles as early childhood teachers.
- QUT commends ongoing initiatives aimed at providing personalised wrap-around support for educators completing their teaching degree. Indeed, we view this as a collaborative endeavour. To maximise the benefits for students, as well as cost-effectiveness, close cooperation among key stakeholders (such as government, peak organisations, employers, VET and universities) is essential in planning, implementing, and evaluating these support programs.
- Engagement in high-quality supervised professional experience is a critical component of all ITE programs at QUT. This enables our preservice teachers to connect theory, research and practice, learn from experienced educators, and engage with diverse children and families in various ECEC contexts and communities. Seeking ways to provide more flexibility, QUT currently allows one professional experience to be undertaken in the work setting (ECEC or school). However, we advocate for diversity in placements, as well as the advantages of working with multiple skilled mentor teachers in different settings and communities. In cases where professional experience occurs in the workplace, QUT strongly recommends that preservice teachers are supported to focus on successfully completing their professional experience and are not counted in minimum staff-to-child ratio requirements.
- QUT strongly advocates for increased funding support for preservice teachers during professional experience. We recognise positive examples of employer commitment and investment in this context, such as sponsored scholarships and bursaries that include paid professional experience (e.g., G8 Education, Goodstart Early Learning). We see this as a shared responsibility that requires employer commitment and contribution, alongside substantial public investment. This is essential to expanding support for, and growing, the ECEC workforce.

3.2 Support innovative delivery of teaching qualifications

- QUT welcomes funding initiatives to support the co-design and trialling of innovative ITE program models of delivery. In line with recent policy report insights and recommendations (e.g., Teacher Education Expert Panel), it is imperative that these initiatives receive funding to ensure they are evaluated thoroughly.

3.3 Improve registration arrangements for teachers in prior-to-school settings

QUT strongly subscribes to “one teaching profession” (AITSL, 2018), and advocates for the right of all qualified teachers to seek professional registration.

- Recognising ACECQA's endorsement of three-year qualifications for teachers in ECEC, QUT expresses concern about the loss of parity in qualification requirements between these teachers and their colleagues in schools. We advocate for framing this as a short-term workforce strategy to address immediate challenges and recommend planning and incentives to support and encourage three-year qualified teachers to pursue a fourth year of study in the medium term.
- QUT supports access to provisional teacher registration for individuals who have completed a three-year early childhood teaching qualification recognised by ACECQA, with the need for a fourth year of study to obtain full teacher registration. QUT strongly opposes a dual-system model of teacher registration (such as the Victorian model) that arbitrarily segregates the profession based on work settings.
- Emphasising the importance of achieving parity among teachers in terms of professional qualifications, recognition and registration, QUT strongly supports creating enhanced pathways for early childhood teachers in prior-to-school ECEC settings. These pathways

would enable such teachers to gain recognition and remuneration as Highly Accomplished and Lead Teachers. We highlight this as being crucial to strengthening career pathways in ECEC.

- QUT advocates for a unified and inclusive Australian Professional Standards for Teachers (APST). We call for the promised revision of the APST (AITSL, 2018) to ensure it respects, reflects and supports the professional work of early childhood teachers across diverse work environments (i.e., long day care, kindergarten, school). The APST should be written in a manner that speaks clearly to all teachers, supporting their professional growth and career progression, regardless of their educational setting.
- As a university that prepares early childhood teachers to work in ECEC and schools, our programs are accredited by AITSL and approved by ACECQA. While recognising the distinct roles of both agencies, we see opportunity to streamline and strengthen the accreditation process for programs that prepare early childhood teachers to work with children from birth to 8 years. Key to this is working towards a more cohesive accreditation process that enhances understanding of the professional work of teachers in ECEC and schools, while also placing equal emphasis on both education contexts.

3.4 Mentoring beginning ECTs

- QUT advocates for a model of shared responsibility for the mentoring of beginning early childhood teachers in ECEC. This should include the Approved Provider as having a role in supporting induction and transition to teaching, ongoing professional learning and growth, and the shift from provisional to full teacher registration.
- Recognising current workforce challenges in ECEC, we agree that state and territory governments should support access to structured evidence-informed mentoring and support programs for beginning early childhood teachers. There is opportunity to learn from, and leverage, a range of established evidence-informed mentoring programs, including the successful QUT program *Mentoring Beginning Teachers* and tailored *Mentoring Beginning Early Childhood Teachers* programs funded by the Queensland Department of Education.
- Considering the current shortage of qualified and registered early childhood teachers who are available for mentoring, we suggest that universities could play a pivotal role. Our vision is that teachers involved in the delivery of early childhood teacher education could continue to provide mentoring and support to clusters of beginning early childhood teachers. We would be pleased to elaborate on this idea but note that our current academic workforce is stretched, and this approach would be dependent on funding support.

3.6 Contribute to professional development for the ECEC workforce.

- QUT advocates for a collaborative approach to ongoing professional learning and development, acknowledging the interrelated roles and responsibilities of employers, professional organisations, early childhood teachers and governments.
- QUT underscores the critical importance of ensuring high-quality, evidence-informed professional learning programs and resources. Considering the proliferation of professional development providers and persisting concerns about the quality of provision, QUT believes that government has a crucial role to perform in relation to disseminating information about, and supporting access to, quality professional development. We point to the Professional Support Coordinator program funded by the Australian Government as one example of a highly effective approach to coordinating and supporting access to high-quality professional learning that is responsive to local priorities and needs.

Towards a universal system of high-quality inclusive ECEC

QUT strongly supports movement towards a comprehensive system of universal ECEC, underpinned by the UN Convention on the Rights of the Child and the right of all children to participate in high-quality inclusive ECEC. We see this as the cornerstone of a modern education system.

Up to 30 hours per week for all children birth to 5 years

- QUT endorses increasing access to high-quality ECEC for all children, from birth to 5 years, regardless of their parents' work status. We are supportive of the proposed 30 hours but are interested in the rationale and evidence supporting this target. We also recommend conducting research to provide guidance for parents and services on the minimum hours of participation necessary to promote the best outcomes for children.

Prioritising the best interests of children

- QUT commends the Commission for positioning children at the centre of considerations and decision-making in ECEC.
- While acknowledging the vital role of ECEC in enabling workforce participation, we believe that expanding the ECEC system must firmly prioritise children and occur in ways that align with their best interests. In planning movement towards a universal child-centred system, there is a need to consider the interconnection between a strong parental leave system, access to high quality ECEC and family-friendly work policies and practices. It is also necessary for all supporting systems to recognise and accommodate the full diversity of family settings if we are to realise a truly child-centred early childhood system.

Inclusive early childhood education and care

QUT advocates for inclusive education as a fundamental human right that enables all other rights ([QUT Centre for Inclusive Education](#)). We aspire to produce early childhood teachers who can “create inclusive learning environments and adopt flexible and informed practices, including making reasonable adjustments to optimise access, participation and engagement in early learning” (AGDE, 2022, p. 17).

2.2 Amendment of the Disability Standards for Education to include ECEC

- QUT strongly supports amending the Disability Standards for Education (2005) to recognise and include ECEC as part of our education system. We note, however, that the Disability Standards for Education does not mention, nor does it define, inclusive education. The internationally accepted definition of inclusive education comes from the UN Convention on the Rights of People with Disabilities (UNRPD) General Comment #4 on Article 24.
- We note the definition of inclusion in the updated *Early Years Learning Framework* (EYLF) was informed by the UNCRPD and reflects contemporary research on inclusion in education. In addition, the EYLF 2.0, referencing the Disability Standards for Education, defines the expectation that educators will make reasonable adjustment to assist the meaningful participation of children with disabilities or who are experiencing barriers to learning. It is time for the requirement for reasonable adjustment to be addressed in legislation.

Improve planning, funding and support for high-quality inclusive ECEC (2.3, 2.4, 2.5)

- QUT strongly supports a review of current programs and practices to support high-quality inclusive ECEC. This is necessary to address concerns about eligibility for inclusion funding, the employment of additional educators where appropriate, and administrative burden, while

also enabling the provision of timely information and support for providers and professionals in ECEC.

- We advocate for clear and supported pathways for children (from diagnosis) and their families to local, accessible, inclusive early childhood programs rather than pathways to segregated “special” programs.
- Reflective of a growing evidence base, we support a more integrated approach to ECEC, drawing together health, education, family support and other human services and supports. For example, providing therapy to children within local ECEC services, instead of removing them from these settings, while also fostering collaborative partnerships among educators, families and other professionals would help build shared knowledge and understanding to support meaningful inclusion within the ECEC setting. We suggest that the current NDIS focus on funding for therapy can work at odds with the inclusion of children in ECEC.
- QUT also supports improved coordination of inclusion funding between governments to ensure equal access to support for children in diverse ECEC settings. For example, the state-based inclusion program in Queensland provides funding for external organisations (e.g., Down Syndrome Queensland, Autism Queensland, SPELD, Learning Difficulties Australia) to assist with building educator capacity around inclusion. However, currently this funding only applies to approved kindergarten programs, not for long day care centres. In addition, kindergartens must apply for each type of funding/support separately, adding to the administrative burden on centres.

Aboriginal and Torres Strait Islander children, families and communities

3.5 Improve pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications

QUT supports the advantages and importance of enhancing diversity within the teaching workforce. We believe that the composition of the teaching profession should mirror the diversity present in the broader Australian community.

- QUT strongly endorses efforts aimed at enhancing the accessibility and cultural responsiveness of early childhood teacher education programs for Aboriginal and Torres Strait Islander people. This involves creating a culturally secure learning environment, the ability to incorporate contextually responsive approaches like 'both-ways' learning, and establishing clear pathways to teaching degrees that recognise and credit prior learning.
- In our pursuit to enrich the diversity of the ECEC workforce, we observe a significant dearth of data and information regarding cultural and linguistic diversity (CALD) within the sector. Recognising the commendable work undertaken by Family Day Care Australia in addressing this aspect within the family day care (FDC) workforce, we advocate for similar attention for other ECEC contexts. QUT supports the systematic and thorough collection of ECEC workforce data, emphasising the importance of including information about the Aboriginal and Torres Strait Islander and CALD workforce.

Secure funding for Aboriginal Community Controlled Organisations providing ECEC

- QUT is committed to building, sustaining and celebrating a culture of excellence in Indigenous education. We strongly support a sustainable funding model for ECEC services provided by Aboriginal Community Controlled Organisations (ACCOs), recognising that this is the preference of many Indigenous families. Indeed, it is acknowledged that ACCOs are best positioned to work with their local community to deliver high-quality, and culturally responsive, ECEC.

- With community consent, and appropriate funding support, there is potential for ACCOs to provide leadership through knowledge sharing, and the creation of professional learning programs and resources to strengthen the provision of culturally responsive ECEC across Australia.

Creation of a new independent Early Childhood Education and Care Commission

- QUT recognises the value of the 'stewardship model' and supports the proposed establishment of an independent national ECEC Commission to champion a universal high-quality inclusive ECEC system. While awaiting further detail, we make the following observations:
 - Foremost, the primary objective of an ECEC Commission should be to place children at the core of the ECEC system, ensuring that all policy decisions are guided by the best interests of children participating in ECEC.
 - There is need for a clear definition and delineation of the Commission's role, with careful consideration of how it will complement, and collaborate with, other relevant departments and agencies, including ACECQA and state and territory education departments.

Quality is paramount to achieving the benefits of ECEC

Australia has a strong track record in quality assurance in ECEC. Our current National Quality Framework (NQF) is internationally recognised as an effective model of contemporary regulation and quality assurance in ECEC. The two recently updated, connected Approved Learning Frameworks – the Early Years Learning Framework and the Framework for School Age Care – promote and support high-quality inclusive educational programs and practices in ECEC.

- QUT recognises the contribution of the National Quality Framework, including meaningful engagement in the Assessment and Rating (A&R) process, in driving quality improvement in Australian ECEC. To optimise impact and benefits, it is vital that governments ensure adequate and secure funding and resourcing for the national independent statutory authority—ACECQA—and state and territory regulatory authorities. This includes enabling time for regulatory officers to work positively with services to undertake the A&R process and to provide constructive feedback to inform and support continuous quality improvement.
- QUT supports further consideration of the performance of providers when assessing an application to expand service provision. Similarly, we advocate for additional consideration and assessment of the leadership and strategies needed to attract and retain teachers and educators. This should extend to nurturing a positive and supportive workplace within the A&R process, while also being part of any application for future public funding to support ECEC provision.

Further engagement

Our response has been informed by input provided by the School of Early Childhood and Inclusive Education. We welcome the opportunity to provide more detailed input into the feedback we have provided should that be of interest to the Productivity Commission. For additional information in relation to this response, please contact:

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