

FAO Committee Chair, Senator the Hon. Maria Kovacic Senate Education and Employment References Committee PO Box 6100
Parliament House
Canberra ACT 2600
Sent by email to: eec.sen@aph.gov.au

10 October 2025

Subject: Social Ventures Australia Submission to the Inquiry into Early Childhood Education and Care Quality and Safety

Dear Senator the Hon. Maria Kovacic.

Social Ventures Australia (SVA) welcomes the opportunity to provide information regarding the quality and safety of Australia's early childhood education and care system.

SVA, a not-for-profit social impact organisation, was created 20 years ago to solve challenging social problems. We influence systems to deliver better social outcomes for people by learning what works in communities, helping organisations be more effective, sharing our perspectives and advocating for change. Our vision is for an Australia where all people and communities can thrive.

SVA has developed a strong body of evidence of what children need to thrive in early childhood, recognising this critical window to change trajectories and alleviate disadvantage. Our work includes <a href="Nurture Together">Nurture Together</a>, building momentum to scale integrated early childhood models including Early Childhood Hubs that provide access to a range of key services and wrap-around supports (including food relief) as well as a safe space for families to build connections and social networks.

SVA is part of Restacking the Odds, in collaboration with the Centre for Community Child Health at the Murdoch Children's Research Institute and Bain & Company which is aiming to ensure all children can access and participate in high-quality early childhood services. This means families being able to access the right supports, when they need them. To achieve a better system, Restacking the Odds works to support partners throughout the early childhood education system through scaling innovative solutions. Key to this work is ensuring early years policymakers, partnerships and services have the right data for decision making, by equipping them with tools and resources to collect and act on data.



SVA's extensive work in the early years gives us a unique systems-level perspective on how the ECEC sector is performing and has informed our recommendations, summarised below under three themes:

### 1. Embed equitable access to quality ECEC through system design

- Apply differentiated responses to improve quality and safety for all children, informed by current patterns of quality and safety and existing inequities.
- Move towards needs-based funding for ECEC in the long-term to ensure services have the capacity and resources they need to provide high-quality ECEC, including consideration of the needs of children and families experiencing early childhood disadvantage.
- Ensure ECEC funding be made more suitable to local contexts, with priority given to communities with high early childhood disadvantage. This should include sustainable funding for Early Childhood Hubs and ACCO-led services where provision is insufficient, and support for integrated, high-quality ECEC models tailored to community needs.

### 2. Strengthen system governance to improve performance, transparency and quality

- Establish stronger, national ECEC governance arrangements, such as a National ECEC Commission, or a new national agreement that clarifies accountability and leadership for ECEC between different levels of government.
- Identify opportunities for governments to strengthen incentives for safe, high-quality ECEC through stronger market stewardship, including through targeted support for expansion of high-quality services.
- Adoption of a structured, coordinated data approach linking federal, state and territory, and service-level data could enhance transparency, and timely action to support quality and safety. This should include lead indicators of quality, quantity and participation, and the tools and capacity building required to use data for decision-making and continuous improvement.

### 3. Support services and create conditions for quality through the NQS

- Ensure adequate funding for regulators in all jurisdictions to ensure effective, routine monitoring, enforcement action and quality uplift support, including extra effort in communities with higher needs. Additionally, ECEC funding should enable investment in and support for ongoing quality improvement processes, data collection, and monitoring This includes investment in initiatives that enable service-led continuous quality improvement, such as Restacking the Odds, to ensure all children can access and participate in high-quality ECEC services.
- Ensure nutrition is articulated as a core component of high-quality ECEC. This includes
  opportunities to harness ECEC to support children's nutrition and food security, such as
  by strengthening how provision of nutritious food is addressed in the National Quality
  Framework (NQF), and consideration of a targeted national ECEC food subsidy program
  for ECEC services operating in areas with high levels of socioeconomic disadvantage
  including food insecurity.

Please find attached our full response for the Committees consideration. We would welcome the opportunity to provide you with more information through an appearance at a committee hearing.



For more information, please contact

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### Introduction

All children deserve the opportunity to participate in high-quality, safe early childhood education and care.

This parliamentary inquiry highlights the Committee's recognition that there is a need for systemic and sustainable responses to ensure children's safety, wellbeing, and development are at the centre of ECEC reform. This includes ensuring regulatory systems are fit-for-purpose, and examining the role of the market and how system incentives can better foster high quality and safety.

It is critical that simultaneous effort is applied to ensuring high quality across the early years system. Safe, quality early childhood education and care is of the utmost importance for children's outcomes, and children gain the greatest benefit from early childhood education and care (ECEC) when they participate in high quality services. However, Australian Children's Education and Care Quality Authority (ACECQA) data shows that high quality services are not evenly distributed, and children who face disadvantage are less likely than advantaged peers to access high-quality ECEC.

Urgent action to improve ECEC safety is essential. However, this must be coupled with sustainable reform that achieves high-quality, equitable ECEC across the entire system.

Valuable steps are being taken to move towards the ECEC system that children deserve. Drawing together recommendations from the Productivity Commission, new evidence relating to safety and quality, and insights from the ECEC sector, there is an opportunity for this Committee to identify priority steps to achieve impact.

SVA's extensive work in the early years, including Nurture Together and Restacking the Odds, our consulting practice and our leadership in impact investing gives us a unique systems-level perspective on how the ECEC sector is performing. Our insights are relevant to multiple Terms of Reference, so the relevant terms are noted under each.

<sup>1</sup> Rankin, P., Staton, S., Jones, A., Potia, A. H., Houen, S., Healey, B., & Thorpe, K. (2024). Linking quality and child development in early childhood education and care: Technical report. Australian Education Research Organisation, https://www.edresearch.edu.au/research/technical-reports/linking-quality-and-child-development-early-childhood-education-and-care



# 1. Embed equitable access to quality ECEC through system design

### Children don't have equitable access to safe, high quality ECEC

Responds to terms **a)** the health and safety of children in childcare services across the country and b) the effectiveness of Australia's childcare regulatory system, including the performance and resourcing of state and territory regulators and the Australian Children's Education and Care Quality Authority, in maintaining and improving quality.

Safe, quality ECEC is essential to support children's outcomes. Children gain the greatest benefit from ECEC when they participate in high quality services<sup>2</sup> and evidence shows this is particularly so for children from priority populations (e.g. Aboriginal and Torres Strait Islander children, and from culturally and linguistically diverse families, children with disability, children from low income households). However, children from priority populations are less likely than their peers to attend high-quality ECEC.

Patterns of quality and Australian Early Development Census (AEDC) outcomes follow socioeconomic patterns – yet disadvantage is not used to guide funding or quality uplift decisions.

ACECQA produces quarterly reports on centres' quality ratings under the National Quality Standard (NQS). Evidence suggests that to realise the benefits for child development outcomes, services need to be 'exceeding' on quality areas 1 (educational program and practice), 3 (physical environment), 4 (staffing arrangements) and 5 (relationships with children), and at least meeting on all others<sup>3</sup> (described below as the 'Restacking the Odds quality indicator'.) SVA and Restacking the Odds analysed how patterns of high- and low-quality link to factors like socioeconomic disadvantage, and remoteness. Our analysis finds:

- Communities in remote areas (20.2%) have the highest proportion of centres working toward the NQS, followed by those in outer regional areas (12.4%), while communities in inner metropolitan areas in major cities (5%) had the lowest proportion.
- Communities in the lowest socioeconomic deciles also show a higher proportion of services *working toward* the NQS (10%) compared with those in the highest deciles (5%)
- Communities in remote (13%) very remote (12%) and outer regional (7%) areas have a high proportion of centres *not meeting* (working toward) *quality area 2: Health and safety*. A lower proportion of centres are not meeting health and safety in metropolitan (4.2%) and inner regional (4.6%) areas.
- Nationally, 15% of services met Restacking the Odds quality indicator, with South Australia having the highest rate (23%) and the Northern Territory and Western Australia having the lowest at 3%. Communities in remote areas have the lowest proportion (5%) of services meeting the Restacking the Odds indicator, followed by those in outer regional (9%) areas, while communities in inner metropolitan areas in major cities had the highest (19%).

<sup>&</sup>lt;sup>2</sup> Rankin, P., Staton, S., Jones, A., Potia, A. H., Houen, S., Healey, B., & Thorpe, K. (2024). *Linking quality and child development in early childhood education and care: Technical report.* Australian Education Research Organisation,

https://www.edresearch.edu.au/research/technical-reports/linking-quality-and-child-development-early-childhood-education-and-care <sup>3</sup> Molloy, Macmillan, Goldfeld, Harrop, Perini. 2018. Centre for Community Child Health at Murdoch Children's Research Institute, Social Ventures Australia and Bain & Company. Restacking the Odds Technical Report Early Childhood Education and Care: An Evidence Based Review of Indicators to Assess Quality, Quantity and Participation

 Services in advantaged (SEIFA 8 - 10) areas have the highest proportion of centres meeting this indicator (17%), while communities in the lowest SEIFA deciles (1-4) had the lowest (12%).

We acknowledge that quality ratings are not a perfect measure – with long periods elapsing between assessments, and the NQS not currently adequately capturing cultural safety and inclusion. However, these figures highlight the opportunity to use ACECQA's reporting to understand patterns, target necessary quality uplift and incentives, and redress issues that result in sustained poor quality – particularly in communities with higher early childhood disadvantage.

Data already available can start to be used now, while proposed enhancements such as more frequent assessments, and the development of inclusion supports will serve to improve the value and utility of these reports over time.

We **recommend** differentiated responses to improve quality and safety for all children, informed by current patterns of quality and safety and existing inequities.

### Needs-based funding is essential to resource equitable access to high-quality ECEC

Responds to terms **h)** the suitability and flexibility of the funding of early education and care across Australia; and **i)** the choice of care options available to parents and families

Social Ventures Australia is undertaking work to explore a potential model to enhance ECEC in communities with high early childhood disadvantage. This work has identified that there is a gap for a needs-based funding model for ECEC. Findings include:

- patterns of poorer early childhood development outcomes are consistent with socioeconomic inequities
- ECEC centres operating in low-socioeconomic communities often support a higher proportion of children and families with higher needs compared to those in highsocioeconomic communities, but face more challenges to ensuring high-quality, including lower available workforce and less ability to generate funds through higher fees
- needs-based funding is used for school and some preschool education and for some priority cohorts, however there is no nationally consistent needs-based mechanism to address early childhood disadvantage across ECEC, particularly for children under age three.

SVA recommends needs-based considerations are built into funding of early years services to ensure adequate, flexible funding for the full operational cost of ECEC service provision (through both fees, subsidy and equity loadings). This includes adequate funding for the 'glue' (deliberate investment in the resources, actions and conditions for integration), support to coordinate access to wrap-around health and family services to meet community need.

<sup>&</sup>lt;sup>4</sup> Social Ventures Australia (2025) *Sticking points: why the 'glue' helps Early Childhood Hubs thrive* https://www.socialventures.org.au/about/publications/sticking-points-why-the-glue-helps-early-childhood-hubs-thrive/



**We recommend** a move towards needs-based funding for ECEC in the long-term to ensure services have the capacity and resources they need to provide high quality ECEC, including consideration of the needs of children and families experiencing early childhood disadvantage.

### Mapping equity highlights where needs-based investment can be targeted for better child outcomes

Responds to terms **h)** the suitability and flexibility of the funding of early education and care across Australia; and **i)** the choice of care options available to parents and families

Committee member Senator Steph Hodgins-May highlighted to the Senate that nearly one in four Australians live in areas with almost no access to early childhood education and care <sup>5</sup>-while a universal, low-cost system could grow our economy by \$100bn.<sup>6</sup>

Social Ventures Australia builds on the Mitchell Institute's research on childcare deserts with *Targeting Investment Where it Counts*<sup>7</sup> identifying 131 communities, representing 25,000 children, where this lack of access, combined with high levels of early childhood disadvantage,<sup>8</sup> leaves children at risk of lifelong health, social and welfare problems. SVA proposes Early Childhood Hubs, one-stop-shops where early childhood education, allied health, family and parenting supports can be delivered together as part of the solution - ensuring resources go to where they are needed most. Evaluations of Early Childhood Hub models show families are better engaged and increase access to support,<sup>9</sup> services are better coordinated, child health outcomes improve, and school readiness and academic outcomes are enhanced.<sup>10</sup>

Many of the identified communities in regional and remote areas have a significantly higher proportion of Aboriginal and Torres Strait Islander people. Supporting and growing a sustainable Aboriginal and Torres Strait Islander Community Controlled (ACCO) sector, including through a dedicated ACCO funding model - is essential. We endorse SNAICC proposals for a dedicated ACCO early years service model (or adjustments to the childcare subsidy)<sup>11</sup> as crucial to enable self-determination and to support First Nations children and communities to thrive.

Australian, state/territory and local governments should prioritise investment in initiatives that foster coordination between early childhood service systems. Services such as early childhood hubs, with a focus on building trusted relationships between families and services, enhance the

<sup>&</sup>lt;sup>5</sup> Hurley, P., Tham, M and Nguyen, H. (2024) International childcare: Mapping the deserts. Mitchell Institute, Victoria University.

<sup>&</sup>lt;sup>6</sup> Commonwealth, *Parliamentary Debates*, Senate (30 July 2025). Senator Steph Hodgins-May,

https://www.aph.gov.au/Parliamentary Business/Hansard/Hansard Display?bid=chamber/hansards/28821/&sid=0258

Social Ventures Australia (SVA), Deloitte Access Economics and Mitchell Institute, Victoria University. (2025) Targeting Investment Where it Counts: Identifying communities for priority investment in integrated early learning models,

https://www.socialventures.org.au/wp-content/uploads/2025/02/Targeting-investment-where-it-counts-report-Feb2025.pdf

Bearly childhood disadvantage is used as a term to describe communities with both high socio-economic disadvantage and early childhood vulnerably. These areas are in SEIFA deciles 1-4 and have over 10% of children developmentally vulnerably on two or more AEDC domains.

Deloitte (2024). Community Hubs Australia: Social return on investment evaluation of the National Community Hubs Program, 2023 <a href="https://www.communityhubs.org.au/wp-content/uploads/2024/03/Full-report-2023-SROI-National-Community-Hubs-Program.pdf">https://www.communityhubs.org.au/wp-content/uploads/2024/03/Full-report-2023-SROI-National-Community-Hubs-Program.pdf</a>
 Honisett, R Cahill, N Callard, V Eapen, J Eastwood, R Goodhue, C Graham, L Heery, H Hiscock, M Hodgins, A Hollonds, K Jose, D Newcombe, G O'Loughlin, K Ostojic, E Sydenham, S Tayton, S Woolfenden and S Goldfeld (2023). Child and family hubs: an important 'front door' for equitable support for families across Australia. National Child and Family Hubs Network. doi:10.25374/MCRI.22031951.

<sup>11</sup> SNAICC, (2024), Funding Model Options for ACCO Integrated Early Years Services Final Report, https://www.snaicc.org.au/wp-content/uploads/2024/05/240507-ACCO-Funding-Report.pdf



practice and skills of early childhood workforce through multidisciplinary learning and make it easier for families to access the supports they need in their community.

We **recommend** ECEC funding be made more suitable to local contexts, with priority given to communities with high early childhood disadvantage. This should include sustainable funding for Early Childhood Hubs and ACCO-led services where provision is insufficient, and support for integrated, high-quality ECEC models tailored to community needs.

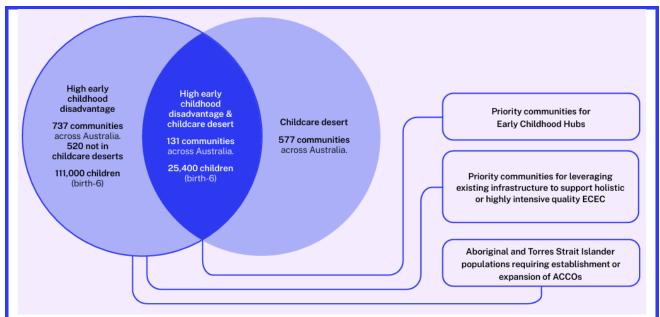


Fig. 1, Intersection of early childhood disadvantage and childcare deserts in Australia.

Source: Targeting Investment Where it Counts report from Social Ventures Australia, image by Deloitte Access Economics (2024) based on data from the Mitchell Institute, Australian Bureau of Statistics, and the Australian Early Development Census



## 2. Strengthen system governance to improve performance, transparency and quality

### Improved governance is essential to clarify accountability for safety and quality Responds to term j) any related matters

Currently, the division of ECEC responsibilities between tiers of government results in system fragmentation, poor visibility and inefficiencies in delivering safe, high-quality and equitable ECEC. A clearer division of responsibilities between Australian and state and territory governments is needed to improve coordination and accountability towards common goals.

A National ECEC Commission has been recommended as one potential approach, filling a gap for a single entity to oversee the system – provided it has the requisite oversight of the system, the authority to hold it to account, and has the power to act. Strengthened governance arrangements need to embed enhanced reporting on system performance, including safety and quality, and over time be extended to improve oversight and coordination of all early childhood development services. This includes early learning, health, development, community support and safety and protection.

We **recommend** stronger, national ECEC governance arrangements - such as a National ECEC Commission, or a new national agreement that clarifies accountability and leadership for ECEC between different levels of government.

### Strengthen incentives for safe, high-quality ECEC through market stewardship

Responds to term f) the role of private for-profit incentives and their impact on childcare quality and safety

Recent inquiries into ECEC, including the Productivity Commission, the Australian Competition and Consumer Commission (ACCC), the South Australian Royal Commission into Early Childhood Education and Care and the NSW Independent Pricing and Regulatory Tribunal (IPART) have shone a light on the operation and limitations of the current market model in ECEC. For example, the Productivity Commission found that for-profit provision has been the main contributor to increased supply of ECEC over the last decade <sup>12</sup> but also that, while no provider type has a monopoly on either excellence or poor quality, services run by not-for-profit providers, governments and schools have better NQS ratings than for-profit providers at an aggregate level. <sup>13</sup>

There is an opportunity through this Inquiry to consider how Governments can strengthen ECEC market stewardship with a focus on the levers for quality and safety. This could include examining how different incentives and sanctions shape service provider behaviour, such as approaches to workforce, compliance and capital investment, to inform potential adjustments to market settings. It should also consider the market signals for parents and carers so that they have confidence in system safety and better understand how to identify high-quality provision.

Through SVA's work with social purpose organisations we have insights into some of the challenges for not-for-profits to meet growing demand for ECEC. This includes poor access to

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<sup>&</sup>lt;sup>12</sup> Productivity Commission (2024), A path to universal early childhood education and care, Inquiry Report Volume 1, 74

<sup>&</sup>lt;sup>13</sup> Ibid p. 14

capital and debt raising as well as low risk appetite to take on debt or to take on new operating challenges that may impact service quality. We encourage the Committee to consider targeted support for expansion by high-quality ECEC providers. In addition to potential changes to the funding model over the longer-term, this could include market-levelling by supporting relationships between government or large not-for-profits and medium or small not-for-profit providers of high-quality services to draw on the strategic planning, capital raising or debt capacity of the more financially secure organisations, freeing up smaller partners to manage ECEC quality delivery in line with for-purpose goals and expertise.

We **recommend** the Committee identify opportunities for governments to strengthen incentives and sanctions for safe, high-quality ECEC through stronger market stewardship, including through targeted support for expansion of high-quality services.

### A cohesive data ecosystem is fundamental to strengthen ECEC governance and delivery

Responds to term g) transparency within the early childhood education and care system, including access to information and data

A focus is needed on the utility of data to make decisions and link to ECEC improvement at system and service level, leveraging data from national, state and service level collections.

Restacking the Odds has researched and is implementing data, tools and capability uplift in ECEC. This work finds:

- Evidence-based lead indicators of quality, quantity and participation can be calculated using data already collected by federal, state and territory and/or ECEC service providers.
- These lead indicators, when coupled with tools (e.g. data dashboard and continuous improvement support) to understand and act can lead to service-level improvements.
- Barriers to services collecting, sharing and using data effectively include: limited workforce capability, inadequate and fragmented data systems, poor quality data, high workload pressures, and unclear or prohibitive data sharing issues.<sup>14</sup>
- Enablers for services to collect, share and use data effectively include: building staff skills, strengthening data systems and organisational support, fostering trust and collaboration, and embedding a positive culture around data use for decisions and improvement.<sup>15</sup>

<sup>&</sup>lt;sup>14</sup> Restacking the Odds (2025). *Ensuring the early childhood workforce has timely data*. Murdoch Childrens Research Institute. Report. https://doi.org/10.25374/MCRI.28545605.v3

<sup>&</sup>lt;sup>15</sup> Restacking the Odds (2025). *Ensuring the early childhood workforce has timely data*. Murdoch Childrens Research Institute. Report. https://doi.org/10.25374/MCRI.28545605.v3



#### Restacking the Odds puts the right data in the right hands at the right time

Restacking the Odds uses real-time, relevant data (lead indicators) to answer three important questions:

- Are there enough services available? (quantity)
- Are they high quality? (quality)
- Are children accessing them enough to benefit? (participation)

The benefits of ensuring ECEC service providers have access and support to use information and data are often overlooked. Early results from services using Restacking the Odds tools show that routinely using data to inform reflection and quality improvement engages staff across all roles, drives continuous improvement, and leads to improved and sustained participation — including among priority cohorts.

While substantial data is collected about ECEC quality, quantity and participation, these are held in separate systems, limiting their utility for decision making, monitoring system performance or quiding service improvement.

A connected data system would improve visibility, accountability and responsiveness, enabling governments and services to identify issues, target resources and prevent problems. Lead indicators are an important part of this system, providing early signals on where to act. The Centre for Community Child Health and Restacking the Odds are developing an early childhood data logic model which can offer a structured approach to identifying what data is needed for what purpose, including lead indicators. We can provide this to the Committee on request.

Existing initiatives such as the Service Delivery Price project, National Preschool Attendance Collection and New South Wales' Independent Market Monitoring Review method <sup>16</sup> underscore the potential value such a system could offer governments, while also providing a baseline for the type of data that would be valuable to routinely collect and make visible.

We **recommend** a structured, coordinated data approach linking federal, state and territory, and service-level data is adopted to enhance transparency, and timely action to support quality and safety. This should include lead indicators of quality, quantity and participation, and the tools and capacity building required to use data for decision-making and continuous improvement.

<sup>&</sup>lt;sup>16</sup> NSW Independent Pricing and Regulatory Tribunal (2025) Methodology Paper, Early childhood education and care – Independent Market Monitoring Review https://www.ipart.nsw.gov.au/sites/default/files/cm9\_documents/Methodology-Paper-Early-childhood-education-and-care-Independent-Market-Monitoring-Review-2025-May-2025.PDF



### 3. Support services and create conditions for quality through the NQS

#### Services need support for quality improvement alongside compliance

Responds to terms b) the effectiveness of Australia's childcare regulatory system, including the performance and resourcing of state and territory regulators and the Australian Children's Education and Care Quality Authority, in maintaining and improving quality; c) early learning providers' compliance with quality standards and legislative requirements, including compliance with workplace laws and regulations; and h) the suitability and flexibility of the funding of early education and care across Australia

We welcome the steps taken to respond to immediate safety concerns with a focus on regulatory compliance, including sanctioning ECEC providers that consistently fail to meet standards. We endorse recommendations made by The Front Project to this inquiry to build on this with additional measures to ensure boards and management carry responsibilities for child safety outcomes and increasing cross-jurisdictional transparency so poor performers cannot avoid scrutiny.

We also recognise that continued effort to support quality improvement is essential – and that there is a risk that this becomes deprioritised in favour of only enforcement action - unless there is effort to ensure compliance and improvement aspects are addressed together.

Restacking the Odds works with a small number of ECEC service providers to monitor and improve service quality. Through this work we have observed limitations of the National Quality Framework tools and assessments in enabling quality improvement, including:

- infrequent assessments
- complexity of the ACECQA's self-assessment tool
- insufficient granularity of assessments in supporting early identification of issues
- · lack of guidance of potential effective action, and
- gaps in the tools to demonstrate practices which are part of business as usual or informed by critical reflection.

Services require data and tools to help quickly identify service gaps and responses. They also value clarity on strategies that improve quality, and support to document rationale, reflection and community engagement. Restacking the Odds service provider partners report that those supporting Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse families, as well as ACCO services often face barriers to achieving high-quality assessments due to factors such as location, staff credentials and curriculum that is not culturally appropriate.

Opportunities to increase support provided to services for quality improvement include:

- more frequent assessments
- peer-based assessors offering guidance, not just judgments
- less emphasis on structural indicators; more on relationships and practice quality
- ready access to data and tools to help services quickly identify service quality gaps and respond efficiently and effectively
- focus on strategies that improve quality, not just a list of standards or outcomes,
- increased support for documentation such as tools to document rationale, reflection, and community engagement, especially for demonstrating "exceeding" quality, and



 tailored support for First Nations and culturally diverse communities and services e.g. more culturally responsive services, appropriate curriculum, and professional development support for workers with representative cultural backgrounds.

Restacking the Odds research<sup>17</sup> shows that continuous improvement is critical in identifying strengths and areas for improvement, setting goals, implementing changes, and monitoring the impact of those changes to achieve improved access to and participation in high-quality early years services. Currently, there is limited support from national and state and territory regulators to support continuous improvement processes. Adequate funding is needed to ensure regulators in each jurisdiction can enforce regulatory compliance, while also effectively monitoring and supporting ECEC quality, with additional support directed to communities with higher needs.

We recommend adequate funding for regulators in all jurisdictions to ensure effective, routine monitoring, enforcement action and quality uplift support, including extra effort in communities with higher needs. Additionally, ECEC funding should enable investment in and support for ongoing quality improvement processes, data collection, and monitoring This includes investment in initiatives that enable service-led continuous quality improvement, such as Restacking the Odds, to ensure all children can access and participate in high-quality ECEC services.

### Quality ECEC must also nourish children

Responds to terms **b**) the effectiveness of Australia's childcare regulatory system, including the performance and resourcing of state and territory regulators and the Australian Children's Education and Care Quality Authority, in maintaining and improving quality; **c**) early learning providers' compliance with quality standards and legislative requirements, including compliance with workplace laws and regulations; and **h**) the suitability and flexibility of the funding of early education and care across Australia

Food insecurity and hunger significantly impact young children's development, wellbeing, play, learning and relationships. It is experienced inequitably not only at home, but also in ECEC – where there is little regulatory oversight to ensure children's nutrition needs are met.

SVA hosted a panel discussion at the National Early Years Policy Summit in Brisbane in June on the urgent need to address hunger and food insecurity in early childhood, highlighting that young children are disproportionately impacted by food insecurity and its harms, yet are underrepresented in systemic responses to address it. The panel identified that food provision in ECEC warrants far greater attention.

Nutrition is critical for brain development, learning, and mood. Yet, the quality and quantity of food is not mandated under the NQF. Services in disadvantaged communities are less likely to provide food, often requiring families – those most at risk of food insecurity – to supply it. Even when food is provided, in centres with limited food budgets, nutrition quality is often insufficient to meet children's needs. Research suggests that the average spend per child per day on food is unlikely to provide at least 50% of children's daily nutrition requirements.<sup>18</sup>

Sherker, Villanueva, Beatson, Macmillan, Lee, Hilton, Molloy, Goldfeld (2025) Barriers and facilitators to data-based decision making in Australian early childhood education and care: A qualitative study. https://doi.org/10.1016/j.ssaho.2025.101285
 Social Ventures Australia, (30 September 2025), Submission to the National Food Security Strategy discussion paper

The result is a system that perpetuates, rather than alleviates, disadvantage, undermining the investment in ECEC as an opportunity to redress inequities for children in this critical period.

There is also promising evidence from international meal subsidy programs (e.g. Child and Adult Food Care Program in the US and Free Early Years Meals in the UK) on participation, behaviour and educational outcomes. <sup>19 20</sup> Similar Australian programs could be targeted to communities with high levels of disadvantage and developmental vulnerability to address food insecurity for children in these areas.

**We recommend** nutrition is articulated as a core component of high-quality ECEC. This includes opportunities to harness ECEC to support children's nutrition and food security, such as by strengthening how provision of nutritious food is addressed in the NQF, and consideration of a targeted national ECEC food subsidy program for ECEC services operating in areas with high levels of socioeconomic disadvantage including food insecurity.

<sup>&</sup>lt;sup>19</sup> J Chriqui and Y Asada, (2023) 'The Child and Adult Care Food Program: A Critical Component of the Nutrition Safety Net for More Than 50 Years', *American Journal of Public Health*, 2023, 113(S3), S171–S174, <a href="https://doi.org/10.2105/ajph.2023.307474">https://doi.org/10.2105/ajph.2023.307474</a>

<sup>&</sup>lt;sup>20</sup> K Cooper and E Jiménez, (2024) *How can we reduce food poverty for under-fives?*, Education Policy Institute <a href="https://epi.org.uk/wp-content/uploads/2024/11/Food-poverty-report">https://epi.org.uk/wp-content/uploads/2024/11/Food-poverty-report</a> CORRECTED-figure 5 29.11.24.pdf