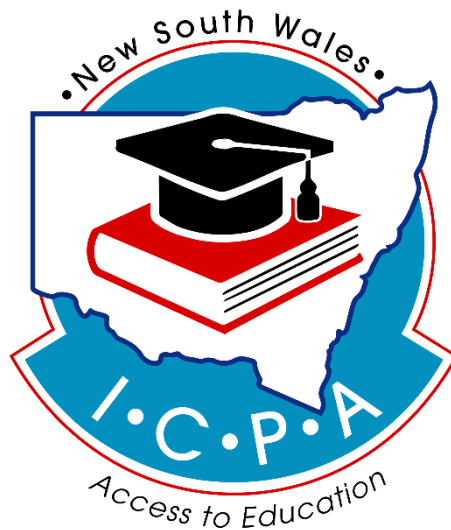# Isolated Children's Parents' Association
# of New South Wales Inc.

Submission to the May 2025 Methodology Paper on the Early Childhood Education and Care (ECEC) Review

President: Mrs Annabel Strachan

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ICPA-NSW is a voluntary non-profit advocacy group that has its roots firmly embedded in rural, remote, and regional areas across the state. ICPA-NSW believes that all students - irrespective of where they live - are entitled to equitable access to education that enables them to participate to their full potential in the social, economic, political and cultural life of a community.

The NSW State Council of the Isolated Children's Parents' Association advocates for members who have children who:

- Attend a rural pre-school or access early childhood education through a mobile service,

- Attend a small rural or remote school,

- Study by Distance Education and School of the Air lessons

- Travel to school by bus or private vehicle (daily, weekly or at the end of term)

- Board away from home to access primary or secondary school at a boarding school, agricultural high school, hostel, private board or maintain a second home,

- Attend a Tertiary institution- University/TAFE/ College

Introduction

We welcome the opportunity to provide input to the 2025 Methodology Paper on the Early Childhood Education and Care (ECEC) Review. This submission is offered from the perspective of stakeholders living and working in rural and remote New South Wales, where access to high-quality, affordable early learning remains deeply inequitable.

Children in rural and remote areas experience a double disadvantage: fewer ECEC options are available to them, and those that exist often face major challenges in workforce retention, sustainable funding, and meeting the National Quality Framework.

We commend the inclusion of KPIs, data sources, and methodological frameworks to underpin a national review. However, these must reflect localised realities and incorporate developmental priorities like universal access to high-quality programs for three-year-olds. Rural and remote children deserve access to structured play-based learning environments, yet program availability remains sporadic and inequitable.

1. Are the dimensions in Table 2.1 appropriate and at the right level of detail?

While the proposed dimensions are broadly relevant, they do not capture the complexity and diversity of the rural and remote ECEC landscape. For instance, the term "geographic location" should be clarified using more detailed classifications such as the ARIA+ scale, differentiating between Outer Regional, Remote, and Very Remote areas. Each of these contexts presents different challenges in service delivery.

The dimension of "availability and type of service" should include non-traditional or alternative models that are more prevalent in low-density areas, such as mobile early childhood services, multi-age care, and integrated hubs with health and family support components. In-home care models should be expanded in remote areas and be more flexible to meet the care needs of families. These are essential in remote communities where standalone ECEC Centres are not viable.

2. Are there additional data sources or data gaps that we should consider?

Critical data gaps persist, particularly in understanding actual demand versus latent demand in rural and remote settings. Families who have given up seeking care due to past unavailability may not show up in formal demand data. Similarly, informal or non-accredited arrangements (e.g., kinship care or playgroups) often fall outside the scope of existing administrative datasets. There is not adequate quantifiable data on distance education preschool delivery where parents are either the supervisor or employing their own supervisor to implement the program.

Additionally, community-run and Indigenous-led services are frequently underrepresented in national data systems. State government departments (such as the NSW Department of Education's Rural and Remote Strategy and the Aboriginal Outcomes and Partnerships Division) often hold rich localised data that could inform this review.

There is also a need for better integration of transport data to understand access barriers. For many rural families, the nearest ECEC service may be significantly over 45 minutes away, with no public transport available.

To address these gaps, the review should actively draw on:
State-based administrative and planning data
Local Government Area (LGA) reports
Place-based program evaluations (e.g., Connected Beginnings, Early Years Connect, Rural School Readiness initiatives)
Qualitative data from families and educators, especially those living in Very Remote areas

3. How should a supply shortage of ECEC services be defined? Are there other measures we should consider?

A simple headcount of licensed places does not adequately define supply in rural and remote NSW. In many cases, services exist on paper but are unable to operate at full capacity due to staffing shortages or infrastructure constraints. In other cases, the available places are too far away, cost-prohibitive, or incompatible with local working patterns.

We propose the following expanded definition of a supply shortage:
- Inability of families to access ECEC within a reasonable travel time (e.g. within an hour) from their home
- Inability of services to meet local demand due to workforce or funding limitations
- Absence of government-funded Before-Kindy programs for three-year-olds, which is a major service gap in many remote regions

In addition, measures should include:
- Comparative ratios of children aged 3–5 to available licensed ECEC places
- Alignment with Commonwealth and State Government targets, such as universal access to preschool for all three- and four-year-olds

4. What is your feedback on the proposed KPIs and indicators for ECEC supply in Table 2.2?

The proposed KPIs focus heavily on supply volume but not on usability or equity. In rural and remote areas, services may be open only a few days a week or may be forced to close intermittently due to educator shortages. Such volatility is not currently captured.

We recommend:
- Including a KPI that tracks "operational capacity" vs "licensed capacity"
- Adding an indicator for service viability, including days per week of operation and enrolment stability
- Disaggregating all supply-related KPIs by remote classification and socioeconomic disadvantage.

5. **What is your feedback on the proposed KPIs and indicators for ECEC affordability barriers in Table 2.3?**

In rural NSW, families face unique affordability challenges due to limited provider choice, hidden costs (e.g., fuel, travel time), and fewer CCS-eligible options, such as mobile or sessional services. In some cases, even when CCS is applied, the out-of-pocket cost remains unaffordable due to irregular work hours or seasonal incomes.

We support measuring affordability through:
- Out-of-pocket cost as a proportion of household income, with particular attention to low-income and Aboriginal families
- Availability of subsidised models for non-CCS settings, such as State-funded mobile preschools
- Availability of free Before-Kindy programs for three-year-olds, which are urgently needed in rural areas where structured early learning is otherwise inaccessible

6. **What is your feedback on the proposed KPIs and indicators for ECEC accessibility barriers in Table 2.4?**

Accessibility must extend beyond physical access to include cultural relevance, flexibility, and service inclusiveness. Rural families often lack transport infrastructure, and parents working shift-based or agricultural jobs require care outside standard hours.

We suggest the inclusion of the following indicators:
- Average travel time to the nearest ECEC service
- Proportion of services offering flexible or non-standard hours, such as the in-home care model
- Proportion of three-year-olds accessing Before-Kindy or equivalent play-based learning programs, by remoteness

7. **What is your feedback on the proposed KPIs and indicators for ECEC workforce pay and conditions in Table 2.5?**

Workforce challenges in rural and remote NSW are profound and systemic. Educators face lower pay, insecure housing, and professional isolation, yet they are expected to meet the same quality benchmarks as their urban counterparts.

We recommend additional indicators that measure:
- Staff turnover rates by remoteness category
- Access to housing or relocation support
- Availability of professional development, particularly for Diploma and Degree-qualified educators in Very Remote areas

8. What is your feedback on the proposed KPIs and indicators for ECEC quality standards in Table 2.7?

While the current quality KPIs focus on service compliance and ratings, these must be contextualised to avoid penalising rural services that struggle due to structural disadvantages rather than poor practice. For instance, services operating under exemption (due to inability to recruit a qualified teacher) can still deliver high-quality care with adequate support.

We recommend:
- Measuring support-to-compliance timeframes – how quickly a service improves when given targeted assistance
- Including mentorship or outreach programs available to rural services to improve quality
- Considering community satisfaction and family engagement indicators, which are particularly relevant in smaller communities

Conclusion

For the ECEC system to be truly inclusive, it must address the structural and contextual barriers that disadvantage rural and remote children. A child's postcode should not determine their access to early learning, yet this remains a persistent reality.

We strongly urge that:

All three-year-olds have access to an early learning program, such as the B4 Kindy model, preferably with trained early childhood education staff as opposed to primary trained teachers, regardless of geography.

Data systems and KPIs reflect the real-world viability of services in small communities.

The workforce is supported through place-based solutions, including housing, incentives, and professional networks

We thank you for the opportunity to contribute to this important review and urge the Review Panel to ensure equity and regional inclusion are in the final methodology.

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