



Australian Competition and Consumer Commission (ACCC)
GPO Box 3131
Canberra ACT 2601

Dear Chairperson and Commissioners

On behalf of the Australian Children's Education and Care Quality Authority (ACECQA) I write in relation to the ACCC interim reports into childcare services, specifically draft recommendation 3 of the second report which relates to the StartingBlocks.gov.au website and the information gathered and reported on the site.

This response seeks to clarify some of the issues raised in the second interim report. I hope this information may be of assistance when finalising recommendations for the ACCC's final report.

ACECQA and StartingBlocks.gov.au

ACECQA is the independent national authority established under the National Law¹ to perform a range of functions, including assessing and approving individual and organisation qualifications; maintaining national registers of approved providers and services; reporting to Education Ministers on the implementation of the National Quality Framework (NQF); training and testing Authorised Officers to undertake assessment and rating; and publishing guides and resources to support regulatory authority authorised officers and the sector to understand the quality framework and achieve its objectives.

ACECQA manages and hosts the National Quality Agenda IT System (NQA ITS), which is used by all state and territory regulatory authorities to store service/provider information plus operational data involved with the quality assessment and rating process as well as compliance and monitoring visits. The NQA ITS enables ACECQA to monitor, report on and provide insight into trends and emerging issues in the sector.

One of the objectives of the NQF is to improve public knowledge, and access to information, about the quality of education and care services. Since its launch in 2015, families have been able to use ACECQA's StartingBlocks.gov.au website to find early childhood education and care (ECEC) services in their area, along with details about the quality of services, supporting them to choose services that best suit their child and family circumstances.

The NQAITS is the primary source of service and quality rating information displayed on StartingBlocks.gov.au. All information is updated daily.

¹ Section 225 of the [Education and Care Services National Law](#)

In 2021, as part of its red tape reductions agenda, the then Australian Government decided to decommission its Child Care Finder website and consolidate information about service fee, vacancies and inclusions into Startingblocks.gov.au. The source of this information, which is also updated daily to Startingblocks.gov.au, is derived from data collected by Services Australia on behalf of the Department of Education.

Since February 2022, StartingBlocks.gov.au has been the primary source of free government information for families and the community regarding the nationally regulated and funded ECEC sector.

Information displayed on Startingblocks.gov.au

As highlighted by the ACCC's interim reports, Australia's early childhood system is large and complex. Different levels of government oversight funding and policy decisions, with services and providers operating ECEC services across different legislative and regulatory systems, including:

- Commonwealth Family Assistance Law, for the CCS system;
- Education and Care Services National Law and Regulation, for NQF regulated services; and
- State-based laws – for services that are not regulated under the NQF.

While the ACCC's focus is on services and providers eligible for the CCS, it is important to note that not all CCS approved services are regulated under the NQF (ie. In-Home-Care). Nor are all NQF approved services eligible to receive CCS (ie. State and territory funded Preschool/Kindergartens).

There are approximately 17,500 services regulated under the NQF, with approximately 14,500 of these eligible to receive CCS. As such, the data matching, explanation, and presentation of consistent information across data fields (ie. fees and vacancies) on Startingblocks.gov.au is not a straightforward process, especially when trying to assist parents compare service quality and offerings on a 'like-for-like' basis.

Potentially adding to this complexity, we note that state and territories are also moving into new areas of providing 3-year-old preschool and seeking to promote state regulated services or funded programs. As such, we may need to source and display more data fields to provide families and the community with a full picture of ECEC offerings across the country.

The accuracy of fee and vacancy on the website relies on the provision of this information by services and providers, and this is an area that the Australian Government continues to progress with the sector. In recent years, the Department of Education has audited and taken compliance action against services and providers where information is out of date or simply not supplied. We understand this work is ongoing and it is an activity we support through our regular communications to the sector reminding them of their obligations to update fee and vacancy information.

The ability to display different types of fee information on StartingBlocks.gov.au, such as discounts or tailored inclusions offered by services and providers, depends on the data collected via the CCS system. If it is not data that is universally collected by the Australian Government, there will not be an accompanying field displayed on Startingblocks.gov.au.

It is important for families and services that the NQF service quality rating information provided on Startingblocks.gov.au is accurate. As soon as a service rating is finalised by a state or territory regulatory authority and updated in NQAITS, both the rating and the date awarded appear on Startingblocks.gov.au. However, as noted by the ACCC's interim report and highlighted in our own research, parents and communities' question the applicability of the quality ratings for decision

making if a service hasn't been formally assessed and rated in recent years. All state and territory regulatory authorities are aware of this, and regulatory authorities have started pursuing regulatory options to ensure the assessment and rating process for all services is efficiently undertaken.

Following the recent NQF Review, there is also work being undertaken by states and territories to examine the rating terminology and to look at possible alternatives that may better engage parents and other users of the system. This work is expected to continue in 2024 and may be influenced by any recommendations arising out of the ACCC, Productivity Commission and state-based inquiries and reviews.

CCS Calculator

In February 2022, at the request of the then Australian Government and coinciding with the inclusion of fee and vacancy information, Startingblocks.gov.au launched a new CCS "fees estimator" tool. It allowed parents to assess and compare the change in subsidy they would receive following amendments to the CCS from March 2022.

Working with the current Australian Government, this tool has recently been updated to reflect the more recent CCS changes from 10 July 2023. The tool was recently renamed the "CCS calculator".

As many financial or subsidy inputs may determine the exact rate of CCS applicable to a family, we also encourage them to use the Services Australia Payment and Service Finder if they would like a more comprehensive assessment.

ACECQA will continue to work with the Department of Education on ensuring the CCS calculator is as comprehensive as it can be.

Promotion of Startingblocks.gov.au

Since the commencement of the NQF, states and territories and ACECQA have promoted the quality rating system with families to assist them in their deliberations on choosing a service for their child/children. Our commissioned research and surveys have sought to ascertain families awareness of Startingblocks.gov.au and their understanding of the service ratings. While we have seen increasing awareness from parents during this time, the use of the service quality ratings as a key tool for decision making has not changed significantly noting that Australian families expect that any approved early childhood education and care service is appropriately regulated.

ACECQA has historically used "below the line" digital marketing strategies such as social media, newspaper advertising and editorials to raise the profile of Startingblocks.gov.au. This has also included engagement activities at conferences and exhibitions targeted at expectant and new parents, and sponsorship of events or organisations with members who would appreciate information on the ECEC system such as Playgroups.

Since its commencement in 2015, there has been 34% year on year growth in visits to StartingBlocks.gov.au. With the recent partnership of the Australian Government, since February 2022, we have seen 55% increase in traffic to the website. This increase has obviously coincided with the inclusion of fee and vacancy information, the CCS calculator tool and the additional communication channels the Australian Government is using to promote the website. We will continue to work with the Australian Government, and states and territories, on opportunities to further promote awareness of the website for families and the community.

ACECQA is committed to ensuring that Startingblocks.gov.au continues to be the primary source of free and reliable information for families seeking to find information on the national ECEC system. As such, over the next 12-18 months we will continue to improve the users experience of the website and ensure we have the right technology in place for future and enhanced functionality.

If you would like to discuss any of the above information, please do not hesitate to contact me or Michael Petrie, General Manager, Workforce, Engagement and Research

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Yours sincerely

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Gabrielle Sinclair
Chief Executive Officer
25 October 2023