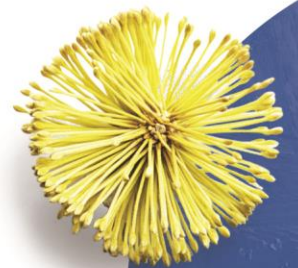


22 September 2023

# C&K Submission to Consultation Regulatory Impact Statement on Growing Child Safe Organisations in Queensland



*Where children come first.*



## C&K Submission to Consultation Regulatory Impact Statement on Growing Child Safe Organisations in Queensland

C&K has a long history of and a strong commitment to upholding and strengthening child safety practices. Our employees are deeply committed to employing best practice approaches in education and the health, safety and wellbeing of the children enrolled in our centres.

C&K strongly support the implementation of Child Safe Standards and a Reportable Conduct Scheme as recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse.

C&K strongly agree that legislation changes are required to strengthen the protection of all children in Queensland, and support 'Option 3(a) Collaborative regulatory model' as described in the Consultation Regulatory Impact Statement. Only through a regulatory approach will compel organisations to prioritise change and invest resources to improve child safe practice. A collaborative regulatory model, with an independent authority will promote consistency of practice across multiple organisations and sectors and at the same time enabling collaboration with existing regulators such as the Office of Early Childhood Education and Care (Queensland Department of Education) which will in turn reduce administrative and compliance burden.

C&K is already committed to implementing the National Principles for Child Safe Organisations and support the adoption of the National Principles as the form of Child Safe Standards in Queensland.

The Australian Early Childhood Education and Care sector is a highly regulated sector and experience a significant amount of administrative burden associated with meeting quality standards and legislative requirements.

To minimise administrative and compliance burden, C&K strongly advocate Government to consider and utilise current Early Childhood Education and Care quality standards, reporting mechanisms and regulations when developing (and implementation of) Child Safe Standard legislation.

In addition to our detailed consultation provided in the response template, C&K highlight the following key elements:

- It is imperative that this much-needed legislation does not put further strain on an already stretched Early Childhood Education and Care sector. Communications to the early childhood sector should focus on how these changes will support the work of educators with children and families.
- Fear of reprisal when participating in mandatory reporting must not act as a disincentive for people considering a career in early childhood education. Educators and anonymity of complainants must be protected.
- Information, guidance and examples of best practices specifically for the early childhood sector will be needed to ensure that children under the age of 5 are informed about their rights. This would include child-friendly complaint management processes.
- Respect for and embedding Aboriginal and Torres Strait Islander perspectives in all aspects of the curriculum and pedagogy is a principle of the National [Early Years Learning Framework](#). As such, C&K support cultural safety for Aboriginal and Torres Strait Islander children be embedded across all principles of a Child Safe Standard.

For more information about this submission please contact Cathy McClennan (C&K Quality and Regulation Manager) via [advice@candk.asn.au](mailto:advice@candk.asn.au).

# About C&K

As a not-for-profit organisation, children are at the centre of everything we do. The core purpose of our work is to create learning environments that allow children to flourish. For C&K, flourishing means that children are confident, secure, courageous, engaged, empowered, empathetic and resilient. As a not-for-profit organisation, we re-invest profits across our portfolio so we can support thousands of Queensland families. In 2022, we welcomed almost 19,000 Queensland children into our centres.

Creating high-quality learning environments requires highly qualified people, delivering quality education programs, that respond to today's children and empower them for the world of tomorrow. We achieve this through our dedicated workforce, that provide outstanding educational experiences for children and families every day. We grow our reputation as thought leaders, by actively engaging in advocacy and consultation and delivering professional learning opportunities to influence the future direction of early childhood education and care.

We are proud of our 116-year history of creating generations of life-long learners. C&K has an enviable reputation and is a brand synonymous with high-quality early childhood education, that has been earned through our deep and unwavering commitment to putting children at the centre of all of our decisions. We are a large early childhood education and care (ECEC) provider, spanning varied geographic and socio-economic communities across Queensland.

C&K employs more than 2,000 employees across our central office, 178 state-funded kindergartens, childcare centres and out of school hours programs. As a Central Governing Body (CGB), we also support 153 affiliated kindergartens, operated by voluntary management committees, on behalf of the Queensland Government.

C&K families tell us of the importance of ECEC in providing their children with the foundational skills for lifelong learning. We have considerable experience in supporting families experiencing vulnerability and disadvantage and providing the conditions for those families to improve their circumstances and those of their children. Early learning is not only a fundamental and essential service for families but provides children with lifelong benefits from participation.