

Thursday 23rd January 2020

Mental Health Inquiry Team
Productivity Commission
4 National Circuit
BARTON ACT 2600

To the Mental Health Inquiry Team,

Re: ACA Response to Productivity Commission Inquiry into Mental Health

As the national peak body in the Australian Early Childhood Education and Care (ECEC) sector, the Australian Childcare Alliance (ACA) represents more than 2,500 members and approximately 360,000 families throughout Australia.

We work on behalf of early learning (centre based, long day care) service owners and operators, predominantly private, as a reputable source of evidence-based advice to policy makers and a trusted source of practical guidance to service operators.

ACA welcomes the opportunity to contribute to the Productivity Commission's current Inquiry into Mental Health.

The role of early learning services in addressing mental health issues

As asserted by the Productivity Commission's Draft Report for the Inquiry into Mental Health ("the report"), the early learning sector is perfectly placed to support children's social and emotional development and identify mental health risk factors early.

With the majority of children attending ECEC services before they start school, bolstered by a commitment from the Australian and State and Territory Governments to provide universal access to preschool/kindergarten programs, the early learning sector provides a front line to Australia's families with young children.

The report states that in the context of mental health and wellbeing, early learning services can fulfil three important roles.

1. High quality ECEC services provide healthy environments for children that can promote their social and emotional wellbeing.
2. Trained staff can focus on child development, identify early signs of concern and communicate these to parents.
3. ECEC services can act as a gateway into the broader mental health system, or provide parents with information and education on social and emotional development and the support services available in the community (Oberklaid et al. 2013).

ACA agrees and supports these three important roles and we agree that services for preschool children and their families should have the capacity to support and enhance social and emotional development.

The report also includes a number of **recommendations** that involve the early learning sector and would directly impact their day-to-day operations.

We have always made it very clear that we support policy that aims to ensure the social and emotional wellbeing for Australia's youngest generation, and in particular those most vulnerable.

Our vision is a future where **every child** in Australia has access to high quality, affordable and sustainable early learning services, thus giving them the **best start in life**.

However we are also acutely aware of the often **unexpected outcomes** of well-intended government policy and programs on the early learning sector.

The introduction of the new Child Care Subsidy in July 2018 provides the perfect example of a government initiative which required an enormous amount of additional work from the sector, from approved provider to educator level, in transitioning to the new system, some of which contributed to increased operating costs.

ACA's May 2019 *Submission to the Australian National Audit Office (ANAO) about the Design and Implementation of the Child Care Package* (available at www.childcarealliance.org.au/advocacy/submissions) provides a detailed explanation of the major repercussions this new subsidy model had on the sector.

Whilst ACA is always keen to assist the Australian Government in addressing community issues around mental health, safety and wellbeing, we believe it is critical to acknowledge that the sector's capacity to assist is limited by resources and funding models.

Additionally we have concerns that any new government initiatives which require substantial involvement from the early learning sector will create an added burden to the existing pressures on approved providers, along with their teams of Early Childhood Teachers and educators, in a work environment which is required to comply with an extensive set of regulations and standards (ie. the National Quality Framework, the Early Years Learning Framework, the Mandatory Reporting Scheme, Mandatory Privacy Breach Notification Law and their various state-level regulations).

Adding to their capacity would bring an immediate cost which most services can't afford, along with introducing an additional responsibility and layer of stress for educators.

It is within this context that ACA has provided responses to the recommendations that relate to the early learning sector from the Productivity Commission's Draft Report for the Inquiry into Mental Health in a table. Please refer to *Attachment A - ACA response to Productivity Commission's Draft Report for the Inquiry into Mental Health*.

On behalf of ACA, I would like to thank the Productivity Commission for the opportunity to contribute to this important Inquiry on Mental Health.

I would also like to inform you that ACA has provided a joint submission to this inquiry in collaboration with fellow stakeholders the Australian Health Research Alliance (AHRA) and two of Australia's NHMRC accredited Translation Research Centres - Monash Partners and Maridulu Budyari Gumal - the Sydney Partnership for Health, Education, Research and Enterprise (SPHERE).

We have come together in a world first collaboration with the aim of building capacity in early childhood educators to identify the risk factors of family violence and intervene early. We would greatly appreciate the Productivity Commission's support regarding this important proposal.

Meanwhile I would be happy to meet with your team or discuss the recommendations of this letter over a teleconference.



Please feel free to contact me directly to discuss this submission.

Alternatively, ACA's National Communication and Admin Coordinator, Celia Falkland

Yours sincerely,

Paul Mondo
President



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Attachment A - ACA response to Productivity Commission's Draft Report for the Inquiry into Mental Health

Productivity Commission's Recommendations relevant to the early learning sector

In the short term (in the next 2 years)

- *State and Territory departments of education should ensure that all early childhood education and care services have ready access to support and advice from qualified mental health professionals.*

This recommendation is made in the context of improving infant wellbeing by supporting parents and families, to aid an improvement in social and emotional wellbeing for vulnerable children.

The report states that each Early Childhood Education and Care (ECEC) service should have access to support and assistance from qualified mental health professionals, similarly to the support available to schools. State and Territory departments of education, as the regulatory authorities responsible for ECEC quality, should provide these as an extension of their existing mental health and wellbeing programs in schools.

It states that expanding the support services offered to parents through maternal and child health clinics (draft recommendation 17.2), as well as improving the accessibility of mental healthcare services (chapter 5), would create meaningful pathways that ECEC services can refer families to.

ACA supports this recommendation.

Whilst some early learning services have already built their own networks and therefore have access to mental health professionals, this is an ad hoc phenomenon based on experience and local community connections.

There is a real need for a government-funded, nationally consistent formal program for all ECEC services, to ensure that **all children** and **all families** have access to the appropriate resources and services which support positive mental health, regardless of location or service provider type.

For example, in Victoria local council-funded kindergartens have access to a different variety of services that support mental health than a long day care centre.

There are differences both within states and across the country from state to state in terms of what sort of mental health services are available to early learning services.

Given the vast range and scale of providers in the ECEC sector, ACA recommends a careful, thorough consultation with the sector to ensure a **nationally consistent**, uniform approach in which any mechanisms put in place by the various state & territory government departments are effective, accessible and ensure **equity of access** for all service providers and their families.

We would like to see a program that is tailored to meet the specific needs of Australia's metropolitan, regional and remote and multicultural communities including Indigenous and Torres Strait Islander communities.

We would recommend that this access be provided to early learning services through simple, easy to access communications channels. ACA's state bodies would be happy to work with their relevant state/territory government departments to ensure this information was readily available for maximum impact.

- *The Australian Children's Education and Care Quality Authority should review the pre service training programs for early childhood educators and teachers to ensure qualifications include specific learning on children's social and emotional development.*

ACA supports the recommendation that vocational training programs for the early learning sector are reviewed to ensure they continue to include content on the social and emotional development of children.

While the topic of children's social and emotional development already forms part of the various ECEC training packages (this content varies slightly between Certificate III, Diploma and Degree packages), ACA supports any measures to ensure that these training packages are fit for the purpose; a review would ensure that the content delivered allows educators to adequately support all children in addressing the mental health needs of all children.

ACA would recommend that the appropriate stakeholders and organisations are charged with the responsibility of reviewing as per the recommendations, to ensure adequate capacity and prevent any duplication of efforts.

We note that it is currently the Australian Skills Quality Authority (ASQA) and SkillsIQ which are responsible for the development of training packages for vocation courses, while the tertiary institutions make the decisions around content in their range of ECEC-relevant degrees.

In addition to developing this content, it is vital that training providers implement this initiative effectively so that educators are adequately equipped to handle the complexities of this very important topic.

ACA's December 2019 *Submission to the Productivity Commission for the Review of the National Agreement for Skills and Workforce Development* (available at www.childcarealliance.org.au/advocacy/submissions) provided recommendations to address the critical shortage of qualified, competent candidates for the positions of early childhood educators and Early Childhood Teachers affecting early learning services Australia-wide.

We have called for **greater funding** coupled with more meaningful, ongoing consultation with the early learning sector to ensure better outcomes for vocationally trained entrants into the early learning sector, and meet the requirements of the ASQA, state/territory regulatory requirements and training package requirements.

ACA would also recommend a transparent evaluation of such an initiative, to ensure that the outcomes could be measured against the objectives in the next few years.

In the medium term (over 2 – 5 years)

- *State and Territory departments of education, as the regulators responsible for early childhood education and care, should review the quality improvement plans of all services to ensure they include professional learning for staff on child social and emotional development.*

ACA strongly supports policy that aims to improve mental health outcomes for **all children** in **all** services.

Notwithstanding the clear benefits of this recommendation, we also believe it is critical to acknowledge that the sector's **capacity** to assist is limited by resources and funding models.

The recommendation specifically mandates professional training for educators and teachers which is to be assessed by regulators through the existing Assessment & Rating process, in the context of the report's goal of ensuring that Early Childhood Teachers and educators are trained to be able to identify risk factors in children's behaviour and support their development, and are equipped with the necessary skills will require action from several parts of government.

In the context of early learning services which operate 52 weeks of the year, under strict child to educator ratios, the introduction of additional responsibilities for early learning service providers and educators will inevitably bring about an **immediate cost** which most services cannot afford and would therefore be required to pass on to families, along with an additional layer of administration and stress for educators.

As it stands the National Quality Framework (NQF) currently mandates training for educators on first aid, CPR, anaphylaxis, asthma, child protection, food handling and hygiene, before any voluntary professional learning can take place.

If the expectation is for this training to become mandatory, ACA strongly recommends a **funding model that covers the cost of the training, the cost of back filling of staff and the administration requirements of the proposed initiative**, to allow service providers to meet any new training requirements without having to pass on costs to families.

ACA supports the Be You program, which builds on the success and learnings from five existing programs aimed at promoting social and emotional health and wellbeing for children and young people in the education space: KidsMatter Early Childhood, KidsMatter Primary, MindMatters, Response Ability and **headspace** School Support.

The Be You program offers ECEC-specific resources and a team model that has been implemented well in many early learning services.

Whilst the access to the program itself is free, the implementation of the program comes at a cost, with additional administration and activities required. Some services have struggled to implement the program due to the additional time and resources required.

For this reason, ACA recommends some form of financial support to enable all services to adequately implement the be You program, with the objective of ensuring effective, positive outcomes for all Australian children.

ACA believes that with **adequate funding and support** to roll out this recommendation, the early learning sector would support the Australian Government's goal of ensuring that the sector is equipped to identify risk factors in children's behaviour, take the appropriate action and engage with the appropriate stakeholders without breaching privacy laws.

- *Where this is not already occurring, funding for backfilling should be made available to enable early childhood education and care staff to attend accredited professional development, to support their knowledge of child social and emotional development and mental health.*

ACA supports this recommendation and appreciates the Productivity Commission's recognition that additional professional development and responsibilities bring about financial repercussions for early learning service providers.

However as previously stated under the previous recommendation, we firmly believe that backfilling alone is not enough – a funding model must also cover the cost of any training along with the administrative oversight.

Professional development takes educators out of their designated room/group of children, away from their regular duties, with temporary staff only fulfilling a portion of the permanent educator's permanent role and suite of responsibilities. Therefore the backfilling of staff only covers some components of their role.