



A Path to Universal Early Childhood Education and Care - Draft Report

February 2024



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Our Commitment to Inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in His name without discrimination.

More information about The Salvation Army is at **Appendix A**.





Executive Summary

The Salvation Army welcomes the opportunity to provide this submission to the Productivity Commission in relation to the release of the draft report of the Inquiry into Early Childhood Education and Care (the Inquiry).

For over 140 years The Salvation Army's services have walked alongside many children and families experiencing hardship and disadvantage. These experiences include, but are not limited to, poverty and financial hardship, family and domestic violence, homelessness, living with disability, and those of people from refugee and migrant backgrounds. It is from their experiences, as well as those of our frontline staff, that we have approached this submission.

We believe that first and foremost, recommendations from the Inquiry should reflect the experiences of children and families across Australia and should focus on addressing the structural elements that contribute to inequities and poor-quality service delivery in Early Childhood Education and Care (ECEC).

In this submission, The Salvation Army builds upon the discussion and recommendations made in our previous submission to the Inquiry. We do not respond to all requests for information, instead focusing only on those which align with our frontline experience.

This submission covers:

- enhancing cultural safety in ECEC's;
- improving the quality of ECEC-related vocational education and training;
- reforming the Child Care Subsidy;
- the importance of system navigator roles within the community;
- more flexible sessions of care in ECEC;
- enhancing availability of occasional care; and
- accountability mechanisms for underperformers.

We have also included some additional case studies as identified by our services in Appendix B, that we believe complement our recommendations across both of our submissions to the Inquiry.

The Salvation Army has made **7** recommendations for the Productivity Commission to consider. A summary of these recommendations follows on the next page.

Summary of Recommendations

Recommendation 1

1.6 The Salvation Army recommends that the Commonwealth, state and territory governments work alongside Aboriginal and Torres Strait Islander and CALD community organisations and leaders to effectively promote culturally safe ECEC services.

Recommendation 2

2.5 The Salvation Army recommends that the Commonwealth Government work alongside state and territory governments to:

- *improve the availability of quality training opportunities across the ECEC sector; and*
- *develop accountability mechanisms for registered training organisations providing ECEC-related education and training.*

Recommendation 3

3.5 The Salvation Army recommends that the CCS application process could be further simplified and streamlined by:

- *removing paperwork and application requirements for families deemed automatically eligible for the CCS; and*
- *widely distributing easy to understand information about the CCS, eligibility requirements, and application to both families and across the early years' service sector.*

Recommendation 4

4.6 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase investment in and availability of community-based system navigators across the ECEC sector.

Recommendation 5

5.4 The Salvation Army recommends that state and territory governments work alongside ECEC centres to fund, develop, and implement flexible sessions of ECEC in response to local family and community needs.

Recommendation 6

6.4 The Salvation Army recommends that state and territory governments increase investment in and availability of occasional care.

Recommendation 7

7.5 The Salvation Army recommends that state and territory governments, in addition to implementing additional powers for regulatory authorities, work to establish non-regulatory bodies that provide support to ECEC services to improve service quality.

1 Cultural Safety in ECEC Services

- 1.1 The Salvation Army believes that ECEC services must be community-led to promote and ensure cultural safety most effectively.
- 1.2 As outlined in our previous submission, families from culturally and linguistically diverse (CALD) backgrounds face additional barriers to ECEC and its benefits. We also highlight that ECEC services that have an understanding and are sensitive to diverse cultures' approaches and barriers to care, education, and parenting are inherent to inclusive service provision.
- 1.3 Additionally, early childhood services that promote Aboriginal and Torres Strait Islander culture and perspectives are critical to support Aboriginal and Torres Strait Islander children to form a sense of belonging and identity.¹ Access and engagement to inclusive and culturally safe support is crucial for Aboriginal and Torres Strait Islander children to thrive.²
- 1.4 Our services report that there is a lack of culturally appropriate services, information, and supports for Aboriginal and Torres Strait Islander and culturally and linguistically diverse (CALD) families in the early years. Aboriginal and Torres Strait Islander and CALD communities know how to best support the needs and development of Aboriginal and Torres Strait Islander and CALD children and should be enabled to do so.
- 1.5 We press the need for increased investment in community-controlled organisations and community-driven initiatives for these cohorts. This should be accompanied by strong partnerships with both community organisations and leaders to ensure culturally sensitive and appropriate service provision.

Recommendation 1

- 1.6 The Salvation Army recommends that the Commonwealth, state and territory governments work alongside Aboriginal and Torres Strait Islander and CALD community organisations and leaders to effectively promote culturally safe ECEC services.

¹ Victorian Aboriginal Education Association Incorporated. (2020). Aboriginal Early Childhood Cultural Protocols. https://www.vaeai.org.au/wp-content/uploads/delightful-downloads/2020/06/2020Cultural_Protocols_VAEAI-1.pdf.

² National Aboriginal and Torres Strait Islander Early Childhood Strategy. <https://www.niaa.gov.au/sites/default/files/publications/niaa-early-years-strategy-5.pdf>.

2 ECEC-Related Vocational Education and Training

- 2.1 According to our frontline services, in recent years there has been a significant push to increase the number of trained staff across the ECEC sector. We warmly welcome this push but reinforce that the quality of the education received by ECEC educators across the sector needs to be maintained.
- 2.2 As discussed in our previous submission, the wellbeing and education of children in ECEC is linked with the qualifications and wellbeing of the ECEC workforce.³ Failing to invest in building a strong ECEC workforce not only causes immediate disruption in staff to child relationships and quality of delivered programs, but can undermine the benefits of ECEC for children in the long-term.⁴
- 2.3 We wholeheartedly welcome the draft recommendations to reduce barriers to educator upskilling, support innovative delivery of teaching qualification, and to lift support and mentoring for ECEC staff. We also welcome a push to increase access and availability of ECEC-related VET training, but we urge that the quality of this training must be maintained.
- 2.4 The Salvation Army highlights the need for increased investment to ensure that all ECEC-related VET training is of high-quality to ensure best outcomes for children in ECEC into the future. We also suggest investment into accountability mechanisms for registered training organisations that work to ensure and promote high-quality training outputs.

Recommendation 2

- 2.5 The Salvation Army recommends that the Commonwealth Government work alongside state and territory governments to:
 - improve the availability of quality training opportunities across the ECEC sector; and
 - develop accountability mechanisms for registered training organisations providing ECEC-related education and training.

³ Australian Children's Education and Care Quality Authority. (2021, September). Shaping our Future: A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022-2031. <https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>.

⁴ Thrive by Five. (Undated). *Workforce Action Plan*. https://thrivebyfive.org.au/wp-content/uploads/2022/08/tb5_200722_workforce_plan_A5_digital-1.pdf.



3 Reducing Administrative Complexity of the Child Care Subsidy

- 3.1 The Salvation Army wholeheartedly endorses the measures outlined in information request 6.5 to reduce the administrative complexity of the Child Care Subsidy (CCS).
- 3.2 In our experience, the CCS application process is complicated and difficult to navigate for both our staff and families we support. This produces feelings of anxiety and mistrust. This can be seen in Anna and Emily's stories below.

Anna's Story*

Anna has two children and is in the process of leaving a violent relationship.

On advice from a social worker, Anna enrolled her children into ECEC with a letter from the social worker stating that the family required the Additional Child Care Subsidy (Child Wellbeing) (ACCS). Anna's children had never previously attended, or been enrolled in, ECEC, and therefore Anna had never applied for the CCS.

Sensing the urgency of the situation, the ECEC director of a local service enrolled the family to commence immediately.

Following discussions with the ECEC director and the social worker Anna assumed that ECEC would be free, and the ECEC centre assumed that the family had already applied for the CCS.

Anna's two children attended four days per week so that Anna could focus on making arrangements related to her separation.

During the first week, the ECEC director discussed CCS with Anna, who advised that Centrelink already had her income details which had been previously provided for another payment. This led the director to believe the CCS application was pending approval.

Following the two weeks of care, Anna received a bill for \$1600 via email which was for the full fee without CCS or ACCS.

With no capacity to pay the account, Anna expressed feeling anxiety and shame. She removed her children from care and stopped answering attempted calls from the centre director.

Anna later communicated to one of our CfC support workers that she felt that the ECEC had tried to 'trick her,' and for this reason, decided not to access ECEC in the future.

* Names changed.



Emily's Story*

Emily requested support from our Communities for Children (CfC) service to apply for the CCS.

The CfC support worker directed Emily to the MyGov website. Emily expressed that she was still struggling to understand the application processes and was provided with one-on-one support by our CfC support worker.

Emily expressed feeling overwhelmed at the size and complexity of the CCS application process. Emily was also very concerned that applying for the CCS would impact her parenting payment – which was her sole source of income – since the application for the CCS required the same information that she had only recently provided for her parenting payment application.

Emily became upset and remarked “no, they already have this information as my only income is the parenting payment. If I answer these questions, it will restart my payment and I won't get paid this week.”

As a result, Emily chose not to enrol her children in ECEC due to being unable to access the CCS.

** Names changed.*

- 3.3 The CCS application process needs to be streamlined to improve accessibility of and engagement with ECEC. As outlined in information request 6.5, one suggested measure is to allow families who are already eligible for income support payments, or a Health Care Card, to be automatically eligible for CCS. We suggest that the benefits of this measure could be further complimented by removing application and paperwork requirements for families deemed automatically eligible for CCS.
- 3.4 The Salvation Army welcomes draft recommendation 6.3 which promotes information about CCS eligibility that is easy to find and understand. We suggest that this information should also outline the CCS application process, and be widely distributed to families and across the early years sector.

Recommendation 3

- 3.5 The Salvation Army recommends that the CCS application process could be further simplified and streamlined by:
- removing paperwork and application requirements for families deemed automatically eligible for the CCS; and
 - widely distributing easy to understand information about the CCS, eligibility requirements, and application to both families and across the early years' service sector.

4 System Navigator Roles in the ECEC Sector

- 4.1 As discussed in our previous submission, The Salvation Army works alongside some of Australia's most disadvantaged and marginalised children and families. Due to experiencing additional needs or barriers to engagement in the early years, these children and their families are often locked out of ECEC services, despite arguably having the most to gain from its benefits.
- 4.2 From the experience of The Salvation Army, the current initiatives to support families experiencing additional barriers are insufficient to meaningfully assist people to navigate the ECEC system. Current initiatives are not widely available, and where they exist, these roles tend to focus on promoting the value of the early years as opposed to navigating service systems.
- 4.3 The Salvation Army highly endorses and advocates for increased investment in system navigator roles across the ECEC sector to support families facing additional barriers to have access ECEC to and its benefits.
- 4.4 Families need to have autonomy and choice between ECEC services without risk of being filtered into certain services that do not necessarily meet their needs. It is our view that local community organisations that are independent from ECEC services are best placed to deliver system navigator services that are responsive to, and considerate of, whole-of-family needs within local contexts.
- 4.5 It is critical that system navigator roles are adequately resourced and trained to ensure that no misinformation is provided which, in our experience, can be more traumatic for families. We believe that this should include a thorough understanding of the local context and the CCS.

Recommendation 4

- 4.6 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase investment in and availability of community-based system navigators across the ECEC sector.

5 More Flexible Sessions of ECEC

- 5.1 The Salvation Army endorses shorter sessions of ECEC, and we acknowledge the Report's draft recommendations that examine regulations that prevent ECEC centres from delivering this service type.
- 5.2 The Salvation Army do not believe that focussing on unused hours or 'air pockets' in ECEC is the solution to increased flexibility. Filling air pockets risks applying further stress to ECEC centres, which would be required to increase staffing levels during times that don't necessarily align with the needs of families.
- 5.3 Flexible sessions of care must be available in response to family and community needs. For example, an ECEC centre in a community with ample healthcare workers being funded to provide care according to shift-working hours.

Recommendation 5

- 5.4 The Salvation Army recommends that state and territory governments work alongside ECEC centres to fund, develop, and implement flexible sessions of ECEC in response to local family and community needs.

6 Availability of Occasional Care

- 6.1 The Salvation Army advocates for increased availability of occasional care in ECEC settings. In our experience occasional care in ECEC is rarely available, acting as a barrier to families accessing ECEC.
- 6.2 It takes time for families to build trust with the services and staff caring for their children. Occasional care is a service type that, if widely available, could be utilised by families as a soft entry into ECEC. This would provide families the opportunity to trial services and see the value of ECEC before being locked into a service contract.
- 6.3 In addition to being a soft entry point, widely available occasional care would support improved outcomes for families experiencing disadvantage. For example, for families experiencing financial hardship, occasional care would enable parents to engage with supports and services they would have been unable to without ECEC – such as employment support services, financial counselling, or job interviews.

Recommendation 6

- 6.4 The Salvation Army recommends that state and territory governments increase investment in and availability of occasional care.

7 Regulatory Actions Against Serial Underperformers

- 7.1 The Salvation Army supports additional powers for regulatory authorities to take action against serial underperformers across the ECEC sector to incentivise high-quality service output.
- 7.2 As outlined in our previous submission, The Salvation Army believes that all children should have access to high-quality ECEC. High-quality ECEC plays an integral role in the early years, particularly for children experiencing vulnerability, acting as a protective factor in reducing impacts of developmental risk factors and disadvantage in the early years.⁵
- 7.3 In our experience, ECEC educators and directors alone do not necessarily have the power to improve service quality in the long-term. We suggest that, in addition to working alongside ECEC educators and directors, regulatory authorities work to incentivise quality at the level of ECEC providers. This should include education and support provision.
- 7.4 The Salvation Army also suggests the implementation of non-regulatory bodies that work to build relationships with, and provide support to, ECEC services, including highlighting areas for improvement prior to the need for funding or service consequences.

Recommendation 7

- 7.5 The Salvation Army recommends that state and territory governments, in addition to implementing additional powers for regulatory authorities, work to establish non-regulatory bodies that provide support to ECEC services to improve service quality.

⁵ The Front Project. (2022). Supporting all children to thrive: The importance of equity in early childhood education. <https://www.thefrontproject.org.au/policy-and-research/research-reports/supporting-all-children-to-thrive>.

8 Conclusion

- 8.1 The Salvation Army thanks the Productivity Commission for the opportunity to provide a written submission to the Inquiry into Early Childhood Education and Care.
- 8.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

February 2024





Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:

<https://www.salvationarmy.org.au/>



Appendix B Additional Case Studies

Liam's Story*

Liam has a young child placed in foster care in a different state.

Liam has worked hard and made many lifestyle changes to be considered to have his child return to his care.

Liam has now satisfied all the child safety services' concerns, and his child is able to be returned to his care under the proviso that he has childcare arranged, because Liam works full time.

The reunification of Liam and his child is now being halted as all the ECEC centres in Liam's surrounding area are full, and he has no informal care options.

** Names changed.*

The Salvation Army's Accommodation Services Tasmania

One of the Salvation Army's Accommodation Services in Tasmania have identified that when working with families there are significant ECEC accessibility issues in local communities, with a lack of availability and long waitlists presenting significant barriers to improved outcomes for families.

Some particular examples include:

- a single parent, with three children under the age of six, being unable to access ECEC as a form of respite;
- a client wishing to start a TAFE course being unable to enrol to commence study due to limited access to ECEC; and
- a client identified as job ready needing to wait until regular childcare becomes available before they can apply and enter the workforce.