Submission to the Productivity Commission's draft report 'a path to universal early childhood education and care'

INTRODUCTION

This submission is provided by the Indigenous Education Consultative Meeting (IECM), made up of representatives from state and territory Indigenous Education Consultative Bodies (IECBs), and/or Aboriginal and Torres Strait Islander education stakeholders.

The key points provided in this submission confirm the views provided to the Productivity Commission by members of the IECM at their meeting in September and November 2023.

Members noted the efforts to capture First Nations children's needs in this report, particularly recognising the strength and expertise of Aboriginal Community Controlled Organisations (ACCOs) in delivering early childhood education and care (ECEC) in their individual communities.

A key priority for improving ECEC for First Nations children is the acknowledgement of values and ways of learning and reflecting cultural safety and capability of services.

Members are excited and encouraged about the opportunity this report and its recommendations will give to raising awareness and enacting the change needed to address ongoing challenges that First Nations communities continue to face in accessing ECEC. Members are looking forward to seeing these recommendations turn into action and set the pathway for moving forward in delivering services that meet the needs of communities.

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KEY POINTS

Universal ECEC system

Key considerations

- While IECM support the expansion of universal access to early childhood education, we have two primary concerns:
 - Consideration of how the word universal is interpreted as it does not always mean uniform.
 - While supportive that all Australian children are guaranteed access to a minimum number of hours to support their early childhood development and school readiness, there remains flexibility for services to respond to the distinct needs of the communities they service. For example, that ACCOs are able to deliver culturally-centred early childhood supports that primarily service the needs of First Nations families in their community.
 - 2. That increased capacity to deliver universal access does not disadvantage Aboriginal and Torres Strait Islander children who may be crowded out of the sector
 - We know from engaging with our families that many have a tendency to register quite late in the process. There are areas, such as in South Australia, where First Nations children currently have access to preschool at three years of age. There will be a period where the sector must increase capacity to meet the demand of universal access and our concern is that those families most vulnerable and in need of support, including First Nations families currently accessing preschool at three years of age, may be inadvertently crowded out of the system during the transition period as a result of late registration practices.

Up to 30 hours or three days a week of quality ECEC available to all children aged 0-5 years.

Key considerations

This recommendation needs to be considered against other ECEC systems that are accessed by
First Nations children, particularly children who are cared for by their family where they are not
able to meet standards for family day care.

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- The role of playgroups should also be acknowledged as effective providers of ECEC in First Nations communities.
- ACCOs have a valuable role in delivering ECEC and are more accepted by First Nations
 communities in providing the expertise in ways of learning and cultural safety, and ACCOs could
 they have a role in setting up family day care systems.
- Where ECEC is being delivered by non-ACCO's, there is a need to deliver services in a culturally safe way to improve access and development. For example, some form of compulsory cultural safety training or framework for educators to the system is ready for the child.

Workforce

Key considerations

- Supportive of wage increases for educators, however, need to consider how increases could be afforded by ACCOs and not for profits without adequate Government funding.
- Acknowledge that quality/service gaps may also occur in cities as organisations are losing staff
 who are relocating due to cost-of-living pressures.
- Pathways and support for First Nations people to obtain ECEC qualifications need to be improved.
- In the context of cultural safety and learning values, there is a need to trial and evaluate new pathways that use a range of different approaches and assessment models that are culturally appropriate, supported by appropriate mentoring and one on one support.

Raise the maximum rate of the Child Care Subsidy (CCS) to 100% of the hourly rate cap for families on incomes up to \$80,000.

Key considerations

- Concern past funding changes have resulted in disadvantage/less funding for First Nations services
- While this recommendation is a positive way forward, further work needs to be undertaken to address the broader issues associated with access and encouraging families to seek placements.
- For example, wrap around services such as inclusion support programs and initiatives that
 address those with undiagnosed additional needs, which can result in a reluctance to approach
 ECEC due to cultural shame.
- ACCOs are well placed to deliver these services with appropriate funding levels.

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Inclusivity, flexibility, and responsiveness

Key considerations

- An understanding of First Nations culture needs to be improved in the ECEC systems and services to provide culturally safe environments.
- First Nations values and ways of learning needs to be strengthened across all services to ensure inclusive environments in which to learn and develop.
- Cultural safety is critical to First Nations families and children in the education system and needs to be embedded in the National Quality Framework to promote cultural capability.
- Supportive of a review/expansion of the Inclusion Support Program to cover children who
 providers recognise have additional needs but with no formal diagnosis, as young First Nations
 parents often do not seek advice on learning issues.
- There may be opportunity for First Nations Service Providers to provide wrap around support.
- The National Quality Framework needs to be more explicit around cultural safety and capability and work towards ensuring mainstream services offer culturally safe and appropriate care.
- There are often increased demands on ACCOs as mainstream services come to communities to build cultural capabilities and this demand may not be able to be met.

A new independent Early Childhood Education and Care Commission

Members are supportive of an ECEC Commission.

CONCLUSION

We acknowledge the important work the Productivity Commission is doing for ECEC and to support First Nations children to enter the education system and enjoy their learning and learning environment. Congratulations on what you are doing to ensure we get it right for children at the start of their education.

IECM welcomes the opportunity to continue to engage with the Productivity Commission as this work progresses.

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ENDORSEMENT

This submission is endorsed by IECM members:

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