



Commissioner for Children and Young People
Western Australia

Our reference: 24/439

Productivity Commission
Level 8, Two Melbourne Quarter
697 Collins Street
DOCKLANDS VIC 3008

Via online submission

Dear Productivity Commission

**Submission – ‘A Path to Universal Early Childhood Education and Care’
Draft Report**

Thank you for the opportunity to provide a submission to the Productivity Commission’s inquiry on the path to universal early childhood education and care in Australia.

As Commissioner for Children and Young People in Western Australia, I have a statutory responsibility under the *Commissioner for Children and Young People Act 2006 (WA)* to advocate for the views of children and young people to be heard in decision making that affects them. This role includes giving priority to, and having special regard to, the interests and needs of Aboriginal and Torres Strait Islander children and young people.

In undertaking these responsibilities, I must also have regard for the United Nations Convention on the Rights of the Child (the UNCRC) which upholds the right of all children and young people to be protected from harm, to be safe, feel safe and be respected wherever they are, and to participate in decision making that affects them.

I welcome the draft reform agenda and recommendations outlined in the draft report, ‘A path to universal early childhood and care’ to address the barriers that affect access to early childhood education and care (ECEC) services and support better outcomes for children and families.

We must improve the quality, accessibility, affordability, and inclusivity of ECEC services, to ensure all children receive the best start to life. This requires an integrated approach across government to re-establish the foundations of ECEC in Australia, and to do so in partnership with children, families, and their communities.

The Voices of Children and their Families

I strongly advocate for an ECEC sector that listens to the voices of all children, families and communities regarding early years education, care, wellbeing, and early development. The voices of families who are struggling to access ECEC, who are not engaging with ECEC or who are experiencing adversity, must be elevated to influence policy reform to ensure that ECEC provision is equitable and meets their needs.

The provision of ECEC should be child-centred, inclusive, equitable, and empowering. Children thrive when they are supported through a holistic collaborative approach with families, educators, communities, and multidisciplinary teams.

I would like to see children's perspectives, together with their families, included in consideration of a universal path to early childhood education and care. I commend the research work, "Children's Perspectives of the Early Years", being undertaken by the Front Project and the Productivity Commission in engaging and conducting research with children's voices at the forefront.

The Formative Role of Early Childhood Development

Research shows that school and wellbeing outcomes for children and young people are strongly related to their early development.ⁱ The social, emotional and material environment in which they live, learn and grow during these early years has a life-long impact.ⁱⁱ

Children experience a significant period of growth but also vulnerability in the early years, with both positive and negative experiences shaping a child's rapidly developing brain.ⁱⁱⁱ The health and developmental gaps among vulnerable or disadvantaged children and their more affluent peers begin to emerge in early childhood and continue to widen with age. This can have long term impacts on a child's educational success, cognitive and social-emotional development, work productivity, and overall wellbeing.

Consistent and sustained engagement with ECEC is a critical factor in achieving positive outcomes for all children, with children from lower socio-economic backgrounds receiving the greatest benefits from universal ECEC programs.^{iv} Identifying and addressing barriers to universal, quality ECEC and the provision of effective early screening and intervention has the potential to positively impact life trajectories. ECEC services that provide holistic education and care, aim to build protective factors and mitigate risk factors, that positively influence developmental outcomes and reduce the need for remedial-stage education, health and criminal justice services in the future.^v

Affordability and Accessibility of ECEC in Western Australia

All children and families should have access to local, high-quality, and affordable ECEC that is inclusive and culturally safe. To do this, governments must address the affordability and accessibility barriers many families face, especially for those in disadvantaged, rural or remote communities, and for those with children who have disability or complex needs. Unfortunately, 39.8 per cent of Western Australian children who are assessed as developmentally vulnerable in one or more domains on the Australian Early Development Census (AEDC) did not have access to ECEC.^{vi}

The cost of accessing ECEC is a significant barrier for many families, particularly for high-priority and low-income families. Modifications to the Child Care Subsidy and Activity Test to improve affordability and accessibility should be targeted towards those priority families who need it most - low-income families, families with children with developmental needs or disability, children in out-of-home care, culturally and linguistically diverse (CaLD) families, and those who live in regional or remote areas.

Unfortunately, the availability of quality ECEC can depend on where children live in Western Australia. The unique geographical context of Western Australia presents significant challenges in the provision of accessible and quality ECEC, particularly in regional and remote areas. In some areas, this means there are not enough available places to meet demand, in others, it means that there is no ECEC service available at all. Staffing challenges, limited or no local services, lack of training opportunities, and little coordination

in government investment means that many children and families in regional and remote WA are missing out.

Proposed changes to the Child Care Subsidy and Activity Test will result in unprecedented demand on existing services across Western Australia, many of whom are already struggling to meet community need. This must be backed by timely investment in quality infrastructure and a sustained workforce to increase and expand service provision, particularly in regional and remote areas.

Inclusive and Culturally Responsive Community-based ECEC Models

A universal, but not uniform, ECEC system is one that is flexible and adaptive to the unique contexts of individual communities. What works for one community may differ significantly for others.^{vii} The provision of ECEC services should be community-led and tailored to community need. In addition to universal funding, targeted place-based funding is required to ensure that communities can better meet the needs of their families. Let communities define their own needs and determine how integrated services (education, health and child protection) will operate at a local area level.^{viii}

A one-size-fits-all approach to ECEC provision in remote and regional areas does not work. We must recognise that high-quality ECEC may take many forms and be provided through different types of services, including playgroups or wrap-around preschools, that better cater for families in regional and remote communities. Flexible options for accessing ECEC should be provided to families, particularly for those experiencing disadvantage or social exclusion.

Playgroups and community-led early years programs, while funded separately to ECEC services and sit outside the formal ECEC system, play a valuable role in supporting families and children in the early years. This is particularly the case in regional and remote communities. Flexible, culturally responsive early years programs, such as Indi Kindi in the NT and Bubani Playgroup in WA, focus on family participation and community engagement as a key priority. These programs are actively working to reduce barriers for families accessing and engaging with early childhood education in their communities.^{ix}

We need culturally safe and fully funded support systems for families and children that are integrated with ECEC services, developed in partnership with families and communities at the local level.^x Greater investment in Aboriginal community-controlled organisations (ACCOs) must reflect the integrated and tailored services that ACCOs provide in the early years. The work being undertaken by the Early Childhood Care and Development Policy Partnership in developing alternative funding model options and building capacity for ACCOs to provide early years services is an important step in the right direction towards realising these outcomes.

Supporting Children with Disability or Developmental Delay

Children with complex needs and disabilities have the indisputable right to participate fully in their families and communities, and access the services needed to help them achieve their potential. These rights are protected for by the United Nations Convention on the Rights of the Child and the United Nations Convention on the Rights of Persons with Disabilities.

For children with developmental delay or disability, high-quality ECEC enables early assessment and intervention, assists families to access appropriate support services,

provides regular respite to parents and carers, and provides appropriate resources and equipment to cater for diverse needs.

It is disheartening to see that many children with disability and complex needs continue to be excluded from mainstream ECEC. Advocates have reported that while some families with children living with complex needs and disabilities rely on the NDIS for support, some are left with no suitable options to meet their childcare needs. As a result, we are seeing thousands of our most vulnerable children being turned away from receiving quality ECEC and all the benefits that it provides.

Children with disability and complex needs must be afforded the same opportunities as all children. High-quality ECEC programs should be informed by inclusive educational programs and practices that allow for individualised support to address the diverse learning needs of children with disability and complex needs. Greater investment in targeted service provision and inclusion funding is required to provide additional and more intensive services for children and families who need the most developmental support.^{xi}

Children with developmental delay are not being consistently identified early in life. There is a significant reduction in WA in the number of eligible children attending child health checks as they age. This is of concern as some developmental issues are only able to be identified at the 12-month and 2-year health checks. Without early assessment and intervention, gaps in development can appear at any time and widen progressively as children grow older.¹¹⁷ Children with developmental delay or disability are less likely to access quality ECEC, experience difficulties in transitioning to formal schooling and often face additional barriers when they reach school.¹¹⁸

ECEC services can play a vital role in raising awareness and empowering families to be aware of and act on developmental delay signals, and by connecting families with the supports they need. Families need coordinated access to health and child development support services that are high-quality, evidence-based, accessible, and culturally responsive. Families should feel safe accessing the supports they need no matter where they live, and they should be easy to navigate.

ECEC services, integrated or co-located alongside schools, health providers and other specialist support services, can not only provide continuity of service provision but make it easier for families to access support services in a familiar setting. In Western Australia, Child and Parent Centres provide a range of easily accessible programs and services for families and their children, including early learning programs, maternal and child health services and child support activities. Allied health services such as speech pathologists, physiotherapists, dieticians and occupational therapists are also available in some locations.

Engaging Culturally and Linguistically Diverse Families (CaLD)

ECEC is one of the first points of contact for many refugee and migrant families with young children. Participation and engagement with ECEC, community and child health services can provide 'soft entry' points into the community, enabling families to build social connections with others and reducing feelings of isolation.^{xii}

The under-representation of children from migrant, refugee and asylum seeker families in ECEC is reflective of the broader barriers many of these families experience in accessing culturally responsive ECEC services. It is important that ECEC services engage holistically with CaLD families and provide flexible approaches such as supported playgroups as a 'soft

entry'. We need to examine ways to reduce the barriers to participation in ECEC for aALD families, including addressing the lack of awareness of the benefits of ECEC, challenges relating to language and literacy, navigating enrolment processes, lack of culturally responsive services, costs, and logistical considerations.

Many refugee families have not had any experience with child and health services or early learning programs.^{xiii} We must prioritise raising awareness and engaging with families on the importance of early learning, play, health prevention and screening, and early childhood interventions; all of which are pivotal to a child's early development. The messages and community engagement initiatives around early childhood development that are delivered to families can be tailored and strengthened in partnership with CaLD organisations.

Workforce Shortages

Progressing towards universal access to ECEC hinges on the availability of skilled educators. The sector is already facing substantial challenges in recruiting and retaining staff – challenges that have been present for many years. Staff shortages are severely reducing access to ECEC services across Western Australia, particularly in regional and remote areas.^{xiv} ACECQA's latest NQF snapshot indicates that waiver numbers are at a record high, with many services capping enrolments due to staff shortages.^{xv}

Boosting the ECEC sector and workforce should be a priority reform. Increasing access and affordability of ECEC services for children and families will not be possible without a strong, supported, and well-trained ECEC workforce. We need targeted initiatives to attract and retain early childhood educators, particularly those from priority cohorts and in regional and remote areas.

We need to strengthen capacity for communities to support the local workforce to train and upskill in ECEC through flexible learning opportunities, practical supports and on-the-job training. Community-led approaches that support parents and carers to upskill and train in ECEC will strengthen local community involvement, foster culturally responsive environments, boost viability of regional and remote early learning programs, and generate local employment opportunities.

Of foremost concern is the early education and care of our young children of today and tomorrow. The value and benefits of children receiving high-quality ECEC is indisputable and is a right that should be afforded to all children, regardless of their socioeconomic status, diverse needs or where they live.

Thank you for the opportunity to comment on the draft of the 'A Path to Universal Early Childhood Education and Care'.

Yours sincerely,

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 Commissioner

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