

SUBMISSION TO THE PRODUCTIVITY COMMISSION EARLY CHILDHOOD EDUCATION AND CARE INQUIRY

Draft Report: A path to universal early childhood education and care

February 2024

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Acknowledgement

SNAICC shows respect by acknowledging the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities. SNAICC's head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally.

SNAICC acknowledges Traditional Owners of all lands and waters across this continent, and pays respects to Elders past and present. We acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted.

About SNAICC

SNAICC is the national non-government peak body for Aboriginal and Torres Strait Islander children. We work for the fulfilment of the rights of our children, to ensure their safety, development, and well-being.

SNAICC has a dynamic membership of Aboriginal and Torres Strait Islander community-based child care agencies, Multi-functional Aboriginal Children's Services, crèches, long day care child care services, pre-schools, early childhood education services, early childhood support organisations, family support services, foster care agencies, family reunification services, family group homes, services for young people at risk, community groups and voluntary associations, government agencies and individual supporters.

Since 1981, SNAICC has been a passionate national voice representing the interests of Aboriginal and Torres Strait Islander children and families. SNAICC champions the principles of community control and self-determination as the means for sustained improvements for children and families, which has been at the heart of SNAICC's work — whether on child protection and wellbeing or early childhood education and development. Today, SNAICC is the national peak body for Aboriginal and Torres Strait Islander children and the sector supporting these children. Our work comprises policy, advocacy, and sector development. We also work with non-Indigenous services alongside Commonwealth, State and Territory Governments to improve how agencies design and deliver supports and services for Aboriginal and Torres Strait Islander children and families.

As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences, needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations.

The findings and recommendations in this submission reflect what SNAICC heard through the extensive consultation with Aboriginal and Torres Strait Islander community controlled early years services we undertook in 2023 in researching and developing funding model options for these services.

Introduction

For more than 40 years SNAICC has advocated for the rights of Aboriginal and Torres Strait Islander children and welcomes the opportunity to provide a submission to the Productivity Commission in response to the *Draft Report: A path to universal early childhood education and care* (the draft report).

SNAICC supports the Productivity Commission's focus on early childhood education and care and the draft recommendations which will strengthen Aboriginal and Torres Strait Islander children and families' engagement in culturally centred and high quality early childhood education and care and integrated early years services, as well as the Aboriginal and Torres Strait Islander workforce that are fundamental to these services.

The Productivity Commission made several Information requests in the draft report. This submission responds specifically to Information requests 2.2, 6.1, 7.1, 7.2, 9.1 and 9.2 as the most relevant to Aboriginal and Torres Strait Islander children and families. However, SNAICC is willing and available to provide further information and expertise across other Information request areas if requested.

Self-Determination

SNAICC advocates for the full enactment of self-determination in all legislation, policies, and strategies. Self-determination describes the right of Aboriginal and Torres Strait Islander peoples to autonomy and self-governance.¹ The United Nations Expert Mechanism on the Rights of Indigenous People under UNDRIP connects the capacity of Indigenous peoples to meet their children's needs with their ability to exercise self-determination².

The Commonwealth Government has taken important steps towards recognising the rights of Aboriginal and Torres Strait Islander peoples to self-determination in matters relating to children. The *Safe and Supported, National Framework for Protecting Australia's Children 2021-2031* commits to progressive systems transformation that has Aboriginal and Torres Strait Islander self-determination at its centre and defines self-determination as:

*a collective right of Aboriginal and Torres Strait Islander peoples to determine and control their own destiny. It is a right of Aboriginal and Torres Strait Islander peoples to exercise autonomy in their own affairs and to maintain and strengthen distinct political, legal, economic, social and cultural institutions.*³

¹ SNAICC 2022, 'The Family Matters Report 2022: Measuring trends to turn the tide on the over-representation of Aboriginal and Torres Strait Islander children in out-of-home care'. Retrieved from: <https://www.familymatters.org.au/wp-content/uploads/2022/11/20221123-Family-Matters-Report-2022-1.pdf> pg. 90.

² United Nations Human Rights Council 2021, 'Rights of the Indigenous child under the United Nations Declaration on the Rights of Indigenous Peoples'. Retrieved from: [G2121979.pdf \(un.org\)](https://www.unhcr.org/refugees/files/2021/02/G2121979.pdf), pg. 2

³ Department of Social Services 2021, 'Safe and Supported: the National Framework for Protecting Australia's Children 2021-2031 (the National Framework)'. Retrieved from: https://www.dss.gov.au/sites/default/files/documents/12_2021/dess5016-national-framework-protecting-childrenaccessible.pdf, pg. 51.

For too long, governments have decided what works and what doesn't for Aboriginal and Torres Strait Islander people and communities without delivering meaningful and tangible positive change for our children and families. Enacting self-determination is critical to designing and implementing effective policies that achieve better outcomes for Aboriginal and Torres Strait Islander children.

Aboriginal and Torres Strait Islander children's rights

Aboriginal and Torres Strait Islander children and young people have a distinct set of rights. Aboriginal and Torres Strait Islander children's rights include those owed to all children as well as their unique rights as Indigenous Peoples. These rights are drawn from international human rights frameworks.

The rights of all children are set out in the United Nations Convention on the Rights of the Child (UNCRC) and are specific to children, their contexts, and needs. The articles within the UNCRC include the right to education that meets their developmental needs and articles that are especially important to Aboriginal and Torres Strait Islander children such as the right to enjoy their culture, and to learn and use the language and customs of their Indigenous Nations. Aboriginal and Torres Strait Islander children also have rights under the (UNDRIP). The articles under UNDRIP include rights to lands, to maintain language and culture and participate in decision making.

The United Nations Committee on the Rights of the Child (the Committee) has provided important guidance on how the UNCRC must be implemented to protect the rights of Indigenous children. This guidance reaffirms that the active protection of Indigenous children's rights requires dedicated attention and the application of special measures. In its General Comment 11, the guidance of the Committee included that:

- Special measures should be taken through legislation and policy in consultation with Indigenous communities to protect the rights of Indigenous children;
- Legislation should apply the principle of non-discrimination to protect Indigenous children against discrimination;
- Special measures should be applied to ensure Indigenous children “*have access to culturally appropriate services in the areas of health, nutrition, education, recreation and sports, social services, housing, sanitation and juvenile justice*”;
- The best interests of the child is both a collective and individual right, and its application to Indigenous children requires consideration of collective cultural rights;
- The best interests of an Indigenous child should be determined through the participation of the child's Indigenous community;
- Special strategies should be used to ensure the participation of Indigenous children in matters affecting them, including ensuring rights to representation and culturally appropriate interpretation; and

- Government should “ensure effective measures are implemented to safeguard the integrity of Indigenous families and communities by assisting them in their child-rearing responsibilities”⁴.

The Committee also provided guidance on special measures necessary to ensure Indigenous children’s rights are protected in areas such as health and education.⁵

Aboriginal and Torres Strait Islander children have a right to education without discrimination. Education under the UNCRC includes both access to education and the content of education which goes beyond formal schooling to encompass a broad range of life experiences and learning processes.

Internationally the right to education is interpreted as beginning at birth and closely linked to a child’s right to life and maximum development. Sufficient public investment in services, infrastructure and overall resources for early childhood has been highlighted as important by the Committee. However, in 2019 the Committee expressed its concern that efforts made to close the gap for Aboriginal and Torres Strait Islander children remained insufficient and urged Australia:

“To invest more in improving education at the early childhood, primary and secondary levels, paying close attention to children living in remote areas, Aboriginal and Torres Strait Islander children, children with disabilities, children in marginalized and disadvantaged situations, children in alternate care and children from refugee and migrant backgrounds.”⁶

Australia’s seventh period report to the Committee is scheduled to be submitted this year. At present, Australia’s investment in services, infrastructure and resourcing for ECEC, particularly in regional and remote Indigenous communities, does not meet the Committee’s expectations, UNCRC obligations, or address the concerns raised during Australia’s last reporting period.

National Agreement on Closing the Gap

In July 2020, the Australian Government, all state and territory governments, and the Coalition of Peaks signed the National Agreement on Closing the Gap (National Agreement). The National Agreement seeks to overcome the entrenched inequalities faced by Aboriginal and Torres Strait Islander people, pushing for equality in life outcomes for all Australians.

The National Agreement is built around four Priority Reforms to change the way governments work with Aboriginal and Torres Strait Islander communities, organisations, and people across the

⁴ United Nations Committee on the Rights of the Child, ‘General comment no. 11 (2009), Indigenous children and their rights under the Convention [on the Rights of the Child]’. Retrieved from: <https://digitallibrary.un.org/record/648790>

⁵ Ibid.

⁶ United Nations Committee on the Rights of the Child, ‘Concluding observations on the combined fifth and sixth periodic reports of Australia’ CRC/C/AUS/CO/5-6. Retrieved from: <https://documents.un.org/doc/undoc/gen/g19/316/49/pdf/g1931649.pdf?token=fQIKo4KXJHJDKpEfdo&fe=true> pg. 12 [43(b)].

country. The Priority Reforms are based on what Aboriginal and Torres Strait Islander people have been saying for a long time is needed to improve the lives of our people, and have been committed to by all Australian, state and territory governments.

The Priority Reforms must inform all government action including legislation, policy, and practice, whether these actions are targeted for Aboriginal and Torres Strait Islander peoples or impact them as part of the general population. The Priority Reforms are listed below.

1. Formal Partnerships and Shared Decision Making

Aboriginal and Torres Strait Islander people are empowered to share decision-making authority with governments to accelerate policy and place-based progress on Closing the Gap through formal partnership arrangements.

2. Building the Community Controlled Sector

There is a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector delivering high quality services to meet the needs of Aboriginal and Torres Strait Islander people across the country.

3. Transforming Government Organisations

Governments, their organisations and their institutions are accountable for Closing the Gap and are culturally safe and responsive to the needs of Aboriginal and Torres Strait Islander people, including through the services they fund.

4. Shared Access to Data and Information at a Regional Level

Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to set and monitor the implementation of efforts to close the gap, their priorities and drive their own development.⁷

In February 2024, in his Closing the Gap speech to Parliament, the Prime Minister re-confirmed the Australian Government's commitment to the National Agreement.⁸

Aboriginal and Torres Strait Islander Community Controlled Organisations (ACCOs)

As outlined in the National Agreement, Aboriginal and Torres Strait Islander community control is an act of self-determination. While Aboriginal and Torres Strait Islander Community Controlled Organisations (ACCOs) may look and operate differently depending on the context and needs of the community they operate within, all ACCOs centre on delivering services that build the strength and empowerment of Aboriginal and Torres Strait Islander communities.

⁷ Australian Government, 'Closing the Gap Priority Reforms'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/priority-reforms>

⁸ Prime Minister of Australia, 'Closing the Gap Speech Tuesday 13 February 2024'. Retrieved from: [Closing the Gap | Prime Minister of Australia \(pm.gov.au\)](https://www.pmc.gov.au/press-releases/2024/02/13/closing-the-gap-speech)

To be considered an ACCO, an organisation must be:

- a. incorporated under relevant legislation and not-for-profit
- b. controlled and operated by Aboriginal and/or Torres Strait Islander people
- c. connected to the community, or communities, in which they deliver the services
- d. governed by a majority Aboriginal and/or Torres Strait Islander governing body.⁹

The elements of a strong community controlled sector are where:

- a. there is suspected capacity building and investment in ACCOs which deliver certain services and address issues through a set of clearly defined standards or requirements, such as an agreed model of care
- b. there is a dedicated and identified Aboriginal and Torres Strait Islander workforce (that complements a range of other professions and expertise) and where people working in community-controlled sectors have wage parity based on workforce modelling commensurate with need
- c. ACCOs which deliver common services are supported by a peak body, governed by a majority Aboriginal and Torres Strait Islander Board, which has strong governance and policy development and influencing capacity
- d. ACCOs which deliver common services have a dedicated, reliable and consistent funding model designed to suit the types of services required by communities, responsive to the needs of those receiving the services, and is developed in consultation with the relevant peak body.¹⁰

The Early Childhood Care and Development Sector Strengthening Plan (ECCD SSP) is a key enabler of Priority Reform 2 of the National Agreement. It was developed in 2021 by dedicated working groups, co-chaired by the Australian Government and SNAICC. The ECCD SSP outlines high level priorities to guide joint national effort and targeted jurisdictional actions to build a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector.

One key area of action of the ECCD SSP is for a dedicated Aboriginal and Torres Strait Islander workforce.¹¹ An Aboriginal and Torres Strait Islander early years workforce with appropriate skills, capabilities and experience is an essential pillar of a thriving and sustainable community controlled early years sector. Strong ACCOs and a strong Aboriginal and Torres Strait Islander workforce are key to our children being confident, proud and engaging in culturally responsive learning, to develop the diverse social, emotional, physical and cognitive skills they need for school and life.

⁹ Clause 44, Australian Government, 'Closing the Gap Priority Reforms'. Retrieved from:

<https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/6-priority-reform-areas/two>

¹⁰ Clause 45, Australian Government 'Closing the Gap Reforms'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/6-priority-reform-areas/two>

¹¹ Joint Council, 'Sector Strengthening Plan: Early Childhood Care and Development'. Retrieved from:

<https://www.closingthegap.gov.au/sites/default/files/2022-03/sector-strengthening-plan-early-childhood-care-development.pdf> pg. 23.

Response to recommendations

SNAICC is supportive of all draft recommendations provided in the report, with the exception of some of the functions and scope proposed for the suggested ECEC Commission. Specifically, SNAICC is concerned about the possibility of a new ECEC Commission inadvertently displacing Aboriginal and Torres Strait Islander sector leadership and undermining self-determination, and suggests that many of the proposed functions should remain with the community controlled sector.

The feedback provided highlights the need for the creation of an ACCO funding model which adequately funds and resources the ACCO ECEC sector through consistent block-based and needs-based funding.

A summary of SNAICC comments in response to each recommendation is outlined in the table below. The draft recommendations are outlined in the same order as they appear in the draft report.

Draft Recommendation	Comment
Availability gaps will have to be tackled to achieve universal access	
<p>5.1 Support universal access in persistently thin markets via supply-side funding</p> <p>Full wording from the report: To ensure that up to 30 hours or three days a week of quality ECEC is available for all children aged 0–5 years whose families wish for them to participate, the Australian Government should provide additional support in markets where it is clear that ECEC providers are unlikely to invest, even with the changes recommended in this inquiry.</p> <p>This support could take the form of:</p> <ul style="list-style-type: none"> • grant funding to establish a service in communities that are able to cover the operating costs of a service (such as wages, rent and other overheads) via child care subsidies and families' out-of-pocket gap fees, but expected earnings would not cover the capital costs of building or expanding physical facilities • block grants to cover capital and operating costs in communities where the level of demand is too low to support all of the costs of operating a service or there are substantial barriers to accessing child care subsidies. Funding in these 	<p>SNAICC supports this draft recommendation. Supply side funding is critical to the sustainability of ACCO ECEC and integrated early years services and will ensure equitable access to services in thin markets such as childcare deserts. Additionally, any funding arrangements intended to be made for ACCOs must be co-designed with ACCO services and Aboriginal and Torres Strait Islander communities.</p> <p>As outlined Information request section of this submission, ACCO early years services operate differently to mainstream and for-profit providers. This requires a separate, dedicated funding model for ACCO ECEC and integrated early years services. In 2023, as the national peak body for Aboriginal and Torres Strait Islander children and families, SNAICC undertook research on funding model options for ACCO integrated early years services, including extensive consultation with ACCO early years services. From this</p>

<p>markets should generally be ongoing, with periodic review to determine if a service can be self-sustaining with child care subsidies</p> <ul style="list-style-type: none"> • specific arrangements for Aboriginal Community Controlled Organisations to be co-designed with Aboriginal and Torres Strait Islander communities. <p>The Australian Government could use a process of competitive tendering to provide services in markets where community representatives do not apply for grants. Centre-based day care, family day care and mobile care should all be considered for funding to help address the varying needs of thin markets. An advisory program should be established that works with community representatives and enables them to get the support they need.</p>	<p>research, SNAICC has designed a block-based, needs-based funding model that meets the full cost of service delivery for ACCO integrated early years services. SNAICC suggests that the Productivity Commission consider this funding model as the basis for further recommendations regarding supply-side funding in its final report.</p>
<p>Availability can only improve if workforce challenges are resolved</p>	
<p>3.1 Reduce barriers to educator upskilling</p> <p>Full wording from the report: To improve pathways for educators seeking to upskill to become early childhood teachers (ECTs), the Australian and state and territory governments should:</p> <ul style="list-style-type: none"> • work with universities and the ECEC sector to develop and promote accelerated degree programs for upskilling diploma-qualified educators to ECTs • expand wrap-around supports to educators who are undertaking university-level qualifications to become ECTs. Supports could include assistance to navigate enrolment processes, assistance to build academic skills, and regular mentoring. These initiatives should be underpinned by robust monitoring and evaluation • provide financial support to ECEC services so they can provide a reasonable amount of paid leave to educators for them to complete supervised professional experience requirements associated with completing early childhood teaching qualifications. <p>In addition:</p> <ul style="list-style-type: none"> • when providing information on teaching courses to potential students, universities should publish an indication of how prior ECEC qualifications will be recognised. This could take the form of a median or average amount of credit that students with ECEC qualifications have received in the past • the Australian Children’s Education and Care Quality Authority (ACECQA) should examine the supervised professional experience that is required in order for an early childhood teaching qualification to be approved for the purposes of 	<p>SNAICC supports this draft recommendation and suggests that in line with the National Agreement any programs designed for Aboriginal and Torres Strait Islander people are developed in partnership with ACCO peak bodies and early years services.</p> <p>Program content should consider the literacy, language and numeracy levels required to engage in the upskilling course and provide appropriate support opportunities for people at all levels to assist them to participate in this learning.</p> <p>Geographical consideration should be included in this recommendation, acknowledging the different barriers faced by educators and responses needed in an urban setting in comparison to educators in rural and remote communities. For example, online courses for remote communities may be met with barriers of digital literacy and technological access capacity within community. Place-based approaches are recommended.</p> <p>The cost of upskilling for both service providers and individuals is a huge issue for ACCO ECEC services, exacerbated in regional and remote areas which do not have easy access to training centres and</p>

<p>the National Quality Framework, with a view of extending the ability of students to fulfil such requirements in their existing workplaces.</p>	<p>facilities. Consideration of the cost and mutual benefit for both services and individuals need to included when thinking about reducing barriers to educator upskilling.</p> <p>The level of qualification required to work in the ECEC sector requires re-evaluation. ACECQA needs to better understand the value of Aboriginal and Torres Strait Islander staff and what they bring to the sector.</p>
<p>3.2 Support innovative delivery of teaching qualifications</p> <p>Full wording from the report: Governments should provide modest financial incentives to universities to facilitate trials of innovative approaches for providing Initial Teacher Education to early childhood teachers. The Australian Children’s Education and Care Quality Authority (ACECQA) should work with governments and universities to develop pathways for early childhood teaching qualifications that are awarded through innovative teaching approaches to be recognised under the National Quality Framework.</p>	<p>SNAICC supports this draft recommendation in-principle and recommends that it also specifically include facilitating innovative, culturally responsive approaches for providing Initial Teacher Education to Aboriginal and Torres Strait Islander people.</p> <p>Financially supporting innovative approaches to the delivery of all qualifications across the ECEC sector is needed. The ability for Aboriginal and Torres Strait Islander students and educators to complete their placement within their community is often crucial to their capacity to complete qualification requirements. Universities should work in partnership with ACCO peak bodies and early years services to design, implement and evaluate these innovative approaches.</p>
<p>3.3 Improve registration arrangements for early childhood teachers</p> <p>Full wording from the report: State and territory governments should amend their teacher registration arrangements so that:</p>	<p>SNAICC supports this draft recommendation.</p> <p>Consistency across all jurisdictions will have a significant impact on the sector. Alignment of registration requirements and</p>

<ul style="list-style-type: none"> • early childhood teachers (ECTs) working in National Quality Framework-approved ECEC settings can be registered with the teacher registration body in their jurisdiction • any ECT-level qualification that has been approved by the Australian Children’s Education and Care Quality Authority (ACECQA) for recognition under the National Quality Framework should be automatically recognised as meeting qualification requirements associated with teacher registration. <p>In undertaking these actions, state and territory governments should also:</p> <ul style="list-style-type: none"> • review their teacher registration arrangements to ensure that there are accessible pathways for ECTs with an ACECQA-approved qualification to teach in primary school (including after they undertake additional study focussing on teaching in primary school settings) • review their arrangements concerning highly accomplished and lead teachers (HALT) certification (in relevant jurisdictions) and act on opportunities to make it more accessible for ECTs. As part of reviewing these arrangements, governments should issue guidance on the eligibility of ECTs for HALT certification, the process through which ECTs can seek HALT certification (including in non-government operated ECEC settings), and the implications for ECTs if certification is achieved. 	<p>arrangements will also allow for the opportunity to streamline processes and simplify the complexity of these systems.</p> <p>Currently, ECEC settings are also legislated by State and Territory based regulatory authorities. Alignment and consistency is also needed across services that are out of scope of the National Quality Framework.¹²</p>
<p>3.4 Lift support and mentoring for new early childhood teachers</p> <p>Full wording from the report: State and territory governments should develop structured mentoring and support programs for new early childhood teachers if they do not already have these in place. In developing these programs, state and territory governments should reflect the findings of the research underway by the Australian Education Research Organisation (AERO) on the effectiveness of existing support programs. Jurisdictions that already operate programs to support and mentor new ECTs should review their programs to incorporate the findings from AERO’s research once this is finalised.</p>	<p>SNAICC supports this draft recommendation, acknowledging the importance of any structures and services for Aboriginal and Torres Strait Islander teachers to be led by ACCO peak bodies and services.</p> <p>Investing in existing supports like ACCO Registered Training Organisations (RTOs) and backbone support services such as SNAICC’s Early Years Support will provide the mentoring and support programs new and current Aboriginal and Torres Strait</p>

¹² ACECQA, ‘The Guide to the National Quality Framework’ Services out of scope of the National Quality Framework. Retrieved from: https://www.acecqa.gov.au/sites/default/files/2024-02/Guide-to-the-NQF-web_0.pdf pg. 37.

	<p>Islander ECEC sector staff need to engaging in and continue their learning and professional development.</p> <p>Both ACCO RTOs and backbone support are discussed in more detail below in response to draft recommendation 3.5 and information request 9.1, respectively.</p>
<p>3.5 Improve pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications</p> <p>Full wording from the report: In collaboration with Aboriginal and Torres Strait Islander people, communities and organisations, governments should trial and evaluate new pathways for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications so they can participate in the ECEC workforce in greater numbers. A central aim of these new pathways should be to better recognise the cultural knowledge and experience many Aboriginal and Torres Strait Islander people have when it comes to educating and caring for children.</p> <p>In designing these pathways, governments should consider:</p> <ul style="list-style-type: none"> • using different approaches – such as culturally appropriate interviews – to better understand the prior knowledge, learning and experience of Aboriginal and Torres Strait Islander people, and to inform decisions about the extent that this can be recognised in the form of course credit (or other ways of recognising prior learning) • using teaching assessment models that – while still ensuring rigour – might be more accessible or culturally appropriate for Aboriginal and Torres Strait Islander students, such as teaching in local languages or making greater use of observational assessments • providing tailored, small group or one-on-one supports to Aboriginal and Torres Strait Islander students 	<p>SNAICC strongly supports this draft recommendation and suggests that improved pathways are designed in partnership with ACCO peak bodies and early years services.</p> <p>Current qualification pathways do not adequately recognise the cultural knowledge and expertise of Aboriginal and Torres Strait Islander people and often create barriers to obtaining ECEC qualifications.</p> <p>ACCO RTOs provide culturally embedded training options with wrap around support for Aboriginal and Torres Strait Islander students, which is central to their strong completion rates. However, the sector receives no baseline operational funding and is solely dependent on a dollar per training hours payment which translates into an operational deficit every year. Significant investment is needed to rebuild the decimated ACCO RTO sector.</p> <p>However, creating visible, accessible and supported local pathways to employment requires more than training. It requires transition to on-the-job-support from committed RTO staff and workplaces to meet people where they are at on their learning journey. This means consistent, grassroots investment in adult learning approaches and local contextualisation of course content; language,</p>

	<p>literacy and numeracy; mentoring; block training and training on Country; and meeting cultural, childcare, travel and accommodation needs.</p> <p>Cultural knowledge is regularly under-recognised as legitimate expertise and a valuable skill within the mainstream ECEC sector. The current qualification processes do not acknowledge cultural knowledge or the relational ways of working and expertise that Aboriginal and Torres Strait Islander people hold. The Australian Industry and Skills Committee, TAFE and Registered Training Organisations need to amend qualification processes to be inclusive of the cultural knowledge and skill that Aboriginal and Torres Strait Islander people bring to the ECEC sector.</p> <p>In addition, there is a very specific challenge faced by Aboriginal and Torres Strait Islander people who are working in services that operate under Minister’s Rules. These services are not authorised to facilitate practicum or sign off on competencies that educators require as evidence to progress for their qualification. In practice, this means that Aboriginal and Torres Strait Islander educators may have to leave their community and their current service to undertake unpaid practicum / work placement in a service that is legislated under the National Quality Framework. Not only is this impractical, it creates additional workforce shortages both over the short and long term.</p>
<p>3.6 Contribute to professional development for the ECEC workforce</p> <p>Full wording from the report: The Australian and state and territory governments should provide support for the ECEC workforce to undertake</p>	<p>SNAICC supports this draft recommendation and suggests that the focus of professional development includes an additional sub-point</p>

professional development activities. This should take the form of a contribution towards the cost of professional development.

Government contributions to professional development should be targeted toward activities that will improve the quality and inclusivity of ECEC practices, including activities that build staff capability to:

- remain up to date with the latest pedagogical research and how to apply this in their teaching
- understand and apply the National Quality Standard and the national approved learning frameworks
- deliver more inclusive ECEC, including for children with disability, developmental delay or additional needs, children who have experienced trauma and Aboriginal and Torres Strait Islander children, particularly those attending in mainstream settings
- work with families – including families in complex or challenging situations – to engage with and participate in ECEC.

that focuses on the needs of the Aboriginal and Torres Strait Islander ECEC workforce.

Professional development activities should consider the specific needs of Aboriginal and Torres Strait Islander people, including cultural knowledge and cultural leadership and governance structures.

The activities should also include National Quality Framework updates and information, resources, training and communications from ACECQA and jurisdictional governing bodies.

Equitable opportunities need to be provided for all staff to learn in a safe and inclusive environment.

It is vital to consider how and when professional development activities occur. Financial investment to support services to engaging in pedagogical research and training to understand and apply NQS is needed. Currently, the day to day complexities of service delivery in supporting vulnerable children results in professional development opportunities being offered after hours or on weekends and this must change.

New initiatives are creating space for planning and professional development within work hours. This includes time off the floor to plan and engage in training, resulting in less burn out as staff are not required to take work home. The Parkville Institute's intensive ECEC program is an example of how this kind of innovation can strengthen the ECEC workforce.

	<p>In addition, the work of backbone support services such as SNAICC Early Years Support provide valuable Communities of Practice for the ACCO ECEC workforce and should be considered as a method of delivery for this work.</p>
<p>3.7 Improve the ECEC Workforce Strategy</p> <p>Full wording from the report: To maximise the value of the National Children’s Education and Care Workforce Strategy (Shaping Our Future), the Australian, state and territory governments should:</p> <ul style="list-style-type: none"> • articulate a clear objective for the strategy against which its effectiveness can be measured • include projections of the number of educators and teachers the sector is expected to require (over different timeframes) in the strategy • clarify how each action in the strategy will be resourced • commit to individually producing annual updates about how the actions, initiatives and reforms they are undertaking are contributing to the strategy’s implementation. These updates should be published alongside the broader assessment of progress in implementing the Strategy published by the Australian Children’s Education and Care Quality Authority (ACECQA). 	<p>SNAICC supports this draft recommendation and suggests that this recommendation also highlight the need for Shaping Our Future to be expanded to include all ECEC services, not just those under the NQF. The objectives and actions from the strategy should include all Aboriginal and Torres Strait Islander ECEC services and exempt services to achieve a sustainable and high-quality workforce across the ECEC sector.</p>
<p>Affordability and complexity should not be barriers to ECEC access</p>	
<p>6.2 Modify the Child Care Subsidy to improve affordability and access</p> <p>Full wording from the report: The Australian Government should modify the Child Care Subsidy to allow:</p> <ul style="list-style-type: none"> • all families to access up to 30 hours or three days of subsidised care per week without an activity requirement • families with annual income at or below \$80,000 should be eligible for a subsidy rate of 100% of the fee, up to the hourly rate cap. <p>In addition, the Australian Government should review the hourly rate cap associated with the Child Care Subsidy, and set a new cap based on the average efficient costs of providing early childhood education and care services. This</p>	<p>SNAICC supports this draft recommendation.</p> <p>SNAICC agrees that the Child Care Subsidy in its current form is not working and creates barriers to access for Aboriginal and Torres Strait Islander children and families in accessing ECEC services.</p> <p>SNAICC has long advocated for the removal of the activity test and increased subsidised hours of ECEC for Aboriginal and Torres</p>

<p>should include consideration of a higher hourly rate cap for non-standard hours (draft recommendation 7.3). The hourly rate cap should be reviewed every three years to ensure it continues to reflect costs (in conjunction with other work mentioned in draft recommendation 6.1). In between these reviews, the hourly rate cap should be indexed at a rate that best reflects changes in the costs of provision such as wage indices or CPI.</p>	<p>Strait Islander children. More information about this position is provided in the Information request 6.1 section.</p>
<p>6.1 Monitor rises in fees and out-of-pocket expenses</p> <p>Full wording from the report: The Australian Government should monitor changes in fees and out-of-pocket expenses on a regular basis to identify services where movements are out of step with sector norms. Increases that vary markedly should prompt closer investigation, and a regulatory response should be considered if they are not reasonable. To inform judgements about what reasonable increases might look like, the Australian Government should commission a detailed investigation of costs and profits across the sector every three years, along the lines of the work that the Australian Competition and Consumer Commission has been undertaking. This work would also signal if the hourly rate cap needed to be reset.</p>	<p>SNAICC supports this draft recommendation in principle, but notes that ACCO early years services do not operate in the same way as mainstream or for-profit ECEC services. Any monitoring of services should be undertaken in a way that does not create additional reporting or administrative burden for ACCO early years services</p>
<p>6.2 Make information about CCS eligibility easy to find and understand</p> <p>Full wording from the report: The Australian Government should explore options to make information provided on government websites about CCS eligibility easy to find and easy to understand by families.</p>	<p>SNAICC supports this draft recommendation. ACCOs are best placed to ensure that Aboriginal and Torres Strait Islander families within their communities have access to accurate and up to date information about CCS eligibility. Any information developed by the Australian Government intended to reach Aboriginal and Torres Strait Islander families should be developed in partnership with ACCO peak bodies and early years services to ensure it is culturally responsive, inclusive and accessible.</p> <p>Resources should include information around informed consent, ensuring consent processes are culturally appropriate and respectful of Aboriginal and Torres Strait Islander knowledge systems and protocols.</p>
<p>6.3 Improve the CCS calculator on the Starting Blocks website</p>	<p>SNAICC supports this draft recommendation in principle.</p>

<p>Full wording from the report: The Australian Government should improve the functionality of the Child Care Subsidy calculator on the Starting Blocks website so that families can estimate their Child Care Subsidy eligibility under different scenarios (such as different working hours or income levels). The Australian Government should investigate the best way to improve awareness of the availability of the CCS calculator on the Starting Blocks website.</p>	<p>Easily understood and accessible information should be provided to all families about their Child Care Subsidy eligibility, although this does not necessarily need to be confined to the Starting Blocks website.</p> <p>Website based information assumes families have access to the internet and digital literacy. At the beginning of every term ACCOs provide support to families to assist them to navigate these systems and engage with Centrelink. This support impacts on their service delivery, and additional resourcing is needed to enable ACCOs to better provide this support to families.</p>
<p>6.4 Prompt families to update their details with Services Australia</p> <p>Full wording from the report: The Australian Government should use Single Touch Payroll information from the Australian Tax Office to prompt families to update their activity and income level details with Services Australia.</p>	<p>SNAICC supports this draft recommendation in principle.</p> <p>Families should be given the option to opt into the proposed sharing of their information and which prompts they receive. There may also be other avenues to encourage and remind families to update their activity and income level details, although this should not fall to the responsibility of service providers.</p> <p>Consideration of how this draft recommendation aligns with and embeds Priority Reform 4 of the National Agreement on Closing the Gap is needed.</p>
<p>6.5 Provide better information to families about CCS withholding rates</p> <p>Full wording from the report: The Australian Government should provide clear and easy to find information to families about the Child Care Subsidy withholding rate during the Child Care Subsidy application process and when families update their details with Services Australia.</p>	<p>SNAICC supports this draft recommendation in principle.</p> <p>The provision of clear and easy to find information about the CCS withholding rate should not be limited to the application process or when details are updated. This information should be readily available to all families in a language and format they understand, at any time. Information which is intentionally created for Aboriginal and Torres Strait Islander families would be a beneficial resource,</p>

and should be created in partnership with ACCO peak bodies and early years services.

A universal ECEC system has to be Inclusive of all children

2.2 Amend the Disability Standards for Education

Full wording from the report: The Australian Government should amend the Disability Standards for Education 2005 (Cth) to include all services within the early childhood education and care sector.

SNAICC supports this draft recommendation.

ACCO early years services often provide services and support to children and families with disability in line with community need, regardless of whether or not they receive funding to deliver these supports.

ACCOs require dedicated, sustainable needs-based funding to deliver the supports and reasonable adjustments required for Aboriginal and Torres Strait Islander children with a disability and those without a formal diagnosis. More information about the requisite funding needed is outlined below at Information request 9.1.

2.3 Amend eligibility requirements for inclusion funding

Full wording from the report: The Australian Government Department of Education should work with Inclusion Agencies to communicate documentary requirements for receipt of Inclusion Support Program funding more clearly to services, including the eligibility of children without a formal diagnosis. Evidence a child has additional needs other than disability should be accepted in all circumstances for services seeking to access the Inclusion Development Fund Subsidy for an Additional Educator and the Family Day Care Top Up. Increasing the funding allocated to the ISP (draft finding 2.5) will ensure children have adequate support, regardless of a diagnosis.

SNAICC supports this draft recommendation, particularly the inclusion of children without a formal diagnosis and children with additional needs other than a disability.

Due to their trusted status within the community, ACCO early years services are often first responders to children and families experiencing health and wellbeing issues and work with families to develop wrap around supports. This work is often invisible and not resourced.

ACCOs have reported they want to provide more targeted support to children with complex needs but that centres in rural and remote areas are often unable to access inclusion support funding. This can be due to the required supports not being

	<p>available in the area, the child not meeting criteria or inaccessibility of funding.</p> <p>The commentary above at draft recommendation 2.2 is reiterated in relation to this draft recommendation. More information about the requisite funding needed is outlined below at Information request 9.1.</p>
<p>2.4 Review and amend additional educator subsidies</p> <p>Full wording from the report: The Australian Government should amend the Inclusion Development Fund Subsidy for an Additional Educator and Immediate/Time-Limited support, including:</p> <ul style="list-style-type: none"> • increasing the current hourly subsidy rate so that it subsidises 100% of an additional educator’s wage, up to the median hourly wage of a certificate III qualified educator and ensuring it is indexed to the Wage Price Index • removing limits on the weekly hours the subsidies can be approved for and ensuring they align with the child's enrolled hours • allowing other human-services qualified staff and inclusion professionals, such as allied health or other relevant professionals to be employed as an additional educator, where the Inclusion Agency agrees this would be appropriate. 	<p>SNAICC supports this draft recommendation.</p> <p>Additional consideration should be made for the subsidy required to access an additional educator in regional and remote communities, as this cost may vary from that of an urban area.</p>
<p>2.5 Reduce administrative burden of Inclusion Support Program applications</p> <p>Full wording from the report: The Australian Government should assess the application process required for the Inclusion Development Fund with a view to reducing the administrative burden on services. This should include considering whether requirements to seek reapproval when there are changes to the care environment could be relaxed and if further upgrades to the Inclusion Support Portal are required beyond those currently being implemented.</p>	<p>SNAICC supports this draft recommendation.</p> <p>ACCO early years services already face significant reporting and administrative burden in accessing funding from multiple sources to ensure they are able to provide holistic services in line with community need. SNAICC is supportive of all calls to minimise administrative burden associated with funding for service provision.</p> <p>In addition, improvements to the Inclusion Support Portal are needed to consider Aboriginal and Torres Strait Families and their extended family and kinship care arrangements. As mentioned</p>

	<p>above, online information and portals assume families have access to the internet and digital literacy.</p>
<p>2.6 Improve coordination of inclusion funding between governments</p> <p>Full wording from the report: Australian, state and territory governments should better coordinate inclusion funding to reduce complexity for services and families. In the short-term, the Australian Government Department of Education and relevant state and territory departments of education should work together to streamline application requirements, to reduce the need for services to apply for funding multiple times. In the long-term, governments should clarify responsibilities for inclusion funding as part of a National Partnership Agreement on ECEC.</p>	<p>SNAICC supports this draft recommendation.</p> <p>In addition to the comments provided at draft recommendation 2.5 above, ACCO early years services in regional and remote locations need priority funding to upgrade infrastructure. The building and renovation costs is much higher in regional and remote locations than in urban settings and this needs to be factored in when determining funding levels.</p>
<p>ECEC services should be flexible and responsive to the needs of families</p>	
<p>7.1 Ensure integrated services are available where needed</p> <p>Full wording from the report: An ECEC Commission (draft recommendation 9.2) should be responsible for advising governments on the need for integrated early years services involving ECEC and the communities in which they are needed.</p>	<p>SNAICC agrees with the intent of this recommendation but does not support its suggested implementation approach.</p> <p>In alignment with principles of self-determination, Aboriginal and Torres Strait Islander peoples and communities are best placed to understand and advise on the need for integrated early years services involving ECEC within their communities. It is critical that a new ECEC Commission does not displace Aboriginal and Torres Strait Islander leadership or undermine self-determination.</p> <p>ACCO peak bodies and early years services, as community controlled entities must be empowered to take on this advisory role to governments.</p> <p>As the community controlled national peak body for Aboriginal and Torres Strait Islander children and families, and the sectors that support them, SNAICC’s role is to advocate on behalf of the early</p>

	<p>childhood care and development sector and advise government on the needs of community.</p>
<p>7.2 Support connections between ECEC and child and family services</p> <p>Full wording from the report: As part of its role in assessing access to ECEC, an ECEC Commission (draft recommendation 9.2) should be responsible for examining connections between ECEC and other child and family service and identifying the most suitable way to address any gaps.</p>	<p>SNAICC agrees with the intent of this recommendation but does not support its suggested implementation approach.</p> <p>ACCOs have been providing integrated early years services tailored to the needs of children and families in their communities for many years. ACCO integrated early years services are grounded in decades of leadership from Aboriginal and Torres Strait Islander communities and community-controlled services in the development and provision of quality and holistic early years supports to children and families. Building on the deep foundation of Aboriginal and Torres Strait Islander ways of knowing, doing and being and cultural child rearing practices that have raised children strong in their cultures and communities for many thousands of years.</p> <p>In alignment with principles of self-determination, Aboriginal and Torres Strait Islander peoples and communities are best placed to understand and advise on the need for integrated early years services involving ECEC within their communities. It is critical that a new ECEC Commission does not displace Aboriginal and Torres Strait Islander leadership or undermine self-determination.</p> <p>This means that ACCOs should be responsible for examining connections between ECEC and other child and family services as they relate to Aboriginal and Torres Strait Islander children and families within their communities. SNAICC is concerned that this responsibility sitting within the ECEC Commission may inadvertently displace Aboriginal and Torres Strait Islander sector leadership in understanding the connections between ECEC and</p>

other child and family services and identifying suitable ways to address gaps.

Similarly, as the national peak body for Aboriginal and Torres Strait Islander children and families, and the sectors that support them, SNAICC currently provides backbone support for ECEC services across three jurisdictions (New South Wales, Victoria and Western Australia). Part of this role is to identify service gaps and support ACCOs to develop and expand their integrated service delivery.

ACCO early years services are also leading this work within their own communities and across sectors to identify gaps and to provide wrap around support and connections for families to address these gaps and to overcome access barriers.

SNAICC suggests that rather than this responsibility sitting with the ECEC Commission as proposed, that ACCO peak bodies, backbone services and early years services are best placed to examine connections between ECEC and other child and family services and address gaps for Aboriginal and Torres Strait Islander children and families.

7.3 Introduce a higher hourly rate cap for non-standard hours

Full wording from the report: The Australian Government should raise the hourly rate cap for ECEC delivered during non-standard hours. In designing the higher rate cap, the Australian Government should ensure:

- families are required to provide evidence that both parents work non-standard hours to access the higher rate cap
- the higher rate cap is only available during non-standard hours, with the definition adopted in the Children’s Services Award (weekdays before 6.00am and after 6.30pm and weekends) offering a useful anchor point (but is not available if services offer care for a short period either side of standard hours).

SNAICC supports the intent of this draft recommendation, however, the requirement that both parents are working non-standard hours in order to access a higher rate cap needs reconsideration. There are many reasons why Aboriginal and Torres Strait Islander families may need access to non-standard hours including caring and cultural responsibilities for young children, family members and community. Refocusing this draft recommendation to reflect the needs of the child, rather than centering the circumstances of parents who may work non-

<ul style="list-style-type: none"> • the higher rate cap is applied to all service types, although different rates should be set for each service type to reflect differences between them in costs of provision. <p>The higher rate cap should be set based on the costs of providing early childhood education and care during non-standard hours and subject to regular review and indexation as outlined in draft recommendation 6.2.</p>	<p>standard hours would ensure access is provided to children and families who need it most.</p>
<p>7.4 Examine planning restrictions related to operating hours</p> <p>Full wording from the report: State, territory and local governments should examine their planning regulations to ensure they do not unnecessarily restrict the ability of services to provide ECEC during non-standard hours.</p>	<p>SNAICC supports this draft recommendation.</p>
<p>7.5 Ensure occasional care is available where needed</p> <p>Full wording from the report: An ECEC Commission (draft recommendation 9.2) should be responsible for advising on the need for additional investments in occasional care and the communities in which these services are needed. Where additional invests are required, funding should be available through a more flexible Community Child Care Fund.</p>	<p>SNAICC agrees with the intent of this recommendation but does not support its suggested implementation approach.</p> <p>In alignment with principles of self-determination, Aboriginal and Torres Strait Islander peoples and communities are best placed to understand and advise on the need for integrated early years services involving ECEC within their communities. It is critical that a new ECEC Commission does not displace Aboriginal and Torres Strait Islander leadership or undermine self-determination.</p> <p>SNAICC suggests that rather than this responsibility sitting with the ECEC Commission as proposed, that ACCO peak bodies, backbone services and early years services are best placed to examine connections between ECEC and other child and family services and address gaps for Aboriginal and Torres Strait Islander children and families.</p> <p>SNAICC has strong ongoing relationships with the ACCO ECEC sector and our members which inform the advocacy and advice we provide to government and other organisations. SNAICC is best</p>

	<p>placed to provide advice regarding the needs of community and required additional investments.</p> <p>SNAICC does not agree that additional investment funding should be made available to ACCO ECEC services through a flexible Community Child Care Fund. More information about the funding model required is detailed in the Information request 9.1 section below.</p>
<p>7.6 Support out for preschool hours ECEC</p> <p>Full wording from the report: To support greater access to outside preschool hours ECEC, the Australian Government should amend Family Assistance Law to:</p> <ul style="list-style-type: none"> • allow dedicated preschools to claim the Child Care Subsidy (CCS) for additional ‘non-preschool’ hours by creating a separate ‘wrap-around preschool’ care type that would: <ul style="list-style-type: none"> – not be subject to minimum operating periods or restrictions that it must not predominantly provide a preschool program in the year before full-time school – attract the CCS for hours of ECEC delivered beyond jurisdiction-specific standard preschool hours, with services required to report on the length of the preschool session delivered • make it easier for providers to establish a CCS-eligible ‘outside preschool hours’ service, by creating a separate ‘outside preschool hours’ care type that would cater primarily to preschool aged children and would not be subject to the minimum 48-week operating period. 	<p>SNAICC is broadly supportive of this draft recommendation.</p>
<p>Quality is paramount to achieving the benefits of ECEC</p>	
<p>8.1 State and territory regulation authorities should improve their performance reporting</p> <p>Full wording from the report: To improve the transparency of the ECEC regulatory system, all regulatory authorities should publish an annual report detailing progress against key objectives, including metrics on the number of</p>	<p>SNAICC supports this draft recommendation.</p>

<p>assessments performed, average time between assessments, funding and other monitoring, compliance and enforcement activities.</p>	
<p>8.3 Ensure regulatory authorities are adequately resourced</p> <p>Full wording from the report: The operations of the state and territory regulatory authorities that administer the National Quality Framework should be independently reviewed. This review should examine the timeliness of assessments, and whether additional funding is required to enable authorities to improve timeliness. Based on the outcomes of this review, the Australian Government should ensure additional funding is provided to state and territory regulatory authorities, to provide updated assessments within agreed timeframes.</p>	<p>SNAICC supports this draft recommendation and suggests that in line with the National Agreement regulatory authorities should be sufficiently resourced to engage in shared decision-making and partnership with Aboriginal and Torres Strait Islander people, build the community controlled sector through support and capacity building, transform government services to ensure cultural safety at all stages of the process and enable access to data at a regional level.</p>
<p>8.4 Incentivise quality provision in new ECEC services</p> <p>Full wording from the report: State and territory regulatory authorities should be required to consider the performance of a provider’s existing services when making decisions on an application to approve new services from that provider, and prioritise new service approvals from higher rated providers over those with lower existing service ratings.</p>	<p>SNAICC does not support this draft recommendation.</p> <p>Applications for new services may be made in circumstances where existing services no longer meet community need. Prioritisation of applications should be triaged to reflect community need in the first instance rather than the performance of a service provider.</p> <p>Thresholds of and definitions for quality should be reconsidered. ACCO ECEC services often experience a disconnect between what community sees as quality service delivery and how quality is defined by regulatory authorities. Better alignment of the two visions of quality is needed before a performance criteria is included in prioritising new service applications.</p>
<p>8.2 A new review of the National Quality Framework</p> <p>Full wording from the report: Australian, state and territory governments should, through the Education Ministers Meeting, commission ACECQA to review the National Quality Framework, with a specific focus on the way in which services are assessed against the National Quality Standard, and if assessments could be made more accurate, consistent and efficient. NQF reviews should be conducted on a regular basis to enable regulators to incorporate</p>	<p>SNAICC supports this draft recommendation.</p> <p>The current National Quality Framework does not adequately reflect the importance of culture in service delivery for Aboriginal and Torres Strait Islander children and families. SNAICC has long advocated for a framework that reflects Aboriginal and Torres</p>

<p>feedback from ECEC providers as well as new findings from research on links between ECEC quality and children’s outcomes.</p>	<p>Strait Islander cultural perspectives, knowledge and expertise in ECEC service delivery.</p> <p>SNAICC suggests a separate Aboriginal and Torres Strait Islander Quality Framework is needed which centers culture in ECEC practice and draws from existing elements of the National Quality Framework.</p>
<p>2.1 Ensure appropriate quality regulation for services outside the scope of the National Quality Framework</p> <p>Full wording from the report: The Australian Government should ensure that any future funding models or agreements for services receiving direct Australian Government ECEC funding that are out-of-scope of the National Quality Framework include mechanisms to ensure and monitor the quality of these services. An ECEC Commission (draft recommendation 9.2) should be tasked with reviewing regulatory arrangements for out-of-scope services receiving direct Australian Government ECEC funding to ensure they meet the needs of children. As part of this work, the ECEC Commission, with Australian, state and territory governments should undertake a process of joint decision-making with Aboriginal and Torres Strait Islander services, communities and peaks to determine the appropriate way to regulate the quality of Aboriginal and Torres Strait Islander services out-of-scope of the National Quality Framework.</p>	<p>SNAICC supports this draft recommendation in principle.</p> <p>While the quality of services is critical, it should be noted that Aboriginal and Torres Strait Islander communities define quality differently to government considerations. The recommended approach of joint decision-making in determining the appropriate way to regulate the quality of Aboriginal and Torres Strait Islander services is a crucial first step to self-determination and aligns with the National Agreement. However, shared decision-making must also be built into the mechanisms for the review and monitoring of the regulatory arrangements.</p> <p>Implementing shared decision making across all aspects of this process reflects Priority Reform One of the National Agreement on Closing the Gap.</p>
<p>New coordination mechanisms will support universal access</p>	
<p>9.1 Improve policy coordination and implementation</p> <p>Full wording from the report: The Australian, state and territory governments should form a new National Partnership Agreement (NPA) for Early Childhood Education and Care (ECEC) by 2026. The NPA should articulate the national vision for ECEC and clarify roles and responsibilities between all governments.</p>	<p>SNAICC supports this draft recommendation in principle and agrees that a new National Partnership Agreement should clarify the roles and responsibilities between all levels of governments.</p> <p>A new National Partnership Agreement should acknowledge that ACCO integrated early years services operate differently to</p>

<ul style="list-style-type: none"> • The Australian Government should remain responsible for early childhood policies in the years before preschool and for associated funding responsibilities and for the funding of outside school hours care through the CCS. • State and territory governments should remain responsible for preschool, school readiness and take on the responsibility of ensuring the delivery of outside school hours care in government schools. • Governments should build upon the Preschool Reform Agreement to ensure funding supports the desired outcomes, regardless of the preschool delivery model adopted in each jurisdiction. The NPA can also help to establish a more formal stewardship approach, underpinned by an ECEC Commission (draft recommendation 9.2). 	<p>mainstream and for-profit providers and requires a tailored block-based, need-based funding approach. More information about funding and governmental coordination is outlined at Information request 9.1.</p>
<p>9.2 Establish an ECEC Commission</p> <p>Full wording from the report: A stewardship model – where the Australian, state and territory governments better coordinate their roles in the ECEC system and share accountability for sector outcomes – should be implemented to address some of the challenges observed in the market, coordinate a more cohesive policy response and steer the sector towards universal access. This should be underpinned by an ECEC Commission, jointly established by the Australian, state and territory governments as part of a new National Partnership Agreement (draft recommendation 9.1).</p> <p>The ECEC Commission should have two main functions:</p> <ul style="list-style-type: none"> • support the Australian, state and territory governments to better coordinate and deliver ECEC policies, by providing information and advice • provide a mechanism to hold the system stewards publicly accountable for achieving the objectives of ECEC policy. <p>The ECEC Commission will require high quality data to execute its advisory and reporting functions effectively. It should have the authority to collect data from the Australian, state and territory governments, as well as mechanisms to safely store and share data between jurisdictions.</p>	<p>SNAICC supports this draft recommendation in principle and the intent behind the establishment of an ECEC Commission. However, it is critical that an ECEC Commission does not inadvertently displace Aboriginal and Torres Strait Islander sector leadership or undermine self-determination.</p> <p>In establishing an ECEC Commission, the creation and functioning of the body must include:</p> <ul style="list-style-type: none"> • Ensuring the ECEC Commission is designed in partnership with Aboriginal and Torres Strait Islander people, peak bodies and service organisations to ensure the functions and scope complement, rather than displace, Aboriginal and Torres Strait Islander sector leadership • Embedding shared decision-making into any Commission functions that impact Aboriginal and Torres Strait Islander children, families or organisations • Ensuring the ECEC Commission mandate includes specific focus on building the community controlled sector and ensuring this is embedded in all its functions

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| | <ul style="list-style-type: none">• Ensuring the ECEC Commission mandate includes specific focus on transforming mainstream organisations to ensure cultural safety and ensuring this is embedded in all its functions• Shared access to data and information in accordance with Indigenous Data Sovereignty principles. |
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More information about this draft recommendation is provided in the Information requests section of the submission.

Information requests

In responding to the information requests listed in the draft report, SNAICC has been informed by the recommendations from the *Review of the National Agreement on Closing the Gap* (the Review).

SNAICC would like to specifically highlight the following:

“Governments need to recognise the authority of ACCOs to represent the perspectives and priorities of their communities, and to determine how service systems and models of delivery can best reflect these. ACCOs should be seen as essential partners in commissioning services, not simply as passive funding recipients. To enable this, commissioning approaches need to incorporate obligations for governments to share decision-making in the design and delivery of solutions.”¹³

Implementation plans need to be more strategic and written in collaboration with Aboriginal and Torres Strait Islander people. Together, they need to agree on a strategy and a set of associated actions that are the most substantive and critical to achieving the objectives of the Agreement and how they will be implemented. They also need to ensure that implementation plans fully reflect the diversity of regional needs, cultures, characteristics and governance structures in the jurisdiction (such as the unique culture, governance and needs of people living in the Torres Strait).¹⁴

ACCOs need to be at the negotiation table from the beginning, so that government funding decisions take full account of ACCOs expertise and knowledge on how best to meet community priorities, solve identified problems, and measure success. This must continue throughout contract lifecycles.”¹⁵

While SNAICC has not provided a response to every information request from the draft report, we would be happy to provide any additional information to support the Productivity Commission in its inquiry.

Information request 2.2 - Cultural safety in ECEC services

Culture is a critical part of Aboriginal and Torres Strait Islander children’s development, identity and self-esteem and strengthens their overall health and wellbeing. Aboriginal and Torres Strait Islander children’s cultural identity is core to who they are. Children who are strong in their

¹³ Australian Government Productivity Commission, ‘Review of the National Agreement on Closing the Gap Study report’.

Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>, pg. 7.

¹⁴ Ibid, pg. 8.

¹⁵ Ibid, pg. 9.

culture and know that people who are important to them support their culture, are more likely to engage with opportunities that enable them to achieve their life goals.¹⁶

The significance of culture to Aboriginal and Torres Strait Islander children's wellbeing and development is well documented and consistently reiterated by Aboriginal and Torres Strait Islander families, services and communities. ACCO services describe the importance of teaching Aboriginal and Torres Strait Islander children to be strong Aboriginal and Torres Strait Islander people as their core identity. Teaching them about their core identity encompasses their obligations to Country, community and the continuation of culture.

ACCO early years services strongly value and embed this culture within their services, providing the holistically focused approach to learning and development required to meet the needs of Aboriginal and Torres Strait Islander children. ACCOs are also uniquely placed to provide high-quality, culturally safe programs consistent with Aboriginal and Torres Strait Islander cultural ways of child rearing, including practices such as storytelling, play-based learning, lifelong learning, and collective education with multiple care givers.¹⁷

While cultural safety is important in all services, it is critical for Aboriginal and Torres Strait Islander children to have opportunities for cultural education alongside mainstream education, beginning with early years education. The development of a strong cultural identity supports Aboriginal and Torres Strait Islander children in school readiness.

For Aboriginal and Torres Strait Islander children and families to experience cultural safety in early years, education services must be grounded in cultural frameworks which reflect the protocols and practices of local families and communities. There is no 'one size fits all' approach a cultural frameworks and these will vary from community to community. Services must work in partnership with the local community to develop the appropriate framework.

Cultural frameworks in ECEC are reflective of traditional and contemporary issues. Cultural approaches enable a holistic understanding of the needs of Aboriginal and Torres Strait Islander children and families. Culture is frequently described as a robust protective factor for Aboriginal and Torres Strait Islander children.

Culture is not an optional extra for Aboriginal and Torres Strait Islander children, families and services: it is at the heart of all that ACCOs do. Embedded culture includes cultural accountability, cultural governance, creating culturally safe spaces and delivering culturally strong curriculum and programs. The embedding of culture, not just in strategy and policy, but in the practical

¹⁶ SNAICC – National Voice for our Children (2010). Working and walking together: Supporting family relationship services to work with Aboriginal and Torres Strait Islander families and organisations. Melbourne: SNAICC

¹⁷ SNAICC, 'Growing Up Our Way: Aboriginal and Torres Strait Islander child rearing Practices Matrix'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2016/01/02802.pdf>

implementation and delivery of services also aligns with recommendation 3 ‘Mainstream systems and culture need to be fundamentally rethought’ of the Productivity Commission’s Review.¹⁸

In addition to the information provided in the table above, SNAICC suggests that the factors that most effectively promote the provision of culturally safe ECEC include:

- recognising the expertise of ACCOs in delivering culturally safe and appropriate ECEC services for Aboriginal and Torres Strait Islander children.
- Providing appropriate, flexible and sustainable funding and resourcing ACCOs to deliver ECEC services, including funding provision for backbone support, that allows ACCOs to tailor their service offerings to meet the needs of children within their communities (more information on this is outlined below).
- Co-designing training, programs and service delivery policies with Aboriginal and Torres Strait Islander community, services and peak bodies.
- Acknowledging that a culturally safe ECEC may look different depending on the location and the traditions, practices and needs of that community.

This can be further facilitated by changes to the National Quality Framework including:

- Embedding cultural safety and capability into the National Quality Framework, and
- Co-designing an Aboriginal and Torres Strait Islander National Quality Framework with Aboriginal and Torres Strait Islander community, services and peak bodies.

More broadly, through the National Agreement all governments have committed to take action to build the community-controlled sector (Priority Reform Two). This commitment is reinforced in the Early Childhood Care and Development Sector Strengthening Plan which includes specific actions aimed at building and growing the ACCO early years sector:

- Support, develop and resource community-based workforce development initiatives led by Aboriginal and Torres Strait Islander early childhood education and care services (Action A5)
- Support for the Aboriginal community-controlled ECEC sector through expansion of existing programs and services (Action C3)
- Direct supports for quality governance development for ACCOs provided through peaks (Action D2)
- Increased Aboriginal and Torres Strait Islander community-controlled service delivery (Action E2)
- Reduce service gaps and establish new Aboriginal and Torres Strait Islander community controlled integrated early years’ services in locations of high Aboriginal and Torres Strait Islander population with high child vulnerability (Action E4)

¹⁸ Australian Government Productivity Commission, ‘Review of the National Agreement on Closing the Gap Study report’.

Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>, pgs. 8-9 and 17.

- Develop a national and state/territory intermediary model to strengthen and represent Aboriginal and Torres Strait Islander ECEC community-controlled services (Action F1)

Information request 6.1 - Potential modifications to the activity test

SNAICC supports the calls of many leading experts and sector organisations for the provision of free universal early childhood education and care to build a more prosperous, equitable and sustainable future for Australia's children. We consider the changes to the Child Care Subsidy made by the Federal Government in July 2023 to be an interim measure which supports progress toward the National Agreement on Closing the Gap targets until a free universal system is implemented.

International evidence suggests that consistent and early intervention between the ages of 0-5 years has the greatest positive impact on developmental outcomes, with some evidence to suggest that birth to three years may be the critical window for child development¹⁹. In addition, research suggests the need for high quality educational support prior to pre-school, particularly for children who have experienced disadvantage²⁰.

The Australian Government is not on track to meet childhood development targets under the National Agreement on Closing the Gap by 2031, and the 2021 AEDC census noted a reversal in the trend towards improvement in the developmental domains of Aboriginal and Torres Strait Islander children, with only 34.3% percentage of Aboriginal and Torres Strait Islander children were on track in all five developmental domains, compared to 56.2% of non-Indigenous children.

Introduction of the Child Care Package in 2018 saw a drop in Aboriginal and Torres Strait Islander engagement in ECEC, for a number of reasons including administrative complexity of engaging with the scheme and reduced access to a minimum 24 hours per fortnight of subsidised care for families who fail the activity test²¹. The increase to 36 hours subsidised ECEC access per fortnight for all Aboriginal and Torres Strait Islander families is a welcome policy change, but is insufficient to support the developmental needs of children. Whilst there is evidence to suggest that 60 – 80 hours per fortnight high quality ECEC produces positive impacts for children experiencing disadvantage, there is no indication whether lesser amounts of educational support will have similarly positive outcomes.²²

¹⁹Early Childhood Australia and SNAICC 2019, 'Discussion Paper Ensuring Equality for Aboriginal and Torres Strait Islander Children in the Early Years'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2019/02/SNAICC-ECA-Discussion-Paper-Feb2019.pdf>

²⁰ SNAICC 2019, 'SNAICC Submission to the Australian National Audit Office Examination of the Design and Implementation of the Child Care Package'. Retrieved from: https://www.snaicc.org.au/wp-content/uploads/2019/06/SNAICC-ChildCarePackageAuditSubmission_May2019.pdf

²¹ Ibid.

²² Early Childhood Australia and SNAICC 2019, 'Discussion Paper Ensuring Equality for Aboriginal and Torres Strait Islander Children in the Early Years'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2019/02/SNAICC-ECA-Discussion-Paper-Feb2019.pdf>

In addition, many Aboriginal and Torres Strait Islander families do not meet activity requirements to qualify for more than the minimum 36 hours per fortnight of subsidised care. According to Impact Economics, Aboriginal and Torres Strait Islander children are 5 times more likely to access only 1 day of care as a result of the activity test, and many families disengage completely because of the small amount of subsidised care available.²³ Fear of incurring debts because of incorrectly reported activity acts as further discouragement, particularly for casual workers with inconsistent hours.

SNAICC recommends the discontinuation of the Activity Test, which will extend the benefits to all Australian children experiencing disadvantage. Access to a minimum 60 hours per fortnight subsidised ECEC is an acceptable interim step to expedite commitments to the National Agreement on Closing the Gap early childhood development targets. Without this entitlement, the most vulnerable Aboriginal and Torres Strait Islander children whose families may be in precarious work or under – employed, have little chance of accessing the amount of educational and developmental support they need.

Further, investment in ECEC is likely to project significant returns both in the long and short term. Extensive international cost/benefit analysis highlights the long-term savings for Government of investing in early education for vulnerable children. Analysis of nine of the most comprehensive and credible international studies indicates that return on investment in well-designed early years' interventions ranged from 75% to over 1,000% higher than costs²⁴. Whilst the central issue of this proposal is the needs of children, it is also obvious that investment which increases the accessibility of childcare will enable increased parental workforce participation, and benefit the economy.

Modelling undertaken by the Grattan Institute suggested that increasing childcare subsidies to 95% for low income families and flattening the taper rate would generate \$11 billion for an investment of \$5 billion. The Grattan Institute proposed this measure as a preferred option to boost female participation in the workforce, rated against criteria of fairness, simplicity for parents, simplicity of administration, and cost/benefit to Government.²⁵

Recommendation: The Australian Government discontinue the Activity Test and implement an interim measure of a minimum of 60 hours a week per fortnight subsidised ECEC for Aboriginal and Torres Strait Islander families.

²³ Impact Economics and Policy, 'Child care subsidy activity test: Undermining child development and parental participation August 2022'. Retrieved from: <https://www.impacteconomics.com.au/home/education> pg. 4.

²⁴ UK Department for Education and Wave Trust 2013, 'Conception to age 2 – the age of opportunity'. Retrieved from: <https://www.wavetrust.org/Handlers/Download.ashx?IDMF=474485e9-c019-475e-ad32-cf2d5ca085b0>

²⁵ Wood D, Griffiths K, Emslie O, 2020, 'Cheaper childcare: a practical plan to boost female workforce participation Grattan Institute Report no 2020-11'. Retrieved from: <https://grattan.edu.au/report/cheaper-childcare/>

Information request 7.1 - The CCCF as a vehicle to address practical barriers to ECEC access

CCCF grants do not adequately or effectively address practical barriers (such as transport and food provision) for families accessing ACCO ECEC services. A new funding model is needed for ACCOs which will provide the needs-based flexibility to respond to individual access barriers of families attending their services. More information about the new funding model for ACCOs is outlined in Information request 9.1 below.

Information request 7.2 - 'System navigator' roles in the ECEC sector

SNAICC's Early Years Support team continuously reports examples of ACCO ECEC services across the country supporting families to navigate the ECEC sector and overcome access barriers. This support is provided to families by ACCO ECEC services without additional resources or funding, as holistic support is a fundamental part of how they work in community and for community.

While it is a feature of their work, assisting families to navigate systems involves additional tasks and often work outside of standard business hours, stretching an ACCOs capacity and contributing to staffing pressures. Many Aboriginal and Torres Strait Islander families ask for support from ACCO ECEC services to understand the ECEC system, what is required of them, and to access and complete Services Australia documentation. This can result in staff accompanying families to Centrelink offices or waiting on hold to obtain identification documents or clarify information from government departments.

Responding directly to the question asked under this information request, ACCO early years services are best placed to provide support to Aboriginal and Torres Strait Islander families to navigate the ECEC system and overcome access barriers.

While there may be an overarching need for national investment in system navigator roles, it is important that this is implemented in a way that enables and supports the existing work done by ACCO early years services. For example, new national investment in system navigator roles that is prescriptive and requires ACCOs to create a specific position, deliver specified activities or that adds to administrative and reporting burden will be both impractical and undermine self-determination.

SNAICC suggests instead, holistic, flexible and sustainable investment is required for ACCO ECEC and integrated early years services should be implemented to enable them to build the resources needed to support Aboriginal and Torres Strait Islander families in their community. Not only does this investment result in better engagement for Aboriginal and Torres Strait Islander children and their families in integrated early years services, it strengthens ACCOs and the broader sector, and positively impacts the growth of the Aboriginal and Torres Strait Islander workforce. This is a critical step to the full realization of self-determination and aligns with the National Agreement Priority Reform areas.

Information request 9.1 - Scope for broader funding reform

New funding model for ACCOs

SNAICC supports the introduction of a new funding approach for Aboriginal and Torres Strait Islander-led ECEC and integrated early years services. ACCO-led integrated early years services provide the wraparound, holistic supports needed in their communities ensuring that Aboriginal and Torres Strait Islander children and families can access the services they want and need when they want and need them. However, current funding approaches do not reflect the full cost of this service delivery or support ACCOs to deliver the services most needed in their communities.

The connection and accountability that ACCOs have to community makes them uniquely placed to identify the services and supports that are most needed or wanted on a local level. When a need in the community is identified, ACCOs respond to the need by connecting services together to provide wraparound support that prioritises cultural care and connection.

In the context of ECEC and integrated early years services, Aboriginal and Torres Strait Islander families value culturally safe early learning for their children to support their child's cultural identity, knowledge, and connection, and to foster a strong sense of belonging and identity. ACCO early years services strongly value and embed this culture within their services, providing the holistically focused approach to learning and development required to meet the needs of Aboriginal and Torres Strait Islander children. ACCOs are also uniquely placed to provide high-quality, culturally safe programs consistent with Aboriginal and Torres Strait Islander cultural ways of child rearing, including practices such as storytelling, play-based learning, lifelong learning, and collective education with multiple care givers.²⁶

Current funding approaches do not meet the needs of ACCOs and, by extension, Aboriginal and Torres Strait Islander children and families. Consultations and research undertaken by SNAICC in 2023 have highlighted a broad range of features of the Commonwealth Child Care Subsidy (CCS) and associated Child Care Safety Net that discourage and limit engagement of Aboriginal and Torres Strait Islander children in early years education and care and contribute to funding challenges for ACCOs. A summary of these challenges is below.

- **Administrative barriers:** The CCS creates administrative complexities for both families and services. Families experience challenges to enrol, access subsidies, and engage with Centrelink. ACCOs invest substantial resources to support families with administrative processes with no allocated funding to provide this support.
- **Funding not matched to holistic supports required:** While ACCO early years services aim to provide outreach and holistic supports that address multiple barriers for

²⁶ SNAICC, Ashton, A., Hawting, J., Harrison, J. 2011, 'Growing Up Our Way: Practices matrix'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2016/01/02802.pdf>

families to access learning and development services, subsidy funding is narrowly targeted to limited educational supports.

- **Stigma and fear of accessing Additional Child Care Subsidy (ACCS):** Requiring a child to be “vulnerable or considered to be at risk of harm, abuse or neglect” is a stigmatising definition that makes parents fearful of contact with culturally unsafe statutory systems and discourages families from accessing the additional support available.
- **System orientation barriers:** The CCS funding model promotes a perception and reality of services being primarily or only available for working families and discourages the participation of the most vulnerable children and families.
- **Market failure:** The market-based funding model is ineffective to ensure services reach and are tailored for the most vulnerable children and families who stand to gain the most from consistent access to early years services. The model also perpetuates childcare deserts in many areas where Aboriginal and Torres Strait Islander children reside.

In addition to the Commonwealth Child Care Package, ACCOs access funding from multiple other sources. Each funding stream has different aims, objectives, eligibility criteria, compliance obligations and reporting requirements dependent on the funding department and/or jurisdiction. This mixture of funding streams across departments, agencies and jurisdictions creates the following challenges:

- **Inequitable funding:** There are often large disparities in funding between ACCOs funded through state-funded integrated early years programs in some jurisdictions, and those that receive more limited funding through the CCCFR program.
- **Administrative burden:** Services often have to manage multiple and different reporting and acquittal processes to comply with the requirements of each funding source. These rarely have consistent formats, information requirements or reporting periods.
- **Difficulty securing funding:** Competitive grant and tender processes disadvantage ACCOs, especially smaller ACCOs, because larger non-Indigenous organisations have the advantage of economies of scale that can mean lower costs of delivery but not culturally safe or responsive services. Smaller ACCOs also have limited resources to dedicate to grant and tender processes, that are often time intensive and require analysis of data and evidence to secure the continuation of successful existing services.
- **Lack of funding certainty:** Funding contracts are too short (less than 5 years), constraining ACCOs from building relationships and setting up programs based on the underpinning principles that are fundamental to their success.
- **Restrictive use of funding:** Grant and program funding is often awarded under strict programmatic guidelines, meaning that funding can only be used under pre-determined activities and timeframes. In most cases these guidelines do not cover the type of support that ACCOs know are most useful and effective within their communities. ACCOs are doing some of the most impactful work for children and families unfunded because

current funding approaches are not built around and do not reflect the full cost of service delivery.

- **Lack of ‘backbone’ support:** Funding across programs do not include backbone support for ACCO business, policy, workforce and program development. This has been felt more acutely across multiple jurisdictions since the discontinuation of the Indigenous Professional Support Unit program.²⁷

Current ways of working are leaving Aboriginal and Torres Strait Islander children behind. Patchwork and piecemeal funding results in inequitable access to services, with the children and families most in need most often missing out. To address the ongoing, systemic disadvantage faced by Aboriginal and Torres Strait Islander people, there must be a renewed commitment to investing in the early years through the community-controlled sector.

There must be a national, systemic approach to funding led by the Australian Government, partnering with states, territories and Aboriginal and Torres Strait Islander people to ensure that Aboriginal and Torres Strait Islander children and families have equitable access to the supports and services they need to thrive both in childhood and throughout their lives. This will require a complete transformation of existing funding arrangements in line with the Priority Reform Areas of the National Agreement with a focus on shared decision-making (Priority Reform 1) and building the Aboriginal and Torres Strait Islander community-controlled sector (Priority Reform 2).

A renewed, national, systemic and sustainable approach to funding ACCO-led integrated early years services will ensure that Aboriginal and Torres Strait Islander children and families have equitable access to the holistic, culturally safe, wraparound supports that allow them to thrive both in childhood and throughout their lives.

In summary, SNAICC recommends the Australian Government commit to leading the design and implementation of a national, systemic and sustainable approach to funding ACCO-led integrated early years services, partnering with states and territories and Aboriginal and Torres Strait Islander people, with a focus on ensuring equitable access and coverage across the country. A new funding model should:

- incorporate block- and needs-based funding as core features, enabling services to provide a range of integrated supports matched to the needs of their communities, including ECEC, family support, allied health, disability support, child and maternal health, and cultural and community programs.

²⁷ Early Childhood Australia and SNAICC 2019, ‘Discussion Paper Ensuring Equality for Aboriginal and Torres Strait Islander Children in the Early Years’. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2019/02/SNAICC-ECA-Discussion-Paper-Feb2019.pdf>

- provide long-term certainty for sustainable service provision alongside flexibility to adjust funding regularly to account for changes in community needs and costs of inflation over time, and
- explicitly and systematically provision for backbone support to ensure ACCOs have necessary supports for business, practice, policy and workforce development (further information below).

A new funding model for ACCO integrated early years services should be funded and delivered through a co-contribution model between Federal, State and Territory Governments with clear roles, responsibilities and long-term funding security established through a national policy framework embedded within a national partnership agreement.

Recommendation: The Australian Government implement a new funding model for ACCO-led integrated early years services which incorporates block-and needs-based funding, with long-term certainty and provision for backbone support.

Ongoing funding for ACCO early years services backbone support

Despite playing a vital role in improving life outcomes for Aboriginal and Torres Strait Islander children, ACCOs face many operational challenges and barriers to accessing adequate and appropriately targeted funding to perform and grow their vital role. ACCOs operate within a mainstream policy, regulatory and administrative environment that hinders their ability to operate in a way that meets the needs of Aboriginal and Torres Strait Islander children and families.

Backbone support services provide support to ACCOs in the early years sector with regulatory compliance readiness, transition through accreditation and continuous approval, policy and program development, service leadership capacity building and administrative and financial reporting.

One example of backbone support service is SNAICC Early Years Support. As an act of self-determination and in delivery of Priority Reform 2 – Building the community-controlled sector and the ECCD SSP, in 2021, SNAICC partnered with philanthropic organisations to develop and implement the SNAICC Early Years Support pilot, which was known at the time as THRYVE. The service was piloted in New South Wales, Western Australia and Victoria and SNAICC Early Years Support is currently partly funded by the Commonwealth Department of Education and the National Indigenous Australians Agency.

SNAICC Early Years Support provides direct locally contextualised business, regulatory compliance, and workforce support to the ECEC sector, including designing and developing resources that contribute to regulatory compliance under the national quality framework and cross jurisdictional knowledge sharing to enable further efficiencies to be realised. SNAICC Early Years Support aims to increase access to culturally safe and responsive early learning for families

and support their sustainability. It is comprised of bespoke, co-designed state-based models, led by local Aboriginal staff. It provides wraparound mentoring, training, and support for ACCO services, brokers integrated service partnerships, elevates the collective voice of ACCOs and communities at regional, state and national levels, as well as catalyses and enables sector growth. Across New South Wales, Victoria and Western Australia – jurisdictions where SNAICC Early Years Support currently operate – ACCOs highlighted the difference that backbone support makes in their ability to effectively deliver their services.

The first annual evaluation of SNAICC Early Years Support was conducted in 2022 and included a small but significant cohort of stakeholders reflecting the early stage of implementation for the initiative. Participation in the evaluation was highest in NSW which was the first and most established pilot state at the time of the evaluation with 67% of supported services in NSW responding to the survey, and 5 out of 5 services in the NSW interview sample participating. The initial findings were promising, highlighting that services were already experiencing measurable benefits across a significant range of areas from connections with other services, access to funding, workforce training opportunities, service compliance, understanding policy and legislative changes, improving access to data, improving integration of services and building capacity to measure impact.

In particular, evaluation survey respondents indicated:

- 91% strong improvement in connections to other services
- 82% strongly improved access to funding opportunities
- 82% at least reasonably improved access to workforce training opportunities
- 82% at least reasonably improved service compliance with the national quality standards, and
- 64% at least reasonably improved understanding of legislation and policy changes.

Despite the critical role backbone services play in the community controlled early years sector, current funding does not fund this function fully or in all jurisdictions. The absence of this support has been felt more acutely across multiple jurisdictions since the discontinuation of the Indigenous Professional Support Unit program that previously provided a range of these supports to ACCOs. This is why dedicated, sustainable backbone support is a critical component of any sustainable funding model for ACCO early years services.

Information request 9.2 - An ECEC Commission

SNAICC supports the intent of establishing an ECEC Commission and better coordination and delivery of ECEC policies and mechanisms for objective accountability are worthy of exploration. However, it is critical that an ECEC Commission does not inadvertently displace Aboriginal and Torres Strait Islander sector leadership or undermine self-determination.

Foundational components of an ECEC Commission

If an ECEC Commission is to be established, the creation and functioning of the body must align with and embed the four Priority Reforms of the National Agreement on Closing the Gap. This includes:

- Ensuring the ECEC Commission is designed in partnership with Aboriginal and Torres Strait Islander people, peak bodies and service organisations to ensure the functions and scope complement, rather than displace, Aboriginal and Torres Strait Islander sector leadership
- Embedding shared decision-making into any Commission functions that impact Aboriginal and Torres Strait Islander children, families or organisations
- Ensuring the ECEC Commission mandate includes specific focus on building the community controlled sector and ensuring this is embedded in all its functions
- Ensuring the ECEC Commission mandate includes specific focus on transforming mainstream organisations to ensure cultural safety and ensuring this is embedded in all its functions
- Shared access to data and information in accordance with Indigenous Data Sovereignty principles.

The Productivity Commission, in its *Review of the National Agreement on Closing the Gap*, has recommended that power must be shared, recognising the importance of self-determination and that Aboriginal and Torres Strait Islander people have the right to have control over decisions that affect their lives.²⁸ Co-design and shared decision making must reflect the geographical spread of Aboriginal and Torres Strait Islander people across the country beyond a focus on capital cities and include grassroots level voices.

Part of the failure of previous ECEC policies, agendas and regulation has been the disconnection from community, how they determine quality and success and whether services effectively meet their needs. True collaboration with Aboriginal and Torres Strait Islander people will redefine how quality and success are defined and determined not only for the ECEC sector but for children and their families and community.

Another recommendation in the Review was for Indigenous Data Sovereignty be recognised and supported.²⁹ Part of this recommendation is to strengthen the technical data capability of ACCOs invest in Indigenous data infrastructure.³⁰ Given draft recommendation 9.2 references the need for high quality data and the authority to collect, store and share data, SNAICC expects that the foundations and framework of these mechanisms will be grounded in Indigenous Data Sovereignty.

²⁸ Australian Government Productivity Commission, 'Review of the National Agreement on Closing the Gap Study report'. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>, pgs. 7-8 and 11.

²⁹ Australian Government Productivity Commission, 'Review of the National Agreement on Closing the Gap Study report'. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>, pg. 8 and 15.

³⁰ Ibid, pg. 8.

Consideration of intersection with existing bodies

When determining the scope of the proposed ECEC Commission's functions, consideration must be given to existing bodies who currently provide information and advice to government across the ECEC sector. Existing bodies who influence ECEC policy, advocate for systems change and provide advice to government include national and jurisdictional Aboriginal and Torres Strait Islander peak bodies, State and Territory Children's and Aboriginal and Torres Strait Islander Children's Commissioners, Guardians and Leadership, the National Children's Commissioner and the recently announced National Commissioner for Aboriginal and Torres Strait Islander Children and Young people, and the National Centre for Excellence when established.

The Early Childhood Care and Development Policy Partnership (ECCDPP) is a partnership between Commonwealth, State and Territory government and Aboriginal and Torres Strait Islander representatives formed under the National Agreement. The objectives of the ECCDPP include but are not limited to:

- Establishing a joined up approach between all government and Aboriginal and Torres Strait Islander community representatives to address early childhood care and development outcomes for Aboriginal and Torres Strait Islander children
- Giving a focus to the Priority Reforms of the National Agreement and how they can be harnessed to make the changes needed to ensure that Aboriginal and Torres Strait Islander children are born health, supported to thrive with strong families and proud in culture
- Identifying specific reforms to support Aboriginal and Torres Strait Islander children to achieve their potential in the early years, to be set up for long-term success
- Identifying opportunities to work more effectively across governments, reduce gaps and duplication and improve outcomes under Closing the Gap.

The ECCDPP has oversight of and drives development of policy reforms outlined in the *National Aboriginal and Torres Strait Islander Early Childhood Strategy* and *Early Childhood Care and Development Sector Strengthening Plan*. Focusing on establishing a strong foundation of shared-decision making and partnership the ECCDPP aims to address longstanding structural barriers to improving outcomes for Aboriginal and Torres Strait Islander children. An environment of transparent, robust and provide discussions has been created by investing significant effort into building strong, trusting relationships between government and Aboriginal and Torres Strait Islander members, based on mutual respect.

Any new ECEC Commission proposed must ensure it does not duplicate existing functions and advisory pathways between the Aboriginal and Torres Strait Islander ECEC sector and government and related bodies.

Conclusion

SNAICC is pleased to have the opportunity to contribute to the Productivity Commission's draft report and is available to be contacted and provide the Productivity Commission with additional information on the points raised in this submission and in relation to the Aboriginal and Torres Strait Islander ECEC sector more broadly, if required.

END



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