



# Early Years Strategy

## Consultation Submission

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# Introduction

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## About Community Early Learning Australia

Community Early Learning Australia™ (CELA) is the voice for Australia’s early education and care sector. As a peak body, our vision is for all of Australia’s children to have access to quality early education, regardless of economic circumstance or where they live.

CELA supports over 1,800 members employing more than 27,000 educators and teachers nationally. Our members include community-managed not-for-profit, government, and privately owned small providers, delivering preschool, long day care, outside school hours care, and family day care services.

Our Mission is to:

- ▶ Deliver effective and expert support for our members, enabling them to deliver quality early education and care for all Australia’s children.
- ▶ Influence policy makers and government by amplifying the voices of community based and small providers.
- ▶ Promote the value and importance of community-based early education.

## Response to the Consultation Questions

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### Key message

CELA welcomes the opportunity to contribute to shaping a national Early Years Strategy. The development of this strategy sits alongside a number of other reviews underway to support children and families. These include the Productivity Commission’s Inquiry into Early Childhood Education and Care, the ACCC’s Childcare Inquiry, Treasury’s consultation, Measuring What Matters, and the Women’s Economic Equality Taskforce.

The sector is at a critical juncture and our great hope is that this Government has the necessary courage, clarity of thinking and ambition for Australia’s children and their families to make the reforms needed. If we get it right, Australia will be well-placed, for generations, to be a productive and thriving economy, with happy, thriving people and communities at the centre.

Every child in Australia has the right to play, grow and learn in the context of loving and secure relationships within their families and communities. Every child in Australia has the right to enjoy the first five years of life with access to the services and opportunities which set them up for success at school, work and civic life.

Our country is currently one in which where you live, how much you earn or your indigenous status predict your future education, earnings and relationship outcomes. If you are indigenous, live in a rural or remote location, or your family is poor, the chances are that your lifetime earnings, educational, relationship and health outcomes will be lower than more fortunate counterparts. Existing policy mechanisms exacerbate rather than ameliorate this inequity. It should not be this way. The Early Years Strategy needs to identify how to remove the barriers which are preventing children from living their best, happiest and healthiest lives.

According to a 2020 UNICEF report ranking rich countries on child wellbeing outcomes, Australia ranks 32 out of 38 rich countries for child wellbeing. We rank 35 out of 38 countries for children’s mental wellbeing.<sup>1</sup> This should be the clarion call.

We need an Early Years Strategy which:

- ▶ Sets out an ambitious vision for Australia’s children and families, such as “Australia is the best place in the world to be born, to grow, and to learn.”
- ▶ Focuses on the priorities which will make a difference, including:
  - » Universal access to high-quality early childhood education and care
  - » Ensuring all children’s developmental milestones are monitored and their health needs are met
  - » Supporting all families to thrive, including appropriate paid parental leave and measures to support parent capacity
  - » An accountable and evidence-based early years system.

## 1. Proposed structure of the Strategy

We note the proposed structure of the strategy is as follows:

- ▶ **Vision** – to set out an overarching and aspirational statement for the Strategy.
- ▶ **Outcomes** – to establish the short and long term intended changes when the Strategy is implemented.
- ▶ **Policy Priorities** – the focus areas under the Strategy that are considered most likely to have a positive effect on outcomes.
- ▶ **Indicators** – measures that show if progress is being made towards reaching the planned outcomes.
- ▶ **Principles** – the rules and guidelines for setting the direction and making decisions under the Strategy.
- ▶ **Evidence** – evaluated and tested information to support the direction of the Strategy.

The proposed structure for the strategy is reasonable, as are the proposed structures for the Implementation Action Plans which are derived from each Policy Priority.

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<sup>1</sup> Equity Economics (2023) Measuring what matters: child wellbeing”  
<https://static1.squarespace.com/static/61b14c4abbc81a1543f55180/t/63db07a47fcd166839418857/1675298726287/Submission+to+Treasury+Wellbeing+Framework+Equity+Economics.pdf> page 1



## 2. What vision should our nation have for Australia’s youngest children?

The National Early Years Strategy vision statement needs to galvanise Commonwealth public service staff. Given the diverse range of organisations delivering services to children and families, the vision should also inspire state/territory and local governments, community organisations, health services and philanthropy to encourage collaboration on policy priorities. Importantly, the vision must put children’s needs at the centre.

CELA believes the vision should include principles such as equality and inclusion, and that it should draw inspiration from the [United Nations’ Convention on the Rights of the Child](#).

Crafting a vision statement which reflects these principles succinctly is challenging.

We note the Australian Research Alliance for Children and Youth’s (ARACY) statement in its 2022 Annual Report that:

***“To thrive, children and young people need to be valued, loved and safe, they need their basic material needs met, they need to be healthy, learning, participating in family, community and decision making, and have a positive sense of their identity and culture.”<sup>2</sup>***

ARACY has its aspiration as:

***“All children and young people are loved and thriving.”<sup>3</sup>***

These are useful starting points. We suggest one option is to build on this and offer the following:

***All young children in Australia have access to the proven supports they need to thrive.***

Australia lags behind other countries when it comes to policies which are friendly to parents and main care-givers of young children.

Firstly, Australia’s public investment in early childhood education and care is underwhelming when compared to other nations. Considering both private and public spending on early childhood education and care as a proportion of GDP, Australia ranks 21 out of all OECD countries.<sup>4</sup> Of the 30 OECD countries which report on private (ie family) contributions to early childhood education and care, Australia is the fourth highest, with 37% of funding coming from private sources, predominantly fees from parents.<sup>5</sup> Clearly there is an opportunity for greater public investment in early childhood education and care, to reduce the fee burden for families and to ensure public investment reflects community aspirations for Australia’s children.

Second, Australia can do better when it comes to paid parental leave. We welcome the Federal Government’s recent efforts in this area but note that it does not go far enough. The target 26 weeks is less than what is

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<sup>2</sup> Australian Research Alliance for Children and Youth’s (ARACY) (2022) 2022 Annual Report [https://www.aracy.org.au/publications-resources/command/download\\_file/id/488/filename/2022\\_Annual\\_report\\_FINAL.pdf](https://www.aracy.org.au/publications-resources/command/download_file/id/488/filename/2022_Annual_report_FINAL.pdf) page 5

<sup>3</sup> Ibid. page 6

<sup>4</sup> Matt Grudnoff (March 2022), “Benefit of high-quality universal early child education”, [https://futurework.org.au/wp-content/uploads/sites/2/2022/11/Economic\\_Aspects\\_of\\_ECEC\\_in\\_Australia\\_FINAL.pdf](https://futurework.org.au/wp-content/uploads/sites/2/2022/11/Economic_Aspects_of_ECEC_in_Australia_FINAL.pdf) page 14

<sup>5</sup> Ibid. page 14

offered in many other OECD countries. Of the 38 nations that are part of the OECD, 31 nations offer longer paid maternity leave than Australia, with the following countries offering the highest: Slovak Republic (164 weeks), Finland (161 weeks) and Hungary (160 weeks). Canada offers 53 weeks and the UK offers 39 weeks.<sup>6</sup> Australian fathers only receive two weeks as opposed to the OECD average of 8.7 weeks.<sup>7</sup>

The Discussion Paper highlights that there is a growing divide in terms of children's outcomes based on socio-economic, locational and cultural factors.<sup>8</sup> Early childhood is a unique opportunity to ameliorate disadvantage which often persists throughout life, however many policies and funding arrangements impacting children serve to exacerbate it instead.

Therefore, a more ambitious vision could be:

***“Australia is the best place in the world to be born, to grow, and to learn.”***

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<sup>6</sup> [https://www.sbs.com.au/news/article/why-is-paid-parental-leave-in-australia-so-short-and-can-the-new-government-fix-it/xi38074m0?/?cid=news:search:gg:en:nacadigital:dsa:prog&gclid=EAlaIQobChMI6PXZ94-P\\_gIVTphmAh0r6g3dEAMYASAAEgKkWFd\\_BwE&gclsrc=aw.ds](https://www.sbs.com.au/news/article/why-is-paid-parental-leave-in-australia-so-short-and-can-the-new-government-fix-it/xi38074m0?/?cid=news:search:gg:en:nacadigital:dsa:prog&gclid=EAlaIQobChMI6PXZ94-P_gIVTphmAh0r6g3dEAMYASAAEgKkWFd_BwE&gclsrc=aw.ds)

<sup>7</sup> [https://www.sbs.com.au/news/article/why-is-paid-parental-leave-in-australia-so-short-and-can-the-new-government-fix-it/xi38074m0?/?cid=news:search:gg:en:nacadigital:dsa:prog&gclid=EAlaIQobChMI6PXZ94-P\\_gIVTphmAh0r6g3dEAMYASAAEgKkWFd\\_BwE&gclsrc=aw.ds](https://www.sbs.com.au/news/article/why-is-paid-parental-leave-in-australia-so-short-and-can-the-new-government-fix-it/xi38074m0?/?cid=news:search:gg:en:nacadigital:dsa:prog&gclid=EAlaIQobChMI6PXZ94-P_gIVTphmAh0r6g3dEAMYASAAEgKkWFd_BwE&gclsrc=aw.ds)

<sup>8</sup> Early Years Discussion Paper page 10

### 3. What mix of outcomes are the most important to include in the Strategy?

CELA draws on ARACY's statement that:

*"To thrive, children and young people need to be valued, loved and safe, they need their basic material needs met, they need to be healthy, learning, participating in family, community and decision making, and have a positive sense of their identity and culture."<sup>9</sup>*

To express these as measurable outcomes related to young children, we suggest the following set of outcomes be considered for inclusion in the Strategy:

#### Universal access to early childhood education and care

- ▶ All children are able to access high-quality early childhood education and care, regardless of where they live, how much their family earns, or their health and development needs.
- ▶ The learning and development gap between children living in rural/remote areas and their metropolitan peers closes.
- ▶ The learning and development gap between indigenous and non-indigenous children closes.
- ▶ Children's connection to family, kin, culture and land is honoured.

#### Ensuring all children's developmental milestones are monitored and their health needs are met

- ▶ Communities are resourced to deliver services for families and children that cater to their unique context and needs.
- ▶ All children's development is monitored.
- ▶ All children can access timely and universal health support to meet their needs.

#### Supporting all families to thrive

- ▶ Parents and care-givers of young children are supported in their caring roles.
- ▶ Parents and care-givers of young children are able to participate in the paid economy in a way which meets their needs (flexible models of service delivery from long day care to in-home care and family day care).
- ▶ Domestic and family violence declines from current rates.
- ▶ All families are able to ensure their children's basic material needs are met.

#### An accountable and evidence-based early years system

- ▶ Develop and report on children's wellbeing.

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<sup>9</sup> [https://www.aracy.org.au/publications-resources/command/download\\_file/id/488/filename/2022\\_Annual\\_report\\_FINAL.pdf](https://www.aracy.org.au/publications-resources/command/download_file/id/488/filename/2022_Annual_report_FINAL.pdf) page 5

## 4. What specific areas/policy priorities should be included in the Strategy and why?

1. Universal access to high-quality early childhood education and care:
  - a. Ensuring equal access to high-quality early education and care, regardless of location, socio-economic status or cultural background.
  - b. Adopt recommendations from the Economic Inclusion Advisory Committee Report to reduce barriers to access for low-income families.
  - c. A coherent funding mechanism for early childhood education and care to move towards universal access.
2. Ensuring all children’s developmental milestones are monitored and their health needs are met.
3. Supporting all families to thrive.
4. An accountable and evidence-based early years system.

### 1. Universal access to high-quality early childhood education and care

It is time for Australia to re-imagine the early years. We need parents to be the best they can be in their roles so that children have every opportunity to enjoy good childhoods and grow into happy, healthy and productive adults. There is a wealth of research both demonstrating the benefit good childhoods can yield for lifelong outcomes, and, tragically, the cost of maltreatment and poverty during these years.

Re-imagining the early years includes re-imagining families’ access to early education and care. Currently, the sector is framed as a user-pays service to enable women to return to work, or, with the Preschool Reform Agreement, as a first-step towards supporting children with early learning to set them up for a successful transition to school.

This approach has served us, to a point, but we can and must do better.

A universal ‘entitlement’ or ‘guarantee’, of access to high-quality early education and care, from when a family needs it, will do much to support families to manage their caring responsibilities while staying connected to paid work. It has the potential to:

- ▶ Close the educational achievement gaps between indigenous and non-indigenous children, between rural and metropolitan children and economically advantaged and disadvantaged children
- ▶ Reduce the gender pay gap
- ▶ Improve children’s lifelong health outcomes
- ▶ Reduce crime.<sup>10</sup>

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<sup>10</sup>Lawrence J. Schweinhart, Jeanne Montie, Zongping Xiang, W. Steven Barnett, Clive R. Belfield, & Milagros Nores (2005) The High/Scope Perry Preschool Study Through Age 40 [https://nieer.org/wp-content/uploads/2014/09/specialsummary\\_rev2011\\_02\\_2.pdf#:~:text=The%20study%20presents%20strong%20evidence%20that%20the%20Perry,over%20study%20participants%E2%80%99%20lifetimes%20up%20to%20age%2040.](https://nieer.org/wp-content/uploads/2014/09/specialsummary_rev2011_02_2.pdf#:~:text=The%20study%20presents%20strong%20evidence%20that%20the%20Perry,over%20study%20participants%E2%80%99%20lifetimes%20up%20to%20age%2040.)



Universal access to early education and care is an essential investment that must be prioritised and done well it will deliver significant benefits for both the Australian way of life and its economy. By resetting government funding models as a balance between equitable block funding and parent subsidies, Universal access can be achieved while improving quality and reducing costs for families. Backed up with investment in workforce attraction and retention, a new system based on universal access will improve child outcomes while supporting parental workforce participation. This proposal is addressed more fully as part of our submission to the Productivity Commission Inquiry into Early Childhood education and care.

The following describes some of the problems with current arrangements, their impact and suggested recommendations for moving towards universal access to high-quality education and care.

**a) Ensure equal access to high-quality early education and care, regardless of location, socio-economic status or cultural background.**

There are 35% of Australians living in a ‘childcare desert’, where there are less than 0.333 places for every child aged 0-4. Australians living outside of major capital cities are more likely to be in childcare deserts, and Australians living in communities of lower advantage have less access. In communities of high advantage, there is greater access to early childhood education and care, and there are higher fees. As the researchers observe:

“Part of the reason for this may be the design of the system where the underlying principles of the childcare system encourage providers to go where there is the lowest risk and the greatest reward.”<sup>11</sup> Indeed, this appears to be a problem for market-based provision of early education overseas also.<sup>12</sup> It is a market failure and it requires active Government intervention.

The design of the system for CCS-funded services in this way compounds, rather than ameliorates disadvantage, in terms of children’s learning and development. The Australian Early Development Census shows that nationally, improvements in children starting school on track on all five domains are evident across all regions of Australia, however a gap remains for children living in regional and remote areas of Australia. This gap widened in 2021.<sup>13</sup>

Different communities will have different needs when accessing early education and care. A mining community in remote Australia may have a need for services which can cater to shift workers; families living in remote communities, or those who are caring for a family-member with a significant disability may need access to in-home care. Parents working traditional business hours will need access to services open during these hours plus additional time for commuting. Communities with significant social challenges may need wrap-around supports such as allied health and parent support programs.

Communities should be resourced to determine the type of early years services they need and to operate them. In some instances, this may mean capital funding to develop or re-purpose a building, and then the appointment of a voluntary committee to lead the organisation. In a community of higher disadvantage it may require ongoing resourcing to either local, state/territory government or school to fulfill the governance obligations of the service.

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<sup>11</sup> <https://www.vu.edu.au/mitchell-institute/early-learning/childcare-deserts-oases-how-accessible-is-childcare-in-australia>

<sup>12</sup> See Martha Friendly (2019) “A bad bargain for us all: why the market doesn’t deliver child care that works for Canadian children and families” Occasional Paper No. 31 <https://childcarecanada.org/sites/default/files/OP31-A-bad-bargain-for-us-all.pdf>, and UNICEF Innocenti Report Card 8 (2008) [https://www.unicef-irc.org/publications/pdf/rc8\\_eng.pdf](https://www.unicef-irc.org/publications/pdf/rc8_eng.pdf) noting Australia has made progress on many indicators since then

<sup>13</sup> Australian Early Development Census, (2022), National Trends in Child Development <https://www.aedc.gov.au/resources/detail/national-trends-in-child-development---aedc-2021-data-story> page 5

### ***A note about “high-quality” education and care***

CELA advocates for universal access to “high-quality” education and care. This means services which are Meeting or Exceeding the NQS. We know that services which are more likely to exceed the National Standards are community-managed not-for-profit. For example, 38% of community-managed not for profit services are rated Exceeding the NQS, compared with 15% of for-profit services and 27% of ‘Private not for profit organisations’ (these are corporate model not for profits and faith-based organisations).<sup>14</sup> For this reason, we recommend expanding education and care to cover all ‘childcare deserts’ through preferencing not-for-profit community-managed services, and ensuring that they are suitably funded to meet the needs of the community.

A key component of a high-quality education and care sector is a workforce of qualified, fair paid educators and teachers. Not-for-profit services tend to pay staff above Award because they do not need to divert income for profits and all income can be reinvested in the service. We will expand on quality and workforce in our submission to the Productivity Commission.

### **Recommendation**

**Ensure that all communities have access to high-quality education and care. Communities need resources, flexibility and autonomy to design services which meet the unique needs of families who live there. Achieve this through:**

- ▶ Capital funding to support the establishment of new not-for-profit community led services, especially in areas of community demand
- ▶ In conjunction with State and Local governments, provide governance, business and management support to communities to establish and maintain not for profit services

**Local, State and Federal government coordination to monitor ECEC service provision and ensure services are delivered in line with demand and community needs.**

**b) Adopt recommendations from the Economic Inclusion Advisory Committee’s Interim Report to reduce barriers to access education and care services.**

The Economic Inclusion Advisory Committee has made three key recommendations which could be implemented now and which could have an immediate impact on workforce participation, particularly for our most disadvantaged families. These are to:

- ▶ Abolish the Activity Test
- ▶ Abolish the ParentsNext Program
- ▶ Remove the Maintenance Income Test from the Family Tax Benefit Part A.

These pieces of policy act to disincentivise workforce participation, particularly for low-income families and single parents. The Activity Test was described by the Committee as “poorly designed and punitive”, that it “has significant administrative complexity for little benefit” and “produces a risk of overpayment

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<sup>14</sup> ACECQA, (2023) NQS Snapshot Q4 2022

for casual employees.”<sup>15</sup> The Committee reports that the ParentsNext Program’s effectiveness has declined, and that this may be due to its coercive nature since it became compulsory. The Committee describes the ParentsNext compliance as “particularly harsh” as it “denies parents and their young children access to a basic standard of living.”<sup>16</sup> Of the Maintenance Income Test, the Committee wrote “The Australian child support-family payment interaction makes budgeting on a low income impossible for recipients, as FTBA cannot be predicted from fortnight-to-fortnight.”<sup>17</sup>

These pieces of policy do not support low-income families with precarious incomes to plan their budgets to meet children’s needs, adding to family stress, heightening the risk of family violence and the risk of material needs not being met.

## Recommendation

Abolish the Activity Test, Parents Next and the Maintenance Income Test from Family from the calculation of the Family Tax Benefit Part A, as recommended by the Interim Economic Inclusion Advisory Committee’s Interim Report.

### c) A coherent funding mechanism for early education and care to move towards universal access.

Addressing and breaking down Government silos has already been identified as one of the key priorities of the strategy. For CELA, the most pressing issue to address is the funding arrangements for access to early childhood education and care. The split between CCS (Commonwealth-administered) and Preschool Reform Agreement funding (a partnership between States and Commonwealth) is not family-centric, causing significant confusion for families, disruption for children moving between service types and inefficiency in service provision. It is a result of historical decisions around Commonwealth versus State Government responsibility and funding, rather than family-centred policy design, and this must be addressed.

## Evidence of the problem

According to comments from CELA members, the announcement by the NSW Government to offer funded preschool, while welcome, has led to two unintended consequences:

- ▶ Parents are confused about whether to move their child from long day care and enrol in preschool, even though the long day care offers a preschool program led by an early childhood teacher;
- ▶ With attrition of 3 and 4 year olds, long day care services find a concentration of enrolments in their infant and toddler age groups, which have higher staff ratios and hence higher costs to operate.

This feedback is consistent with other findings about the challenges families experience when navigating the early childhood education and care sector. Research commissioned by the Front Project found that 27% of

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<sup>15</sup> Interim Economic Inclusion Advisory Committee (April 2023) 2023-24 Report to the Australian Government [https://www.dss.gov.au/sites/default/files/documents/04\\_2023/interim-economic-inclusion-advisory-committee-2023-24-ieiac-report\\_2.pdf](https://www.dss.gov.au/sites/default/files/documents/04_2023/interim-economic-inclusion-advisory-committee-2023-24-ieiac-report_2.pdf) page 70

<sup>16</sup> Ibid. page 76

<sup>17</sup> Ibid. page. 80

parents/care-givers *disagreed* that working out their eligibility for CCS was straight-forward.<sup>18</sup> And 54% were unaware of the cost-drivers for ECEC services or why some options cost more or less.<sup>19</sup>

### Recommendation

Develop a coherent funding mechanism for early education and care to move towards universal access.

Transition to a universal entitlement of free early childhood education and care from birth to school age across all service types, provided through block funding.

## 2. Ensuring all children’s developmental milestones are monitored and their health needs are met.

CELA works with education and care services across a range of locations within Australia. We see considerable variability in monitoring children’s health and developmental milestones and, if their development is not on track, suitable access to timely and affordable support.

The result is that children’s additional needs are not being identified in a timely fashion and that they do not receive the interventions they need to help set development trajectories on track. Since 2015, the proportion of Prep/First Year of School children whose teachers identify that they need further assessment (for medical, physical, behaviour management, emotional or cognitive development) has increased across many communities. This warrants further investigation.

Accessibility and appropriateness of maternal child health (MCH) services also vary. Research on MCH utilisation in QLD has found a broad trend of inequitable health service utilisation, where,

*“those with the greatest healthcare needs – First Nations women, rural and remote women and those at socio-economic disadvantage – engaged with health services less frequently than other women, and when they did engage, they accessed a narrower range of services.”<sup>20</sup>*

We note the Senate Select Inquiry into Autism found that diagnosis and early intervention is wanting, and that the Committee “is concerned about the impact of socio-economic status and geographical location on the ability of families to access early intervention services.”<sup>21</sup>

### Recommendation

- ▶ Co-location of maternal child-health, allied health services with early childhood education and care services to support ease of access and referral. In addition, ensuring adequate paid time for both ECEC staff and allied health to maintain connections and to support interventions within ECEC settings.
- ▶ Investment in culturally appropriate healthcare services for First Nations’ families.

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<sup>18</sup>The Front Project (2021) *Work and Play: Understanding how Australian Families experience early childhood education and care.* <https://www.thefrontproject.org.au/media/attachments/2021/11/24/work-and-play-report-final.pdf> page 43

<sup>19</sup> Ibid. page 43

<sup>20</sup> Monash University (August 2021) How equitable is Australia’s maternal healthcare? <https://www.monash.edu/medicine/news/latest/2021-articles/how-equitable-is-australias-maternal-healthcare>

<sup>21</sup> Select Senate Inquiry into Autism, (March 2022) [https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024412/toc\\_pdf/Services,supportandlifeoutcomesforautisticAustralians.pdf;fileType=application%2Fpdf](https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024412/toc_pdf/Services,supportandlifeoutcomesforautisticAustralians.pdf;fileType=application%2Fpdf) page viii

### 3. Supporting all families to thrive

As mentioned earlier, Australia’s paid parental leave scheme, while improved, still lags behind other rich OECD nations. Of the 38 nations that are part of the OECD, 31 nations offer longer paid maternity leave than Australia. High aspirations for Australian children necessitate better paid parental leave, to enable parents to provide the intensive levels of care that infants and young children require, while meeting basic material needs.

Addressing child poverty must be a national priority; over 16.6% (761,000) of children live in poverty, according to research by the Australian Council of Social Services (ACOSS).<sup>22</sup> As mentioned above, measures such as improved paid parental leave and abolition of punitive and complex mechanisms such as the Activity Test, ParentsNext and the Maintenance Income Test are needed to improve children’s outcomes.

The Australian Institute of Family Studies writes in its submission into the nature and extent of poverty in Australia<sup>23</sup> that:

***“Children living in poverty and financial disadvantage had poorer developmental outcomes: lower cognitive development, poorer social-emotional outcomes, poorer general health and an elevated risk of obesity with negative impacts being more pronounced for children experiencing more severe and prolonged financial disadvantage.” and***

***“Children of families experiencing disadvantage were associated with harsh parenting and poor family relationships and interactions.”<sup>24</sup>***

Given the prevalence and long-term impact of child maltreatment, as shown by the recently published Australian Child Maltreatment Study (ACMS),<sup>25</sup> measures which reduce the drivers which contribute to family violence are needed. The reduction of family financial stress is one of these measures.

The ACMS points that there is an established causal relationship between child maltreatment and physical and mental health outcomes across the lifetime.<sup>26</sup> However, addressing poverty will not in and of itself end child maltreatment and the long-term consequences that flow from it.

The researchers argue for an ecological approach to respond to violence against children, which necessitates actions at individual, community and policy levels to build parent capacity, change harmful attitudes and create policies and laws to support children. They say:

***“Mechanisms for these efforts exist through policy and programmatic efforts, supported by public health law. At the societal level, leverage for change is offered by recalibrating broad policy settings, such as in housing, taxation, parental leave, and access to childcare and early childhood education, which can ameliorate some of the circumstances heightening the likelihood of some types of maltreatment.”<sup>27</sup>***

<sup>22</sup>Australian Council of Social Services (2022) Poverty in Australia 2022: a snapshot. <https://povertyandinequality.acoss.org.au/a-snapshot-of-poverty-in-australia-2022/>

<sup>23</sup> Australian Institute of Family Studies (2022) Senate Inquiry into the nature and extent of poverty in Australia. Submission, [https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Community\\_Affairs/PovertyinAustralia/Submissions](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/PovertyinAustralia/Submissions)

<sup>24</sup> Ibid. page 5

<sup>25</sup> Ben Matthews et al, (3 April 2023) The Australian Child Maltreatment Study, Journal of the Australian Medical Association, Vol 218 No. 6. [https://www.mja.com.au/system/files/2023-03/MJA2\\_v218\\_is6\\_Is2Press\\_Text.pdf](https://www.mja.com.au/system/files/2023-03/MJA2_v218_is6_Is2Press_Text.pdf)

<sup>26</sup> Ibid. page s40

<sup>27</sup> Ibid page s49

The researchers note that change is possible to do better, noting the reduction in physical and sexual abuse, “probably influenced by changes in policy, practice, social sensitisation, education, and parenting practices in Australia.”<sup>28</sup>

Programs which build parent capacity and reduce abuse, in all its forms, is urgently needed. In 2020 the Productivity Commission estimated that mental health and suicide costs Australia \$200-220b each year – a significant proportion of this will be as a result of child maltreatment.<sup>29</sup>

In addition to the health burden of child maltreatment, child’s nutrition is not where it needs to be. About 95% of children are not eating enough vegetables and child obesity is on the rise, with 1 in 3 children aged 5-25 overweight or obese.<sup>30</sup> There is an opportunity to address this through universal access to early education and care and provision of meals at these services. However, appropriate funding, training and regulatory requirements are needed; a report by Deakin University of Victorian long day care services found most services were feeding children too much refined food, such, and not enough fruit and vegetables.<sup>31</sup> A survey conducted by the United Workers Union found that the average amount being spent on a child per day was \$2.15. Nearly 40 per cent of educators and 60 per cent of cooks said they had bought food for the children they educate and care for out of their own pocket.<sup>32</sup> For profit services were more likely to agree that the children at their centre do not receive enough high-quality food (51% compared to 44% at not for profits).<sup>33</sup>

## Recommendation

- ▶ Design funding mechanisms for families which reduce poverty and financial stress, including improving paid parental leave.
- ▶ Implement evidence-based, targeted programs to reduce child maltreatment.
- ▶ Fund services appropriately to provide high-quality food, as well as implement training and regulatory measures when moving towards universal access to early childhood education and care.

## 4. An accountable and evidence-based early education and care sector

UNICEF has developed a wellbeing index<sup>34</sup> for children which could be a launching pad for decision-makers to measure the effectiveness of Government policy relating to the Early Years Strategy.

The index covers the following inter-related domains:

- ▶ **Valued, Loved and Safe** – children have trusting relationships with family and friends.

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<sup>28</sup> Ibid. page s17

<sup>29</sup> Ibid. page. S48

<sup>30</sup> UNICEF Australia, ARACY, Kristy Noble, Patrick Rehill, Kate Sollis, Penny Dakin and Diana Harris (March 2023) Australian Children’s Wellbeing Index Report [https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eedb9876b6a8/Australian-Childrens-Wellbeing-Index-Report\\_2023\\_for%20print.pdf](https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eedb9876b6a8/Australian-Childrens-Wellbeing-Index-Report_2023_for%20print.pdf) page 28

<sup>31</sup> Deakin University Media Release (August 2022) <https://www.deakin.edu.au/about-deakin/news-and-media-releases/articles/study-finds-children-missing-out-on-healthy-diets-at-childcare>

<sup>32</sup> United Workers Union (2021) Children going hungry <https://unitedworkers.org.au/wp-content/uploads/2022/03/Children-going-hungry.pdf>

<sup>33</sup> Ibid

<sup>34</sup> <https://www.unicef.org.au/the-wellbeing-of-australia-s-children>



- ▶ **Material Basics** – children live in suitable housing with appropriate clothing, nutritious food, clean water and clean air.
- ▶ **Healthy** – children have their physical, mental, and emotional health needs met.
- ▶ **Learning** – children and young people learn through a variety of experiences within the classroom, the home and the community in which they live.
- ▶ **Participating** – children and young people have a voice, are listened to and have a say in decisions that impact them.
- ▶ **Positive Sense of Identity and Culture** – children feel safe and support to express their identity and have a sense of belonging.

An index nested within this, focused on the early years, could help provide critical visibility on how well Government policy is working to help young children thrive.

We note that ARACY has published data on Australia’s performance regarding child wellbeing. Having visibility around these indicators can help us celebrate what is working for Australian children and families, and where we need to do better.

For example, the report notes that the good news in terms of how Australia is performing include:

- ▶ More than 4 in every 5 children attend preschool
- ▶ 91% of children are fully immunised at age 2.

However, where Australia needs to improve include:

- ▶ 1 in 6 children live below the national poverty line
- ▶ Almost 95% of children do not meet the daily recommended intake of vegetables.<sup>35</sup>

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<sup>35</sup>UNICEF Australia, ARACY, Kristy Noble, Patrick Rehill, Kate Sollis, Penny Dakin and Diana Harris (March 2023) Australian Children’s Wellbeing Index Report [https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eeb9876b6a8/Australian-Childrens-Wellbeing-Index-Report\\_2023\\_for%20print.pdf](https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eeb9876b6a8/Australian-Childrens-Wellbeing-Index-Report_2023_for%20print.pdf)  
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## 5. What could the Commonwealth do to improve outcomes for children—particularly those who are born or raised in more vulnerable and/or disadvantaged circumstances?

CELA supports measures to develop a rights-based, coherent funding model for early childhood education and care. If these are adopted we anticipate the benefits of universal access to high-quality education and care to include:

- ▶ Better learning and development outcomes for children, particularly vulnerable children
- ▶ Improved access to allied health supports
- ▶ Closing the gender gap by reducing the barriers for women to re-enter the workforce after having children; and
- ▶ Reducing the health, employment and educational gaps between advantaged and less advantaged communities.

Instead, the current market-based, demand driven model exacerbates inequality. Children who are disadvantaged have these disadvantages compounded because:

- ▶ It makes sense for providers to open in highly-populated and affluent communities, so children in less advantaged communities may not have access to a place
- ▶ Women in less advantaged communities are not able to participate in paid work due to a lack of places and affordability, widening the gender pay gap.

## 6. What areas do you think the Commonwealth could focus on to improve coordination and collaboration in developing policies for children and families?

The complexity of funding arrangements across Commonwealth and State and Territory jurisdictions for the early years is confusing for parents and inefficient. Coordination is required to ensure families can easily navigate options in terms of models of delivery, whether long day care, family day care, preschool, outside school hours care or in-home care.

Different communities have different needs. There is a place for local government, with appropriate funding, to advocate and influence the number and types of services available to the community, depending on their needs. For some communities, Aboriginal led organisations are best-placed to lead this and should be supported to do so.

Given the childcare deserts already mentioned, it may be that coordination and collaboration between Commonwealth, State/Territory and local governments occur to ensure all communities have access to a level of provision which meets their needs.

## 7. What principles should be included in the Strategy?

We suggest the following principles be included in the Strategy:

- ▶ All children have a right to access high-quality early education and care
- ▶ Child and family-centred funding mechanisms, systems and services
- ▶ Inclusive systems and services which respond to children’s developmental and health needs
- ▶ Recognition of the rights of the child
- ▶ Recognition of the importance of families in children’s lives
- ▶ Equitable outcomes
- ▶ Community determination and choice – enabling communities to determine and design services according to need
- ▶ Evidence and accountability.

## 8. Are there gaps in existing frameworks or other research or evidence that need to be considered for the development of the Strategy?

### Emotional regulation, executive function and culturally responsive pedagogy

A study published in 2021 explored the connection between self-regulation and executive function, preschool attendance and early academic achievement between Aboriginal and non-Aboriginal populations in the Northern Territory.

This study used structural equation modelling to investigate the pathway from self-regulation and executive function (SR-EF) at age 5 to early academic achievement (i.e. Year 3 reading/numeracy at age 8) for 3,199 NT children.

The study confirmed the expected importance of SR-EF for all children but suggests the different pathways for Aboriginal and non-Aboriginal children.

The researchers argued that the positive effect of self-regulation and executive function skills on early years academic outcomes for all children in the NT, which is consistent with other international and Australian studies [4, 42–45] speaks to the need to elevate the importance of these foundational skills in policies, programs and data collection.<sup>36</sup> In particular, the study highlights the need for further investigation and development of culturally, linguistically and contextually responsive programs and policies to support self-regulation and executive function skills in the current Australian education context. There is a pressing need to better understand how current policies and programs enhance children and their families' sense of safety and support to nurture these skills.

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<sup>36</sup> Vincent Yaofeng He, Georgie Nutton, Amy Graham, Lisa Hirschausen, Jiunn-Yih Su “Pathways to school success: Self-regulation and executive function, preschool attendance and early academic achievement of Aboriginal and non-Aboriginal children in Australia’s Northern Territory”, PLOS, Published: November 11, 2021, <https://doi.org/10.1371/journal.pone.0259857>

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