

Early Years Strategy Team  
Australian Government Department of Social Services  
Via email: [earlyyearsengagement@dss.gov.au](mailto:earlyyearsengagement@dss.gov.au)

8 May 2023

Dear Early Years Strategy Team,

Thank you for the opportunity for the [NSW Advocate for Children and Young People](#) (ACYP) to provide feedback on the Early Years Strategy (the Strategy).

Established under the *Advocate for Children and Young People Act 2014*, the Advocate for Children and Young People is an independent statutory appointment overseen by the Parliamentary Joint Committee on Children and Young People. ACYP advocates for the safety, welfare and wellbeing of children and young people aged 0-24 years and promotes their participation in decisions that affect their lives. The Act requires ACYP to 'give priority to the interests and needs of vulnerable and disadvantaged children and young people' and to 'focus on systemic issues affecting children and young people'.

ACYP strongly supports the Commonwealth's considerations that this Strategy should be child and family centred; strengths based; and give consideration to children's rights as articulated in the United Nations Convention on the Rights of the Child.

As one of the central functions of ACYP is to promote the voices and participation of children and young people in decision making, ACYP also welcomes references in the discussion paper to 'genuinely listen and include the voices of children and seek to capture their ideas and intentions'. Throughout the development of the Strategy, ACYP would welcome a clear articulation of how young children will be consulted and how their views will be considered.

We also support the intention to bring together existing data sources to measure the performance of the strategy, particularly for priority cohorts. However, we note there may be some opportunities to meet gaps in these data sources by collaborating with States and Territories and working with the Australian Institute of Health and Welfare (AIHW) to address some of the data gaps stated in their 'Australia's Children' report. For instance, the AIHW report notes opportunities to for greater data collection about key population groups, such as:

- children of refugee and asylum seeker families;
- those from culturally and linguistically diverse backgrounds;
- those living in out-of-home care (which we would extend to those who had prior contact with the out-of-home care system);
- those who have had contact with the youth justice system;
- those with disability; and

- those who identify as LGBTQIA+.<sup>1</sup>

These are each groups of children and young people ACYP focuses on under its mandate to give priority to the interests of children experiencing disadvantage and vulnerability. We would recommend that these be considered priority cohorts for action and support. In addition, we would recommend that children of young parents, children whose parents had been in contact with the criminal justice system, and children whose parents themselves had experience with the out-of-home care system be prioritised for support, and that where data gaps exist, funding is allocated to understand the needs of these groups in more detail.

Identifying data gaps and opportunities to address them will allow for earlier intervention for children experiencing developmental delays. For instance, while the Australian Early Development Census (AEDC) is a useful way to measure the success of interventions prior to age 5, the age at which it is completed means it cannot be used to indicate need for increased early intervention in that cohort of children. In order for early intervention to occur, there is an opportunity for greater consistency of data collection in the earlier years across health and childcare services, and coordination of wrap-around supports.

However, in order for this to be successful, parents also need to be able to easily access those health services throughout the first 2000 days. ACYP surveys and consultations have found that the increase in the cost of living is impacting the ability of some young people to access medical care. For instance, a recent survey found 27% of young people aged 18-24 said they had avoided seeking medical support due to costs and 12% of children and young people aged 10-24 who live with their parents, said their parents had avoided seeking medical support for them. While we do not have sufficient data to understand the full scope of the impact on early childhood, this is further indication that cost of living may impact the ability of young parents to engage with medical supports, thereby limiting opportunities for their children to receive early intervention. Increasing access to bulk-billing practices and access to child and family allied health services would go some way to addressing these concerns. We note the Federal Government has indicated it will announce some changes to Medicare in coming weeks.

There is also a need for the Strategy to give consideration to the particular impacts that the experience of disaster can have on the early years and wellbeing of children. It has been widely reported that we can expect more frequent disaster and hazard events to occur over the coming years, and there is a strong evidence base highlighting both the short- and longer-term impacts of disaster on the physical, emotional, psychological, and social wellbeing of children and young people.<sup>2</sup> As a result, ACYP considers it important that the Strategy incorporate a focus on

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<sup>1</sup>Australian Institute of Health and Welfare (2022) *Australia's Children: Overarching Data Gaps* accessed via: <https://www.aihw.gov.au/reports/children-youth/australias-children/contents/data-gaps/overarching-data-gaps>

<sup>2</sup>International Journal of Disaster Risk Reduction (2015), Children and young people's wellbeing post-disaster: Safety and stability are critical, accessed 5 May 2023. <https://www.sciencedirect.com/science/article/abs/pii/S2212420915300212>

supporting community preparedness, as well as children and families' resilience and wellbeing following disaster events.

Throughout the discussion paper ACYP was pleased to see reference made to the Strategy building on and aligning with existing Commonwealth Government strategies, including commitments made under the National Agreement on Closing the Gap. We note that the development of future action plans developed to sit underneath the Strategy, should also include reference to relevant State and Territory Strategies, such as the NSW First 2000 Days Framework. In addition, action plans should include clear mechanisms to ensure children and young people are supported to participate in the development of action plans, implementation, and monitoring.

Thank-you once again for the opportunity to provide feedback on the development of the Strategy. We note that we would be happy to share existing data or facilitate feedback from children and young people, in order to assist with the development of future action plans, as well as implementation and monitoring of the Strategy as it develops.

Please do not hesitate to contact me at or my team at [REDACTED] if we can be of any assistance as the Strategy development continues.

Yours Sincerely,

