

Response to the Australian Government Early Years Strategy discussion paper

1. Introduction

SDN Children's Services (SDN) is a not-for-profit organisation that has been delivering quality early childhood education and care, early childhood intervention and therapies for children and young people, and family support services since 1905.

Our purpose is to promote and enhance children's wellbeing, learning and development in inclusive environments; and our vision is for an equitable world where all children thrive.

SDN provides services in greater Sydney, regional NSW and the ACT. We operate 26 early childhood education and care (ECEC) services – 23 long day care centres and three stand-alone preschools including our autism-specific preschool SDN Beranga located at Rooty Hill, Sydney. We are a registered NDIS provider offering early childhood intervention and therapies for children and young people across Sydney, and we deliver NSW and Federal government funded family support programs including Family Preservation and supported playgroups.

SDN was the first to integrate preschool education and long day care in NSW.

Children's wellbeing, learning and development in inclusive environment drives all our work. We define wellbeing using ARACY's wellbeing framework "viewing wellbeing in a way that brings together the different elements a child or young person needs in order to

thrive."¹ SDN's wellbeing wheel is taken directly from ARACY's work as it is evidence-based and informed by what children and young people have said.



Figure 1

The SDN Child Wellbeing Wheel based on ARACY'S *The Nest*.

¹ <https://www.aracy.org.au/the-nest-in-action/the-nest-overview>

SDN welcomes the Strategy's intention to create an enduring vision for Australia's children and families through an integrated approach to the early years.

We strongly support:

- the intention to create an integrated approach to the early years, including by reducing program and funding silos across Commonwealth departments and better integrating and coordinating functions, to seek to ensure that all children, wherever they live, enjoy the same opportunities to learn, develop and thrive.
- the focus on the first 5 years inclusive of antenatal period, and on an integrated approach that recognises interdependencies across policies and programs.
- the recognition that communities, families, parents, carers and kin all play an important role in shaping the early years.
- The commitment to Closing the Gap and the National Aboriginal and Torres Strait Islander Early Childhood Strategy
- a focus on strengths and recognition that there is no one right way to raise and support a child.
- that the strategy will be based on children's and families' voices, needs, interests, strengths, understandings and capacity.
- the recognition that the early years are not just about setting the right foundations for the future but are also about the present.

We do not support:

- the strategy not including a focus on state and territory policies and programs and recommend more than the stated *may note their points of intersection with Commonwealth activities.*²

We wish to note that:

- it is stated in the discussion paper that the State and Territory governments are responsible for ensuring the quality of Early Childhood Education and Care (ECEC) services and continuous improvement in the sector.² SDN would like to emphasise the important role the Commonwealth has for ensuring overall quality in the Early Childhood Education and Care services by continuing to support and expect the continuation of the applied law system under which the National Quality Framework (NQF) for ECEC operates, comprising the *Education and Care Services National Law* and the Education and Care Services National Regulations.

We recommend that:

- the National Disability Insurance Scheme Act 2013 (NDIS Act) be added to attachment A under 'Disability'.

² The Early Years Strategy Discussion Paper, February 2023, pge 7

2. Response to the discussion paper questions

1. Do you have any comments on the proposed structure of the Strategy?

SDN strongly supports an outcomes driven structure that aligns with a *Theory of Change* approach³. The most important driver will be the choice of outcomes and the resulting indicators, particularly if these are linked to funding, as this is what will drive activity on the ground.

SDN recommends the structure articulate the shared :

- Vision
- Outcomes
- Indicators
- Measures
- Responsibilities
- Accountabilities

In addition, to shared accountabilities, it should clearly articulate the connections between policies and roles.

Importantly, SDN recommends establishing a National Children's Minister to drive action on the strategy and to ensure collaboration and coordination.

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

The nation's vision for children should reflect what is best for children, as evidenced by ARACY's Nest agenda. These elements will support children to thrive, grow their sense of identity and connection to the world, and become confident and engaged citizens.

As citizens children actively participate in decisions about things that affect them, in line with their age and abilities, and are not blank slates who passively receive services.

We have the evidence of what is best for children, what is needed is a coordinated approach that prioritises children so that policies and funding put children first.

For example, a vision for children would position children at the centre of early childhood education policy with workforce participation an important secondary outcome.

Similarly, a vision for children would drive changes to the NDIS which is currently adult-centric and incentivises poor practices that are not evidence-based.

³ <https://aifs.gov.au/resources/practice-guides/what-theory-change>

In addition to the outcomes identified in the Nest agenda, children need a strategy that gives them:

- timely targeted support available when needed, for their entire childhood journey, for all children and their families or carers
- equality of opportunity and targeted supports to access and participate
- policy and funding support for the coordinated services that children and families may need to allow equitable access and participation, including capacity building of families
- outcomes that enable all children to be developmentally on track in all domains (as measured by the Australian Early Development Index (AEDI))

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

That children are:

- loved and safe
- have material basics
- are healthy
- are learning and participating,
- have a positive sense of identity and culture.

Input to these outcomes include supportive, supported, capable families, communities and policies.

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

A framework that drives the coordination and clarification of roles and responsibilities between the state and federal governments is essential. This is not just to improve policies and coordination of supports between federal departments, but to improve efficiencies across the states and territories as well.

SDN supports the inclusion of the policy areas stated in the discussion paper and recommends that care is taken not to focus disproportionately on early childhood education and care at the risk of other policy areas.

However, SDN wishes to emphasise that the ECEC policy area that promotes an artificial split between long day care for birth to school age children funded by the Commonwealth, and stand-alone preschools funded by the states is based on an outdated view of long day care and preschools that is not in line with the National Quality Framework for Early Childhood Education and Care that providers work to.

The relevant laws have been harmonised across all states and territories, with an agreed national curriculum as set out in the Early Years Learning Framework. The compliance and quality requirements are identical, yet different funding and policy frameworks apply to each, creating inequity of access and affordability' and leads to perverse outcomes for children and their families.

Areas to be considered should include:

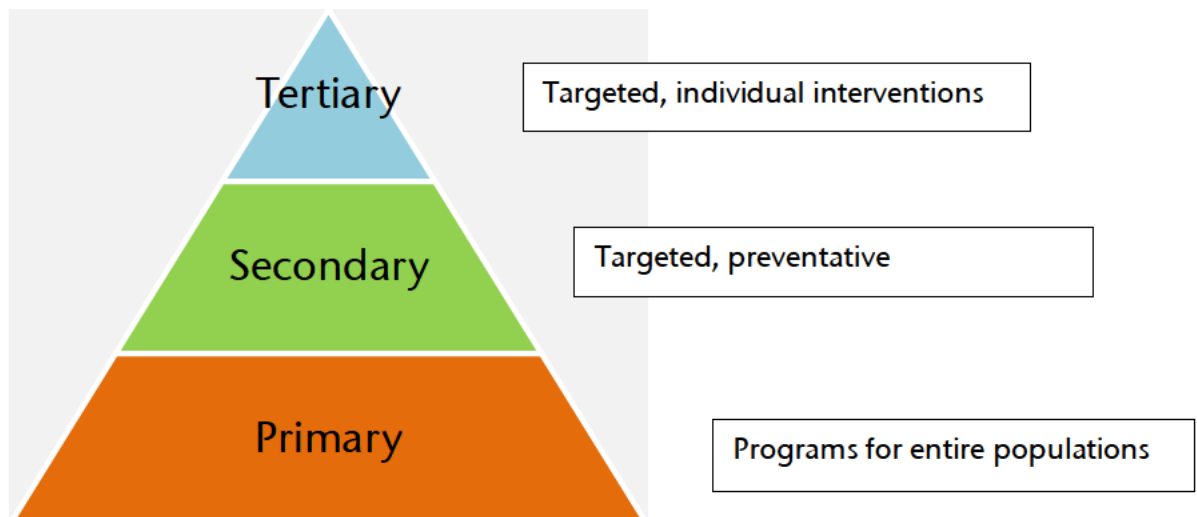
- A policy view of early childhood education and care (ECEC) that supports the funding and delivery of the evidence-based National Quality Framework consistently across all ECEC service types
- Review of the NDIS as it applies to young children and whether it is the best vehicle for delivering early childhood intervention and disability supports in line with best practice. This should include what policy and funding supports are needed at a state as well as federal level to ensure, for example, early childhood intervention for children are enabled to be delivered in children's regular setting settings in line with best practice
- Better integration of health services and disability supports for children, based on more widespread understanding that best practice for early childhood intervention should not be a medical model, but a social model
- Support for training and resources about mental health for young children, especially trauma informed practices with children who have experienced violence or other trauma
- Collaboration with state based child protection services, which can be family or adult focused rather than child focussed, and which are not sufficiently funded to coordinate the range of services needed for families with young children such as early childhood education and care, early childhood interventions, health, and mental health services, in addition to housing or other supports
- Use a combination of direct funding and the tax system to support service providers working with young children and families, noting that some children will be in families who are not in the income tax system, e.g. depending on their visa status and their ability to work
- The need for capital funding for place based providers in different sectors such as early childhood education and care, some types of early childhood intervention, community based health and mental health services
- A long view of the workforce issues impacting sectors, with support for tertiary institutions to improve and expand their teaching of early childhood development in relevant courses including early childhood education, allied health, medicine, nursing, social work, and mental health

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?

For children born or raised in more vulnerable and/or disadvantaged circumstances SDN recommends policies and programs be aligned with three levels of intensity, for example the Public Health Model used by the NSW Department of Communities and Justice.⁴

⁴ <https://www.facs.nsw.gov.au/providers/children-families/interagency-guidelines/prevention-and-early-intervention2/chapters/the-public-health-model-for-child-protection-and-wellbeing>

Figure 2



SDN recommends greater attention be paid to the programs at the primary level, including but not limited to early childhood education and care, so that investment is made in building the capacity and capability of mainstream workforces to meet the needs of, and to facilitate full inclusion.

SDN also recommends programs align with Systems Theory based on the principle that the component parts of a system can best be understood in the context of the relationships with each other and with other systems, rather than in isolation. This would apply to policies and programs within government; and to the design of policies and programs by recognising that a child does not live in isolation but within a dynamic system that includes the pivotal influence of their family and family circumstances.

Attention must also be paid to children who:

- fall through cracks. For example, children of families not in the tax system who do not benefit when the Tax System is used to improve affordability of services
- are disadvantaged and unable to access services due to the parents' visa status
- live where there are thin markets such as in rural and remote areas, when service provision is dependent on funding paid direct to the parent and not to the service

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

- Take a human-centred design thinking approach to the development of policies, by engaging with beneficiaries, community and providers
- Alignment of outcomes and policies between the states and federal government
- Genuine consultation with targeted communities in a culturally appropriate manner
- Data sharing between agencies and jurisdictions, and review the data needed and collected – for example ABS census data is generally reported for a wider age bracket than 0-5 years, which is not useful for early years policy making

- When applying data, acknowledge that geographic and demographic data may be at a high level and may need to be more granular, e.g. inner city suburbs where there is social housing and families with high incomes.

7. What principles should be included in the Strategy?

SDN believes the following principles should be included:

- That the first five years of a child’s life is a period of rapid brain development, and intensive early intervention at this stage is usually more effective than later in life
- Approaches should be evidence based, and apply known and existing best practice and quality frameworks
- Policies and funding need to focus on what is best for children’s learning and development during the first five years, and other outcomes (such as workforce participation) although important are secondary, because as a child ages and developmental opportunities are missed, there may be no way to recover that opportunity
- Approaches should be strengths-based, understand that that development happens in the context of the system of relationships that forms the child’s environment (bio-ecological systems theory), take a life-course perspective, and take into account that people have particular needs and challenges in a particular context and at a particular time, and that this is not who they are, but describes what they are experiencing
- There is no ‘one size fits all’ approach – place-based strategies are required to address intergenerational disadvantage and particular issues affecting regional and remote communities; while demographic- or cohort-based approaches are more appropriate for other issues ego post-natal depression
- Transitions are important times to offer targeted support for children and their families, e.g. new parent, starting early childhood education, transition to school, transition into or out of out of home care

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

SDN suggests research into the short and long term impacts of COVID restrictions on young children.

[REDACTED]