



Submission to the consultation to inform the Early Years Strategy

April 2023



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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

More information about The Salvation Army is at **Appendix A**.





Executive summary

The Salvation Army welcomes the Commonwealth Government's commitment to supporting children in the early years, and the opportunity to provide this submission to the Department of Social Services in relation to the *Early Years Strategy* (the Strategy).

For over 140 years The Salvation Army's services have walked alongside many children and families experiencing hardship and disadvantage. These experiences include, but are not limited to, poverty and financial hardship, family and domestic violence, homelessness, living with disability, and those of people from refugee and migrant backgrounds.

It is from their experiences, as well as those of our frontline staff, that we have approached this submission. We outline just a few of the challenges faced by children and families, the barriers preventing them from thriving in the early years, and solutions to even the playing field.

We believe that the Strategy should, first and foremost, be developed according to the experiences of children and families across Australia, addressing the structural elements that contribute to inequities in the early years and beyond. Many of our recommendations focus on the need to keep families and children at the centre of the Strategy by emphasising holistic and localised responses in the early years, particularly for families experiencing disadvantage.

This submission responds and has been structured according to the proposed structure of the Strategy. We recommend that:

- The **vision** of the Strategy should be that all children and families have equitable access to opportunities they need to thrive.
- The **outcomes** of the Strategy should include an early years system that is ready to meet the needs of all children and families, and all children and families having timely access to high quality early childhood education and care, and the resources and interventions they need to thrive. This must be supported by a well-resourced and culturally aware system.
- The **policy priorities** of the Strategy should include addressing service silos through co-location of services and enhanced information sharing processes, enhancing accessibility to early years support for cohorts of children and families experiencing disadvantage, and ensuring funding for early years services is structured and allocated in a way that facilitates the realisation of the Strategy's vision, outcomes and policy priorities.
- The Strategy's **guiding principles** should include a child- and family- centred and place-based approach to promote optimal and localised outcomes for children and families.

Many of the issues and recommendations contained below are not particularly new nor innovative. They include problems and solutions that the community sector has been raising and advocating for over many years. We raise them again here to emphasise their continued relevance and importance.

The Salvation Army has made **18** recommendations for the Department of Social Services to consider. A summary of these recommendations follows on the next page.





Summary of Recommendations

Recommendation 1

1.8 The Salvation Army recommends that the vision of the Commonwealth Government's Early Years Strategy be based on all children having access to opportunities that allow them to thrive and overcome inequalities early in life.

Recommendation 2

2.11 The Salvation Army recommends that the Commonwealth Government prioritise the following outcomes in the Early Years Strategy:

- *The early years system is inclusive of all families and their needs.*
- *All children have access to high quality early childhood education and care.*
- *All children have timely access to early intervention and community supports.*
- *The early years system is well-equipped to support children and families.*

Recommendation 3

3.4 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase service and community support access and uptake through co-located early years services.

Recommendation 4

3.7 The Salvation Army recommends the Commonwealth Government work with state and territory governments to develop an early years information sharing scheme.

Recommendation 5

3.13 The Salvation Army recommends that the Commonwealth Government remove the Activity Test for the Child Care Subsidy and extend the Additional Child Care Subsidy period.

Recommendation 6

3.14 The Salvation Army recommends that the Commonwealth Government immediately and meaningfully increase the rate of the Jobseeker Payment to ensure that recipients can live with dignity.

Recommendation 7


3.15 The Salvation Army recommends that the Commonwealth Government allow parents to stay on the Parenting Payment Single until their youngest child turns 16 and increase the payment to match the single Age Pension.

Recommendation 8

3.19 The Salvation Army recommends that the Commonwealth Government work alongside state and territory governments to increase availability and accessibility of affordable healthcare in the early years.

Recommendation 9





3.22 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to fund culturally appropriate support to assist families from CALD backgrounds to navigate Australia's early years systems. This could include broadening access to payments and subsidies, support to navigate health and education systems, and multilingual information materials.

Recommendation 10

3.23 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to enhance early years services' cultural competencies and understanding related to alternative parenting approaches.

Recommendation 11

3.28 The Salvation Army recommends the Commonwealth Government work with state and territory governments, and Aboriginal and Torres Strait Islander communities and community-controlled organisations to fund culturally appropriate supports for Aboriginal and Torres Strait Islander children and families in the early years.

Recommendation 12

3.34 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to invest in social housing specifically for victim-survivors of family and domestic violence.

Recommendation 13

3.35 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to ensure that funding for family violence service provision always includes a component for direct service provision and therapeutic support for children. This includes culturally appropriate family and domestic violence services for children.

Recommendation 14

3.39 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase parental awareness of infant mental health concerns, including funding options, referral pathways and service availability for children in the early years.

Recommendation 15

3.42 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to ensure that long-term policy implications on children are considered in the policy development process.

Recommendation 16


3.43 The Salvation Army recommends that the Commonwealth Government work with state, territory and local governments to consult, and where possible, co-design reforms to early years policy with early years services and local communities.

Recommendation 17

3.47 The Salvation Army recommends that the Commonwealth Government work with state and territory governments towards minimum four-year funding periods and more flexible criteria for funding use.

Recommendation 18





4.5 The Salvation Army recommends that the Strategy be child-centred and family-centred and take a place-based approach to ensure optimal outcomes for children and families. This must include prioritising the voices of children, families and their communities in policy development and implementation.

1 Vision

All children have access to opportunities which allow them to thrive

- 1.1 The Salvation Army's early years services work with some of Australia's most disadvantaged and marginalised children and their families. Many of the children that we encounter have additional needs or are experiencing some form of disadvantage. This impacts their ability to fully engage with the early years system and creates barriers to development and wellbeing.¹ The key to enhancing the wellbeing of children lies in addressing the drivers of inequity for children and their families.² We must work towards an early years system that is inclusive and provides all children with the opportunities they need to thrive well into adulthood.
- 1.2 It is widely acknowledged that a child's earliest experiences provide the foundation for their future.³ Research tells us that 90 per cent of brain growth occurs by age five, making the early years period a crucial one in determining future health, wellbeing, learning and development outcomes of Australian children.⁴
- 1.3 Recent research by the United Nations Children's Fund (UNICEF) and the Australian Research Alliance for Children and Youth (ARACY) found that whilst most of Australia's children are doing well across many wellbeing areas, there is much room for improvement.⁵ Areas for improvement include:
- decreasing rates of involvement with the child protection system;
 - addressing the disproportionate impacts felt by Aboriginal and Torres Strait Islander children;
 - decreasing high rates of child poverty;
 - addressing an increasingly inequitable education system; and
 - increasing consideration of children's participation and positive sense of identity and culture in research and policy.⁶

¹ Australian Research Alliance for Children and Youth (ARACY). (2014). *The Nest action agenda: Improving the wellbeing of Australia's children and youth while growing our GDP by over 7%*. Canberra: ARACY. <https://www.aracy.org.au/documents/item/182>.

² Noble, K., Rehill, P., Sollis, K., Dakin, P., & Harris, D. (2023). *The Wellbeing of Australia's Children: A story about data, a story about change*. https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eebd9876b6a8/Australian-Childrens-Wellbeing-Index-Report_2023_for%20print.pdf.

³ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf.

⁴ The Parenthood. (2021). *Making Australia the Best Place in the World to be a Parent*. https://d3n8a8pro7vnm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.

⁵ Noble, K., Rehill, P., Sollis, K., Dakin, P., & Harris, D. (2023). *The Wellbeing of Australia's Children: A story about data, a story about change*. https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/7157d4c1-214f-4539-8fd7-eebd9876b6a8/Australian-Childrens-Wellbeing-Index-Report_2023_for%20print.pdf.

⁶ Ibid.





- 1.4 In line with *The Nest* interrelated outcomes, The Salvation Army believes that to ‘thrive’ a child should feel loved and safe, have access to material basics, be healthy, have opportunities to learn and participate in their community, and have a positive sense of culture and identity.⁷ The return on investment in outcomes in the early years cannot be understated. The Centre for Policy Development reports that early intervention could save the nation up to \$15.2 billion annually, and that high-quality early education in the year prior to school could save up to \$4.1 billion in healthcare, \$1.1 billion in reduced crime costs, and \$1.7 billion in higher tax revenue.⁸
- 1.5 A child’s ability to thrive and experience the best life outcomes is directly impacted by family and community context.⁹ A lack of support to parents and caregivers as they transition into parenthood and navigate caring for young children has been linked with outcomes that result in lower lifetime earnings, poorer health and wellbeing outcomes for parents, reduced workforce participation (particularly for women), and lower rates of fertility, which undermine the long-term sustainability of government finances.¹⁰
- 1.6 The Salvation Army’s services highlight that the Australian early years system is complex and difficult to navigate. The current system inhibits families’ ability to support their children’s growth and development. For example, many of our services report an 18-month waitlist for paediatricians. This delays medical care, diagnoses and support available to children, and ultimately their developmental trajectory and outcomes.
- 1.7 Targeted investment in the early years system can ensure that maximised opportunities and high-quality services are available to support all children and families. This ensures optimised and equitable outcomes, giving all Australian children the best possible start in life.

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“Families are left with the responsibility to navigate convoluted pathways to access support. They have to fight for services when most professionals can’t even figure out the system.”

- A Salvation Army Communities for Children team member

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Recommendation 1

- 1.8 The Salvation Army recommends that the vision of the Commonwealth Government’s Early Years Strategy be based on all children having access to opportunities that allow them to thrive and overcome inequalities early in life.**

⁷ Australian Research Alliance for Children and Youth (ARACY). (2014). *The Nest action agenda: Improving the wellbeing of Australia’s children and youth while growing our GDP by over 7%*. Canberra: ARACY. <https://www.aracy.org.au/documents/item/182>.

⁸ Centre for Policy Development. (2021). *Starting Better Report*. <https://cpd.org.au/wp-content/uploads/2021/11/CPD-Starting-Better-Report.pdf>.

⁹ Australian Research Alliance for Children and Youth (ARACY). (2014). *The Nest action agenda: Improving the wellbeing of Australia’s children and youth while growing our GDP by over 7%*. Canberra: ARACY. <https://www.aracy.org.au/documents/item/182>.

¹⁰ The Parenthood. (2021). *Making Australia the Best Place in the World to be a Parent*. https://d3n8a8pro7vnm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.





2 Outcomes

- 2.1 The Salvation Army believes that the following mix of outcomes are critical in the development of the Strategy. These issues are further expanded in Chapter 3: 'Policy Priorities'.

The early years system is inclusive of all families and their needs

- 2.2 Some Australian children get a significantly better start in life in comparison to others.¹¹ Children and families who are facing disadvantage or additional barriers to engaging with the early years system arguably have the most to gain from access to comprehensive support.
- 2.3 An inclusive early years system must prioritise simplicity to ensure these families can access support and early intervention. This would mitigate inequities to ensure all children have their immediate needs met, and ultimately improve outcomes and developmental trajectories for children across their lifespan.¹² Investment in inclusive and accessible early intervention has a high return on investment, yielding savings on remedial education, physical and mental healthcare, welfare reliance, and substance misuse treatment into the future.¹³

All children have access to high quality early childhood education and care

- 2.4 Evidence shows that high quality early childhood education and care (ECEC) has positive impacts on child development as children learn to socialise, and manage their behaviour and emotions.¹⁴ It can act as a protective factor to reduce the impacts of developmental risk factors and disadvantage in the early years, ensuring equitable opportunities for children to thrive into adulthood.¹⁵ ECEC also provides significant benefits to parents, supporting workforce participation and reducing stress.¹⁶
- 2.5 Disadvantaged areas in Australia are the least likely to have high-quality ECEC, despite children and families experiencing disadvantage being the most likely to benefit from these services.¹⁷ Our experience is that access issues stem from lack of appropriate services, high costs and staffing shortages.

¹¹ The Australian Early Development Census. (2022). *Australian Early Development Census National Report 2021: Early Childhood Development in Australia*. <https://www.aedc.gov.au/Websilk/Handlers/ResourceDocument.ashx?id=75ac2964-db9a-6d2b-9fadff0000a141dd>.

¹² Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf

¹³ Ibid.

¹⁴ The Parenthood. (2021). *Making Australia the Best Place in the World to be a Parent*. https://d3n8a8pro7vhm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.

¹⁵ The Front Project. (2022). *Supporting all children to thrive: The importance of equity in early childhood education*. <https://www.thefrontproject.org.au/policy-and-research/research-reports/supporting-all-children-to-thrive>.

¹⁶ Centre for Policy Development. (2021). *Starting Better Report*. <https://cpd.org.au/wp-content/uploads/2021/11/CPD-Starting-Better-Report.pdf>.

¹⁷ Ibid.



All children have timely access to early intervention and community supports

- 2.6 Timely access to quality early intervention services and community supports that meet a child's physical, mental, and emotional health needs is critical to ensure the best possible life outcomes.¹⁸ Early interventions and supports support a reduction in lifetime inequalities.¹⁹ This is particularly important for children with chronic medical conditions, physical or intellectual disabilities, emerging mental illness, or an experience of trauma.
- 2.7 Access issues, including location, cost, poor quality or lengthy waiting lists, can result in a child's developmental vulnerabilities being left unaddressed or inadequately supported for significant periods. This risks worsening and negatively impacting long-term health, wellbeing and educational outcomes. Prioritising access to timely and appropriate interventions and supports would allow all children the resources they need to thrive.

The early years system is well equipped to support children and families

- 2.8 A high-quality and well-resourced early years system is one that acknowledges the differing needs of children and their families and provides wraparound supports in a timely manner to ensure the best outcomes for children into the future. This includes the full range of services and supports that children and families need in the early years.
- 2.9 A joined-up system ensures that children and families can navigate and access the services they need during the early years. It facilitates smooth transitions and access to services which ultimately mitigate inequities and improve wellbeing outcomes to allow children and families to reach their full potential in the early years and beyond.
- 2.10 It is crucial that Australian governments allocate funding and develop policy in a way that acknowledges, equips, and empowers early years services to provide high-quality support and to be responsive to the needs of children and families within their communities.

Recommendation 2

2.11 The Salvation Army recommends that the Commonwealth Government prioritise the following outcomes in the Early Years Strategy:

- **The early years system is inclusive of all families and their needs.**
- **All children have access to high quality early childhood education and care.**
- **All children have timely access to early intervention and community supports.**
- **The early years system is well-equipped to support children and families.**

¹⁸ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf.

¹⁹ Ibid.



3 Policy Priorities

Breaking down silos

- 3.1 The Salvation Army welcomes the Commonwealth Government's commitment to addressing silos. Our experience is that this could be addressed through service and support co-location and information sharing.

Co-location of services and community supports

- 3.2 Families experiencing disadvantage are more likely to access services when they are co-located.²⁰ This could be achieved through providing integrated and wraparound support at a dedicated early years site at the local primary school or through funding a standalone "one-stop shop". Services could include ECEC services, preschools, healthcare and family support.
- 3.3 We have seen great outcomes through our Communities for Children FamilyZone Hub in Ingle Farm. The FamilyZone offers integrated support facilitated by a number of agencies in a co-located space, acting as a single-entry point for families who are experiencing disadvantage. The FamilyZone has seen improvement in children's social and emotional development, family relationships, and parenting skills and knowledge across the local community.²¹ We have also seen great success and uptake of family support in our Balga service.

The Salvation Army - Balga Corps

The Salvation Army corps (church) in Balga WA offers a suite of early years services including:

- An early learning centre and long day care service.
- Partnership with Child Adolescent Health Services, with two full-time child health nurses on site, completing health and hearing checks for children up to two years old.
- Education classes on topics including postnatal depression, early parenting, pregnancy, breastfeeding, fitness classes, cultural classes, and first aid.
- A community garden and garden-based playgroup.
- Faith-based programs including Just Brass and Mainly Music.

As a "one-stop shop", Balga Corps acknowledges that parents and families need a support network around them to improve long-term outcomes for children.

²⁰ Centre for Policy Development. (2021). *Starting Better Report*. <https://cpd.org.au/wp-content/uploads/2021/11/CPD-Starting-Better-Report.pdf>.

²¹ Nova Smart Solutions. (2019). *The Family Centre Approach to Early Intervention and Prevention*. https://www.salisburyc4c.org.au/_files/ugd/8930ed_cd564efd88c24daf8bfa83287d348277.pdf.





Recommendation 3

- 3.4 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase service and community support access and uptake through co-located early years services.**

Improved communication and information sharing

- 3.5 The Salvation Army believes that the development of an information sharing scheme in the early years, could assist to strengthen partnerships and collaboration between health, education, and early years services and lead to better outcomes for children. Improved communication and information sharing processes would assist in establishing holistic, wrap-around service provision to, and lead to better outcomes for, children and their families.
- 3.6 Participating agencies could include health, correctional services, education, police and courts and tribunals, and other joined up entities. Shared information could include learning and development assessments, relevant healthcare data, any risk or safety concerns, or interventions between relevant bodies. This must be supported by robust privacy and consent processes to ensure families know what information will be shared and how it will be used. Gaining consent from families regarding the sharing of information related to their children should be prioritised unless there is serious or imminent risk to the children.

Recommendation 4

- 3.7 The Salvation Army recommends the Commonwealth Government work with state and territory governments to develop an early years information sharing scheme.**

Enhancing accessibility for families facing barriers to engagement

3.8 Children exposed to adversities and stressors during the early years – either directly or within the family context – are at greater risk of experiencing health, behavioural and social difficulties during childhood, and poorer outcomes later in life.²² Children experiencing disadvantage are also overrepresented among the children who are developmentally vulnerable by the time they start school.²³ The Salvation Army believes the Strategy should include specific measures to address systemic disparity and accessibility for the following cohorts of children.

Families experiencing poverty and economic disadvantage

- 3.9 There is a strong correlation between poverty in the first thousand days of a child's life and adverse health and wellbeing outcomes in later life, including poor educational and employment outcomes.²⁴ The Australian Early Development Census (AEDC) found children living in socio-economically disadvantaged areas had rates of developmental vulnerability up to 4.4 times greater than children from the least disadvantaged areas.²⁵
- 3.10 The Salvation Army's Red Shield Appeal report found that due to inadequate income, many family households could not afford social, leisure and educational opportunities for their children, or necessary medical and health care when out-of-pocket payment was required. Those respondents seeking work experienced vocational barriers and struggled to find suitable employment in the past year. Many were left reliant on government income support, supplemented by assistance from charities and community organisations to survive.²⁶
- 3.11 For families experiencing poverty and economic disadvantage, the costs associated with childcare and other early years support can act as significant barriers to accessing services. This is only becoming more of a concern with rising costs of living.

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“I have had people come in and have to choose between food and medication, rent or childcare. People who are working and have never been in financial hardship previously.”

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- A Salvation Army Community Engagement Worker

²² Oleson, S., Macdonald, E., Raphael, B., and Butterworth, P. (2010). Children's exposure to parental and familial adversities: Findings from a population survey of Australians. *Family matters*, 84(1). https://aifs.gov.au/sites/default/files/fm84e_0.pdf.

²³ The Australian Early Development Census. (2022). *Australian Early Development Census National Report 2021: Early Childhood Development in Australia*. <https://www.aedc.gov.au/Websilk/Handlers/ResourceDocument.ashx?id=75ac2964-db9a-6d2b-9fadff0000a141dd>.

²⁴ Royal Children's Hospital Melbourne. (2019). *Strong Foundations: Getting it Right in the First 1000 Days A Case for Investment*. 28 <https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/The-First-Thousand-Days-A-Case-for-Investment.pdf>.

²⁵ The Australian Early Development Census. (2022). *Australian Early Development Census National Report 2021: Early Childhood Development in Australia*. <https://www.aedc.gov.au/Websilk/Handlers/ResourceDocument.ashx?id=75ac2964-db9a-6d2b-9fadff0000a141dd>.

²⁶ The Salvation Army. (2022). *Red Shield Appeal Report 2022: Between a Rock and Hard a Place*. 4 https://www.salvationarmy.org.au/subscribe/sites/auesalvos/files/RSA2022/RSA22_Research_Report_FINAL.pdf.



3.12 We welcome the Productivity Commission's review of ECEC, particularly regarding cost and availability. Families experiencing poverty and economic disadvantage can also be supported through other social support payments and subsidies. We draw attention to the following:

- **Paid Parental Leave:** We welcome the Commonwealth Government's commitment to enhancing the accessibility and flexibility of the Paid Parental Leave scheme for families following the birth or adoption of a child. The Salvation Army's submission to the Paid Parental Leave Amendment (Improvements for Families and Gender Equality) Bill 2022 includes further recommendations, including a single-family application form and extension of a shared entitlement of up to one year of full wage replacement.²⁷
- **Child Care Subsidy:** Our frontline services report that the requirements of the Child Care Subsidy activity test act as a strong inhibitor for families who are facing poverty or other hardships, and whose children are most likely to benefit from high quality ECEC.²⁸ Fulfilling the work or study requirements can be difficult for families who are struggling to even meet their immediate needs such as housing or food. In line with the recommendation of the Interim Economic Inclusion Advisory Committee and Thrive by Five, we urge the Government to abolish the activity test to ensure the subsidy is accessible for all families.²⁹ Abolishing the activity test would ensure all children benefit from ECEC regardless of parent activity.³⁰ Impact Economics and Policy report that this could benefit approximately 126,000 Australian children from low-income families who are currently unable to access ECEC, and ultimately improve their development and life outcomes.³¹
- **Additional Child Care Subsidy:** According to our services, the Additional Child Care Subsidy is becoming increasingly difficult for families to access, and the 13 weeks of additional subsidised care is inadequate for families to overcome financial crises or engage meaningfully with services to remediate their circumstances. Ultimately, families are required to apply repeatedly for extensions. The process of gathering supporting evidence adds an administrative burden and stress to both the supporting services, and families who are already facing hardship and other stressors.
- **Jobseeker Payment.** The current rate of the Jobseeker Payment is such that children and families are unable to live with dignity. There is a strong correlation between this type of financial hardship in the first thousand days of a child's life and adverse health and wellbeing outcomes in later life including poor educational and employment outcomes.³²

²⁷ The Salvation Army Australia. *Paid Parental Leave Amendment (Improvements for Families and Gender Equality) Bill 2022, January 2023*. https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/PaidParentalLeave2022/Submissions.

²⁸ Dundas, R., and Depers, L. *Children at the Centre – Insights for development of a national Early Years Strategy*. ARACY 2023.

²⁹ Interim Economic Inclusion Advisory Committee. *2023-24 Report to the Australian Government*.

<https://ministers.treasury.gov.au/sites/ministers.treasury.gov.au/files/2023-04/eiac-report.pdf>.

Thrive by Five. (2022). *Removing Activity Test for Child Care Subsidy Critical to Accessible Early Learning*.

<https://thrivebyfive.org.au/news/removing-activity-test-for-child-care-subsidy-critical-to-accessible-early-learning/>.

³⁰ Impact Economics and Policy. (2022). *Child Care Subsidy Activity Test: Undermining Child Development and Parental Participation*.

https://static1.squarespace.com/static/61e32e62c8c8337e6fd7a1e6/t/630de5c741a8de08ad48d593/1661855185396/Undermining+Child+Development+And+Parental+Participation+Report_FINAL.pdf.

³¹ Ibid.

³² Royal Children's Hospital Melbourne. (2019). *Strong Foundations: Getting it Right in the First 1000 Days A Case for Investment*. 28 <https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/The-First-Thousand-Days-A-Case-for-Investment.pdf>.



- **Parenting Payment Single (PPS).** The Salvation Army recommends allowing single parents to stay on the PPS until their youngest child turns 16 and increasing those payments to match the single Age Pension. The scarcity of family-friendly employment and childcare means that single parent families are forced to live on the much lower Jobseeker Payment through no fault of their own. Increasing the age to 16 would also benefit single parent victim-survivors of family and domestic violence (FDV), half of whom are reliant on government payments as their main source of income.³³ The Salvation Army's FDV services work with many victim-survivors who have no income, either due to caring responsibilities or coercion by the perpetrator to quit their job. This cohort often leave a violent relationship with no income and very little savings and become reliant on government payments.

Recommendation 5

- 3.13 The Salvation Army recommends that the Commonwealth Government remove the Activity Test for the Child Care Subsidy and extend the Additional Child Care Subsidy period.**

Recommendation 6

- 3.14 The Salvation Army recommends that the Commonwealth Government immediately and meaningfully increase the rate of the Jobseeker Payment to ensure that recipients can live with dignity.**

Recommendation 7

- 3.15 The Salvation Army recommends that the Commonwealth Government allow parents to stay on the Parenting Payment Single until their youngest child turns 16 and increase the payment to match the single Age Pension.**

³³ Summers, A. (2022). *The Choice: Violence or Poverty*. https://assets.website-files.com/62b998c0c9af9f65bba26051/63228540ce74a60866ee4e98_TheChoice-violence-or-poverty-web.pdf



Families impacted by disability, additional or special needs

- 3.16 For children with disability or additional needs, it is widely acknowledged that the earlier the intervention, the greater the trajectory of their development into the future.³⁴ Our experience is that children and families impacted by disability or developmental delay face significant barriers to accessing appropriate supports in the early years. The onus is placed on parents and caregivers to navigate complex systems such as healthcare, early intervention supports, and disability supports to better understand and meet their child's developmental needs. This is further exacerbated by long waitlists – up to 18 months in certain areas, or a complete lack of appropriate local services.
- 3.17 The Salvation Army's ECEC and early years services have reported that the evidentiary burden, long waitlists, and shortage of affordable support mean that families are simply unable to access early intervention in a timely manner. This negatively impacts children's immediate and long-term developmental needs and outcomes.
- 3.18 We have also witnessed examples of children receiving NDIS funding for supports that have extensive waitlists or are simply not available in their local area. This results in unused funding, and loss of support budget when the plan is reviewed.

Recommendation 8

- 3.19 The Salvation Army recommends that the Commonwealth Government work alongside state and territory governments to increase availability and accessibility of affordable healthcare in the early years.**

³⁴ National Disability Insurance Scheme. (2022). *The early childhood approach for children younger than 7*. <https://www.ndis.gov.au/understanding/families-and-carers/early-childhood-approach-children-younger-7>.

Families who are culturally and linguistically diverse

- 3.20 People from CALD backgrounds make up approximately 80 per cent of the people we support at our Balga Corps early years' service in Western Australia. These families are often navigating complex housing and employment systems with English as an additional language and minimal culturally appropriate support. Families on certain temporary visas are further restricted from accessing many social support payments and subsidies. This leaves little headspace to ensure children are meeting developmental milestones.
- 3.21 Our services have also identified a significant gap in service providers' understanding of different cultures' approaches and beliefs related to caring for children, parenting, health and wellbeing. We urge all governments to act on the need for greater cultural education across the early years' service system to ensure culturally appropriate service provision.

Recommendation 9

- 3.22 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to fund culturally appropriate support to assist families from CALD backgrounds to navigate Australia's early years systems. This could include broadening access to payments and subsidies, support to navigate health and education systems, and multilingual information materials.³⁵**

Recommendation 10

- 3.23 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to enhance early years services' cultural competencies and understanding related to alternative parenting approaches.**

³⁵ Dundas, R., and Depers, L. *Children at the Centre – Insights for development of a national Early Years Strategy*. ARACY 2023.

Aboriginal and Torres Strait Islander families

- 3.24 Aboriginal and Torres Strait Islander children continue to experience inequity in life outcomes. This includes being twice as likely as other children to be developmentally vulnerable by the time they start school, seven times more likely to live in out of home care and more likely to be living below the national poverty line.³⁶
- 3.25 Significant work is required to better support Aboriginal and Torres Strait Islander communities to ensure children thrive.³⁷ National Closing the Gap targets urge the need for action in the early years, specifically to increase the proportion of Aboriginal and Torres Strait Islander enrolled in early childhood education and the number of children who are assessed as developmentally on track according to the AEDC domains.³⁸
- 3.26 The Salvation Army's services report a lack of culturally appropriate services, information and supports for service providers and for Aboriginal and Torres Strait Islander families in the early years. Aboriginal and Torres Strait Islander communities and community-controlled organisations know how to best support the needs and development of Aboriginal and Torres Strait Islander children and should be enabled and placed to do so.
- 3.27 Early years services that promote Aboriginal and Torres Strait Islander culture and perspectives support Aboriginal and Torres Strait Islander children to form a sense of belonging and identity.³⁹ Access and engagement to inclusive and culturally safe support is crucial for Aboriginal and Torres Strait Islander children to thrive.⁴⁰

Recommendation 11

- 3.28 The Salvation Army recommends the Commonwealth Government work with state and territory governments, and Aboriginal and Torres Strait Islander communities and community-controlled organisations to fund culturally appropriate supports for Aboriginal and Torres Strait Islander children and families in the early years.**

³⁶ SNAICC. (Undated.) *Early Childhood*. <https://www.snaicc.org.au/policy-and-research/early-childhood/>.

Noble, K., Rehill, P., Sollis, K., Dakin, P., & Harris, D. (2023). *The Wellbeing of Australia's Children: A story about data, a story about change*. 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.

³⁷ The Australian Early Development Census. (2022). Australian Early Development Census National Report 2021: Early Childhood Development in Australia. 9 <https://www.aedc.gov.au/Websilk/Handlers/ResourceDocument.ashx?id=75ac2964-db9a-6d2b-9fadff0000a141dd>.

³⁸ Ibid.

³⁹ Victorian Aboriginal Education Association Incorporated. (2020). *Aboriginal Early Childhood Cultural Protocols*. https://www.vaeai.org.au/wp-content/uploads/delightful-downloads/2020/06/2020Cultural_Protocols_VAEAI-1.pdf.

⁴⁰ *National Aboriginal and Torres Strait Islander Early Childhood Strategy*. <https://www.niaa.gov.au/sites/default/files/publications/niaa-early-years-strategy-5.pdf>.



Families experiencing family and domestic violence

3.29 Experiencing family and domestic violence has been linked to lifelong harms for children and those around them, including psychological and behavioural impacts, health and socioeconomic impacts, and to intergenerational violence and re-victimisation.⁴¹

3.30 In recent research conducted by The Salvation Army, we found that:

- Respondents affected by family violence struggled financially, were more likely unable to afford basic living expenses, and were frequently unable to afford items for their children.
- One in four respondents (24 per cent) were unable to afford three meals a day, or prescribed medicine for their children, and 33 per cent could not afford a yearly dental check-up for their children.
- Approximately seven in 10 respondents impacted by family violence reported that their children struggled in the past year with challenges such as social isolation and mental ill-health.⁴²

3.31 The Salvation Army's family and domestic violence services highlight a lack of coordination, communication or collaboration between service systems for those experiencing family and domestic violence. This includes, but is not limited to, family violence services, policing, housing, child protection and the legal and justice system. This results in a lack of support offered to families experiencing violence until the non-offending parent makes the decision to leave the violence, after which wraparound services are provided. For example, our services highlight a lack of coordination between the Family Court and state courts, which can result in families who have Family Court-ordered contact arrangements, to be forced to continue parenting arrangements that put mothers and children at risk.

3.32 Children are often silent victims of family violence.⁴³ For Aboriginal and Torres Strait Islander children there is a double conundrum. Firstly, the family and domestic violence sector is not equipped to respond to the needs of children as victim-survivors in their own right. When there are child specific resources, they are often not culturally appropriate for Aboriginal and Torres Strait Islander children. Secondly, there are few culturally appropriate family and domestic violence services available to Aboriginal and Torres Strait Islander people, and those that do exist focus on adults and not on the specific needs of children.⁴⁴ The Salvation Army acknowledges the importance of listening to the voices of Aboriginal and Torres Strait Islander children. This must be supported with an increase in funding to services for children.

⁴¹ Richards, K. (2011). Children's exposure to domestic violence in Australia. *Trends & issues in crime and criminal justice*. No. 419. Canberra: Australian Institute of Criminology. <https://www.aic.gov.au/publications/tandi/tandi419>.

⁴² The Salvation Army. (2022). Red Shield Appeal Report 2022: Between a Rock and Hard a Place. https://www.salvationarmy.org.au/subscribe/sites/auosalvos/files/RSA2022/RSA22_Research_Report_FINAL.pdf.

⁴³ Ibid.

⁴⁴ Australian National Research Organisation for Women's Safety. (2022). New Ways for our Families: Designing an Aboriginal and Torres Strait Islander cultural practice framework and system responses to address the impacts of domestic and family violence on children and young people. https://anrowsdev.wpenginepowered.com/wp-content/uploads/2022/04/Morgan-et-al-RR1_NewWaysOurFamilies.pdf.



- 3.33 Therapeutic programs that support children and young people to overcome the immediate and long-term psychological, emotional, and physical impact of family violence and other associated issues also reduces the risk of intergenerational transfer of abusive behaviours and violence supporting attitudes.⁴⁵

Recommendation 12

- 3.34 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to invest in social housing specifically for victim-survivors of family and domestic violence.**

Recommendation 13

- 3.35 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to ensure that funding for family violence service provision always includes a component for direct service provision and therapeutic support for children. This includes culturally appropriate family and domestic violence services for children.**

Children experiencing mental ill-health

- 3.36 The Salvation Army's services have noticed an increase in children accessing our services who have emerging mental health concerns in the early years. For these families, early intervention referral pathways and services are difficult to identify prior to cases being classified as acute upon presentation.
- 3.37 Infant mental health concerns present as behavioural and emotional issues, and often go unrecognised by families and carers.⁴⁶ When these concerns go unrecognised or unsupported, children are likely to continue to struggle throughout their childhood. Most adult diagnoses of mental health disorders can be traced to poor mental health during infancy and early childhood.⁴⁷
- 3.38 Our services report a gap in mental health and trauma care in the early years, particularly regarding service understanding and availability. This prevents children accessing


⁴⁵ Cameron, P. (2016). Expanding early interventions in family violence in Victoria. Melbourne, Vic: Domestic Violence Victoria.

⁴⁶ Alla, K., & Hinkley, T. (2021). *What is infant mental health, why is it important, and how can it be supported?*

<https://d2p3kdr0nr4o3z.cloudfront.net/content/uploads/2021/08/12161109/What-is-infant-mental-health-PracticePaper.pdf>.

⁴⁷ Ibid.





trauma-informed healthcare and risks funnelling them into diagnoses of ADHD and autism, which can be detrimental for the children and their families.

Recommendation 14

- 3.39 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to increase parental awareness of infant mental health concerns, including funding options, referral pathways and service availability for children in the early years.**

Addressing cross-sector and intergenerational policy implications

- 3.40 It is vital that policy makers consider every member of society impacted by social policy decisions, regardless of age. Children and their families are impacted by decisions made across many policy areas, including family and domestic violence, justice, Aboriginal and Torres Strait Islander Affairs, housing, health, and education.
- 3.41 Good social policy decisions have the potential to address the impact of adverse childhood experiences, breaking the cycle of inequality, systemic violence, and oppression. This requires policy makers to genuinely consult, and where possible, co-design policy, with early years services and local communities to ensure that outcomes for children and families are kept at the forefront of decision-making.

Recommendation 15

- 3.42 The Salvation Army recommends that the Commonwealth Government work with state and territory governments to ensure that long-term policy implications on children are considered in the policy development process.**

Recommendation 16

- 3.43 The Salvation Army recommends that the Commonwealth Government work with state, territory and local governments to consult, and where possible, co-design reforms to early years policy with early years services and local communities.**



Funding that facilitates Strategy implementation

- 3.44 The Salvation Army's early years services report that funding can be restrictive and difficult to access for service providers. One-year funding contracts with rigid eligibility criteria inhibit services' ability to implement support services and early years initiatives in local communities.
- 3.45 The Salvation Army welcomed the five-year grant extensions given to certain Families and Children Activity providers in 2021. Longer-term funding certainty and more flexible funding criteria allows services to better plan, develop and implement localised initiatives to support children and families. It acknowledges and empowers early years services as experts within their local communities.
- 3.46 Funding processes are also a good mechanism to promote localised and collaborative approaches between early years services to further contribute to the breaking down of system silos.

Recommendation 17

- 3.47 The Salvation Army recommends that the Commonwealth Government work with state and territory governments towards minimum four-year funding periods and more flexible criteria for funding use.**

4 Principles and Evidence-base

- 4.1 A **child-centred** Strategy would acknowledge children as individuals with unique needs, ensure children are given the opportunity to participate in decisions which impact their lives, and acknowledge that children need to be provided with age-appropriate opportunities to learn and develop.⁴⁸ It must also prioritise children's safety. A child-centred approach acknowledges that children exist within and are best supported by their families.⁴⁹
- 4.2 A **family-centred** and **strengths-based** Strategy would work alongside families to enhance their ability to support and care for their children, while recognising the uniqueness of families and communities and building on families' strengths to achieve optimal outcomes.⁵⁰
- 4.3 A **localised, place-based approach** is critical in combatting service silos. A one-size-fits-all approach to policy development fails to acknowledge the diversity of local communities and is therefore unlikely to be effective in addressing systemic gaps and barriers. A place-based approach recognises that local communities know the outcomes they need, and how to best achieve them.⁵¹ It allows services to be responsive to local cultural, economic and social needs and to build on existing resources and strengths to develop local capabilities and deliver support in areas of need for greatest impact.⁵²
- 4.4 The Commonwealth Government must prioritise the voices of children, families and their communities, recognising them as experts in their own circumstances. We urge the Commonwealth Government to work with state and territory governments to implement collaborative and consultive practices to better respond to the needs of children and families.

Recommendation 18

- 4.5 **The Salvation Army recommends that the Strategy be child-centred and family-centred and take a place-based approach to ensure optimal outcomes for children and families. This must include prioritising the voices of children, families and their communities in policy development and implementation.**

⁴⁸ Children and Family Intensive Support. (2017). *Child-Centred, Family-Focused Support*. https://www.dss.gov.au/sites/default/files/documents/04_2022/cafis_1b_-_child_centred_family_focused_support.pdf.

⁴⁹ Ibid.

⁵⁰ Child Welfare Information Gateway. (Undated). *Family-Centered Practice*.

<https://www.childwelfare.gov/topics/famcentered/#:~:text=Family%2Dcentered%20practice%20is%20a,for%20and%20protect%20their%20children>.

⁵¹ Dundas, R., and Depers, L. *Children at the Centre – Insights for development of a national Early Years Strategy*. ARACY 2023.

⁵² Centre for Policy Development. (2021). *Starting Better: A Guarantee for Young Children and Families*. <https://cpd.org.au/wp-content/uploads/2021/11/CPD-Starting-Better-Report.pdf>

Moore, T.G, and Fry, R. (2011). *Place-based approaches to child and family services: A literature review*. Parkville, Victoria: Murdoch Childrens Research Institute and The Royal Children's Hospital Centre for Community Child Health.





5 Conclusion

- 5.1 The Salvation Army thanks the Department of Social Services for the opportunity to provide a written submission to inform the Strategy.
- 5.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

28th April 2023





Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services
- Children and family services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <

<https://www.salvationarmy.org.au/>>

