



Submission to the Productivity Commission Draft Report: A path to universal early childhood education and care [Information request 2.2]

Due: 14 February 2024

To: [Make a submission - Early Childhood Education and Care - Productivity Commission \(pc.gov.au\)](https://www.pc.gov.au)

Who are fka Children's Services?

fka Children's Services (fkaCS) advocates for children's cultural and linguistic rights and provides support to ECEC services in the provision of culturally rich environments that support a civil society. Our vision is for all children to have access to quality education and care services that recognise and value diversity.

fkaCS services deepen educators' capacity in the provision of culturally inclusive pedagogy and the ability to engage meaningfully with children and families for whom there is no shared language.

Our work is guided by the United Nations Convention on the Rights of the Child (UNCRC), Article 29, which states children's education should be directed to:

"The development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate, and for civilizations different from his or her own."

Response to information request

1. What factors most effectively promote the provision of culturally safe ECEC?

I. Shifting our thinking from an inclusion lens to a rights-based lens strengthens the impetus to provide culturally safe ECEC services.

Children are citizens with equal rights. The committee on the Rights of the Child articulates a definition of a child's rights approach as requiring a "paradigm shift away from approaches in which children are perceived and treated as "objects" in need of assistance rather than as rights holders entitled to non-negotiable rights." It states that "A child rights approach is one which furthers the realization of the rights of all children as set out in the Convention by developing the capacity of duty bearers to meet their obligations to respect, protect and fulfil rights"¹ As early years professionals, we are those 'Duty Bearers'.

The transition from an inclusion mindset, (where amendments need to be made to include a particular child), to a commitment to responding to the needs of all children, (as is their right), where linguistic and culture differences are seen as assets, underpins a culturally safe ECEC service. This shift in mindset can take time and often requires sustained professional support.

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II. Skills in Critical Reflection are required to identify personal values, bias, assumptions, and to explore culturally safe pedagogy, practice, and service policy.

Exceeding Theme 2: Practice is informed by critical reflection and requires educators to draw on diverse perspectives including those of children and families and to:

- *consider the social justice and equity implications of their practice.*
- *draw on various sources of knowledge and research evidence.*
- *consider the theoretical perspectives underpinning their actions and decision-making.ⁱⁱ*

III. A partnership approach with families, children, and community whereby ECEC professionals use multiple ways to communicate to negotiate and to overcome barriers to equity and engagement.

Culture is the fundamental building block of identity, and the development of a strong cultural identity is essential to children's healthy sense of who they are and where they belong.ⁱⁱⁱ

From birth, relationships are at the foundation of children's construction of their identity.^{iv}

NQS Exceeding Theme 3: Practice is shaped by meaningful engagement with families and/or the community, outlines critical practice that supports the development of genuine relationships:

- *Educators consider the children and families who are using the service as well as the particular characteristics, priorities and strengths of the local community when planning, delivering and reflecting on everyday practice. This results in practice that is tailored and responsive to the needs of the children, families and community.*
- *The service actively builds and maintains relationships with families and/or community partners, drawing on a range of communication strategies to support meaningful participation by all.*
- *Practice reflects, utilises and builds on the unique strengths and priorities of children and families at the service.*
- *Opportunities are regularly provided for family and/or community partners to meaningfully participate in service decisions and solve problems.*
- *Children learn and develop in the different contexts in which they live. They are more likely to be confident and involved learners when they see connections and experience continuity of learning between their different contexts.*
- *Drawing on the strengths of the service context fosters a culture of inclusiveness that enhances families' sense of belonging, making it more likely that they will sustain their engagement with the service. It also provides opportunities for children to develop a sense of identity, to actively participate and see themselves as agents of change in a tolerant and diverse world.*
- *The voices of children are valued and taken into account.*
- *Practice fosters a sense of inclusiveness and belonging for children, families, the service team, and the broader community.^v*

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IV. Culturally responsive pedagogy and practice must be embedded in all aspects of program delivery - from enrolment and orientation to assessment of/for learning, curriculum design, routines, and transitions to create cultural safe ECEC services.

Exceeding Theme 1: Embedded in service operations.

Practice is embedded in service operations when it occurs consistently, frequently and intentionally as part of an ongoing process that is understood and implemented by all educators across all aspects of the program.^{vi}

V. The acquisition and maintenance of first or home languages has a significant and continuing role in the construction of identity.^{vii}

For some, a shift from the goal of only teaching English to developing an understanding that the home language is an asset and a prerequisite for learning English is required. Alongside this, educators require professional support on the acquisition of English as an additional language.

2. Should there be changes to the National Quality Framework to promote cultural safety and capability, beyond the updated learning frameworks?

The National Quality Framework, introduced in 2012, aims to drive continuous quality improvement in children's education and care to provide quality learning and developmental outcomes for children. The National Quality Standard (NQS), now in its 12th year of implementation, was streamlined in 2018 to reduce overlap between standards and elements however there has been no change to how standards and elements impact on the assessment and rating process, i.e., no "raising of the bar" has occurred.

In 2013, 57% of services were rated Meeting NQS and in Q3, 2023, 90% of services were rated Meeting NQS. Over the same period, 24% of services were rated as Exceeding NQS.^{viii} While it is pleasing to see larger numbers of services Meeting NQS, the number of services operating at Exceeding NQS (the evidenced based drivers of quality that make the most difference) has remained relatively stagnant. *At the Exceeding level, educators demonstrate a deep understanding of pedagogy. This leads to exemplary practice such as embedding high quality practice throughout service provisions, underpinning all practice with critical reflection and creating contextually appropriate practice for the service community.^{ix}*

It could be construed from this data, that the Exceeding level is not motivating continuous improvement and that to progress improvement, the Meeting NQS elements need to be lifted to include critical elements within the Exceeding themes.

As highlighted earlier, it is at the Exceeding NQS rating where fkaCS believes culturally safe practice is aligned. It is the requirement for services to consistently apply (embed) culturally safe pedagogy and practice, to critical reflect and to develop meaningful partnerships with families, children and community that are the foundations to the provision of culturally safe ECEC services.

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The need to review the NQS is also necessitated by progression over the last decade in ECEC reform, new research to support evidence-based practice, pre-service training and community and family expectations.

3. Would a national cultural competency framework help improve the cultural safety of ECEC services for Aboriginal and Torres Strait Islander families and children?

Anecdotally, and somewhat supported by the NQS ratings data, in many instances, ECEC services aim to achieve Meeting NQS and do not strive beyond this rating. Rather than introduce another framework, which can create confusion, the most effective lever to ensure the provision of culturally safe ECEC services is to review the NQS and include these principles at the Meeting NQS rating. As is current practice, the services Quality Improvement Plan (QIP) would identify areas for improvement and strategies to address these.

If a Framework were to be introduced, we would strongly advise that a “cultural competency” framework does not sufficiently address the factors to ensure active engagement and participation and a strong sense of identity and wellbeing. A framework to improve cultural safety requires ECEC professionals to critically reflect on relational pedagogy, culturally safe pedagogy, practice, and service policy with a rights base rather than one of inclusion.

4. Does the structure of the Inclusion Support Program adequately prioritise and allow provision of culturally safe ECEC in mainstream services? If not, what are the issues and how could these be addressed?

The Review of the Inclusion Support Program stated that *Ideas around inclusion in the early childhood field have evolved steadily over the past few decades and are continuing to progress. This has occurred in a context of ongoing social change, which has been accompanied by similar changes across a range of social values and ideas. Definitions of inclusion traditionally focussed on readiness for assimilation into a general class (mainstreaming) (Petriwskyj, 2010) and integration in general classes with English language instruction and support for disability (Cook, Klein, & Tessier, 2008). These views have shifted to those incorporating curricular and pedagogic differentiation to support children’s senses of belonging (Gillies & Carrington, 2004).*

In contrast to this approach, the review noted that *Evidence collected from program data suggests that while the Program is designed to address a broad cohort of children based on their unique context, a substantial proportion of supports delivered through the Program are being used to enable the inclusion of children with disability, particularly autistic children.*^x

Whilst we are unaware of the number of services accessing Bicultural Support provided by Inclusion Support Agency (ISA) staff, we can conclude from report findings (such as the above statement, as well as the identification that ISA require additional capacity to provide bicultural support) that this support is minimal.

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As the Victorian provider of Language Support (referred to as Bilingual Support in ISP), we can however demonstrate the reduction in Bilingual Support provided in the current model, as compared to that delivered under the previous Australian Government Inclusion and Professional Support model:

- In the 2015 financial year, *fkaCS* provided language support to 516 ECEC services.
- In the period 2018 to 2023, *fkaCS* received 50 requests under the Innovative Support Solutions element of the ISP. Of the 50 requests:
 - 19 were for Bilingual Support
 - 9 were for specialist Bicultural consultancy support.
 - 22 were for a combination of Bilingual Support and Bicultural consultancy support.
- Of these requests, 19 were rejected by the Inclusion Development Fund with little clarity provided about why the services did not meet the criteria.

fkaCS recommends that whilst review and re-design of the ISP is occurring, the following measures to address barriers are implemented as soon as possible:

- i. The Innovative Support Solutions (ISS) guidelines are reviewed, and the Inclusion Development Fund Managers application of the guidelines is reviewed to ensure the intended implementation.
- ii. To address ISA staff lack of capacity and considering the ISS funding allocation is consistently underspent, Bicultural Support should be made available to be accessed via the ISS.

Would professional development in cultural capability (draft recommendation 3.6) be adequate to promote inclusion in ECEC services, or are there other components required? [Information request 2.2]

In *fkaCS* experience, providing professional support alone does not reach those that are most likely to need it. For many ECEC services to prioritise professional support regarding culturally responsive pedagogy, there needs to be an external requirement to do so e.g. Frameworks, regulation, professional standards etc, coupled with low/no cost support to participate.

In support of this statement, the review of the ISP found that *while there is a strong and stable quality improvement framework that supports the development of ECEC service capacity in a range of areas, that the provision of ECEC for children with diverse learning needs is not a consistent priority among services. Subsequently, in some ECEC settings, services can seek to create capacity to ‘placate’ the problem – rather than revising the way the service operates to genuinely support students.*^{xi}

Contemporary approaches to inclusion require ECEC services to focus on social cohesion and equitable participation and engagement for all children. The shift from a view of cultural inclusion as a “problem to be fixed” or an additional need to be addressed, whereby linguistic and cultural differences are seen as assets rather than barriers, requires more than professional development in cultural capability. This shift in attitude can take time and requires skilled facilitators to support critical reflection.

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fkaCS believes the pedagogical principles that support cultural inclusion apply more broadly and raise the quality of service provision across the service. To maximise the outcome for service to be culturally responsive (or socially cohesive), a two-pronged approach is required:

1. Changes to the NQS (as outlined earlier in our response) to compel ECEC services to focus their efforts and commit to change in practice via the QIP.
2. Multifaceted professional learning that in the first instance supports ECEC professionals to critically reflect and identify required strategies, followed by sustained evidence-based professional support to implement strategies in a meaningful way, including in the acquisition of English as an additional language.

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References and Sources

ⁱ UNICEF Child rights educational tool kit

ⁱⁱ [National Quality Standard | ACECQA](#)

ⁱⁱⁱ Educators' Guide to the Early Years Learning Framework p.23

^{iv} Victorian Early Years Learning and Development Framework 2016

^v [National Quality Standard | ACECQA](#)

^{vi} [National Quality Standard | ACECQA](#)

^{vii} Victorian Early Years Learning and Development Framework 2016

^{viii} NQF snapshot Q3, 2023 https://www.acecqa.gov.au/sites/default/files/2023-11/NQF%20Snapshot%20Q3%202023_0.pdf.

^{ix} [National Quality Standard | ACECQA](#)

^x Review of the Inclusion Support Program, Australian Government Department of Education- Deloitte Access Economics September 2023. <https://www.education.gov.au/download/17404/review-inclusion-support-program-final-report/35230/document/pdf>

^{xi} Review of the Inclusion Support Program, Australian Government Department of Education- Deloitte Access Economics September 2023. <https://www.education.gov.au/download/17404/review-inclusion-support-program-final-report/35230/document/pdf>

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