



SNAICC

National Voice for our Children

**Productivity Commission inquiry into Australia's
early childhood education and care system**

May 2023

Acknowledgement

SNAICC acknowledges the Traditional Owners of the lands on which we live and work and pays respects to their Elders past and present. SNAICC offices are located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally. SNAICC acknowledges Traditional Owners of all lands and waters across this continent and pays respects to Elders past present and emerging.

About SNAICC

Established in 1981, SNAICC – National Voice for our Children (SNAICC) is the national non-government peak body for Aboriginal and Torres Strait Islander children, representing a core membership of Aboriginal and Torres Strait Islander community-controlled organisations that provide child and family welfare and early childhood education and care services.

SNAICC works for the fulfilment of the rights of our children, in particular to ensure their safety, development and well-being by advocating for the rights of Aboriginal and Torres Strait Islander children and families and providing resources and training to support the capacity of communities and organisations working with our families.

The SNAICC vision is an Australian society in which the rights of Aboriginal and Torres Strait Islander children, young people and families are protected; our communities are empowered to determine their own futures; and our cultural identity is valued.

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Introduction

SNAICC welcomes this opportunity to provide a submission to the Productivity Commission's inquiry into Early Childhood Education and Care (ECEC). Our history of trusted relationships with the Aboriginal Community Controlled ECEC sector and broader sector stakeholders provides us with a deep understanding of the needs of Aboriginal and Torres Strait Islander families and early years services and enables us to provide evidence-based recommendations to this inquiry. In accordance with SNAICC's vision, our submission focuses on the terms of reference pertaining to supporting access to affordable and culturally safe quality ECEC for all First Nations children. Our hope is that this will enable the Commissioner to make recommendations to the Commonwealth that will support the outcomes and implement the priority reforms set in the National Agreement on Closing the Gap, thereby fostering equitable outcomes for all First Nations children across their lifetime.

Context

Early development outcomes for First Nations children

Aboriginal and Torres Strait Islander parents have robust cultural practices in family life and child rearing and know how to keep their children safe and to raise them to be active contributors to family and community life (Lohoar et al., 2014). However, many Aboriginal and Torres Strait Islander families have experienced pervasive violence, loss of land, displacement, punitive social and legal policies, and child removal practices, resulting in complex traumas and ongoing disadvantage (Reid et al., 2022).

Evidence shows that experiences in early childhood have the greatest impact on children's school readiness, educational engagement, and later health, social and well-being outcomes (Heckman & Mosso, 2014). However, according to the Australian Early Development Census findings, **42%** of Aboriginal and Torres Strait Islander children are developmentally vulnerable on one or more domains in their first year of school (AEDC, 2021). Notably, there is also a significant relationship between the level of socioeconomic disadvantage and geographic remoteness and rates of developmental vulnerability, with rates rising steadily with increasing remoteness and/or socioeconomic disadvantage (AEDC, 2021).

This is important because we know that Aboriginal and Torres Strait Islander children are more likely than their non-Indigenous counterparts to reside in areas with a greater concentration of persistent poverty and socioeconomic disadvantage (Arefadib & Moore, 2017), and are more likely to live in remote and very remote areas (17%) than all Australian children (2.4%) (Australian Institute of Health and Welfare, 2022). This 'double jeopardy' phenomenon means that because Aboriginal and Torres Strait Islander children are more likely to experience concurrent disadvantages, they are more likely to experience inferior developmental outcomes compared to their non-Indigenous counterparts who face fewer disadvantages.

As observed by the AEDC (2021), this disadvantage is further exacerbated by an alarming trend toward a widening gap in the **quality** of ECEC services between Australia's most advantaged and disadvantaged communities. Evidence shows that disadvantaged children benefit most from attending high quality ECE programs but **gain nothing and may even be harmed by attending low quality programs** (Moore & Arefadib, 2022). In practice, this means that Aboriginal and Torres Strait

Islander children who live in Australia’s most disadvantaged communities, and who stand to gain the most from quality ECEC, are less likely to have access to it.

The significant role of Aboriginal Community-Controlled ECEC

Recommendation 1: ACCO ECEC services are provided with adequate, long-term and flexible funding which will allow them to continue their important work.

Recommendation 2: Commit to priority and increased funding toward ACCOs that provide integrated, holistic and culturally appropriate early years and family support hubs, including Aboriginal Children and Family Centres (ACFCs) and Multifunctional Aboriginal Children’s Services (MACS)

Recommendation 3: That the Commonwealth expand the number and coverage of ACCO integrated early years hubs to address gaps in ACCO service availability.

Recommendation 4: That the Commonwealth provides sustainable and ongoing funding to SNAICC’s THRYVE initiative so that it can continue to support ACCO ECEC service growth and development. Funding should enable the THRYVE initiative to continue beyond its funding expiry date in December 2024, and expand to all other states and territories beyond its pilot operation in NSW, WA and VIC.

Closing the Gap Outcome 3: Aboriginal and Torres Strait Islander children are engaged in high quality, culturally appropriate early childhood education in their early years.

Closing the Gap Priority Reform 1: Formal Partnership and Shared Decision Making.

Closing the Gap Priority Reform 2: Building the Community-Controlled Sector.

National Aboriginal and Torres Strait Islander Early Childhood Strategy:

Goal 2: Aboriginal and Torres Strait Islander Children are Supported to Thrive in Their Early Years.

Goal 3: Aboriginal and Torres Strait Islander Children are Supported to Establish and Maintain Strong Connection to Culture, Country, and Language.

Aboriginal and Torres Strait Islander people’s right to **self-determination** is espoused by the *United Nation Declaration on the Rights of Indigenous Peoples*. Aboriginal Community Controlled Organisations (ACCO) are governed by, and entirely accountable to, the local Aboriginal and Torres Strait communities they serve (Mazel, 2016), making them a best practice example of the implementation of the right to self-determination. *The National Agreement on Closing the Gap* acknowledges the significance of meaningful partnerships with ACCOs and has committed Australian governments at all levels to build “a strong and sustainable Aboriginal and Torres Strait Islander

community-controlled sector delivering high quality services to meet the needs of Aboriginal and Torres Strait Islander people across the country.¹

ACCOs provide a broad range of education, family and early intervention services ranging from community-based playgroups to fully integrated early education and family support hubs which provide holistic wraparound services to families. These services have a significant impact on supporting children and families, preventing child protection intervention, support self-determination and work to ensure children are connected to their families, communities, cultures and Country. Holistic and culturally safe support services offer compassionate support, provide opportunities to develop parenting skills, reduce isolation and offer holistic healing approaches (Austin & Arabena, 2021). SNAICC members consistently highlight that ACCOs must be resourced to partner with a range of health, disability, and education services to provide effective support for Aboriginal and Torres Strait Islander children and families. In many cases, ACCOs delivering early childhood services provide a level of service integration and coordination in a broadly fragmented service system. One example of an ACCO led ECEC service is the Bubup Wilam Aboriginal Child and Family Centre.

***Bubup Wilam Aboriginal Child and Family Centre's** overarching aim is to foster a strong sense of identity and self-determination for Aboriginal children and families. They provide wrap-around services for families and children who may require additional supports due to the impact of trauma, social challenges and developmental delay. These include, family violence assistance and prevention, mental health support, child protection, advocacy and support. The service is also a registered NDIS provider of Early Childhood Interventions including speech and occupational therapy.*

At the heart of the service is its commitment to providing services that are culturally safe, trauma informed, and importantly, recognise the strengths of the children and families who attend the centre.

The foundation of local cultures upon which ACCOs are built, ensure that culture is at the centre of not only what is provided, but also how services are delivered, and community members are supported. This is significant in light of the robust body of evidence demonstrating that maintaining connection to Country and culture enhances wellbeing outcomes and is a strong protective factor for Aboriginal and Torres Strait Islander children and families (Dockery & Colquhoun, 2012; Dockery, 2020; Lohoar et al., 2014; Salmon et al., 2019). For example, research shows that where Aboriginal caregivers place a high value on instilling a strong sense of identification with their Aboriginality, including pride, respect and knowledge of their family networks and history, those children display better developmental and health outcomes (Dockery, 2017). Similarly, research shows that connection to culture improves the effectiveness of programs for Aboriginal and Torres Strait Islander parents and caregiver and improved early childhood development outcomes (McCalman et al., 2017). Recent economic analysis commissioned by the Victorian Aboriginal Community Controlled Health Organisation (2023) has also highlighted the significant social return on

¹ <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/3-objective-and-outcomes>

investment for ACCO led services that promote culture and kinship, returning \$8.29 in social value of for every dollar invested.

ACCO led early years services are trusted by families and the communities in which they operate, making them uniquely positioned to promote and strengthen children and caregivers' connection to culture beyond mainstream early learning services. ACCO led ECEC services' committed to hiring Aboriginal staff makes Aboriginal and Torres Strait Islander families feel connected to the service and know that it is a culturally safe setting for their children, and that their children are learning in the context of culture, family and community (SNAICC, 2019). In fact, not only is the local Aboriginal staffing of ACCO ECEC services essential to their capacity to provide culturally safe care, but it also acknowledges the value and validity of Aboriginal and Torres Strait Islander ways of knowing, doing and being, to all those involved in the service.

This is important because considerable evidence supports the notion that misrepresentation of First Nations knowledge frequently occurs when interpreted from a non-First Nations perspective, resulting in First Nations content that is at best superficial (Locke, 2022). The best way to overcome this is to ensure that the development of ECEC curricula and services are led by Aboriginal and Torres Strait Islander peoples. This will ensure that Aboriginal and Torres Strait Islander narratives are voiced by local community members who are recognised as the owners and experts of local knowledge. Moreover, the presence of Aboriginal and Torres Strait Islander educators and staff who share a cultural schema (i.e. a framework for making sense of their world) with children, fosters relatedness and supports the development of identify and cultural pride in Aboriginal children (Webb, 2022). To that end, Aboriginal and Torres Strait Islander educators and staff must be recognised and employed to promote the inclusion of their knowledge and perspectives in both Western-based and ACCO led ECEC (Locke, 2022). The combined impact of this is increased engagement in ECEC services by the entire family and ultimately Aboriginal and Torres Strait Islander children who are resilient and strong in their culture.

The report in 2014 found that the proportion of Aboriginal and Torres Strait Islander children attending the ACFCs who had all age-appropriate health checks increased from 81% to 95%, and the proportion who were fully immunised increased from 92% to 99%. It also found that on average 78% of children attending childcare through an ACFC had not previously accessed an early learning service, demonstrating the success of the centres to reach 'hard to reach' families.

SNAICC is working hard to support and build a robust network of culturally safe Aboriginal Community-Controlled early years services through the THRYVE Pilot. The Pilot is funded by the Commonwealth Government, philanthropy, and the New South Wales Government. The Commonwealth Government has not yet committed any long-term funding beyond the Pilot end date in December 2024. THRYVE has thus far played a critical role in supporting the development of the ACCO early years sector by providing support and leadership to individual services, as well as facilitating a collective representative voice to partner with government and inform policy change. THRYVE supports ACCO service development across a range of key areas that reflect priorities in the national Early Childhood Care and Development Sector Strengthening Plan under Closing the Gap, including: workforce development at the local, regional, and state-wide levels; policy and program development; meeting accreditation requirements; and service networking and sharing of best practice. For families and children, THRYVE aims to increase access to high quality and culturally strong early years support to enable the communities to thrive. SNAICC has commissioned Deloitte

Access Economics to evaluate THRYVE's impact over three years. Their recent interim report highlights the following:

- The co-design process implemented by THRYVE has supported the model in reflecting ACCO led early years sector's priorities.
- Most early years services indicated that THRYVE is able to respond to their needs and facilitate service-led decision-making.
- THRYVE has started to achieve its intended outcomes, with many early years services agreeing that it has been beneficial, particularly in areas such as funding, compliance, advocacy, and establishing networks.
- A greater impact is generated for early years services when they 'lean in' to THRYVE – the willingness of services to engage, in turn influencing the impact THRYVE can have, is dependent on the trust, relationships, and reputation that THRYVE is able to create.
- THRYVE has a particularly positive impact for less established services, since they tend to require support in a greater number of areas.
- THRYVE has performed well in meeting immediate objectives.

Given the evidence supporting its important work, SNAICC calls on the Commonwealth to provide sustainable and ongoing funding to SNAICC's THRYVE initiative so that it can continue to support ACCO ECEC service growth and development. Funding should enable the THRYVE initiative to continue beyond its funding expiry date in December 2024, and expand to all other states and territories beyond its pilot operation in NSW, WA and VIC.

Addressing workforce issues

Recommendation 5: Invest in local workforce attraction, retention and qualification, particularly in regional rural and remote areas by:

a) Taking steps to formally acknowledge and remunerate the significant cultural knowledge that Aboriginal and Torres Strait Islander staff bring to their roles.

b) Funding the co-design, with ECEC services, of education and training models which support ACCO ECECs to train local Aboriginal people on country.

c) Funding an increase in wages and conditions of early childhood educators, teachers, other staff and Elders to put them on par with their school education counterparts.

d) Expanding the number of Aboriginal community-controlled integrated early years services to address gaps in service availability. This can be done by developing a market strategy to support ACCO capacity and establish market transition approaches that increase the proportion of services delivered by ACCOs. This includes mapping the growth, spread and location of new ACCOs and building the capability of existing ACCOs corresponding to changes of need within each jurisdiction.

e) For the Australian Industry and Skills Committee as well as TAFEs and other RTOs to amend their qualification processes to be inclusive and acknowledge the knowledge, relational way of working and experience that many Aboriginal and Torres Strait Islander people bring to the industry.

Recommendation 6: For the Australian Government to fund SNAICC to codesign a National Aboriginal and Torres Strait Islander ECEC Workforce Plan.

Closing the Gap Outcome 3: Aboriginal and Torres Strait Islander children are engaged in high quality, culturally appropriate early childhood education in their early years.

Closing the Gap Outcome 8: Strong economic participation and development of Aboriginal and Torres Strait Islander people and communities.

Closing the Gap Priority Reform 1: Formal Partnership and Shared Decision Making.

Closing the Gap Priority Reform 2: Building the Community-Controlled Sector.

National Aboriginal and Torres Strait Islander Early Childhood Strategy:

Goal 2: Aboriginal and Torres Strait Islander Children are Supported to Thrive in Their Early Years.

Goal 3: Aboriginal and Torres Strait Islander Children are Supported to Establish and Maintain Strong Connection to Culture, Country, and Language.

Goal 5: Aboriginal and Torres Strait Islander Children, Families and Communities are Active Partners in Building a Better Service System.

The Australian Children's Education and Care Quality Authority (ACECQA) highlight that families are more likely to participate in ECEC services when local Aboriginal staff are employed. This is due to a number of factors, such as Aboriginal and Torres Strait Islander staff adopting a more informal and less structured approach to service delivery; having more empathy and a better understanding of protocols and issues in the local community; and assisting families to feel more at ease and assured that their culture will be respected, acknowledged, and valued (Kellard & Paddon, 2016).

The need for local Aboriginal and Torres Strait Islander staff is also significant to ensuring that Aboriginal and Torres Strait Islander children with a disability have equal access to quality and culturally appropriate ECEC. Cultural competence improves educators' capacity to provide individualised support to Aboriginal and Torres Strait Islander children with disabilities, as local staff are better equipped to identify and address the unique challenges faced by these children and their families, resulting in increased engagement and ultimately better long-term outcomes. Local staff have the advantage of understanding the importance of incorporating cultural elements into supports and therapies, which improve engagement, participation, and positive outcomes for Aboriginal and Torres Strait Islander children with a disability.

While recruitment of Aboriginal staff is key to early childhood outcomes for our children., retaining staff is just as critical. Continuous care prioritises the long-lasting, trusting relationships among caregiving professionals, children, and their families by ensuring consistency of carers or educators for infants and young children (McMullen, 2017). The benefits of having this continuity in early learning are far reaching for children, including decreased stress levels; more steady developmental progress; smoother transitions into pre-school; stronger relationships; fewer behavioural concerns; and more secure attachments that have positive lifelong impact for infants and young children (McMullen, 2017). Trust and long-term relationships are required to build both awareness and engagement for Aboriginal and Torres Strait Islander families. Disjointed service delivery, unstable staffing and a lack of continuity can significantly hamper our families' efforts in accessing ECEC services. This is significantly jeopardised in the current climate of high rates of turnover of staff in the ECEC sector.

Despite knowing how critical a strong and stable Aboriginal and Torres Strait Islander workforce is for our children and families, recruiting sufficient ECEC workers to meet the demand remains an ongoing challenge. The Aboriginal workforce experience poor pay, demanding conditions and low professional status just as their non-Indigenous colleagues do. However, recruiting and retaining Aboriginal and Torres Strait Islander staff has been highlighted as particularly difficult in some communities for a range of reasons, including:

- Attaining the qualifications necessary (due to factors such as high cost; time required; family commitments; lack of confidence; barriers to travel to attend TAFE; lack of cultural safety in training institutions).
- The transient nature of some communities (particularly in more remote parts of Australia).
- Stressful working conditions that are exacerbated by working with children and families with complex needs and often experiencing high levels of trauma.

SNAICC acknowledges that overall, the ECEC sector faces a critical shortage of qualified staff, a problem exacerbated by poor wages (Dean, 2022). However, this can be addressed when State and Federal Governments take steps to formally acknowledge the significant cultural knowledge that

Aboriginal and Torres Strait Islander staff bring to their roles. Formal recognition can pave the way to revise remuneration as well as ensure adequate support mechanisms are put in place to improve retention and reduce stress and burnout affecting Aboriginal and Torres Strait Islander staff (Deroy & Schütze, 2019). While acknowledging that low wages have a significant impact on staff retention, it must be noted that ACCO-run ECEC provides services to communities where socio-economic disadvantage is often widespread, and providers cannot pass on the cost of wage increases to families without severely limiting children's access to care.

The need to recruit, train and retain staff from local Aboriginal and Torres Strait Islander communities is even more pressing in rural and remote areas. This is largely due to inadequate infrastructure to support skilled workers to move to the regions and childcare not being profitable to attract new operators to the sector (Federation University, 2021). According to a study undertaken by researchers at Federation University Australia (2021), gaps in regulatory supports means that no singular entity is responsible for the provision of childcare where market failures occurred. This contrasts with government-funded kindergarten services which have to be provided. The researchers note that the issue must be reframed from a problem for individuals to a problem for regional economic development and equity in order to be resolved.

There is an urgent need to commit to a national strategy on Aboriginal and Torres Strait Islander workforce development, including the development of targeted support for training. Results from SNAICC's recent [National Aboriginal and Torres Strait Islander Early Childhood Strategy](#) consultation clearly highlighted the need for governments to direct more funding towards expanding and strengthening the Aboriginal and Torres Strait Islander workforce (particularly in the community-controlled sector), **in line with Priority Reform Two of the National Agreement:**

“Reform in workforce and employment is critical to achieve systems change and is key to services and systems being community-led. Only a local First Nations service delivery workforce can ensure the provision of culturally safe and appropriate services and programs, delivered through the culture and language of those they are seeking to engage and support. Engaging local people as service delivery staff means they are the agents of change, and this shifts their relationship with services from one of dependence and need to one of power and self-determination. The focus should be on building a sustainable local workforce which creates empowerment” (Children’s Ground, written submission).

The Kimberley Development Commission has profiled several examples of ECEC services which have developed training programs and processes to assist the recruitment and retention of Aboriginal staff from their local community as ECEC educators.² Not only does this approach minimise the need to provide housing and other incentives to entice an external workforce to the region, it concurrently facilitates the employment of local Aboriginal and Torres Strait Islander staff who have a commitment to and connection with their local community.

Inadequate funding

Despite their huge significance, ACCOs continue to receive far less funding for these services proportionally than non-Indigenous organisations. In some cases, funding has been stripped from ACCOs. In 2014, the Abbott government cut federal funding to 38 Aboriginal and Torres Strait Islander Children and Family Centres (ACFCs), undermining efforts to ensure that Aboriginal and

² Kimberley Development Commission (December 2022) Sector Profile # 1 Childcare in the Kimberley accessed 17/1/23 from: <https://kdc.wa.gov.au/sector-profiles/childcareinthekimberley/>

Torres Strait Islander children could have the best start in life by accessing ACCO led ECEC. ACFCs had been established across the country under Closing the Gap in 2009, with funding committed by Commonwealth and state governments. They provide an array of critical integrated services designed to meet locally determined priorities and needs for Aboriginal children and families. The flexible, inclusive and community-based approach of ACFCs has been successful in facilitating the participation of Aboriginal and Torres Strait Islander children to access high-quality early childhood education programs, many for the first time. Since the removal of federal funding, ACFCs have been caught in the crossfire of State-Commonwealth politics.

In 2013, Professor Deborah Brennan authored a paper proposing program and funding options for integrated Aboriginal and Torres Strait Islander services. Citing the OECD, she notes that:

“Direct supply-side investment by governments in ECEC is the most desirable approach to funding. Supply-side funding results in ‘more uniform quality and superior coverage of childhood populations than parent subsidy models.’ Parent subsidy models are politically attractive for governments, the OECD argues, but are not as effective in delivering results:

“[D]irect public funding of services brings... more effective control, advantages of scale, better national quality, more effective training for educators and a higher degree of equity and access and participation than consumer subsidy models”

OECD 2006, in (Brennan, 2013)

Market forces have shaped the availability of ECEC services, to the detriment of families living in remote, regional and socially disadvantaged metropolitan areas. Research on the availability of centre-based day care, demonstrated that many Australian families live in ‘childcare deserts’ defined as populated areas where there are three or more children for every available child care place (Hurley et al., 2022). Limitations related to available places and proximity are most severe in remote areas where up to 85% of families live in childcare deserts, but are also evident in metropolitan areas, particularly those locations experiencing greater levels of social disadvantage, where more than a quarter of families are likely to live in a childcare desert. The current ECEC funding model does not address the thin market for ECEC services experienced by families living in these areas, despite government efforts to direct childcare subsidies to low- and middle-income earners³. This is not an isolated phenomenon. In total, one million Australians have no access to childcare. Aboriginal and Torres Strait islander families are affected by thin markets for ECEC services in rural, regional areas and are more likely to live in socially disadvantaged metropolitan areas where childcare deserts exist. In addition, Aboriginal families are likely to experience thin markets for culturally safe ECEC services which meet their needs for holistic care. Government investment is needed to expand the number of ACCO controlled ECEC services.

Although many things have changed since Professor Brennan wrote her options paper, the prerequisites she identified for the sustainability of high quality, culturally safe ACCO ECEC services remain the same. These include:

- I. Local Workforce development: services design enables capacity building for local Aboriginal and Torres Strait Islander community and organisations. Training and workforce development for local community members are central in ensuring a skilled, qualified, long-term and culturally appropriate workforce who understand the local culture and community.

³ Ibid

- II. Adequate long-term funding: Planning for sustainable, long-term funding is crucial to ensure ongoing, viable service delivery, community ownership and to facilitate and foster community planning in the long-term. Funding bodies must make long-term commitments to providing secure and adequate funding for quality service delivery (and that) Government is up-front and transparent about future funding arrangements.
- III. Operational structures and systems that are determined by services and respond to service context: to be able to respond to and engage with children and families requires flexibility within funding and administrative arrangements. Flexible frameworks and service contracts to enable local service design that reflects local Aboriginal and Torres Strait Islanders priorities and aspirations and responds to children and family needs.
- IV. Ownership or long-term control of land and building: Ownership or long-term control (i.e. a minimum 50 year lease) of the land and building from which a service operates is crucial for the stability and sustainability of a service. This supports self-determination for Aboriginal and Torres Strait Islander communities and enables services to design and implement long-term program and service delivery.

Professor Brennan also notes that reliance upon Child Care Subsidies (CCS) for services such as Aboriginal Child and Family Centres is likely to be culturally inappropriate and could damage the integrated ECEC and family support model on which these services are based. In particular, it is noted that this funding model risks the viability of integrated ECEC and family support model that underpins these services and potentially excludes the most vulnerable families (Brennan 2013).

Ongoing sustainability of integrated ACCO led ECEC requires a funding model that supports:

- **Integrated service delivery:** ACCOs provide a range of wrap around supports for children and families with complex needs that are critical to engagement and success in early education.
- **Limited economies of scale:** ACCO service providers are typically small, and usually independent entities which must address operational resource requirements, administrative and other costs without cross subsidy or support of a parent organisation.
- **Rural and remote servicing:** ACCOs in rural and remote areas face challenges with higher service delivery costs due to geographic spread, workforce recruitment and retention challenges, and population distribution.
- **Tailored support services:** the unique needs of ACCOs are often not accounted for in models designed for broader, mainstream demographics, which means they may not adequately address the particularly high rates of socio-economic vulnerability and unique circumstances of some Aboriginal and Torres Strait Islander communities.
- **Aboriginal and Torres Strait Islander Workforce:** dedicated workforce attraction, mentoring, training and development resources that enable on the job training and support for the local Aboriginal and Torres Strait Islander workforce, reducing reliance on fly-in, fly-out or transient non-Indigenous workforce, particularly in rural and remote areas.

Realising the Closing the Gap objectives will not be possible without adequate and long-term investment in ACCOs. The Early Childhood Development and Care Policy Partnership convened to address priorities under the National Closing the Gap Agreement is funding research to inform the development of a funding model which meets the needs of ACCO ECEC and integrated services.. This

has been identified by government and Aboriginal and Torres Strait Islander people as a priority because long-term, flexible and adequate funding of ACCOs is foundational to:

1. *Aboriginal and Torres Strait Islander peoples' right to self-determination:* ACCOs are best placed to understand the needs and priorities of their own communities and providing them with adequate funding allows them to take control of their own affairs and make decisions that reflect their own values and priorities.
2. *Equitable outcomes:* ACCOs are trusted and more effective at delivering culturally safe, integrated and holistic services and achieving positive outcomes than mainstream services. By providing long-term funding, ACCOs can build capacity, develop expertise, and deliver services in a way that is culturally appropriate and responsive to the needs of the community. This can lead to improved health, education, and social outcomes for Aboriginal communities.
3. *Sustainability:* Long-term funding allows ACCOs to plan and invest in their own futures, rather than being forced to operate on a year-to-year basis. This allows ACCOs to develop long-term objectives and partnerships, build infrastructure, and develop sustainable business models to support their continued operations and expansion.
4. *Addressing historical injustices:* Adequate and long-term funding is a way to address the historical injustices that have been perpetrated against Aboriginal and Torres Strait Islander peoples. By providing resources to communities and allowing them to control their own affairs, governments and other stakeholders can help to redress the balance of power and build more equitable and just societies.

Ensuring quality and accessibility

Recommendation 7: Commit to a process of shared decision making with Aboriginal and Torres Strait Islander peaks and organisations regarding how best to support Aboriginal ECEC services that are not National Quality Framework (NQF) approved services.

Recommendation 8: Develop a unique quality framework and standards which apply to Aboriginal and Torres Strait Islander ECEC services in partnership with Aboriginal and Torres Strait Islander Peaks and Community Controlled Organisations.

Recommendation 9: In partnership with Aboriginal and Torres Strait Islander Peaks and Community Controlled Organisations, develop a cultural competence framework which will support the implementation and assessment of the guiding principles of the National Quality Framework to ensure that Aboriginal and Torres Strait Islander cultures and ways of knowing doing and being are embedded in curriculum. This should include criteria for the assessment of mainstream ECEC services supporting Aboriginal and Torres Strait Islander children.

Recommendation 10: Existing policies, which largely focus on the economic benefits of ECEC, are reframed so that they place equal importance on adequately addressing the social determinants of wellbeing that impact children, including breaking the cycle of intergenerational poverty and disadvantage.

Recommendation 11: That the activity test, which is a barrier to ECEC access that disproportionately affects Aboriginal and Torres Strait children, is removed for all Aboriginal and Torres Strait Islander families.

Recommendation 12: If the activity test remains, provide a minimum entitlement of 30 hours of 95% subsidised care per week for all Aboriginal and Torres Strait Islander children as an ongoing measure to Close the Gap in ECEC attendance and AEDC outcomes.

Closing the Gap Outcome 3: Aboriginal and Torres Strait Islander children are engaged in high quality, culturally appropriate early childhood education in their early years.

Closing the Gap Outcome 4: Aboriginal and Torres Strait Islander children thrive in their early years.

Closing the Gap Priority Reform 2: Formal Partnerships and Shared Decision Making.

Closing the Gap Priority Reform 3: Transforming Government Organisations.

National Aboriginal and Torres Strait Islander Early Childhood Strategy:

Goal 2: Aboriginal and Torres Strait Islander Children are Supported to Thrive in Their Early Years.

Goal 3: Aboriginal and Torres Strait Islander Children are Supported to Establish and Maintain Strong Connection to Culture, Country, and Language.

Goal 4: Aboriginal and Torres Strait Islander Children Grow up in Safe Nurturing Homes, Supported by Strong Families and Communities.

Priority Area Three of Closing the Gap can only be achieved when Aboriginal and Torres Strait Islander people's right to self-determination is honoured by the Government. In practice, this means that Aboriginal Community Controlled Services are supported to establish their own priorities, based on the unique needs and aspirations of their communities, and that mechanisms are put in place to ensure that ACCOs can meaningfully contribute to the design and evaluation of the systems and processes which govern them. In partnership with Aboriginal and Torres Strait Islander organisations and services, all levels of government must commit to realising this critical objective. To that end, all systems and processes designed to support the Closing the Gap priorities, including early childhood development and education outcomes, must facilitate these principles and strategies. This has explicit and clear implications for the Australian Children's Education and Care Quality Authority (ACECQA), the National Quality Framework (NQF) and National Quality Standards (NQS).

The quality of ECEC is central to long-term beneficial effects, with effective approaches simultaneously targeting quality and accessibility. Robust evidence shows that the provision of ECEC without consideration to the quality of the service provided is simply not enough (Melhuish, 2014) and that the positive effects of ECEC are proportionate to the quality of the provided service (Centre for Education Statistics and Evaluation, 2018). For example, in a landmark review, the Organisation for Economic Cooperation and Development (OECD) reported that literacy at age 15 was strongly associated with ECEC participation in countries where a large proportion of the population attended ECEC regularly and **where there were measures to maintain the quality of ECEC**. In fact, the OECD concluded that improving access to ECEC would only improve lifelong outcomes and address socioeconomic disparities if the quality of the ECEC service provided was not compromised (OECD, 2010).

In Australia, the National Quality Framework (NQF) provides measures for evaluation of 'mainstream' ECEC services and overall focuses on the structural (e.g. educator-child ratios) and process domains (interactions between staff and children and between children) of quality. However, in its current form, the NQF does not effectively promote or facilitate optimal outcomes for Aboriginal and Torres Strait Islander children for three reasons:

- 1. It does not support the quality requirements of many Aboriginal Community Controlled ECEC services.** Many Aboriginal Community Controlled (ACCO) ECEC services, particularly those funded by the Community Child Care Fund Restricted (CCCF R) are deemed 'out of scope' of the NQF and therefore not assessed under its National Quality Standard (NQS). In addition, there are currently no nationally consistent regulatory standards for Aboriginal and Torres Strait Islander services that do not fall within the scope of the NQF. To address this, efforts must be made to examine the requirements of the NQF in partnership with the Aboriginal and Torres Strait Islander sector and consideration must also be given to service types and contexts, specifically those services funded under the CCCF-R, for which the NQF may not be an appropriate regulatory framework. Consideration should be given to developing a unique framework and standards which apply to Aboriginal and Torres Strait Islander ECEC services.
- 2. It does not adequately promote or reflect the significance of culture to Aboriginal and Torres Strait Islander children and families.** As noted above, culture is a protective factor for Aboriginal and Torres Strait Islander children and is intimately connected to developmental outcomes. While NQS Quality Area 5 (promoting relationships with children that promote

children's sense of security and belonging) and Quality Area 6 (promoting collaborative partnerships with families and communities where the expertise, culture, values and beliefs of families are respected) highlight critical elements of quality ECEC, there are currently no specific provision in the NQF and NQS regarding how these standards will be implemented or assessed, including on cultural competence and safety. Moreover, under the NQF, there is no explicit requirement for ECEC services to embed culture into their curriculum, raising critical questions regarding the suitability, cultural safety and inclusivity of 'mainstream' ECEC services for Aboriginal and Torres Strait Islander children and families. This is problematic because ECEC services that do not reflect the culture and knowledge of the local Aboriginal community are not seen as culturally safe and tend not to be used by families in that community (Harrison et al., 2012). Furthermore, evidence indicates that Aboriginal and Torres Strait Islander children may experience adverse long-term consequences if ECEC services are not responsive to their unique cultures and needs (Sydenham, 2019).

To address these issues, the SNAICC recommends the development, in partnership with Aboriginal and Torres Strait Islander Peaks and ACCOs, of a cultural competence framework that will support the implementation and assessment of the guiding principles of the National Quality Framework in order to ensure that Aboriginal and Torres Strait Islander cultures and ways of knowing, doing, and being are integrated into the curriculum. **We note that SNAICC is currently supporting the development and implementation of an [Aboriginal Cultural Safety Framework for Early Childhood Education \(the framework\)](#) for the NSW government**, as part of their commitment to the [First Steps Aboriginal Children's Early Childhood Education Strategy](#) 2021-2025 as well as aligned to measures under the Commonwealth Government's Closing the Gap strategy. The aim of the framework is to:

- support uplift within the ECEC sector by providing clear expectations, standards and guidance to support services to develop, maintain and improve cultural safety.
- encourage best provision and maintenance of culturally safe and responsive environments for Aboriginal and Torres Strait Islander children, their families and ECEC staff in every type of ECEC service.
- support an increased participation of Aboriginal and Torres Strait Islander children in ECEC services.

3. **It fails to acknowledge the significance of wrap-around family supports as a key component of quality ECEC.** For ACCO ECEC services which fall within the scope of the NQF, the current quality framework fails to acknowledge or address the unique needs and circumstances of Aboriginal and Torres Strait Islander families and does not value how the unique wrap-around family supports they provide address the social determinants of wellbeing. Providing cognitively stimulating and rich learning environments that optimise children's experiences is a key component to high quality ECEC. However, quality does not stop there. In addition to providing optimal centre-based learning environments and opportunities, quality ECEC services recognise the significant role that social determinants plays in children's development and actively work toward supporting families by providing parents /caregivers with supports that are likely to strengthen their parenting capacity (Axford & Albers, 2019; Heckman & Mosso, 2014; Melhuish, 2014; Shuey & Kankaraš, 2018). While Australia's ECEC policies acknowledge education as a social determinant of wellbeing, they largely fail to acknowledge that when children return to

caregivers experiencing distress, poverty, and inadequate housing, education loses much of its power as the great equaliser. Evidence shows that home learning environments can have up to twice the impact of early childhood programs, limiting the extent to which even high-quality ECEC can mitigate shortfalls in the child's home environment (Melhuish, 2014). Research demonstrates that the best outcomes occur when both the home environment and ECEC promote the child's development (Moore & Arefadib, 2022).

ECEC services located in Australia's most disadvantaged communities are more likely to serve Aboriginal and Torres Strait Islander families who experience multiple and concurrent vulnerabilities, including poverty and family violence (Victorian Agency for Health Information, 2020). How an ECEC service responds to and supports families through such experiences is a true indicator of the quality of that service and will have a significant impact on shaping outcomes for the most vulnerable children. Consequently, there is an urgent need to a) reframe existing policies, which largely focus on the economic benefits of ECEC, so that they can respond adequately and equitably to the social determinants of wellbeing that impact children and their families; and b) ensure that ECEC policies prioritise and adequately support breaking the cycle of intergenerational poverty and disadvantage (Van Eyk et al., 2021).

Early Access

It is important to preface this section by acknowledging that while the percentage of Aboriginal and Torres Strait Islander children enrolled in preschool has increased over time (Australian Bureau of Statistics, 2022), the fact that Aboriginal and Torres Strait Islander children continue to enter their first year of school with greater rates of developmental vulnerabilities than their non-Indigenous peers means that policies that focus primarily on increasing enrolments and not early access **and** regular attendance are largely ineffective. Enrolment rates are not necessarily indicative of actual attendance rates, which continue to be lower for Aboriginal and Torres Strait Islander children who experience concurrent vulnerabilities, including poverty, and those who reside in remote and very remote communities where barriers to accessing high-quality ECEC are greater (AEDC, 2021; Australian Government, 2020a). For highly vulnerable children and families, the long-term developmental benefit of early access to quality ECEC (starting age of 0-2 years) is well supported, including by evidence from the Abecedarian Project which showed benefits across cognitive academic and socio-emotional functioning (Molly et al., 2018). Similar findings regarding the significant benefits of early access to quality ECEC for vulnerable children have been reported by US-based studies, "The Early Head Start" program (Love et al., 2005), the "Milwaukee Project" (Garber, 1988) and "Project Care" (Wasik et al., 1990).

Several factors contribute to lower attendance rates among Aboriginal and Torres Strait Islander children, including financial constraints (cost of ECEC), geographical location (no available ECEC services, limited transportation) and cultural factors, including a lack of culturally appropriate services, language barriers, and distrust of mainstream services. Evidence also shows that children who are more vulnerable (i.e. reside in families where the main source of income is government benefits, experience housing transience or insecurity, reside in families who experience racial discrimination) are less likely to attend ECEC (Sydenham, 2019). A recent report by SNAICC (Sydenham, 2019) highlights the wide range of barriers to ECEC access among Aboriginal and Torres Strait Islander families (**Table 1**). To address these issues, there is a need for culturally responsive

and community-led approaches to early childhood education and care that consider the needs and perspectives of Aboriginal and Torres Strait Islander families and communities.

Table 1. Barriers to service access for Aboriginal and Torres Strait Islander families

Individual barriers— complex needs, circumstances, experiences and expectations of families	Service barriers— service delivery systems, processes, programs and style, staffing, practice approaches	Social and neighbourhood characteristics of the immediate community that the service operates within	Cultural barriers obstruct communication and the development of trusting relationships
Family breakdown Discrimination and past experiences Number of children in family Fear of removal of children Individual distress/dysfunction (e.g. depression/feeling of being stigmatised/excluded) Poverty and low income Lack of employment Cost—even with subsidisation Lack of awareness of available services and/or their benefits Beliefs related to the non-parental care of young children Reluctance to separate from children Number of books at home, reflecting comfort with literacy and education Moving residence Child health concerns	Lack of Aboriginal leadership and involvement Lack of qualified local Aboriginal and Torres Strait Islander staff Disjointed services or regular staff turnover Failure to find culturally appropriate (often local) training for Aboriginal and Torres Strait Islander staff Lack of cultural competence Failure to incorporate culture within programs Inappropriate venues or clinical environment Lack of flexibility Limited service coordination and service fragmentation Limited capacity for administration of government funds can limit small services from accessing resources for comprehensive services Staff fluent in local language Perception by service providers of barriers as insurmountable Short-term program funding	Social stigma Isolated location and access to transport for remote families and families living in outer suburbs Lack of understanding of the importance of early education and care services Past experiences and community-level distress Poor living conditions Transient populations Tenancy instability Mental illness, family violence, substance abuse and gambling Complex cultural relationships in community, including community or family conflict	Lack of awareness and celebration of legitimate cultural differences Lack of consultation with local communities and Elders, following cultural protocols and incorporation of local Aboriginal and Torres Strait Islander parenting styles Unmet cultural needs of families and lack of respect for Aboriginal knowledge and ways of learning Poor consideration of Aboriginal and Torres Strait Islander issues and cultures, and failing to draw on child and family strengths Unmet family support needs, given different cultural meaning of services and needs Fear that engagement will undermine culture Negative associations with institutions and services, including of child removal Discrimination Fear of being judged and misunderstood because of cultural practices and ways of communicating

Further to the above, families also experience concurrent structural and administrative barriers to accessing ECEC services, including the requirements of the activity test, which disproportionately disadvantages Aboriginal and Torres Strait Islander families in regional and remote areas. While SNAICC welcomes increased childcare subsidies and guaranteed ECEC access of 36 hours per fortnight for Aboriginal and Islander children that will be implemented from July 2023, we note that 1) this falls significantly short of the 30 hours ECEC per week which has been shown to provide positive outcomes for vulnerable children (Loeb et al., 2007); and 2) this does not fully address the barriers to ECEC access imposed by the activity test. ECEC experts agree that the dose and duration of quality ECEC should be proportionately greater for vulnerable children (Molly et al., 2018). Furthermore, the requirements of the activity test are difficult to navigate for some families who are

unsure as to which activities satisfy the test’s guidelines, or who have fears about the financial consequences of incorrectly reporting their activity.

Throughout our sector consultations, SNAICC consistently receives evidence from ACCOs that a high proportion of families experiencing socio-economic disadvantage are unable to access ECEC due to the activity test. This is especially problematic for families with unpredictable incomes, those with casual work and/or short-term contracts, as they are unable to take on additional work without stable childcare but are unable to secure ongoing or stable childcare without the assurance of a wage increase to pay for it. Furthermore, while ‘vulnerable’ families can apply for the additional childcare subsidy for their children, doing so can be stigmatising and culturally unsafe. It may also amplify the trauma created by forced child removal, as it insinuates that children residing in these families are ‘at risk’ and require protection and that the family may be under the scrutiny of child protective services.

This evidence is echoed by recent analysis carried out by Impact Economics and Policy (2022) who found that **as a result of the activity test, Aboriginal and Torres Strait Islander families are over five times more likely than their non-Indigenous counterparts to be limited to one day of subsidised child care per week.** Utilising data from the Department of Employment and Workplace Relations (Child Care in Australia Report September Quarter 2019-June Quarter 2021) the authors found that when the activity test was halted for all families during the Covid 19 pandemic, childcare usage amongst Aboriginal and Torres Strait Islander children increased by 12% in 9 months (Figure 1).

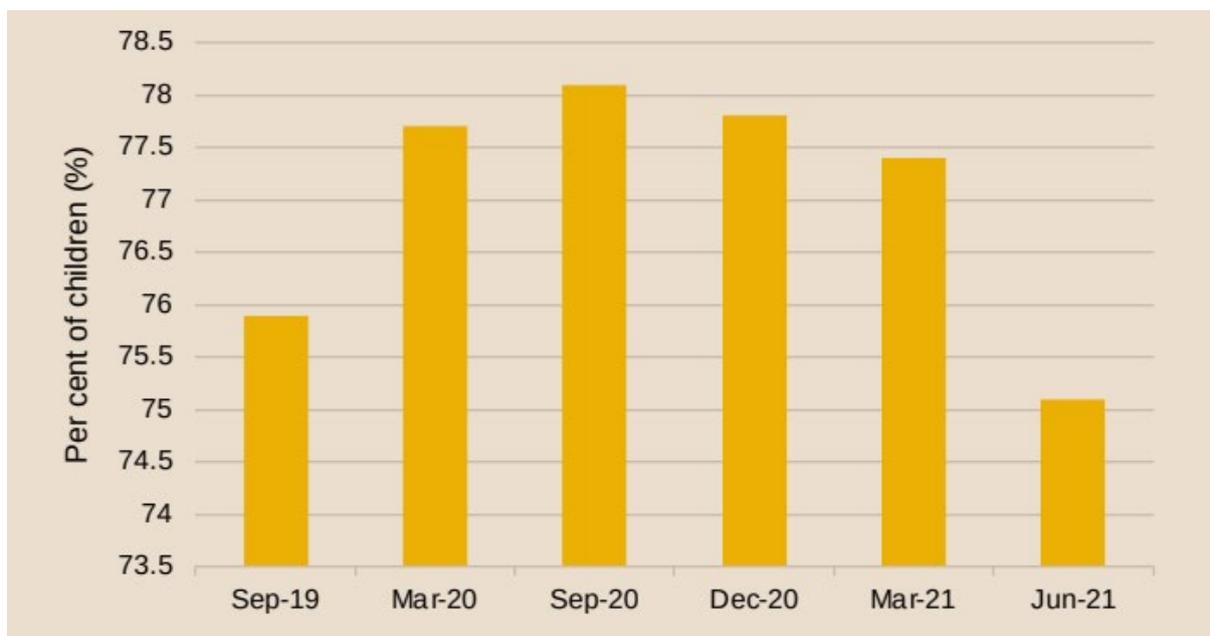


Figure 1. Percentage of Aboriginal and Torres Strait Islander children attending childcare

Overall, the report highlights that:

“Removing the activity test now will provide a foundation for future reform that delivers universal early childhood education and care for every Australian child. The costs of abolition or simplifying the activity test today will be recouped in improved outcomes for the most disadvantaged Australian children and increased participation of parents in paid work. Long

term all Australians will benefit from the improved educational outcomes for children, higher productivity and economic growth”(Impact Economics and Policy, 2022, p. 5).

It is important to recognise that even Aboriginal and Torres Strait Islander families with higher incomes can face obstacles in overcoming intergenerational disadvantage, trauma, and discrimination, and that they should have ready access to additional early learning to support efforts to Close the Gap. In recognition of these social and economic challenges, SNAICC maintains that the activity test should be removed for all Aboriginal and Torres Strait Islander families. We note that this is also in line with recent recommendations put forth by the *Senate Inquiry into Work and Care* (Commonwealth of Australia, 2023). Specifically, **Recommendation 29: “...the committee recommends the Australian Government consider amending the relevant social policy and family assistance laws to abolish activity tests.”** The committee note that this recommendation was made based on overwhelming evidence which showed that *“the activity tests associated with subsidised childcare have a disproportionate negative impact on First Nations families and parents (and holds them back from work and study)”* (Commonwealth of Australia, 2023, p. 66). As a result of these findings, the committee, in both its Interim and Final Report, recommend removal of the activity tests for First Nations people to receive childcare subsidies.

Should the Government decide to apply means testing to this measure, the level of subsidy should taper above a significantly higher threshold than the current Child Care Subsidy. In this case, SNAICC would recommend a minimum entitlement of 30 hours of 95% subsidised care per week for all Aboriginal and Torres Strait Islander children as an ongoing measure to Close the Gap in ECEC attendance and AEDC outcomes.

Aboriginal and Torres Strait Islander children with disability

Recommendation 13: Expanding the definition of ‘disability’ to include social and emotional well-being and the experience of trauma to ensure adequate support provision.

Recommendation 14: Government to consult with First Nations disability and ECEC peaks to inform and shape how Aboriginal and Torres Strait Islander children with a disability (as well as their families) are supported by ECEC services.

Recommendation 15: Ensure sufficient and sustainable funding specifically allocated to ACCO-led ECEC services. This funding should consider the unique needs and challenges faced by children with disabilities and support the provision of culturally safe environments, culturally responsive curriculum, and specialised staff training, including in trauma-informed care.

Recommendation 16: Provide specialized training on supporting Aboriginal and Torres Strait Islander children with disabilities, including strategies for inclusion, cultural sensitivity, and addressing trauma-related challenges.

Recommendation 17: Develop inclusive policies and frameworks that explicitly recognise and address the unique needs of Aboriginal and Torres Strait Islander children with disabilities, including trauma. Ensure that these policies are implemented consistently across government departments, early childhood education and care services, and mainstream disability services.

Closing the Gap Outcome 3: Aboriginal and Torres Strait Islander children are engaged in high quality, culturally appropriate early childhood education in their early years.

Closing the Gap Outcome 4: Aboriginal and Torres Strait Islander children thrive in their early years.

Closing the Gap Outcome 14: Aboriginal and Torres Strait Islander people enjoy high levels of social and emotional wellbeing.

Closing the Gap Priority Reform 2: Formal Partnerships and Shared Decision Making.

Closing the Gap Priority Reform 3: Transforming Government Organisations.

National Aboriginal and Torres Strait Islander Early Childhood Strategy:

Goal 2: Aboriginal and Torres Strait Islander Children are Supported to Thrive in Their Early Years.

Goal 3: Aboriginal and Torres Strait Islander Children are Supported to Establish and Maintain Strong Connection to Culture, Country, and Language.

Goal 5: Aboriginal and Torres Strait Islander children, families and communities are active partners in building a better service system.

Aboriginal and Torres Strait Islander people are 1.8 times more likely to experience disability, twice as likely to have a severe disability and are less likely to access support (Gilroy et al., 2016) compared with non-Aboriginal and Torres Strait Islander Australians (Australian Institute of Health and Welfare, 2015). Aboriginal and Torres Strait Islander children, living in urban, rural and remote Australia, have an increased risk of adverse neuro-developmental outcomes (Blair et al., 2016; DiGiacomo et al., 2013; Fitzpatrick et al., 2017). These often result in cognitive and/or physical disability: Aboriginal and Torres Strait Islander children are 30% more likely to have a physical disability, and are at higher risk of developmental and intellectual difficulties, compared with non-Aboriginal and Torres Strait Islander children (DiGiacomo et al., 2013; Luke et al., 2022; McDonald et al., 2014). The prevalence of neuro-developmental disorders in some remote communities is reported to be as high as 30% of the paediatric population (Fitzpatrick et al., 2017). Research also highlights that Aboriginal and Torres Strait Islander children with a disability face multiple and concurrent barriers to accessing adequate supports, including racial discrimination, geographical isolation, and cultural and linguistic barriers (Hanft, 2014).

It is critical to note that Aboriginal and Torres Strait Islander peoples' understanding of health and disability can vary greatly from those of non-Aboriginal people. For example, Aboriginal and Torres Strait Islander people typically hold a more holistic view of health as encompassing not only their own health, but also cultural, communal and spiritual elements (Biddle et al., 2021). Moreover, in Aboriginal and Torres Strait Islander communities, disability is often viewed as a part of the individual, as opposed to an impairment which needs to be 'fixed' (Gilroy et al., 2016). In many Australian Aboriginal language groups, there is no comparable word for 'disability' or specific disabilities (Biddle et al., 2014; Ferdinand et al., 2021) and many Aboriginal and Torres Strait Islander people living with disabilities do not self-identify as having a disability. Additionally, given white Australia's historical use of medical labels to discriminate against Aboriginal and Torres Strait Islander people, there may also be fear and stigma surrounding the word 'disability' (Gilroy et al., 2016). Limited trust in medical or educational institutions can also lead to delayed recognition of disability and the additional supports that children with disability are entitled to and may need to participate in ECEC on an equal basis with children without disability. Differences in how Aboriginal and Torres Strait Islander people conceptualise and experience disability also contributes to some clear distinctions between the support needs identified by Aboriginal people with disability and the supports mainstream ECEC services are designed to provide (Ferdinand et al., 2021).

According to the Government's recent review of Disability Standards for Education, including ECEC, (Australian Government, 2020b) Aboriginal and Torres Strait Islander children with a disability face intersectional disadvantage and 'double discrimination' in their ability to access quality ECEC, resulting in inferior experiences and outcomes. The Review found that Aboriginal and Torres Strait Islander children, especially those residing in regional and remote communities, often encountered transport, logistical and cultural barriers to their access and participation. Alarming, the Review highlighted that many Aboriginal and Torres Strait Islander families reported that educators and other staff in mainstream services lacked sufficient cultural knowledge and capability to adequately support Aboriginal and Torres Strait Islander children with disability, and this was acknowledged by educators themselves. In particular, educators had a limited understanding that Aboriginal and Torres Strait Islander caregivers value advice and input from their community, including extended family such as community aunts and uncles, when making choices and decisions about their children. Educators also raised where their own low cultural awareness made them reluctant to take steps to provide adequate support to Aboriginal and Torres Strait Islander students for fear of getting things wrong. Many respondents suggested that some Aboriginal and Torres Strait Islander

families strongly prefer to work with Aboriginal and Torres Strait Islander educators and organisations, as culture and language are essential when determining appropriate educational adjustments.

Finally, we believe that, given Aboriginal and Torres Strait Islander peoples' experience of colonisation and displacement, it is important to consider expanding the definition of 'disability' to include social and emotional well-being and the experience of trauma. Aboriginal and Torres Strait Islander peoples have endured a history of colonisation, dispossession, forced removal of children, cultural suppression, and systemic discrimination. These experiences have led to significant intergenerational trauma, impacting the social and emotional well-being of individuals, families, and communities. Recognising the effects of historical trauma within the definition of disability acknowledges the unique challenges faced by Aboriginal and Torres Strait Islander peoples and the need for culturally sensitive support. It also recognises the multifaceted and interconnected nature of disabilities, which are not limited to physical or cognitive impairments but also include psychological, emotional, and social dimensions. Moreover, social and emotional well-being is deeply intertwined with cultural identity for Aboriginal and Torres Strait Islander peoples. Recognising the importance of social and emotional well-being within the disability framework acknowledges the vital role that cultural identity, connection to country, spirituality, and community have in supporting overall well-being. It allows for the development of services and interventions that incorporate cultural practices, healing approaches, and community involvement.

Recognising the experience of trauma within the definition of disability for Aboriginal and Torres Strait Islander peoples also underscores the importance of providing culturally safe and trauma-informed support. Culturally safe practices involve acknowledging and addressing the historical, social, and cultural factors that impact well-being. It ensures that support services are delivered with respect, cultural understanding, and awareness of the impact of trauma, fostering healing and resilience. To that end, embedding this more holistic definition facilitates a more comprehensive and inclusive understanding of the needs and experiences of Aboriginal and Torres Strait Islander children with a disability (as well as their families), emphasising holistic support, trauma-informed care, and person-centred approaches.

The above highlights an urgent need for ACCO led ECEC services to be adequately funded, supported and expanded. ACCOs are better equipped to incorporate and pass on cultural knowledge, traditions, and languages to the next generation. These providers understand the importance of cultural preservation and can create an environment that respects and promotes Aboriginal and Torres Strait Islander cultures. Adequate funding allows them to develop culturally relevant curriculum and materials, engage elders and community members as educators, and organise cultural activities and events. It also enables these providers to access resources and expertise necessary to incorporate Aboriginal and Torres Strait knowledge and perspective and will ensure that Aboriginal and Torres Strait Islander children with disability and additional support needs (and their families) are able to access much needed wrap-around ECEC services and supports. Moreover, cultural competence enhances educators' ability to provide tailored support to Aboriginal and Torres Strait Islander children with disabilities given that local staff are better equipped to identify and address the specific challenges faced by these children and their families, leading to increased engagement and ultimately better long-term outcomes. Finally, it is important to note that ACCO led ECEC services are significantly better equipped to provide therapeutic supports that are culturally appropriate and responsive to the needs of Aboriginal and Torres Strait Islander children with disabilities. They understand the importance of incorporating cultural elements into supports and

therapies, such as storytelling, art, music, and connection to country. These culturally relevant approaches can enhance engagement, participation, and positive outcomes for Aboriginal and Torres Strait Islander children with a disability.

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