

Submission to the Early Years Strategy

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For further information or questions about this submission please contact:

Katie Maskiell

Head of Child Rights Policy and Advocacy

UNICEF Australia

e: kmaskiell@unicef.org.au

m: +61 417 091 806

Australian Committee for UNICEF Limited

Suite 4.02 Building B, 33-35 Saunders Street PYRMONT NSW 2009

P: +61 2 9261 2811 F: +61 2 9261 2844 E: unicef@unicef.org.au

PO Box 488, Queen Victoria Building, NSW 1230 | ABN 35 060 581 437

www.unicef.org.au | Donation Hotline: 1300 884 233

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Executive Summary

With the highest aspirations for the healthy development and wellbeing of Australian children and their families, the ambition the Australian Government is showing through the creation of the landmark Early Years Strategy is to be commended. UNICEF Australia welcomes the opportunity to provide this submission to the Strategy, drawing on our experience working with governments in Australia to progress reforms in the early years, as well as our vast international expertise helping to deliver early education programs and lasting systems change across a variety of developing and developed contexts.

The Early Years Strategy is an opportunity to realise the enormous and compounding benefits that come with early investment in children. By providing a vision for childhood in Australia – the first chapter in all our lives – the Strategy can in effect articulate a roadmap for the ambitions of Australian society as a whole, and in doing so, make our nation one of the greatest in the world for children to grow up in.

The holistic and integrated intent of the Strategy to cut across portfolios is a welcome one and is in keeping with our desire to make children a national policy priority in Australia. To do this, we must recognise that their wellbeing is ensured through a variety of enablers and factors which exist not within any single area of responsibility but with many. It is our hope that this concerted and integrated approach to children’s wellbeing on display in the Early Years Strategy is a sign of things to come as further reforms are sought.

On further reform, UNICEF Australia acknowledges that we are at the beginning of this process not the end, therefore we must be realistic about what we can achieve at every stage of this journey. We also acknowledge that there are other concurrent reforms in the early years space being led by the Productivity Commission and the Australian Competition and Consumer Commission. The wealth of opportunities to get our approach to the early years right is positive, and it is in everyone’s best interests that these myriad reforms align. We look forward to working with the Government to ensure they do.

In this context, UNICEF Australia provides our contribution to the Early Years Strategy in the hope that it may reflect our vision for this generational reform. Through the Strategy as a vehicle we want to see the creation of a truly universal early years system, which centres children and their voices and embeds equity as a key design principle, so that those children who are most likely to benefit from support but least likely to access it, are able to do so.

The starting point for the Strategy should be a set of domain specific child wellbeing indicators, based in the [Australian Children’s Wellbeing Index](#), to help ensure it moves the dial on all the critical aspects that contribute to their wellbeing. This will mean designing policies that go beyond the school gate and consider those broader policy domains like housing, health and the environment, all of which have a material impact on the trajectory and life course of children. Further to this, by linking policies directly to children rather than the adults around them, we can ensure that a continuity of care and support remains even when the circumstances of a child’s caregiver change.

While the work on these important foundational pieces of the Strategy continues, there are immediate priorities to address within the next year which we know will boost access to support for those who need it most, including removal of the Child Care Subsidy activity test, and re-instating federal funding for Aboriginal and Torres Strait Islander Children and Family Centres around the country. This removal of barriers to access for the most disadvantaged families is a pressing need.

UNICEF Australia is eager to work with all involved to realise the ambition of the Early Years Strategy and make our vision a reality. Together we can ensure a greater collective wellbeing for our children, giving them the best start in life, and in the process create a truly transformative and generational change for Australian society.

Summary of Recommendations

1. Centering children in the Early Years Strategy

- *Consult with children, their families and caregivers, at all stages of the lifecycle of the Early Years Strategy, with particular efforts made to capture the views of children whose voices are often missing.*
- *Ensure that policy design in the Early Years Strategy is linked directly to children themselves wherever possible and beneficial, to prevent loss of support when the circumstances of their parents and caregivers change.*
- *Include within the scope of the Early Years Strategy broad policy settings that address the social and economic determinants of wellbeing.*
- *Incorporate domain specific indicators across all critical aspects of child wellbeing in the Early Years Strategy, based on the Australian Children's Wellbeing Index and the Australian Institute for Health and Welfare's national child wellbeing data asset (in-development).*

2. Creating a truly universal early years system

- *Commit to delivery of the Guarantee for Young Children and Family through the Early Years Strategy, to help create a truly universal early years system in Australia.*
- *Remove the activity test for the Child Care Subsidy to provide greater immediate access to early childhood education and care, particularly for low-income families.*
- *Incorporate existing sector-identified solutions to workforce and infrastructure challenges in the Early Years Strategy, to further enable a universal early years system.*

3. Embedding equity in the system to drive change for the most vulnerable

- *Embed equity as a key design principle in the Early Years Strategy, and explore the scale-up of needs-based funding models, incentivised wrap-around and integrated hubs and networks, and alternative models of care, to provide access to support for those children and families who most need it.*
- *Include commitments in the Early Years Strategy to an adequately-resourced Aboriginal and Torres Strait Islander community-controlled and integrated early years and family-focused service sector, including federal funding for the re-establishment of Aboriginal and Torres Strait Islander Children and Family Centres.*

Detailed Recommendations

1.Centering children in the Early Years Strategy

Everything we do in relation to the Early Years Strategy ought to begin with children themselves, placing them in the centre of our response and building around them. In the first instance what this means is a genuine desire and intention to listen to the voices of children, their families and carers.

This means making sure our systems reflect children’s own experiences and views on what will make a difference for their development in services, supports and material conditions, rather than existing ways of doing things or discredited assumptions about childhood and children’s experiences of their lives. This isn’t just the right thing to do (as per a child’s right to have their voice heard in Article 12 of the Convention on the Rights of the Child)ⁱ, it is the smart thing to do as well - policies designed in consultation with those they are made for are more tailored to need and fit-for-purpose, producing better outcomes, improving efficiency, and saving resources.

Australia already recognises the value of children’s voices in the early years. The National Quality Standards in Early Childhood Education and Care state that every child should have their agency promoted, enabling them to make choices and decisions to influence their world.ⁱⁱ And there are recent examples of positive work to draw on in this regard including:

- the Brotherhood of St Laurence’s 2020 Practice Guidelines for Engaging Children’s Voices in the Early Years,ⁱⁱⁱ which they utilised through action research in their Home Interaction Program for Parents and Youngsters;
- the current initiative underway from The Front Project and the Apiary Fellowship, the Future Visioning Conversations with Children initiative, which aims to provide children and families with the opportunity to contribute their lived experience and express themselves in a safe and supportive environment, through facilitated conversations and activities;^{iv} and
- 2013 research by Professor Pauline Harris in South Australia, capturing the voices of children in early education, which drew on the Convention on the Rights of the Child and UNICEF’s Child Friendly Cities framework.^v

As we develop the Early Years Strategy, children will need to be consulted with at all stages of its lifecycle. In doing so, we’ll need to ensure their involvement is meaningful, safe, and supported by appropriate resourcing. To avoid the trap of tokenistic consultation, clarity should be provided about the extent of children’s participation and influence, taking into account their evolving capacities, and with explicit discussion of the potential for change and limitations on influence arising from their involvement.

Backing this with a focus on enabling participation that is representative and reflective of the diversity of children and their experiences in Australia, in particular children whose experiences are typically not represented in processes such as these, will result in a richer Strategy more targeted to children’s needs. This would include children experiencing disadvantage and vulnerability of various kinds, and those facing particular challenges in accessing their rights.



UNICEF Australia, Save the Children/54 Reasons, and the Australian Child Rights Taskforce (2023), Blueprint for a National Children’s Plan

Recommendation

Consult with children, their families and caregivers, at all stages of the lifecycle of the Early Years Strategy, with particular efforts made to capture the views of children whose voices are often missing.

Centering children in the Early Years Strategy also means designing policies which are linked directly to children themselves, treating them as a stakeholder in their own right, and following them regardless of the circumstances of the adults around them to ensure there is continuity of support.

We see this playing out with negative consequences through examples like a parent losing access to the Child Care Subsidy due to a loss of employment and failure to meet the requirements of the activity test, with their child then losing access to early education, or through children “ageing out” of Parenting Payments and missing the associated benefits their caregivers are able to provide with that additional support.

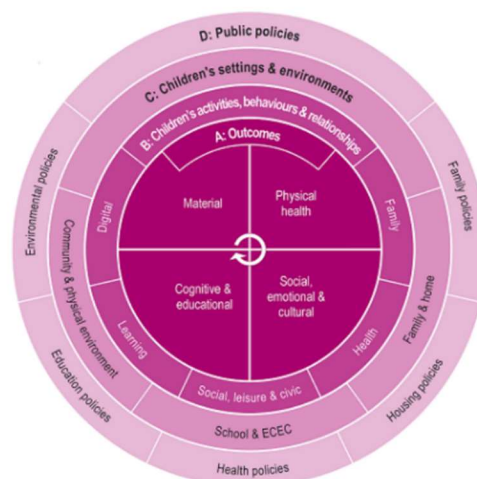
By centering children and designing policies that follow them wherever support is needed, we can minimise the negative outcomes associated with the changing circumstances of their parents and caregivers, ensuring a continuity of care which leaves no child behind.

Recommendation

Ensure that policy design in the Early Years Strategy is linked directly to children themselves wherever possible and beneficial, to prevent loss of support when the circumstances of their parents and caregivers change.

If we really want to shift the dial for children, particularly those who continue to face disadvantage, then centering children also means placing them at the centre of our policy development and identifying and providing for all the social and economic determinants that contribute to their wellbeing. We’ll need to focus not just on policies that stop at the school gate and affect the immediate family environment, but also those that affect the entire ecology of the child - housing, healthcare, education, local community, and the natural and built environment.

The Discussion Paper itself identifies this, outlining Organisation for Economic Cooperation and Development (OECD) wellbeing frameworks which touch on children’s immediate settings and environments, but also the broader public policy environments that affect and contribute to their wellbeing.^{vi} It is these outer policy settings that will also require focus if we want to make an impact on the wellbeing of those children who face entrenched disadvantage.



OECD Aspirational Child Wellbeing Measurement Framework

Recommendation

Include within the scope of the Early Years Strategy broad policy settings that address the social and economic determinants of wellbeing.

To ensure that we are in fact moving the dial for children’s wellbeing, domain specific indicators across all critical aspects of child wellbeing will keep us accountable and show that the changes being made are achieving their desired intent. This will also help ensure the Strategy is genuinely an early years one, focusing not on any single issue but all the aspects that contribute to a child’s wellbeing. In this regard, the Discussion Paper identifies the Australian Research Alliance for Children and Youth’s (ARACY) Nest framework as particularly helpful.

The Nest is Australia’s evidence-based framework for child and youth wellbeing. The Nest was developed in consultation with over 4000 experts and children, young people, and families about what they need to thrive. The Nest presents holistic wellbeing as six interdependent domains. A child or young person needs to be doing well in all six domains to thrive. Wellbeing is therefore seen as a holistic term with domains sitting within it. When many people talk about wellbeing, they are often referring to certain aspects only, such as mental health or social-emotional learning. While these are crucial elements, we need to ensure everyone working with, and for, children and young people, understands that wellbeing refers to *all* the areas of a child's life.

Based on the Nest framework, UNICEF Australia and ARACY have created the [Australian Children’s Wellbeing Index](#), which uses data to describe how Australian children are faring across all aspects of wellbeing and how this is changing. The Index can be used as the basis for domain specific indicators on children’s wellbeing in the Early Years Strategy. These can also be complemented by the work currently underway by the Australia Institute for Health and Welfare, developing a national child wellbeing data asset as per Measure 29 of the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-30*.



ARACY's the Nest framework

Incorporating domain specific indicators across all critical aspects of child wellbeing into the Early Years Strategy will ensure the transformative changes we’re making are in actuality producing a step-change for the wellbeing of Australia’s children.

Recommendation

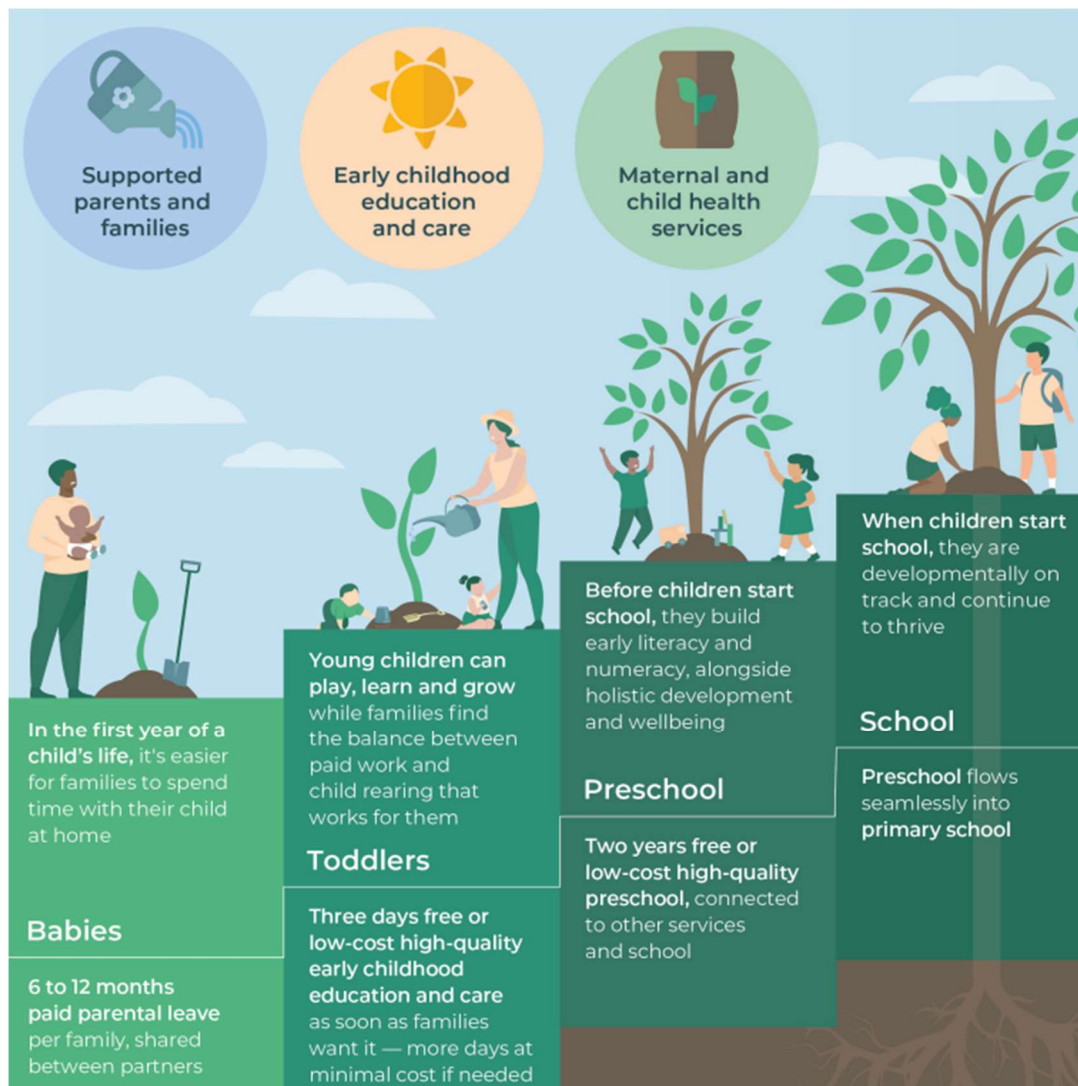
Incorporate domain specific indicators across all critical aspects of child wellbeing in the Early Years Strategy, based on the Australian Children’s Wellbeing Index and the Australian Institute for Health and Welfare’s national child wellbeing data asset (in-development).

2. Creating a truly universal early years system

The Early Years Strategy Discussion Paper begins with a bold mission statement – “Australia should have the highest ambitions and aspirations for all young children, their families and kin.”^{vii} UNICEF Australia very much supports this ambition. We want Australia to be the best place in the world to grow up, and this begins with giving every child the best start to life.

To achieve this, we’ll have to reimagine an early years system which is truly universal, so that every child is afforded every opportunity across the crucial first 1000 days of their life and beyond, from maternal and child health services, to world class early childhood education and care (ECEC).

Thankfully, much of the thinking in this regard has been done as evidenced through the Centre for Policy Development’s landmark *Starting Better* report,^{viii} which proposes a Guarantee for Young Children and Families (see below infographic). This new pillar of Australia’s social deal would provide every child and family with stronger maternal and child health support, access to free or low-cost ECEC from birth until school, more paid parental leave, smoother transitions to school, and more integrated services.^{ix}



Centre for Policy Development's Starting Better Guarantee

UNICEF Australia supports the Guarantee for Young Children and Families, noting these reforms will be sequenced over several years, in particular:

- universal access to maternal and child health care, consistent across all states and territories, with additional home visits for families needing extra support, with access to up to 25 high-quality maternal and child health checks;
- three days (up to 30 hours) of free or low-cost high-quality early childhood education and care per week as soon as families want it, with additional days for those who need it at minimal cost;
- three days (up to 30 hours) of free or low-cost high-quality preschool per week for the two years before children start school, with additional days for those who need it at minimal cost; and
- increased Paid Parental Leave to 12 months with incentives for leave to be shared between partners. In two parent households, parents would receive 18 weeks paid leave each, plus an additional 16 weeks to be used as best suits the family. Single parents would receive the full 52 weeks.^x

Commitment to the Guarantee for Young Children and Families through the Early Years Strategy will help the Strategy deliver on its bold ambition and make Australia the best place in the world for children to grow up.

Recommendation

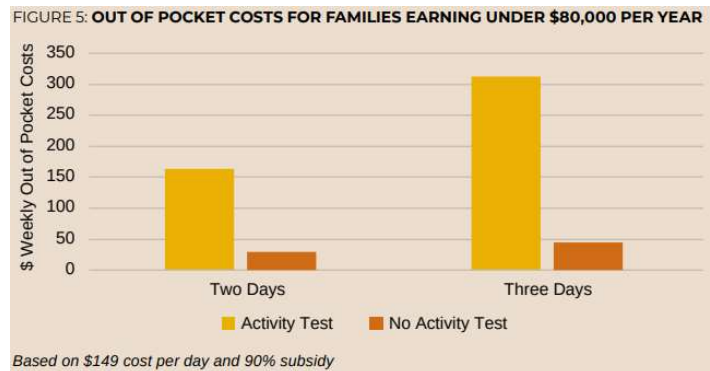
Commit to delivery of the Guarantee for Young Children and Family through the Early Years Strategy, to help create a truly universal early years system in Australia.

While the work towards achieving a universal early years system is a long-term undertaking, we know there are immediate issues which are preventing access, particularly for ECEC. Families experiencing vulnerability and disadvantage can struggle to access ECEC if they don't meet the strict requirements of the activity test for the Child Care Subsidy. The current activity test is contributing to at least 126,000 children and families from the poorest household missing out on ECEC.^{xi}

Research from the Australian Institute of Family Studies has shown that the activity test is negatively impacting low-income families, First Nations families, single parents and families from non-English speaking backgrounds, more than other cohorts.^{xii} In terms of workforce participation, the test creates uncertainty for parents in casual employment due to the risk that they will not meet requirements and be left with over-payment debts.^{xiii}

UNICEF Australia was pleased to see the recent recommendation of the Interim Economic Inclusion Advisory Committee to remove the activity test.^{xiv}

No family should go without ECEC support where it is needed, and simplification or removal of the activity test as a matter of priority would ensure greater access to ECEC for low-income families, improved participation from parents dissuaded from working because of the risk of incurring debts, and reduced red tape and improved efficiency.^{xv} By removing the activity test for the Child Care Subsidy, we can ensure these benefits are realised.



Impact Economics and Impact's Child Care Subsidy Activity Test: Undermining Child Development and Parental Participation

Recommendation

Remove the activity test for the Child Care Subsidy to provide greater immediate access to early childhood education and care, particularly for low-income families.

In addition to barriers to access early years services, we know there are also barriers to service delivery itself, and as the early years service system grows, due both to the ambition of the Early Years Strategy along with State and Territory-based reforms already underway, we'll need to plan to break down those barriers rather than exacerbate them. In this regard, workforce and infrastructure in ECEC are two huge undertakings that require focus.

The challenges facing the ECEC workforce are now well understood. The mostly female workforce faces low pay, under-investment in skills development, and high staff turnover.^{xvi} In addition to retention, the supply of staff is a real pinch point, with tens of thousands of new educators needed by July 2023 just to meet the additional demand created by the Government's welcome Cheaper Childcare changes.^{xvii}

Just as the workforce challenges are well known, so too are a number of proposed solutions to address them. Dandolopartners in their early years policy series have identified a series of ideas to investigate including funding models that require ECEC providers to provide adequate wages and consistent conditions, industrial reforms to create better career pathways and progressions, and innovation around job design including the role that employers can play in creating supportive workplaces.^{xviii} Thrive By Five has a broadly endorsed ECEC Workforce Action Plan which calls for immediate pay rises comparable to school educators, and longer-term workforce planning through investment in TAFE and universities, and accelerated pathways to formal qualifications, amongst other initiatives.^{xix}

Along with workforce, infrastructure is another significant barrier to service delivery. An increase of supply will necessitate a scale-up of physical infrastructure, and although there is some capacity within existing services to meet demand, it is unlikely to be sufficient given the ambition of the reforms in question.^{xx} The capacity and readiness of service providers to expand is also variable.^{xxi} Across NSW and Victoria as an example, ~40-60% of service providers

have a strong capacity to expand, ~20-50% have some capacity to expand, and ~10-20% have limited or no capacity to expand.^{xxii}

Sector-identified solutions to the infrastructure challenge are thankfully also beginning to materialise. Several ideas for further inquiry exist including:

- increasing the accuracy and availability of supply and demand data, with more streamlined data sharing between Commonwealth and other jurisdictions;
- incentivising employers to build and provide early years services;
- providing tailored support and incentives for service providers with the capacity to expand;
- cross-portfolio investment to grow integrated early years hubs; and
- working with local governments to aid in the planning and provision of early education.^{xxiii}

These sector-solutions and others will need to be considered in the context of the Early Years Strategy if the significant workforce and infrastructure challenges are to be overcome, further enabling the realisation of a truly universal early years system.

Recommendation

Incorporate existing sector-identified solutions to workforce and infrastructure challenges in the Early Years Strategy, to further enable a universal early years system.

3. Embedding equity in the system to drive change for the most vulnerable

Currently, those children who are most likely to benefit from support in the early years are the least likely to access it. UNICEF Australia wants to flip this script so we can shift the dial on the one in five children who are developmentally vulnerable.^{xxiv} We can achieve this by front-loading equity in the Early Years Strategy, embedding it as a key design principle, so that all of our decisions are made with the intention to adequately address it.

As the early years system is scaled-up in line with the ambition of the Early Years Strategy, we will have to remain diligent to avoid scaling-up inequity in the process. If the reimagined system simply mirrors the existing one, the gap between disadvantaged and advantaged may grow even greater.^{xxv} Currently children who are not enrolled in early education access 600 less hours of education than children who are enrolled; this gap could grow to 1800 hours if the existing system is replicated.^{xxvi}

The complexity of the current system, challenging life circumstances, and the capacity of providers to deliver inclusive services trusted by families, are all contributing to inequity in access.^{xxvii} There are a variety of solutions to address these barriers and reduce inequity including:

- Linker models which work systematically to remove barriers for children and their families in finding a service and attending, acknowledging that in the short to medium term these models will be required, but that ultimately we can create a system in which Linker models are not required;
- using needs-based funding models which reflect the cost of delivering quality early education to children experiencing disadvantage, and equip services to meet child and family needs through resourcing for outreach roles and other additional supports;
- incentivising and funding wrap-around, integrated hubs and networks, ensuring early education services are embedded in wider support networks for children and their families.^{xxviii}

There is also benefit in investing in alternative models of care which are responsive to the needs of children who are struggling to access the formal ECEC system. In Australia, there are examples like the [Indi Kindi](#) program, an early years program for children under five years of age in remote Aboriginal and Torres Strait Islander communities.^{xxix} Indi Kindi is an integrated physical and mental health, wellbeing, education and development program, which gives local children the best start in life.^{xxx} Internationally, UNICEF has seen alternative models of care deployed in a variety of contexts to

reach hard to reach children, from seasonal preschools in the mountainous regions of Kyrgyzstan, to mobile kindergartens across Fiji, to supervised neighbourhood play and catchup programs in conflict-affected areas of the Philippines.^{xxxix}

By embedding equity as a design principle in the Early Years Strategy, and investing in the above solutions, we can ensure that the Strategy is always working towards making real impact for the most vulnerable children and families, helping to bring support to those who need it most.

Recommendation

Embed equity as a key design principle in the Early Years Strategy, and explore the scale-up of needs-based funding models, incentivised wrap-around and integrated hubs and networks, and alternative models of care, to provide access to support for those children and families who most need it.

In the context of inequity, we know that while one in five children across Australia are still starting school developmentally vulnerable, this is even higher for some communities including Aboriginal and Torres Strait Islander children.^{xxxix} Aboriginal and Torres Strait Islander children are half as likely to access ECEC as non-Indigenous children,^{xxxix} stressing the need for early years services run by Aboriginal community-controlled organisations which are able to provide tailored holistic support, grounded in culture and trauma-informed practice, and capable of responding to the complex needs that the children and their families may be facing.^{xxxix}

There is strong existing work which provides guidance on the ways we can positively impact the lives of Aboriginal and Torres Strait Islander children in the early years. The *National Aboriginal and Torres Strait Islander Early Childhood Strategy*^{xxxv} developed by the Australian Government in partnership with SNAICC, and the *Closing the Gap Sector Strengthening Plan: Early Childhood Care and Development*,^{xxxvi} are just a couple to call out. These pieces of work and others like them should inform the Early Years Strategy and in doing so, have their integrity maintained.

What we can confidently say when reflecting on this existing work is that culturally-safe early education is a key protective factor to ensure the education and healthy development of First Nations children.^{xxxvii} To this end, funding for a dedicated Aboriginal and Torres Strait Islander community-controlled early years sector continues to be a pressing need, both through funding of the sector broadly, and as a matter of priority through specific funding earmarked for the re-establishment of Aboriginal and Torres Strait Islander Children and Family Centres (ACFCs) around Australia. ACFCs provide a holistic model of care through an array of integrated services which result in better outcomes, however, 38 federally-funded ACFCs spread around the country had their funding ceased in 2014.^{xxxviii}

Ultimately, the Early Years Strategy will be made stronger by expressing clear commitments to driving real and lasting change for Aboriginal and Torres Strait Islander children and families.

Recommendation

Include commitments in the Early Years Strategy to an adequately-resourced Aboriginal and Torres Strait Islander community-controlled and integrated early years and family-focused service sector, including federal funding for the re-establishment of Aboriginal and Torres Strait Islander Children and Family Centres.

About UNICEF Australia

UNICEF believes in a fair chance for every child and we are the world's leading organisation working to protect and improve the lives of children in over 190 countries. At UNICEF Australia we work to protect and promote children's rights by advocating for the rights of children in Australia and overseas.

UNICEF Australia would welcome the opportunity to expand further on any of the measures we have outlined in this submission.

- ⁱ *Convention on the Rights of the Child*, opened for signature 20 November 1989, Treaty Series Vol. 1577 (entered into force 2 September 1990) art 12
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- ^v Pauline Harris and Harry Manatakis (2013), *Children's Voices: A principled framework for children and young people's participation as valued citizens and learners*, https://www.education.sa.gov.au/sites/default/files/childrens-voices-framework.pdf?acsf_files_redirect
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- ^{xiv} Interim Economic Inclusion Advisory Committee (2023), *2023–24 Report to Government*, <https://ministers.treasury.gov.au/sites/ministers.treasury.gov.au/files/2023-04/eiac-report.pdf>
- ^{xv} Impact Economics and Policy (2022), *Child Care Subsidy Activity Test: Undermining Child Development and Parental Participation*. https://static1.squarespace.com/static/61e32e62c8337e6fd7a1e6/t/630de5c741a8de08ad48d593/1661855185396/Undermining+Child+Development+And+Parental+Participation+Report_FINAL.pdf
- ^{xvi} 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>
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