



**Secretariat of National Aboriginal and Islander Child Care**

**SNAICC Submission to the Department of Education,  
Employment and Workplace Training (DEEWR)**

**Quality Early Childhood Education and Care for Children in  
Regional, Remote and Indigenous Communities  
Review of the Budget Based Funding Program**

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## Introduction

SNAICC welcomes the opportunity to participate in the discussion on the future of the Budget Based Funded (**BBF**) program for early childhood education and care (**ECEC**) services. BBF services have provided a fundamental support to children, families and communities for decades. Being owned and run by communities has meant that their understanding of and relationships with communities has enabled effective and responsive programs that build on community and cultural strengths, and attain great outcomes for children and families. Despite significant challenges in funding, infrastructure and workforce development support, these services continue to be a bedrock for Aboriginal and Torres Strait Islander families around Australia. This review provides an opportunity to redress some of the challenges that BBF services face and better enable them to provide quality, culturally safe environments in which children will flourish.

SNAICC strongly believes that any reform of the BBF program must respond to and seek to address the persistently low educational, health and wellbeing outcomes experienced by Aboriginal and Torres Strait Islander children. Critical to this is recognising the concerns recently identified by the United Nations (**UN**) Committee on the Rights of the Child regarding “The serious and widespread discrimination faced by Aboriginal and Torres Strait Islander children, including in terms of provision of and accessibility to basic services”.<sup>1</sup> There is extensive and well established evidence that investment in early childhood education for Aboriginal and Torres Strait Islander children is “fundamental to attempt to reverse the historic and continuing health, social, economic and political disadvantages they face”.<sup>2</sup> Drawing from this, SNAICC considers it imperative that the Australian government consider this an opportunity to respond to the UN Committee’s recommendations to increase availability and access to early childhood education for Australia’s children by considering providing free or affordable early childhood services.<sup>3</sup>

This submission responds to and is informed by the questions contained within the Department of Education, Employment and Workplace Relations (**DEEWR**) discussion paper *Quality Early Childhood Education and Care for Children in Regional, Remote and Indigenous Communities*. This submission does not answer these questions in a direct, linear fashion, but instead it seeks to respond to the issues raised within the discussion paper through the following structure:

- Section A: Executive Summary
- Section B: Background context
- Section C: Consideration of the principles fundamental to Aboriginal and Torres Strait Islander ECEC services;
- Section D: Consideration and practical examples of the constraints and relevant issues with the current BBF model;
- Section E: Consideration and practical examples of the constraints and relevant issues with the Child Care Benefit (CCB) model; and
- Section F: A discussion and ideas for a revised future BBF model.

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## Section A. Executive Summary

- This review is a prime opportunity to review the current challenges faced by the BBF model and to begin the process of building a future for Aboriginal and Torres Strait Islander early childhood education and care (**'ECEC'**) services that is based on an equitable, sustainable and effective model. Imperative to this review process is that it is given sufficient time, and involves the active participation and contribution of Aboriginal and Torres Strait Islander people, ECEC services and sector experts.
- BBF services operate in urban, regional and rural areas to provide holistic education and care opportunities to Aboriginal and Torres Strait Islander children, families and communities. They are extremely diverse services with diverse operational and funding needs.
- The historical BBF funding model provides a strong foundation for effective service delivery but contains many challenges that limit its current effectiveness and scope for Aboriginal and Torres Strait Islander ECEC services. Funding constraints lie at the core of these challenges.
- Identification of core governing principles for Aboriginal and Torres Strait Islander ECEC BBF services should guide consideration of an effective funding program.
- In particular, early childhood services need to reflect and respect the complexities of Aboriginal and Torres Strait Islander family and community strengths and needs. While they should be resourced to retain and extend the cultural and social strengths, they also need to counter the damages of past indignities and meet pressing additional needs. Therefore any funding program must be assessed by whether they can meet the complex needs of our communities.
- While there are limitations in the current BBF model, simply shifting services to the other current alternative available, a Child Care Benefit (**'CCB'**) model, is clearly not the answer. Many services and sector experts have reinforced to SNAICC serious reasons why the model would be incompatible for many Aboriginal and Torres Strait Islander early childhood services. These range from the philosophy and objectives of the model, to substantial technical and administrative challenges with its requirements. A shift to CCB may have grave implications then, particularly in light of the current pressures and limitations of the system.
- The current Federal Government policy agenda recognises the importance of early childhood for positive outcomes for children and in reversing cycles of disadvantage. It is also investing significantly in achieving equality between Indigenous and non-Indigenous Australians.
- Any changes to the current non-mainstream ECEC model must ensure that they advance rather than undermine this agenda. In particular to move towards these outcomes, early childhood education and care services must be accessible, particularly to those most excluded, of high quality, responsive to community needs and culturally appropriate.
- A flexible method to determine eligibility for the BBF program would assist in ensuring consistency and equity. This could be based on a demonstration of need for support by ECEC services through each three year funding proposal, therefore allowing consideration of any change in service needs over time. Fair means of review would be essential to this approach.
- SNAICC urges that the current national consultations be followed by more in depth work with experienced practitioners in BBF services and Aboriginal and Torres Strait Islander early childhood experts to really understand the complexities of service needs, and the tools or models required to value the strengths of communities and

obtain strong outcomes for children, and to interrogate how diverse community needs translate into an effective national funding program.

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## Section B. Background context

Strong evidence indicates that the early years from 0-8 are critical in a child's development, and that "investment in early education, particularly for disadvantaged children, is more effective than intervention at later ages."<sup>4</sup> A number of international studies indicate that high quality early childhood programs that focus on children as active program participants and focus on improving parenting skills provide greater returns on investment than those focusing on family economic circumstances.<sup>5</sup> Outcomes from such programs include "improved health status, cognitive skills, achievement motivation, and school readiness in the short term as well as school achievement, educational attainment, and reductions in remedial services and criminal behavior in the longer term."<sup>6</sup>

The current Government policy agenda reflects a shift in priority towards investment in the early years, specifically through the *Investing in the Early Years: A National Early Childhood Development Strategy, 2009* ('**Early Years Strategy**'), and the new reform agenda for early childhood education and care outlined in the National Quality Framework ('**NQF**'). Furthermore, early childhood is one of the seven interrelated 'Building Blocks' developed to support the 2008 COAG agreed reforms to close the gap in Aboriginal and Torres Strait Islander disadvantage, and the 2008 Council of Australian Governments ('**COAG**') National Partnership Agreement for Indigenous Early Childhood Development, 2008 sets out the path forward for this.

Early childhood development within this overarching policy context is framed as encompassing:

- all aspects of children's development (cognitive, learning, physical, social, emotional and cultural);
- supporting "all children, and providing additional help for those children most in need to reduce social inequalities",<sup>7</sup> and
- focusing on "respect for diversity and difference as a strength, and helping children develop a positive sense of self and culture."<sup>8</sup>

To meet these aims, programmatic responses therefore need to encompass and support holistic, culturally competent care and development services that focus on addressing societal inequities and increasing access for the most disadvantaged.

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## Section C. Principles fundamental to Aboriginal and Torres Strait Islander ECEC services

This section introduces the key principles that underpin Aboriginal and Torres Strait Islander early childhood services. The seven elements are drawn from a wealth of evidence, historical and recent, that outlines what works in delivering early childhood services to Aboriginal and Torres Strait Islander children and families. These elements need to be considered within and operationalised by the future funding model.

### 1. Innovative governance and self-determination

A wealth of evidence from national and international literature demonstrates that service governance models that foster Aboriginal and Torres Strait Islander leadership and

ownership lead to improved service delivery outcomes<sup>9</sup> that directly benefit children and families.<sup>10</sup> Recent SNAICC research highlights the relevance of self-determination for improved and better integrated service delivery, citing compelling international evidence that “the best outcomes in community well-being and development for Indigenous peoples are achieved where those peoples have control over their own lives and are empowered to respond to and address the problems facing their own communities.”<sup>11</sup> Further evidence indicates that when Indigenous communities “make their own decisions about what development approaches to take, they consistently out-perform external decision makers on matters as diverse as governmental form, natural resource management, economic development, health care, and social service provision.”<sup>12</sup> The principle of active participation of and engagement with Aboriginal and Torres Strait Islander communities is recognised within the National Indigenous Reform Agreement (**NIRA**) as fundamental in designing programs to effectively overcome disadvantage; “Through improved engagement, Indigenous people are being made central to the design and delivery of services and programs. The aim is to build responsibility and capacity at the personal and community level and lay the basis for lasting change.”<sup>13</sup>

This principle is confirmed by the UN Committee on the Rights of the Child, which states that the right to education requires that educational programs are developed in collaboration with Indigenous communities so as to best address their specific needs, and that Indigenous communities have a right to establish “their own educational institutions and facilities, provided that such institutions meet minimum standards established by the competent authority in consultation with these peoples.”<sup>14</sup> Article 14 of the *United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)*, to which Australia is a signatory, reaffirms that through their own educational institutions Indigenous people have the right to provide education “in their own languages (and) in a manner appropriate to their cultural methods of teaching and learning.”<sup>15</sup> This is particularly important in early childhood with strong cultural identity forming the bedrock for later development.<sup>16</sup>

As the recent Australian National Audit Office review of Aboriginal and Torres Strait Islander service delivery capacity recognised, there is a critical need for greater investment in Aboriginal and Torres Strait Islander controlled services as a priority not just for effective service delivery, but as a policy objective in itself, “in so far as it promotes local governance, leadership and economic participation, building social capital for Aboriginal and Torres Strait Islander peoples.”<sup>17</sup> The recent NSW Ombudsman report on addressing Aboriginal disadvantage also provides key learnings in this area – highlighting a lack of Aboriginal and Torres Strait Islander participation and ownership as a major contributor to the failure of government policies to address Aboriginal and Torres Strait Islander disadvantage.<sup>18</sup>

#### *Service example*

A number of Aboriginal and Torres Strait Islander services identified in recent SNAICC consultations that community governance mechanisms are vital supports to ensure that the service is truly managed by, reflective of and responsive to the community. For example, Yappera MACS in Victoria felt that having a committee made up of parents, grandparents or other family members who are both actively involved and invested in the service *and* in the local community enables the service to better respond to community needs. Committee members often have strong historical connections with the centre – with a number of Board members involved with Yappera for up to 20 years. Board members are therefore invaluable partners in ensuring that Yappera remains connected to its history and long-term objectives, and retains a strong connection with the community.

## 2. Strengths based, quality service provision

A strengths based approach to ECEC service provision builds on existing family and community strengths and expertise to develop children's and families' capacity, confidence and pride. It utilises Aboriginal and Torres Strait Islander culture and languages, recognizing – as stated in the House of Representatives recent report on Aboriginal and Torres Strait Islander traditional language development - the multitude of evidence that “early childhood Aboriginal language and cultural programs lead to increased self-esteem, improved academic performance, improved school attendance, reduced drop-out rates and better proficiency in reading skills in both the Indigenous language and English.”<sup>19</sup>

It requires active community participation, “encouraging and facilitating communities ‘doing it for themselves’ rather than ‘being done to’.”<sup>20</sup> The National Early Childhood Development Strategy describes this as “engaging and empowering parents and communities in early childhood development and services”, highlighting this as an essential component of a responsive early childhood service.<sup>21</sup> A strengths based approach is particularly important for Aboriginal and Torres Strait Islander families and communities, for whom past policies, structures and histories have eroded self-esteem and social cohesion. In overcoming this, therefore, a critical element of an empowering, strengths based approach is recognising each family and community's unique context and qualities. As Sims describes, “It is essential to remember that each family/community/culture has different strengths, not all of which are recognised as strengths in a white, middle-class world.”<sup>22</sup>

### *Service example*

Many Aboriginal and Torres Strait Islander ECEC services see their role as being proactively engaged in the development of their local community. The Director of the Tasmanian Aboriginal Children's Centre described to SNAICC how partnerships with families strengthens partnerships with the community, explaining that, “I don't think we've ever thought this place is about strengthening just children, this place is about building a stronger community.” She feels that their community development approach has myriad benefits for children, helping to build a stronger community and parents who can support their development, and helping to strengthen children's identity and connection. She describes that “MACS centres aren't just services to the community, they're part of the community.”<sup>23</sup>

Essential to a strengths based approach is recognising and valuing quality within Aboriginal and Torres Strait Islander ECEC services – which may look different to quality in non-Aboriginal and Torres Strait Islander ECEC services. The Early Years Learning Framework (EYLF), a key element of the National Quality Standard, is a positive shift in the sector towards a strengths based approach that provides flexibility to provide a strong standard of quality that can then be applied to reflect the differences of local community contexts. Drawing on recent SNAICC consultations with 14 Aboriginal and Torres Strait Islander BBF services, it is clear that Aboriginal and Torres Strait Islander ECEC services are effectively implementing the EYLF, and, critically, that the Framework provides flexibility for services to demonstrate their own unique, context-specific approaches to quality service provision.<sup>24</sup>

## 3. Values and incorporates identity and culture

A wealth of literature highlights the importance for Aboriginal and Torres Strait Islander children of early childhood service models that “acknowledge and affirm Indigenous culture and build positive cultural identity.”<sup>25</sup> Aboriginal and Torres Strait Islander families have identified that a critical factor in their engagement with a child care service is the ability of the service “to recognise and incorporate cultural practice into the way the child and family is dealt with.”<sup>26</sup> The NIRA affirms this, setting out that “Connection to culture is critical for

emotional, physical and spiritual well being. Culture pervades the lives of Indigenous people and is a key factor in their wellbeing – culture must be recognised in actions intended to overcome Indigenous disadvantage....Efforts to Close the Gap in Indigenous Disadvantage must recognise and build on the strength of Indigenous cultures and identities.”<sup>27</sup>

Aboriginal and Torres Strait Islander ECEC services incorporate culture on an everyday, incidental basis by focusing on developing children’s identity, sense of belonging and pride within their community, family and culture.<sup>28</sup> Whilst many mainstream early childhood services do aim to be inclusive of Aboriginal and Torres Strait Islander culture, there are important distinctions. Aboriginal and Torres Strait Islander ECEC services, for example, naturally embrace culture as central to every aspect of service delivery: it is not something external, but inherent in what they are. This creates a sense of cultural safety for families.<sup>29</sup>

*Service example*

Reflecting culture on a deep level involves using it to engage children in learning experiences. Birrelee MACS in Tamworth has worked collaboratively with Macquarie University to do this - designing numeracy and literacy resources that reflect the children’s culture. The Director describes how this engages children in topics they may not be interested in, “So the numeracy may not engage the child but that sense of connection and identity (within the resource) engages the child.” She emphasises “our learning experiences have to be culturally centred, and I think that’s why our kids struggle at school, because it becomes a secondary thing or an optional extra. Whereas here it’s our daily experience.”<sup>30</sup>

#### **4. Holistic and responsive to community needs**

Holistic and responsive services seek to cater for a child’s comprehensive developmental needs, including language development, speech and hearing support, etc. These need to be part of an integrated approach and not considered as add-ons to a program. Holistic early childhood services also need to provide a range of services beyond child care and development programs,<sup>31</sup> including health, family support and capacity building, nutrition and early intervention. These additional programs have been identified by families and services alike as critical to increasing families’ access and engagement with an early childhood service.<sup>32</sup> The provision of such additional programs in an integrated approach is also critical to meeting broader family needs<sup>33</sup> and overcoming disadvantage in early childhood. This requires “a holistic approach that addresses children and families in the context of their communities and cultures, taking into account children’s physical and mental health, emotional wellbeing and development.”<sup>34</sup>

Such an integrated approach is defined in the National Early Childhood Development Strategy, which states that “Services for children and their families are linked in different ways, depending on local needs and circumstances, to promote a holistic response to each child and family situation. This includes integration, whether physical or virtual, that encourages interdisciplinary approaches to meeting the needs of children and their families...”<sup>35</sup> The National Partnership further defines that “Early childhood experts advocate integrated delivery of services, including antenatal services, child and maternal health services, parenting and family support services, and early learning and child care, as the best delivery platform to ensure families actually receive the support they need.”<sup>36</sup> This approach is recognised by the UN Committee on the Rights of the Child as being a positive shift towards “a coordinated, holistic, multisectoral approach to early childhood”, recognising that the traditional divide between education and care services has not always been in children’s best interests.<sup>37</sup> SNAICC research on integrated service delivery has identified that



genuine and respectful partnerships are key to the provision of holistic, integrated services.<sup>38</sup> Effective integration requires collaboration at various distinct levels, including “regional and local service development (and) management and coordination.”<sup>39</sup>

A recent UN review of Australia’s child rights record recommended that the Australian government “further improve the quality and coverage of its early childhood care and education...with a view to ensuring that it is provided in a holistic manner than includes overall child development and strengthening parental capacity.”<sup>40</sup> Many BBF services, such as the MACS, offer a strong model of this type of service provision.

A final critical feature of holistic services is that they target their programs and approach to the specific needs and context of their local community. This involves the capacity to spontaneously adapt to short-term needs and/or changing community dynamics – such as an increase in children visiting with their families for cultural business. It also involves a capacity to reflect longer-term community priorities and requirements, for example responding to an identified need for literacy support. This is reinforced by the UN Committee on the Rights of the Child, which sets out that governments need to ensure that ECEC standards are “tailored to the circumstances of particular groups and individuals...(States) are encouraged to construct high-quality, developmentally appropriate and culturally relevant programmes and to achieve this by working with local communities rather by imposing a standardised approach to early childhood care and education.”<sup>41</sup>

#### *Service examples*

Recent SNAICC consultations identified that a number of services provide nutritional programs as part of their service. These provide a useful example of how an early childhood service can provide additional programs.

Congress Child Care Service in Alice Springs has identified a particular need for children who are failing to thrive. Working in collaboration with their parent body’s health clinic they provide specialised care and a nutrition program for these children. As the Director explains, this is about looking at “what sort of things we can do to improve these children’s weight while they’re in care here”.<sup>42</sup>

Tamworth-based Birrelee MACS works with a dietician to conduct regular cooking activities with the children and share recipe examples with families that can be cooked on limited budgets. Through this approach they have noticed tangible positive differences in children’s eating habits.<sup>43</sup>

## **5. Community not centre focused**

Aboriginal and Torres Strait Islander ECEC services are about meeting the needs of *all* children in the community.<sup>44</sup> Services focus not on just the children attending the centre but seek to reach all children who may be in need. This is achieved, for example, through outreach, mobile services, and provision of care to children visiting the community. This “community approach to child care is consistent with a ‘traditional’ Indigenous approach.”<sup>45</sup> This principle is supported within the National Early Childhood Development Strategy, which states that a key element of a responsive ECEC services is “active service outreach into the community”.<sup>46</sup>

Such an approach addresses the well-documented challenge of the lower rates of Aboriginal and Torres Strait Islander children’s participation in early childhood care.<sup>47</sup> The barriers to their participation are not simply the low availability of services in a given area, as one report notes “Increasing the number, scope and capacity of services did not necessarily

mean Indigenous families accessed and engaged with these services.”<sup>48</sup> Barriers centre around unmet cultural or support needs of families; remoteness or lack of transport; negative associations with institutions and government services; and lack of cultural competent staff.<sup>49</sup>

A key service delivery principle within the NIRA is that services “should be physically and culturally accessible to Indigenous people recognising the diversity of urban, regional and remote needs.”<sup>50</sup> Whereas mainstream child care services are established to support families working or studying, Aboriginal and Torres Strait Islander ECEC services prioritise access and engagement for Aboriginal and Torres Strait Islander children not accessing, or not likely to access, mainstream services. They target their services to improve access for the most disadvantaged members of a community, and through their unique features they overcome many of the identified barriers Aboriginal and Torres Strait Islander families experience in accessing early childhood services.<sup>51</sup> One example of this is the community management committees discussed above, which help families to feel that the service is part of and owned by their community.<sup>52</sup>

These concerns are supported by earlier evidence from the UN Committee on the Rights of the Child that Indigenous children “are among those children who require positive measures in order to eliminate conditions that cause discrimination and to ensure their enjoyment of the rights of the Convention on equal level with other children.”<sup>53</sup> This lies behind States’ responsibility to ensure that Indigenous children can enjoy their right to education through allocated and targeted resources specifically aimed at increasing Indigenous’ children’s access to education.<sup>54</sup> Review of the BBF program provides an ideal opportunity to instigate positive measures to increase Aboriginal and Torres Strait Islander children and families’ access to and engagement with ECEC services. This is consistent with NIRA service delivery principle of priority that: “Programs and services should contribute to Closing the Gap by meeting the targets endorsed by COAG while being appropriate to local community needs.”<sup>55</sup>

#### *Service examples*

Broome-based service Jalygurr Guwan operates a mobile outreach service to provide education, care, health and parenting services for approximately 10 families a week who would not normally access a child care service.

Outreach services are a key form of targeted support identified within the National Early Childhood Development Strategy as effective in reaching high need and/or at risk children and families.<sup>56</sup>

#### *Service example*

During recent SNAICC research many services identified that the trust families have in them as an Aboriginal and Torres Strait Islander organisation means that the most vulnerable families in the community will access the service. The Director of one regional service cites the example of a vulnerable family who came to the centre for help because they “were told that this was a safe place to go”, and attributes this to the community’s trust in them as a local service with local staff.<sup>57</sup>

## **6. Supports ongoing learning, information-sharing in and across sectors, and innovation**

Ongoing learning within an early childhood centre means that educators and staff “become co-learners with children, families and communities, and value the continuity and richness

of local knowledge shared by community members, including Aboriginal and Torres Strait Islander Elders.”<sup>58</sup> This involves educators working within a cycle of reflective practice in which “current practices are examined, outcomes reviewed and new ideas generated.”<sup>59</sup> It means learning from practice, engaging with other services and having the flexibility to innovate based on local needs, strengths and opportunities. Therefore, ongoing learning is also about staff staying closely in touch with local needs and accordingly adjusting services to meet those needs, as discussed under Principle 4 above.

## **7. Sustainability**

Lastly, Aboriginal and Torres Strait Islander ECEC services must be built upon and supported by sustainable foundations, which encompasses several elements.

### *Local workforce development*

Numerous studies have articulated the benefit of having Aboriginal and Torres Strait Islander staff to improve families’ access and engagement with a service.<sup>60</sup> Sustainable, long-term outcomes for Aboriginal and Torres Strait Islander children, families and communities, requires service designs that enable capacity building for local Aboriginal and Torres Strait Islander community and organisations.<sup>61</sup> Training and workforce development for local community members are central to this, in ensuring a skilled, qualified, long-term and culturally appropriate workforce who understand the local culture and community. Services need to be able to take on untrained local workers, who they can then support to gain their qualifications. This involves an understanding that the staff may not stay on at the service, but that the service will play an important role in enabling their career development. This then contributes to the pool of skilled workers within the community. Supporting this, the NIRA sets out that a key element of service sustainability is ensuring that attention is paid to “building the capacity of both Indigenous people and of services to meet the needs of Indigenous people, particularly: (i) developing the skills, knowledge and competencies, including independence and empowerment of Indigenous people, communities and organisations.”<sup>62</sup>

### *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.<sup>63</sup> SNAICC has identified that a key principle in integrated services for families and children is that “Funding bodies 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.”<sup>64</sup> In a 2012 paper the Australian Institute of Health and Welfare identified that long-term and stable funding and the delivery of long-term programs, are key factors in improving accessibility for Aboriginal and Torres Strait Islander families to ECEC services.<sup>65</sup> Short-term funding is linked to ‘initiative fatigue’, where families lose motivation to continually engage in new, short-term programs.<sup>66</sup> Shorter timeframes also hinder the building of relationships between program providers and families, and do not allow sufficient time to work through complex issues – such as health concerns.<sup>67</sup> The paper also identifies that a further key element is that a service is economically accessible for families.<sup>68</sup> For a more detailed discussion of the implications of this see Section D, Part 1.

Adequacy of funding is also clearly a fundamental aspect of quality ECEC service provision for Aboriginal and Torres Strait Islander children. A number of key reports have noted the lack of increase in funding to Aboriginal and Torres Strait Islander services to date,<sup>69</sup> and the need for additional funding in the short-term to ‘close the gap’. In particular, appropriate

funding would address service's urgent and ongoing infrastructure and workforce development needs, and would recognize the necessity of overcoming additional needs Aboriginal and Torres Strait Islander communities face due to factors such as colonization, intergenerational trauma and depletion of parenting skills caused by the Stolen Generations, and entrenched poverty.

*Operational structures and systems that are determined by services and respond to service context*

The National Early Childhood Development Strategy identifies that to better respond to and engage with children and families requires flexibility within funding and administrative arrangements.<sup>70</sup> SNAICC research also identifies that flexibility within government funding frameworks is a key principle in ensuring a strengths based approach to integrated service delivery, and to enable targeted and innovative community-based service design that responds to local needs and priorities.<sup>71</sup> This requires "Flexible frameworks and service contracts to enable local service design that reflects local Aboriginal and Torres Strait Islander priorities and aspirations."<sup>72</sup> Such systems are also vital in ensuring service empowerment and self-determination.

This means sufficient flexibility to enable a service to develop the content of its own program, including the most essential services, and to define how those services are provided. Budgetary and reporting requirements must also appropriately respond to a service's context and type. In particular, the relevancy of reporting requirements will vary between a small, mobile children's service providing a fortnightly playgroup, and a large, centre-based long day care centre.

Operational structures and systems must also be sufficiently flexible to cater for the very diverse types of service models currently required to meet the needs of communities around Australia. This includes, playgroups, mobiles, long day care centres, crèches, and Out-of-School-House care. There is also a need to be able to reshape models as the community needs change over time. Research indicates that "Perceiving child care as a continuum of options (along which communities can move in either direction) enables communities to build on current strengths and work together towards planning for their future."<sup>73</sup> This allows services to establish and foster relationships with children and families, and to introduce families to early childhood services. For example, in many communities informal playgroups have created accessible entrance points to early childhood care for new families. Such 'soft' entry points are a key way to enable access to services for hard-to-reach families, including Aboriginal and Torres Strait Islander families.<sup>74</sup> Once established within a community, and where community demand dictates, the playgroups can then transition to more formal child care services. This gradual process of transition enables services to ensure that they are built on strong, foundational relationships with community, and that they respond and are tailored to community needs.

As one report states, "Service development, community needs and appropriate infrastructure must be bound together and synchronised. This requires ongoing assessment and consultation with communities. This ensures adequate facilities and a sense of ownership over the usage of buildings, for example, and can be critical in the development and sustainability of the service."<sup>75</sup>

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## Introduction to Sections D and E

The issues and concerns outline in Section D and E have been relayed to SNAICC through discussions with: Aboriginal and Torres Strait Islander BBF and CCB early childhood services from across Australia; Indigenous Support Units ('IPSUs'); SNAICC National Executive members working in the early childhood sector; representatives from peak bodies and other relevant early childhood organisations; and sector experts. The structure of each element is as follows:

- A short explanation of the issue or concern;
- Where relevant, an evidence-based substantiation of the concerns raised by reference to relevant sector reports and literature;
- Brief individual service examples that highlight the practical effects of a particular issue; and
- Potential possible alternatives that have been proposed from the sector or from the literature.

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## Section D. Consideration and practical examples of the constraints and relevant issues with the current BBF model

### 1. Longer funding cycles

#### *Issue*

The current method of one-year funding cycles presents various issues. In particular it:

- Limits services' ability to conduct long-term, strategic planning,<sup>76</sup> and to save money for larger or one-off projects such as vehicle replacement, building maintenance or general depreciation;
- Creates a significant administrative workload for both services and contract administrators;<sup>77</sup>
- Can create a perception of service instability amongst staff, which can effect their commitment to the service;
- Can create challenges when employing new staff – such as trainees, or supporting staff to further their qualifications – when it is not known whether the service will be able to employ that person the following year; and
- Creates pressure to spend funds within the year to ensure budget levels are not decreased, as unspent funds cannot be carried over to the following year.

#### *Evidence*

A key COAG *Closing the Gap* service delivery principle is sustainability, with programs and services to be "directed and resourced over an adequate period of time to meet the COAG targets".<sup>78</sup> Key to this is ensuring that attention is given to "ensuring adequate and appropriate resources, particularly...considering workforce supply and future planning." Based on these concerns, the Australian National Audit Office has stated that there would be merit in DEEWR exploring the benefits of multi-year funding arrangements, which it states the Department has in theory agreed with.<sup>79</sup> Multiple year contracts would afford service providers greater flexibility in how they use their funding, which ANAO states would "allow them to cater for local changes in demand and circumstance..."<sup>80</sup>

### *Possible alternative*

A number of services and sector reports have indicated that a solution to this challenge is extended - for example three to four-year - funding cycles that would enable services to conduct longer-term, sustainable future planning to better meet the needs of their communities and families.<sup>81</sup> This would contribute to addressing the sustainability issues identified in Section C, Part 7.

See Example 3.1 for an example of the restrictions of the one-year funding model.

## **2. Need for additional services**

### *Issues*

Many services are struggling under current budget restrictions to deliver more than just child care, and have been forced to make budget reductions – for example cutting transport, staff, nutrition or other programs to continue operating.

### *Evidence*

The lack of budgetary provision for additional services was identified as a particular issue for Multifunctional Aboriginal Children’s Services (MACS) as far back as 2000, when SNAICC identified that the funding model was still essentially a model for the provision of long day care, and that whilst this was, and continues to be, an important component of MACS it is not the only thing they do: “MACS...are expected by their communities to do many things but are funded to do one thing.”<sup>82</sup> This issue is not limited just to MACS, but extends to all BBF services, with one report identifying that,

A number of service providers talked about the types of services they want to offer, services they perceive as vitally important to the future of their communities, but they are unable to do so because the desired program is not part of their child care funding, they do not have the expertise to apply for alternative sources of funding, or they have had success with alternative funding but this is not available on an ongoing basis. A number of service deliverers talked in despair of quality programs they had been running but are now closed, or are closing, because non-renewable funding had run out and they could not find alternative sources.<sup>83</sup>

There are several common features amongst services who do deliver additional programs. One of these is having a proactive Director, often non-contact, who is able to utilise professional networks to create and sustain partnerships with other organisations who have the capacity to co-deliver these programs. However, not all services have the capacity or are able to source such a Director. A further feature is having an umbrella or parent body who provides additional programs to the community. However, where services do not have these, “Limited capacity for administration of government funds can prevent some organisations that are well-placed in an Indigenous community from providing necessary services.”<sup>84</sup> This is defined as a provider level barrier in enabling Aboriginal and Torres Strait Islander families to access ECEC services.

This issue is not about providing specialist services, but about providing services that are essential to ensuring access, engagement in a service, and a holistic response to children’s learning and developmental needs. This aligns with and is verified by the Government’s agenda to promote and support quality, integrated services that seek to ‘close the gap’ in early childhood outcomes.

Aboriginal and Torres Strait Islander early childhood services have identified to SNAICC that the essential services they need to provide to cater for their communities’ needs include;

- Culturally centered and affordable early childhood care and development programs;
- Transport to and from the centre;
- Food and/or nutrition programs;
- Health programs; and
- Parenting and/or family support programs.

A key paper informing the 2007 National Indigenous Child Care Services Plan identified that the future funding model “should respond to and provide for all the core elements of any service (transport, health, nutrition, early learning, culture and family support) and appropriate service infrastructure and administration.”<sup>85</sup>

To look at two of these elements in more depth, the provision of transport has been recognised as a major contributing factor to Aboriginal and Torres Strait Islander participation in ECEC services – both by families and service providers.<sup>86</sup> This issue affects both rural and urban areas, with a government respondent in one study identifying that “The bus is the umbilical cord to the service, if it breaks down it's really low”. As one parent states from the same study describes “Without the bus service I would have to travel 45 minutes every morning from the community to take my five year old to the nearest preschool. The cost of this trip in petrol alone is too much.”<sup>87</sup> Nutrition programs are another essential element: ensuring that children have the required energy to concentrate on learning and development; helping to teach children and families about healthy eating; and supporting children who may not be receiving their full nutritional requirements at home. These are just two out of a number of programs that evidence indicates supports improved access to and outcomes from early childhood development for Aboriginal and Torres Strait Islander children.

As discussed earlier in this paper, the provision of these additional services is vital to increase Aboriginal and Torres Strait Islander access to early childhood services, as identified by the OECD, “It is widely acknowledged that particular communities and families will experience difficulties in gaining access to ECEC unless specialist programs are provided. These include rural and remote communities, (and) Indigenous communities”.<sup>88</sup> These additional programs are also fundamental in addressing the well-documented disadvantage Aboriginal and Torres Strait Islander face in a number of wellbeing outcomes.

#### **Example 2.1**

Congress MACs, operating in Alice Springs, cater for a population with high community needs. However due to budgetary constraints they currently have a waiting list of nine months. The Director explains that most families do not understand that there is a waiting list – and critically - that for families who need immediate support a waiting list is “far too long to keep a child safe.” The Service Manager describes a situation they see frequently – young mothers who are trying to come out of difficult circumstances around housing, family violence and alcohol abuse issues seeking support from the centre so that they can break the cycle of disadvantage and commence study. She states that they regularly have to turn these families away – noting how “At least 3 days every week, we have a call or someone come to the Centre on this basis that we mostly need to turn away....If we cant take them, then the whole purpose of the Centre is lost.”

The MACS also naturally responds to other kinds of additional needs in the relationships that staff (majority Aboriginal) build with children. 82 per cent of children currently attending Congress are in an out-of-home care arrangement. The Director informs that for these children, “the Centre is actually the most consistent thing in their life”. She describes a cycle

of children transitioning from home to foster care, to respite care when foster families go on holidays, back to their family for reunification and then often to a different foster family. The staff at Congress know and understand these children – as the Director describes, “we know their history, we appreciate their feelings, we understand their behavioural and emotional issues that can emerge, and we know what works to bring out their strengths and to support them.”

To ensure children are receiving the support they need as they move into school, Congress sees a need for additional programs such as parenting sessions, and a transition to school program where primary schools would work in collaboration with the centre. This would enable schools to have a deeper understanding of each child’s unique emotional needs and the environment they have come from. However, the funding is not available to facilitate this most essential component. Thereby when schools do not have an understanding of the history of each child it often then just reinforce and exacerbate emotional and behavioural issues of these children.

#### **Example 2.2**

Staff at Brewarrina Mobile Children’s Service in remote New South Wales strongly feel that the provision of additional support services – such as parenting, nutritional and health programs - are critical to both encouraging and sustaining families’ participation, and to providing effective and high quality early childhood care that addresses the complexity of children’s needs. Despite this, their current budget does not enable them to provide the additional programs they feel necessary to most effectively work with their families.

#### **Example 2.3**

Yappera MACS in Thornbury, Victoria, have found that significant limitations with the current BBF funding model have forced them to close their out of school hours care (OSHC) service, and limit the additional essential services they need to run to meet the needs of their community. They estimate that a further annual allocation of \$370,000 is required to provide essential programs such as OSHC, maternal and child health, a playgroup and parenting program, and to raise staff ratios to meet obligatory national standards.

#### **Example 2.4**

Allira MACS, a Dubbo-based service, has found that the insufficiency of their budget has forced them to increase their fees and take on more working families in order to subsidize the cost of the low-income families. As a result this limits space for the low-income families to use the services.

### **3. Infrastructure**

#### *Issues*

Due to low budgets, and the issues discussed above in regards to annual funding cycles, infrastructure maintenance and renovation remains a large challenge that is not addressed within the current funding model. Services have explained that there is little or no provision within the BBF model to upgrade their facilities or set aside money for depreciation, despite many services indicating that they operate out of older buildings in need of repairs and maintenance.<sup>89</sup>

#### *Evidence*

A 2009 Australian Government report indicated that 20 per cent of Aboriginal and Torres Strait Islander services classified their premises as ‘poor’ or ‘very poor’, with a further 23 percent reporting that they were only ‘adequate’.<sup>90</sup> Whilst the BBF Quality Measure does



include an allowance for upgrading infrastructure, this does not constitute a long-term solution that will empower and resource services to sustainably manage their infrastructure requirements.

#### **Example 3.1**

Yappera MACS operates out of an 18-year-old building in much need of renovation and repairs. However due to the limitations of the funding, they have not been able to make the necessary infrastructure improvements to their building and site. They have identified that a longer funding agreement would enable greater forward planning in order to make long-term improvements to their service.

#### **4. Cost of staff wages**

##### *Issue*

The rising cost of staff wages means that the majority of service budgets are going towards wages and associated costs – leaving little for external programs, purchasing resources and other costs. Furthermore, new state and national regulations to lower educator-to-child ratios have meant that many services have had to employ new staff without receiving additional funding – which often involves cutting other programs or services. Increased budgetary pressure and inflexible budget models do not support services to retain senior, skilled staff, or to hire new highly qualified staff.

##### *Evidence*

Research has identified that once staff become qualified, services are often unable to afford the increased wage level, and as a consequence cannot retain these higher qualified staff.<sup>91</sup> This is exacerbated by budget levels being based on set percentages of staff at various qualification levels, so that when staff gain further qualifications the increase in their wages is not catered for within current budgets.

#### **Example 4.1**

Allira MACS has a high majority of highly qualified staff who therefore sit within a higher salary bracket, resulting in the service spending a majority of their budget on staff wages. To compensate for this the service has had to cut back on staff, and are now debating whether to cut their nutrition program to save costs.

#### **Example 4.2**

Yappera MACS identifies a significant disconnect between the requirements of new national regulations and the lack of an associated increase in budget. The recent regulations have required that the service increase staff and staff wages at a cost of up to \$100,000, but their current budget has no allowance for this. As a result of these cost increases, they have had to shut down their OSHC program in order to meet these costs within their current budget. They have also had to cut back on their provision of transport for children, which compromises accessibility and service delivery for many families.

#### **5. Reporting requirements**

##### *Issue and evidence*

Several issues with the BBF reporting requirements have been identified by services and within the literature. These include:

a) Onerous reporting requirements

The reporting requirements under the BBF program are reported to be arduous and time-consuming. Generally service providers submit between five to eight reports annually, including a certified or audited acquittal. A recent 2010 Australian National Audit Office report found that 72 per cent of service reports were submitted late, and of these over 56 per cent were a month late. This meant that 67 per cent of DEEWR payments were approved after the date specified in the funding agreement.<sup>92</sup> The report identified that the reporting requirements were particularly challenging for services with more limited administrative capacity.

b) Repetitive reports

The various reports required often ask the same or similar questions, requiring services to repeat information a number of times.

c) Cumulative burden of donor reports

Services with the capacity to do so often access funding from different sources in order to provide additional programs and services. Some ECEC services have reported feeling overwhelmed by the multiple reporting requirements they face.<sup>93</sup> The National Early Childhood Education Strategy states that given the complexity and multiple funding sources on offer across the ECEC sector, to better respond to and engage with children and families requires “Accountability mechanisms capable of capturing this complexity without overburdening service providers.”<sup>94</sup>

d) Inadequacy of report contents

Whilst DEEWR’s reports have recently been streamlined, a further concern expressed by services is that the current reporting format does not allow them to showcase the quality of the work they are doing, being more focused on quantitative rather than qualitative data.

**Example 5.1**

Brewarrina Mobile Children’s Service is required to produce bi-annual service reports. The Director estimates that the most recent of these required approximately 28 hours of work, and totaled 110 pages. Staff feel that this is a highly unsustainable requirement.

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**Section E: Consideration and practical examples of the constraints and relevant issues with the Child Care Benefit (CCB) model**

Recognising that Government views CCB as a potential alternative model to the BBF program in order to open up funding amounts, the next section considers whether CCB is a viable option or not, and explores some of the potential limitations and challenges within the model. As with Section D, the information presented reflects discussions SNAICC has participated in, in particular drawing on reflections from services who have transitioned from BBF to CCB, or who have always operated under CCB but who also service Aboriginal and Torres Strait Islander populations. The same structure has been used to present this information.

**6. Incompatibility with Aboriginal and Torres Strait Islander ECEC service objectives**

*Issue*

Services are concerned about two major impacts resulting from a shift to CCB that would directly contradict the mandate of Aboriginal and Torres Strait Islander ECEC services, and

shift service focus to creating profits, instead of supporting all children and families within their community:

- Firstly, to be viable under CCB services would need to raise fees – which would limit access for the most disadvantaged families in the community. This would result in a flow-on effect whereby families’ access to the additional programs so integral to Aboriginal and Torres Strait Islander ECEC services would also be cut off.
- Secondly, operating under CCB would create pressure for services to maintain high enrolments. This which would force a shift in focus from providing for the most disadvantaged children in the community to prioritising access for families who can afford to pay fees. One report, drawn from extensive consultations with services, identified significant concerns about a utilization funding basis, “because this disadvantaged Indigenous services dependent upon a population with quite different needs to the general community”, and who were often absent for cultural and family reasons.<sup>95</sup>

### *Evidence*

As stated by DEEWR, BBF services operate in areas “where mainstream or conventional child care services are not available or viable, and where there is a need for culturally competent services, in particular Indigenous focused child care.”<sup>96</sup> Aboriginal and Torres Strait Islander communities resoundingly affirm that their early childhood services are not purely about supporting families’ work choices and/or providing children with early childhood development opportunities; they are about holistically supporting the wellbeing of all children and families in the community. They also act as key hubs to link families in with a variety of early childhood support services such as parenting and child health programs. However, a user-pays model inherently risks children’s participation in a service being terminated due to unpaid fees and/or families not adhering to administrative requirements. This is directly counter to the BBF philosophy of fostering participation of all children in a community, regardless of family circumstances or capacity to pay.

#### **Example 6.1**

Yarrabah PCYC School Age Care operates in Yarrabah, a Queensland community with nearly 100 per cent Aboriginal and Torres Strait Islander population. The centre opened in 1998, running a drop-in centre until 2003 when, upon receiving BBF funding, it commenced vacation and after-school care.

Yarrabah transitioned to CCB funding in 2005. DEEWR felt that CCB would be viable at Yarrabah due to the high numbers of eligible children (980 children in the community, and with - at that stage - 130-150 children attending daily). However, many children have become ineligible under CCB, because of:

- Inconsistencies between a child and carer’s Centrelink details and Yarrabah’s records (often caused by misspelt names or incorrect birthdates);
- Lapsed immunisation or missing immunisation records; and
- Children living with multiple families – meaning that the adult claiming child support for the child changes frequently without information being passed on to Yarrabah.

This has left Yarrabah unable to claim CCB for these children and therefore substantially unable to meet its budget. It has also resulted in a drop since 2005 from 130-150 children attending daily, to 40-50.

Based on the community context, Yarrabah PCYC also does not charge fees. Although 45 kilometers from Cairns, Yarrabah is an isolated community with high unemployment and low personal wealth. Most families do not have their own transport, and so obtaining and

sustaining work outside the community is challenging. The centre's management know that to charge even minimal fees would deter almost all families from sending their children to the centre and so covers all gap fees within the centre's budget.

Children's intermittent attendance at Yarrabah, has also meant that the CCB allowable absences requirement is unworkable. Of the 40-50 children attending daily, about 10 % attend for three or more days a week. Most children therefore exceed their allowable absences within the year. Once their CCB has been terminated, the centre then has to cover the full fees. All of these factors lead to a heavy and unsustainable financial burden on the service.

Yarrabah has sought to counter these challenges. Since 2006 Yarrabah has run two annual open days to sign up new children and correct enrolment and Centrelink details for enrolled children. However, the higher numbers of children registered under CCB quickly fades. Required to operate with minimal staff, Yarrabah does not have the staff capacity to constantly monitor and maintain the administrative requirements to ensure that children do not drop out of the Centrelink CCB system.

Since the transition to CCB, attendance has consistently fallen. Because Yarrabah covers the CCB gap fees - and in many cases full fees - they have had to make difficult decisions in order to continue operating. Required staff cuts have meant that staff to child ratios cannot be met, and child numbers must therefore be reduced to comply with state and national regulations. The centre therefore currently caters for an average of 40-50 children per day, or roughly one third of the children participating under BBF funding.

Yarrabah has also had to reduce its opening hours and cut back its program to save money. The program now runs from 3pm - 6 pm (rather than until 6.30pm), with the evening program (6pm - 9pm) reduced to a basic program. This has led to reduced attendance. The centre has also had to sell their larger bus, relying now on one small bus to pick up and drop children.

Yarrabah experiences a \$300,000 deficit between funding received and funding required to operate. The centre is currently heavily subsidised by the Queensland PCYC Head Office. Whilst Yarrabah does apply for and receives some grant funding, most grants are not available for operational funding, which is the most pressing need.

Yarrabah PCYC operates to provide disadvantaged children with a safe, secure and supervised environment in which they can participate in a range of enriching and stimulating activities. Yarrabah is the only service within the community that provides after-school and vacation care. The service cannot however continue operating on the current model. This is very distressing because if it were to cease operating, the children would have nowhere else to go.

### Example 6.2

At Yappera MACS fees are set at \$60 per week, but this is not dependant on which day(s) the children attend. As ECEC is not compulsory parents often keep their children home or are away for extended periods for family and/or cultural reasons. This flexibility has enabled the service to establish a strong system of attendance and retention based on good communication, but one that allows for differences in circumstance and lifestyle of each individual family. Under CCB funding is distributed strictly according to children's attendance. The service is concerned that this will negatively impact funding stability, as well as create an imbalance where children whose parents are working or studying and who attend often will be preferred and targeted. This goes against the principle of providing services to the most disadvantaged children as well as challenges service delivery in a culturally competent manner.

## 7. Fees

### *Issue*

Several concerns have been identified regarding a user-pays model:

- Whilst many BBF services can and do collect fees (albeit in most cases low fees) from their families, not all families – particularly those with unstable incomes - are able to consistently pay. With a fee-driven model such as CCB, when families cannot pay fees, children will be forced to drop out of the service. As well as the detrimental effects this will have on families and children, it will also lead to gaps in service budgets and cause services to operate at a loss until fees can be recovered or enrolment rates raised;
- Reliance on fees as a service's major income source would be inadequate to cover the range of costs a service incurs, without escalating fees to prohibitive levels; and
- Collection of fees can be highly challenging, and can have a negative impact on the relationship between staff and families.<sup>97</sup>

The current CCB model has major flaws, and is demonstrated to be inappropriate and actually very damaging for disadvantaged families, and higher cost targets such as ages birth to three; rural communities; and children/families with additional needs.

### *Evidence*

#### a) Viability of the current system

The majority of ECEC services in Australia are delivered by private, for-profit organisations under a market service model. This type of model "impacts on accessibility and affordability because...whether they are profit-making or not-for-profit operations, services must operate as viable commercial enterprises and make decisions about location, costs and fees accordingly."<sup>98</sup>

There is increasing concern that the current system is resulting in escalating, unaffordable fees, limiting many families' participation in early childhood services.<sup>99</sup> Child care rates have recently been increasing at a rate faster than the Consumer Price Index (CPI), with one study indicating that since it's introduction over a decade ago, CCB has declined in value by more than 15 per cent.<sup>100</sup> Given the higher requirements for staff qualifications and staff-to-child ratios under the National Quality Framework, fees are projected to further increase over the next few years – potentially over 15 per cent in some jurisdictions.<sup>101</sup> Whilst CCB rates are indexed to the CPI, the fact that ECEC rates are rising at a faster rate means that child care is increasingly becoming less affordable – "as out-of-pocket costs rise faster than subsidies".<sup>102</sup> The Productivity Commission predicts that this situation is only set to continue, citing that "The value of the CCB will not change as it is based on the standard hourly rate, rather than

the actual costs paid by parents, and the CCR will only refund half of the additional costs.”<sup>103</sup> Given this, research by Price Waterhouse Coopers states that “Linking funding increases to increases in the cost of delivery is...an appropriate basis for determining public funding rates”.<sup>104</sup> The higher costs are forecast to have a particularly detrimental effect on lower-income families, who will be forced to spend a larger proportion of their income on child care fees compared to higher income families.<sup>105</sup> That funding should reflect actual costs is therefore also an argument of equity as well as one of effectiveness. As PWC explain,

For ECEC services, costs are likely to differ for children of different ages, for delivery in regional locations, and delivery to children with high needs. In the Australian child care context, observers have noted significant undersupply of high cost places – that is, places in regional or concentrated urban areas, places for younger children and places for children with special needs. Providing funding that is linked to the costs of delivering these places will help to reduce these disparities.<sup>106</sup>

The recent review of Australia by the UN Committee on the Rights of the Child cites the unaffordability of child care in Australia as a major challenge, and recommended that the Government “further improve the quality and coverage of its early childhood care and education, including by: Increasing the availability of early childhood care and education for all children, by considering providing free or affordable early childhood care...”<sup>107</sup>

*b) The need for subsidised places for disadvantaged families*

Given the wealth of evidence that indicates that participation in an early childhood service is particularly beneficial for disadvantaged children, it is key that low-income, non-working and/or disadvantaged families receive particular assistance with the cost of child care fees to support child development.<sup>108</sup> Supporting families’ participation in such services is key to breaking intergenerational cycles of disadvantage by providing children with a fundamentally strong base from which to transition on to school.

With a clear link between participation in an early childhood centre, and cost to families, “a policy of offering free services or capping the cost to low-income families is most likely to facilitate access.”<sup>109</sup> In contrast, “fee subsidies and tax relief are more likely to impose cost burdens on families in the form of gap fees, administrative barriers, delays between paying the fee and receiving the benefit, and exclusion of non-taxpaying families. Participation of children from low-income families is therefore less likely.”<sup>110</sup> The Review of Australia’s Future Tax System suggests a model that ensures that low-income families “receive up to 90% of fees – and 100% for at risk or vulnerable children”.<sup>111</sup>

The *Universal Access to early childhood education for Aboriginal and Torres Strait Islander children strategy* identifies fees as a particular issue impacting on the participation of Aboriginal and Torres Strait Islander families in ECEC services.<sup>112</sup> The Strategy highlights a wealth of evidence that demonstrates “that particular approaches have been shown to be effective in maximising enrolments, participation and outcomes for Aboriginal and Torres Strait Islander children (including) no fees, or minimal fees”.<sup>113</sup> Considering this, it follows that to promote the best outcomes for Aboriginal and Torres Strait Islander children and families suffering from complex and multiple disadvantages, child care should be fully subsidised, and that it is not appropriate to link child care assistance with family income. Instead, “better measures of disadvantage may come from the health, community services or child protection systems.”<sup>114</sup>

#### **Example 7.1**

The operation of services with a high proportion of Aboriginal and Torres Strait Islander clients in disadvantaged areas demonstrates the failure of a user-pays system for these clients. For example, KU Children's Services has stated that their centres in wealthier areas directly subsidise those in lower socioeconomic areas, explaining that "Without this surplus generated by our 'giver' centres we would not be able to fund our Affordable Fees Program and the fees at our centres in the most disadvantaged areas, where children perhaps need KU most, would be unaffordable for families."<sup>115</sup>

#### **Example 7.2**

Gundoo, in Cherbourg, Queensland, operates BBF funded MACS and a CCB funded long day care (LDC) service. The service has found that the fees derived from the CCB service do not cover operating costs, and therefore the LDC budget has to be supplemented from the BBF MACS budget – including covering additional services such as food.

#### **Example 7.3**

Nurapai Kazil Centre on Horn Island, operating a playgroup, after school hours care, vacation care and long day care, has experienced significant difficulties with the user-pays basis of the CCB model. These have included:

- Enabling both staff and families to understand the CCB requirements;
- Inability of a families to pay fees – either because they are on low-incomes, but also due to the lack of a 'user-pays' culture within the community – resulting in a significant barrier to families paying fees.
- Resentment from families directed at the service over perceived high fees;
- Significant administrative time to support parents to understand CCB requirements; and
- Families not applying for CCB and then not paying the full fees.

The service has found that the CCB funded long day care service needs to be partially funded from the BBF budget, in order to keep running. However this still does not address the significant issues associated with non-payment of fees.

Whilst the service has had a held a number of meetings with the community to negotiate various options for repayment plans, including direct wage deductions, none of these options have been accepted by families in the community. The current situation is therefore that a number of families have incurred high debts. When faced with the option of having to shut down, the centre has opted to suspend the child instead. This is a last resort option and not ideal for anyone, but it has been necessary to keep the service running.

#### **Example 7.4**

Thursday Island Child Care centre, operating both a long day care and after school hours program, experiences extensive difficulties in collecting fees from families. Some weeks families do not pay fees, which means that the service operates at a loss for that period. Families then have two weeks to pay the overdue fees, and after this their child's participation from the service is terminated. The families cannot re-enroll at the service until they pay the overdue fees. This means that a number of children cannot participate at the service. The service management do not want to limit participation – but in order to continue operating they are forced to do this.

### Example 7.5

The newly established Children and Family Centres model also faces similar challenges. Recent SNAICC research found that,

“The absence of guaranteed and ongoing funding for new integrated centres creates pressure to pursue self-sustainability. Some leaders in the development of Aboriginal and Torres Strait Islander Children and Family Centres identify that a self-sustaining funding model for integrated service delivery at the Centres is unachievable while maintaining costs at a level that will encourage and enable access to ECEC services for Aboriginal and Torres Strait Islander families. This creates concern that Centres will increasingly need to accommodate higher fee paying families and lose their focus on targeted service provision for Aboriginal and Torres Strait Islander children and families.”<sup>116</sup>

An operating centre, Bubup Wilam Child and Family Centre (CFC) in Thomastown, Victoria, have costed out their service to balance financial viability with affordability to ensure access for their families. In order to ensure families most in need can attend the centre, Bubup has set families’ fees at an amount that currently delivers half their annual operating costs – approximately \$500,000. Whilst they can and do seek alternative/additional funding to account for some of the remaining operational costs, they still require government-funded support to operate and to continue to offer the range of programs for which, as a Children and Family Centre, they are mandated. These include “a dynamic mix of services, responsive to community needs (including)...child care, early learning and parent and family support services.”<sup>117</sup> If the extra \$500,000 cannot be found annually, Bubup will need to cut back on staff or programs, both of which will impact negatively on the children and families who use the service.

Bubup staff feel the current CCB arrangement puts them into a ‘deficit’ model, with funding constraints threatening their operation as a fully integrated service providing for the Aboriginal and Torres Strait Islander community. Staff describe the impact this has on families – who, despite paying what they can and participating in and contributing to the service – are still incurring debts and being made to feel that they are second class citizens.

### Example 7.6

A number of services have reported that they have trialed a fees system and have found that families would not pay (Brewarrina Mobile Children’s Service, Wunala Creche, Yarrabah PCYC). Adopting a fees system would therefore mean that children would not be able to access the service.

## 8. Funding fluctuations

### *Issue*

The CCB model brings the potential for funding fluctuations due to sporadic and/or changing enrolment numbers, and a lag in CCB registrations, both of which create budgetary uncertainty. A number of services have communicated that enrolments change frequently throughout the year due to seasonal/environmental factors, because families migrate between areas for cultural or family reasons, and because families lose their CCB entitlement (for reasons such as exceeding the allowable absences, discussed in Part 9; or not meeting CCB administrative requirements, discussed in Part



### **Example 8.1**

Yawarra Child Care Service in Mount Druitt, NSW, frequently experiences fluctuating enrolments and income from fees, for example when families leave the service or their CCB percentage changes. There is often a lag – in some cases up to three weeks - between the change in family details and the service receiving this information. With government BBF payments being processed to the service in arrears, this means that the service often does not receive the right amount of CCB, and is underfunded.

## **9. Allowable absences**

### *Issues*

Several issues have arisen with the number of allowable absences mandated under CCB, including:

- The allowable absence maximum of 42 days is too few and results in Aboriginal and Torres Strait Islander families frequently exceeding the allotted time;
- Families are often unable to provide the supplementary documentation required to increase the number of allowable absences;
- The discretionary additional days are often not given even for absences caused by health problems; and
- There is no discretion to grant additional days for absences caused by attendance at cultural and/or family events.

### *Evidence*

Services have reported that Aboriginal and Torres Strait Islander families in general require more absences for a number of reasons, including:

- Cultural affairs (for example families taking time away for Sorry Business, NAIDOC week, to go back on Country, and other cultural events);
- Family reasons (for example families travelling to spend extended periods of time with each other); and
- Recurrent health reasons such as ear or respiratory problems.

A number of services have reported that families have incurred large debts by exceeding their allowable absences. Families often are unable to pay their debts, causing services to terminate a child's enrolment. Services then have to bear the burden of the unpaid fees themselves, and children are deprived of ECEC services.

### *Possible alternative*

Given this, one significant report has recommended that Centrelink "review its arrangements to enable....services to extend the allowable absence to ninety days where children and families need to attend cultural events such as funerals."<sup>118</sup>

### **Example 9.1**

Yawarra Child Care Service has identified significant problems with families frequently exceeding their 42 days of allowable absences. Once this has happened CCB payments are terminated and the family must then pay the full fees. If parents can't then pay the full fees the centre loses out on the full fee cost of each subsequent day – or is forced to terminate children's access. Staff feel that the 42 days maximum does not take into account children's chronic health conditions and cultural/family responsibilities - which account for most excessive absences. The fact that public holidays count towards allowable absences serves to aggravate the situation. This requirement does not reflect appropriate cultural practices targeted towards their specific community.

## 10. Higher administrative burden for families

### *Issue*

The CCB model creates a more complex and higher administrative burden for families, which can result in some families not contacting Centrelink, or being put off registering for CCB because of the requirement to go through Centrelink. Services have reported that families often face lengthy phone calls or long waits at Centrelink offices, and this also acts as a disincentive to go through Centrelink. A further challenge is that some families forget to initially register with CCB when they begin using a service – and this either means that they are paying full fees until their CCB registration is approved – or the service pays their CCB gap fee.

### *Evidence*

Comparative research indicates that “administrative complexity discourages eligible families from applying for fee subsidies.”<sup>119</sup> A solution to counter this is suggested within the NIRA Service Delivery Access principle, which states that “programs and services should be physically and culturally accessible to Indigenous people...attention is to be given to: minimising administrative red tape that may be a barrier to access; and providing adequate information regarding available programs and services.”<sup>120</sup>

### *Possible alternative*

A further recommendation to mitigate against difficulties and/or delays families may experience in signing up for CCB is for “Centrelink to review its arrangements to enable clients to access 100 per cent fee subsidy while waiting to have their claim processed.”<sup>121</sup>

#### **Example 10.1**

Gundoo MACS has found that the extensive CCB administrative burden can discourage families from applying for or continuing with CCB. Staff have found that to overcome this the service needs to provide administrative support to families to complete and update their CCB documentation – for example phoning Centrelink and/or assisting families to fill out forms.

#### **Example 10.2**

Bubup Wilam Child and Family Centre are concerned that there is a significant delay in families reporting changes to income and/or personal situations to Centrelink, and these changes being processed to result in an ensuing drop in fees. The service has observed, for example, families whose income has dropped dramatically having to then wait months for this information to be processed, and their fees to be accordingly lowered. This results in the family either experiencing increased financial pressure, or incurring large debts from non-payment of fees.

## 11. Termination of CCB

### *Issue*

Services report frequently inaccurate details that result in families having their CCB payments terminated. These include:

- Inconsistencies between a child and carer’s Centrelink details and the service’s records (often caused by misspelt or incorrect names and/or incorrect birthdates);
- Missing documentation such as immunization records, birth certificates and/or employment details;
- Lapsed immunization;

- Not notifying Centrelink of changed financial circumstances; and
- Children changing residences. In many communities across Australia Aboriginal and Torres Strait Islander children frequently change who they live with. This creates difficulties with their CCB registration, as CCB requires that a child and carer's client reference numbers (CRNs) are linked. Services have found that when children move house and carer, and the adult claiming child care benefit for the child therefore changes, this information is frequently not passed on to the service. This results in the families' CCB being terminated, and the service or family then having to cover the full fees, or the child dropping out because the family can not pay the full fees. In some cases it has been reported that children change residence up to seven times per month.

Once they are cut off from CCB, families have 28 days to rectify any lapsed immunisation, inaccurate or missing data. However, services have explained that this often doesn't happen in time, resulting in families incurring higher fees. Furthermore, a number of services have indicated that families often don't communicate this information to services in time for services to readjust their fees once they stop receiving CCB on behalf of the families.

#### **Example 11.1**

Gundoo MACS has found that the CCB immunization requirements and lapses have meant that many families have had their CCB eligibility cut off, resulting in them incurring higher fees or withdrawing the child because they can't afford the fees.

## **12. Children with additional needs**

### *Issue*

Under a CCB model, if a service needs to decrease their child to educator ratio to respond to children with additional needs, they must cover this cost themselves. Whilst services can access additional funding for children with diagnosed additional, such funding is not available for children whose additional needs do not meet the criteria. This includes children demonstrating developmental delays associated with disadvantage, poverty and challenging home environments.

### *Evidence*

Aboriginal and Torres Strait Islander services provide care for the most disadvantaged communities in Australia, and therefore generally cater for a larger proportion of children with additional needs. The extent of poverty experienced by Aboriginal and Torres Strait Islander peoples ranges from between 40 to more than 50 per cent across Australia, whether for remote or urban areas.<sup>122</sup> Aboriginal and Torres Strait Islander peoples experience significant disadvantage across all economic and social development indicators, including gross overrepresentation of children in the child protection system, with a substantiation rate of 7.4 times that of non-Aboriginal and Torres Strait Islander children.<sup>123</sup> The causes of for these indicators of disadvantage are recognised as complex, and include the legacy of past policies of forced removal, intergenerational effects of separations from family and culture, poor socio-economic status and perceptions arising from cultural differences in child-rearing practices.<sup>124</sup> The Western Australian Aboriginal Health Survey<sup>125</sup> (2005) found a link between adverse life outcomes and the forced separation of Aboriginal people from their natural families and intergenerational effects caused by policies of forced separation and removal. In terms of the intergenerational effects of forced separations and removals, the survey found that children cared for by a primary carer who was forcibly separated from their natural family were over twice as likely to be at high risk of clinically

significant emotional or behavioural difficulties when compared with children whose Aboriginal primary carers were not forcibly separated. More generally, the survey found that children whose primary carers were forcibly separated experience many negative life outcomes when compared with children whose carers were not forcibly separated. It is therefore not surprising that Aboriginal and Torres Strait Islander children present at early childhood services with a variety of additional support needs.

#### **Example 12.1**

The Tasmanian Aboriginal Child Care Association (TACCA), a BBF service operating in Launceston, provides flexible, individualised services for a high proportion of children with additional needs such as trauma, and/or family substance abuse and violence. TACCA is able to provide this additional support by keeping educator to child ratios low – sometimes dropping them down to as low as one educator to two children when needed. They also charge a daily fee of approximately \$20 to ensure affordable access for families. Staff believe that their ability to provide individual flexible service and low fees are key to how they operate in the community and their success in doing this. They perceive that a shift to CCB would require them to raise fees to the point that families access would be threatened. It would also lessen their ability to budget for lower educator to child ratios when needed.

#### **Example 12.2**

Bubup Wilam Child and Family Centre perceive that a major deficiency within the model is that it assumes that children and families do not have additional needs, and it doesn't cater for families on low-incomes. This therefore ignores both the large number of Aboriginal and Torres Strait Islander children with additional needs, and the large number of families who are working but still on low-incomes.

The service currently has seven children with significant additional needs. Despite their needs, these children don't qualify for an extra worker, and the centre is not able to fund this. They also have two children under the care of the Department of Human Services who have varied and serious additional needs/issues, for whom only one extra worker is provided. Staff feel that the intense needs of these children – requiring much staff time - has a detrimental effect on the other children in the room. They also report that the administrative requirements for these nine children are significant and take up much staff time.

### **13. Limited hours of care**

#### *Issue*

Only parents who meet the work/study requirements (or fall into the other specific categories) can access care for more than 24 hours per week.

#### *Evidence*

This requirement prioritises access for working and studying families, and is in contradiction with the principles of Aboriginal and Torres Strait Islander ECEC services – which are to provide services to *all* children in the community, particularly targeting the most disadvantaged (see Section E, Part 6). The requirement fails to understand that families most in need may need to access full-time care for their children, regardless of whether they are working or studying, and fails to take into account the significant impact that quality early childhood care has on the most disadvantaged children.<sup>126</sup> Access to early childhood programs are therefore particularly relevant for Aboriginal and Torres Strait Islander

children, who are at a higher risk of experiencing significant disadvantage during their early years, yet participate at lower levels within early childhood education and care programs.<sup>127</sup>

#### 14. Priority of access

##### *Issue*

The CCB Priority of Access Guidelines<sup>1</sup> discriminate against Aboriginal and Torres Strait Islander families who are not working or studying, placing them at a lower priority than those who are working or studying. This is in contradiction to the principles of Aboriginal and Torres Strait Islander ECEC services (see Parts 6 and 12), and may have the effect of decreasing access for the most vulnerable children in a community.

##### *Evidence*

Whilst priority of access does enable services flexibility to give preference to Aboriginal and Torres Strait Islander and/or disadvantaged families – this must still be within the three priority areas. Under CCB an Aboriginal and Torres Strait Islander child whose parents/carers do not fit the requirements of Priority 2, but who is also not within Priority 1, would still therefore be at a lower priority than a non-Aboriginal and Torres Strait Islander child whose parents/carers fit the requirements of Priority 2. Such a situation is in direct contradiction with one of the key outcomes within the National Partnership on Indigenous Early Childhood Education, which is for “increased proportion of Indigenous children participating in quality early childhood education and development and child care services.”<sup>128</sup> It is also in opposition to the UN Committee on the Rights of the Child recommendation that States take positive measures to eliminate the discrimination Indigenous children may experience in enjoying their right to education, including through “the application of special measures in order to ensure that indigenous children have access to culturally appropriate services in the areas of...education...”<sup>129</sup>

#### 15. Child Care Rebate

##### *Issue*

Two distinct issues arise in regards to the Child Care Rebate (CCR):

- The CCR is currently paid directly to families, who in theory then pay this to the service. However, this often does not happen, resulting in services having to cover the gap in fees; and
- The CCR is paid to families three weeks in arrears, however many services have voiced that they bill families one week in advance. Families therefore often wait to pay the service fees until they have received CCR, which means that the service has to cover the budget shortfall until they receive the reimbursement from families.

##### **Example 15.1**

Thursday Island Child Care Centre provides long day care and after school hours care. Staff feel that the CCR needs to be paid directly to the service - as parents often don't pass on the rebate to the service (despite paying fees that reflect both the CCB and CCR deductions), and this therefore means that parents go into debt, potentially have their access suspended, and that the service loses out on this money.

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<sup>1</sup> These are:

- First Priority: a child at risk of serious abuse or neglect;
- Second Priority: a child of a single parent who satisfies, or of parents who both satisfy, the work/training/study test under Section 14 of the 'A New Tax System (Family Assistance) Act 1999';
- Third Priority: any other child.

### Example 15.2

Yawarra Child Care Centre is also concerned that families receive the CCR rebate regardless of whether they have paid their fees or not. They have found that many families have outstanding fees but are still not paying their portion of the CCR back to the service. They believe that a solution to this would be for CCR to be paid directly to the service.

## Section F. The way forward

BBF services have been subject to ad hoc, inconsistent, inequitable funding for too long. These services serve a critical need in community and in society more broadly that deserves recognition and support. The BBF review provides an opportunity to work towards a sustainable and effective model that in fact does meet the needs of Aboriginal and Torres Strait Islander children and families, based on the principles outlined in Section C of this paper (recapped below). The BBF model provides a strong basis to work with. SNAICC believes that a model that is viable, equitable and efficient, and that meets these principles, is possible, and is happy to work with the Government over the next period to explore feasible possibilities.

The issues canvassed in this paper highlight some of the complexities of the funding needs of ECEC services for Aboriginal and Torres Strait Islander children. SNAICC believes that these must be central considerations in the review of the BBF program, as must the core objective of the BBF program, namely:

**To support the operation of services in areas where a mainstream, market-based form of child care would not be viable, and where there is a need for culturally competent services.**

A strong Indigenous cultural model requires a specific approach. Prioritising access to reverse the cycle of disadvantage that many children experience as a consequence of colonisation and flow on effects of poverty and the Stolen Generations, also requires a specific approach. Significant Federal investment in Closing the Gap, with whole of Government commitment demonstrated through the National Partnership Agreement on Indigenous Early Childhood Development, reflects this current context. Aboriginal and Torres Strait Islander BBF services are well positioned to play a significant role in reversing current disadvantage, providing the necessary, culturally safe support in the early years. Any developments of this program or any other early childhood education and care model with similar objectives will also need to recognise and reflect this context if it is not to further exacerbate existing conditions through excluding children most in need of support, and undermine the broader national agenda.

While there is some evidence now of the importance of early childhood development to reverse cycles of disadvantage, there is less demonstrated evidence of what is critical to achieving these outcomes for Aboriginal and Torres Strait Islander children. The principles we do know are encapsulated in Section C. SNAICC urges DEEWR to work with experienced practitioners in BBF services and Aboriginal and Torres Strait Islander early childhood experts

### Key principles of Aboriginal and Torres Strait Islander BBF services

1. Innovative governance and self-determination
2. Strengths based, quality service provision
3. Values and incorporates identity and culture
4. Holistic and responsive to community needs
5. Community not centre focused
6. Supports ongoing learning, information-sharing in and across sectors, and innovation
7. Sustainability

over the next period to really understand these questions, the complexities of service needs, and the tools or models required to value the strengths of communities and to achieve sustainable change.

What is clear is that an ECEC funding model must be determined bottom-up based on the needs of children and families. SNAICC understands the need for clear eligibility requirements for services to be included within a non-mainstream model and the need to develop a consistent methodology to manage the BBF model. A flexible method that SNAICC considers would provide a reasonable balance is for services to demonstrate their need for support under the BBF model through a three year funding proposal. This could be repeated for each three year period, allowing DEEWR and the service to consider changing service needs over time. The funding proposal would demonstrate need through explanation of factors central to the cost of service provision within the local service area, including for example: geographical location (rural, remote); service type (such as playgroup, crèche, mobile service); socio-economic difficulties; proportion of children with high additional needs; proportion of children experiencing a disability; workforce development needs; infrastructure development needs.

Current pressures on the CCB model and the experiences of BBF services transitioning to CCB detailed in this paper highlight the need for caution in considering alternative models. In particular, it highlights the fundamental incompatibilities between Aboriginal and Torres Strait Islander ECEC service needs and the CCB model. Careful consideration and thinking through the consequences of any alternative model proposed is fundamental to avoid damaging communities already in stress, discriminating communities with a model incompatible with their reasonable cultural needs, and excluding children from services. Simply shifting services to a CCB type model is clearly not the answer. Broad national consultations are a good beginning. The next step is to really interrogate how the diverse community needs translate into an effective national funding program.

There is significant expertise that SNAICC urges the Government to draw on in its consideration of how best to meet current government imperatives and early childhood education and care service needs. To assist this move forward, SNAICC proposes that DEEWR support a two-day workshop to frame a sustainable direction forward for non-mainstream child care. The workshop would consist of approximately 10 key practitioners and academics (majority Aboriginal and Torres Strait Islander) with expertise in Aboriginal and Torres Strait Islander early childhood, modelling and workforce development.

Preparatory work would include:

- Working paper on needs, principles and eligibility criteria for the proposed program
- Review of existing program and learnings from key submissions to the BBF review
- Outline of some proposals for moving ahead
- Key questions requiring expert attention.

Workshop program could encompass:

- Response to key questions identified
- Development of eligibility criteria for the BBF program
- Development of key proposals for improving non-mainstream childcare and recommendations for the next stage of process.

SNAICC urges that any decisions for change be delayed until after emerging proposed options are developed and tested.

The importance of early childhood development in creating real equality for Aboriginal and Torres Strait Islander peoples, and overcoming the historic disadvantage resulting from colonisation processes, is irrefutable. We can only move towards this outcomes however where early childhood education and care services are accessible, particularly to those most excluded, of high quality, responsive to community needs and culturally appropriate. The BBF model provides a strong foundation. Efforts to improve and strengthen this model, including with the provision of adequate funding, has the potential to see vastly improved outcomes over time. Other models may be appropriate, and should be explored. However, the only other current alternative, the CCB model, is at complete odds with the underlying objectives and needs of the BBF program. Combined energy is required then to determine how best to develop the BBF program in a manner that sustainably meets its targeted community needs and works within current government constraints.

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<sup>1</sup> Committee on the Rights of the Child. (2012). *Consideration of reports submitted by States parties under article 44 of the Convention. Concluding observations: Australia*. U.N. Doc. CRC/C/AUS/CO/4, paragraph 29 (a), p7.

<sup>2</sup> Hutchins, T. Martin, K. Sagers, S. and Sims, M. (2007). "Indigenous Early Learning and Care". Australian Research Alliance for Children and Youth (ARACY), 9.

<sup>3</sup> Committee on the Rights of the Child. (2012). *Consideration of reports submitted by States parties under article 44 of the Convention. Concluding observations: Australia*. U.N. Doc. CRC/C/AUS/CO/4, paragraph 29 (a), p19.

<sup>4</sup> Steering Committee for the Review of Government Service Provision. (2011). *Overcoming Indigenous Disadvantage: Key Indicators 2011 Report*. Productivity Commission, 4.28; see also Sims. (2011). 'Early childhood and education services for Indigenous children prior to starting school'. Closing the Gap Clearinghouse, Australian Government. Resource sheet no. 7, 4 .

<sup>5</sup> Wise, S. et al. (2005). *The Efficacy of Early Childhood Interventions*. Australian Institute of Family Studies. Prepared for the Australian Government Department of Family and Community Services. Melbourne, 47.

<sup>6</sup> Reynolds, A. et al. (2002). 'Age 21 Cost-Benefit Analysis of the Title I Chicago Child-Parent Centers'. *Educational Evaluation and Policy Analysis*. Vol. 24, No. 4, 268.

<sup>7</sup> COAG. (2009). *Investing in the Early Years – A National Early Childhood Development Strategy*. Canberra, 4.

<sup>8</sup> Ibid.

<sup>9</sup> See Flaxman et al. (2009). 'Indigenous families and children: coordination and provision of services'. Occasional Paper No 23. National Evaluation Consortium, 34; SNAICC. (2004). *Indigenous Parenting Project: Main report*, 44; SNAICC. (2011). 'Increasing Aboriginal and Torres Strait Islander access and engagement with child and family services'. Policy Paper, 1 & 3; and Sims et al. (2008). "Indigenous child carers leading the way". *Australian Journal of Early Childhood*, 33 (1), 4.

<sup>10</sup> Secretariat National Aboriginal and Islander Child Care (SNAICC). (2012). *Improved Outcomes for Aboriginal and Torres Strait Islander Children and Families in Early Childhood Education and Care Services: Learning from Good Practice*. Melbourne, 10-14.

<sup>11</sup> Harvard Project on American Indian Economic Development, Retrieved 3 September 2012 from: <http://hpaied.org/about-hpaied/overview> cited by SNAICC. (2012). *Coming together: the journey towards effective integrated services for Aboriginal and Torres Strait Islander children and families*. Melbourne, 9.

<sup>12</sup> US-based Harvard Project on American Indian Economic Development (Available at Harvard Project on American Indian Economic Development, <http://hpaied.org/about-hpaied/overview>).

<sup>13</sup> <http://www.fahcsia.gov.au/our-responsibilities/indigenous-australians/programs-services/closing-the-gap/closing-the-gap-engagement-and-partnership-with-indigenous-people>; see also the Council of Australian Governments (COAG). (2009). *National Indigenous Reform Agreement (Closing the Gap)*. Canberra, D-76.



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- <sup>15</sup> United Nations Declaration on the Rights of Indigenous Peoples, G.A. Res. 61/295, U.N. Doc. A/RES/61/295 (2007), Article 14.
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- <sup>22</sup> Sims. (2011). 'Early childhood and education services for Indigenous children prior to starting school'. Closing the Gap Clearinghouse, Australian Government. Resource sheet no. 7, 6 & see also 8.
- <sup>23</sup> SNAICC. (2012). *Learning from Good Practice: Implementing the Early Years Learning Framework for Aboriginal and Torres Strait Islander Children*. Melbourne (forthcoming), 45.
- <sup>24</sup> Ibid.
- <sup>25</sup> SNAICC. (2004). *Indigenous Parenting Project: Main report*, 42; see also Trudgett, M. & Grace, R. (2011). 'Engaging with early childhood education and care services: The perspectives of Indigenous Australian mothers and their young children'. *Kulumun Indigenous Online Journal*. Vol. 1, 17; Priest, K. (2005). *Preparing the Ground for Partnership - exploring quality assurance for Aboriginal and Torres Strait Islander child care: A literature review and background paper*. Department of Family and Community Services. Commonwealth of Australia, 9-10; and Kitson R. & Bowes J. (2010). 'Incorporating Indigenous ways of knowing in early education for Indigenous children'. *Australian Journal of Early Childhood*. Vol. 35 (4).
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- <sup>27</sup> COAG. (2009). *National Indigenous Reform Agreement (Closing the Gap)*. Canberra, A-22.
- <sup>28</sup> SNAICC. *Learning from Good Practice: implementing the Early Years Learning Framework for Aboriginal and Torres Strait Islander children*. Melbourne (forthcoming).
- <sup>29</sup> Hutchins, T. Martin, K. Saggors, S. and Sims, M. (2007). *Indigenous Early Learning and Care*. Australian Research Alliance for Children and Youth (ARACY), 22.
- <sup>30</sup> SNAICC. *Learning from Good Practice: implementing the Early Years Learning Framework for Aboriginal and Torres Strait Islander children*. Melbourne (forthcoming), 10.
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- <sup>38</sup> SNAICC. (2012). *Coming together: the journey towards effective integrated services for Aboriginal and Torres Strait Islander children and families*. Melbourne.
- <sup>39</sup> Ibid, 6-7
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- <sup>53</sup> United Nations Committee on the Rights of the Child. (2009). General comment No. 11 (2009) Indigenous children and their rights under the Convention. U.N. Doc CRC/C/GC/11. Paragraph 60, p.6.
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- <sup>55</sup> Council of Australian Governments (COAG). (2009). *National Indigenous Reform Agreement (Closing the Gap)*, Canberra, A-24.

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- <sup>58</sup> Department of Education, Employment and Workplace Relations (DEEWR). (2010). *Belonging, Being, Becoming: The Early Years Learning Framework for Australia*. Canberra, 13.
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- <sup>60</sup> See for example Ware, V. (2012). *Improving access to urban and regional early childhood services*. Resource sheet no. 17 produced for the Closing the Gap Clearinghouse. Australian Institute of Health and Welfare and Australian Institute of Family Studies, 5; and Hutchins, T. Martin, K. Siggers, S. and Sims, M. (2007). *Indigenous Early Learning and Care*. Australian Research Alliance for Children and Youth (ARACY), 29.
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