Secretariat of National Aboriginal and Islander Child Care

SNAICC Submission

Productivity Commission Draft Report

Inquiry into Child Care and Early Childhood Learning

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1. Introduction

The Secretariat of National Aboriginal and Islander Child Care (SNAICC) is the national non-government peak body in Australia representing the interests of Aboriginal and Torres Strait Islander children and families.

SNAICC welcomes the opportunity to participate in the Productivity Commission Inquiry into Child Care and Early Childhood Learning (Inquiry). This is a timely and valuable opportunity to develop a long-term national strategy that seeks to enable access and meaningful participation in early childhood development for Aboriginal and Torres Strait Islander children. If effectively utilised, this opportunity could fulfil significant untapped potential to realise early childhood outcomes for particularly disadvantaged children.

Accordingly, we ask the Productivity Commission to consider the discussion, evidence and recommendations outlined within this submission.

2. Transitioning Budget Based Funding services to mainstream funding

The draft report proposes that the *Disadvantaged Communities Program* not apply to services "where there is a viable labour market", recommending within Recommendation 13.1 that these services are assisted to transition to mainstream early childhood education and care (ECEC) funding. SNAICC has significant concerns with this approach, outlined through the issues discussed below.

SNAICC recommends the following amendments to the draft report:

1. **Ensure a focus on the specific needs of disadvantaged communities and Aboriginal and Torres Strait Islander communities in urban areas, not only rural and remote locations.**

2. **Recognise the cultural, engagement and service delivery strengths and importance of Aboriginal and Torres Strait Islander specific and community run services. Build on and expand Aboriginal and Torres Strait Islander specific services as a priority.**

3. **Recognise that overcoming intergenerational trauma and disadvantage for Aboriginal and Torres Strait Islander peoples requires long-term and ongoing investment - transitioning services targeted to close the gap in outcomes for our children to mainstream funding is not a viable or desirable option in the short to medium term.**

4. **Make specific allowance for the high number of children with additional needs related to inter-generational trauma, family violence, poverty and culture loss in Aboriginal and Torres Strait Islander communities.**

The reasons these changes are needed are described below:

   a) *The approach assumes, wrongly, that the existence of a viable labour market within a community means that that community does not suffer disadvantage.*

Firstly, the existence of a viable labour market does not guarantee participation in that market — as many Indigenous job seekers will attest. A 'viable labour market' is also no indication that a community

is not experiencing disadvantage. The direct effects of colonisation persist today with entrenched disadvantage clearly visible in Aboriginal and Torres Strait Islander communities through intergenerational trauma, lower rates of participation in education and employment, high rates of poverty, endemic dislocation, disempowerment and depletion of parenting skills caused by the Stolen Generations, and other harmful government policies and practices. Disadvantage is experienced by Aboriginal and Torres Strait Islander communities on many levels, "The cumulative effect of historical and intergenerational trauma severely reduces the capacity of Aboriginal and Torres Strait Islander peoples to fully and positively participate in their lives and communities, thereby leading to widespread disadvantage."[1] Thus, it cannot be reduced to a simple economic equation nor the existence, or not, of a 'viable labour market'.

Reversing the cycle of disadvantage that many Aboriginal and Torres Strait Islander children experience therefore necessitates a targeted, intentional approach. Specifically, it requires funding to enable community-led solutions that empower, heal, develop and strengthen children and families – roles uniquely played by Aboriginal and Torres Strait Islander Child and Family Centres and Budget Based Funded (BBF) services across Australia.

Transitioning BBF services to the Early Childhood Learning Subsidy (ECLS) purely based on the existence of a viable labour market therefore risks punishing and excluding children based on the circumstances of their parents. A more equitable ECEC system would instead start from the premise of what a child needs – rather than what their parents are eligible for or could financially support.

b) The approach does not recognise the need for, nor value of, targeted funding for culturally appropriate, community controlled services.

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."[2] Aboriginal and Torres Strait Islander families have identified a critical factor in their engagement with a child care service to be the ability of the service "to recognise and incorporate cultural practice into the way the child and family is dealt with."[3] The *National Indigenous Reform Agenda* (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."[4]

Whilst many mainstream early childhood services do aim to be inclusive of Aboriginal and Torres Strait Islander culture, and must continue to do this, 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. They 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. This creates a sense of cultural safety for families and children in which community and individual healing and development can take place.

Aboriginal and Torres Strait Islander services such as the BBF services, and a number of the Aboriginal Child and Family Centres, also adopt strong community controlled approaches that carry significant benefits for Aboriginal and Torres Strait Islander children and families. 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[5] that

directly benefit children and families.[6] 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."[7] 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."[8] The principle of active participation of and engagement with Aboriginal and Torres Strait Islander communities is recognised within the 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."[9]

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."[10] 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."[11] This is particularly important in early childhood with strong cultural identity forming the bedrock for later development.[12]

As an 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."[13] The 2011 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.[14]

c) ***Significant challenges arise in the implementation of mainstream, child-based funding subsidies within Aboriginal and Torres Strait Islander early childhood services***
Please note that this section also responds to the following Information Requests:

Information Request 8.2
b) *Views on the best way to fund integrated services that provide ECEC, including whether child-based funding would be an appropriate funding model*
c) *How funding could be apportioned across activities operating within an integrated service, including for the coordination of services, the management of administrative data and an evaluation of outcomes.*

Direct evidence from a large number of Aboriginal and Torres Strait Islander early years services strongly indicates that mainstream subsidies that are allocated on a per-child basis are not effective for

Aboriginal and Torres Strait Islander early years services. Four particular issues are raised in relation to this.

i. Complex administrative requirements

The complex administrative requirements of the Child Care Benefit (CCB) and Child Care Rebate (CCR) schemes can hinder, and in some cases directly reduce, Aboriginal and Torres Strait Islander children's participation. Brennan confirms this, stating in a recent report that "Imposing the CCB/CCR model could jeopardise the integrated ECEC and family support model that characterises these services and could result in the exclusion of the most vulnerable children and families – the very children and families for whom these services were designed."[15] Consultation with a number of Aboriginal and Torres Strait Islander early childhood services indicates the existence of a significant number of challenges with the CCB system. The extent to which these challenges would also be present with the Early Childhood Learning Subsidy is not yet fully known. However if Aboriginal and Torres Strait Islander children's access is to be prioritised, these critical considerations must be further explored and sufficiently addressed.

- Fees may need to be significantly raised to enable service sustainability, particularly within rural or remote areas where the cost of service delivery is much higher. This will adversely affect families with low or unstable incomes, and/or multiple children enrolled;
- The allowable absences element of CCB has caused children to lose their place at a service when they exceed their allocated allowable absence days due to cultural, family or Sorry Business reasons;
- Current CCB/CCR requirements mean that inconsistencies between a child and carer's Centrelink details and early years service records can lead to de-registration from the system and ensuing disenrollment from the service;
- A per-child, income-based system is more likely than a block-funding arrangement to result in a higher staffing, administrative and monitoring requirements to manage funding requirements; and
- There is the potential for negative impacts on staff and family relationships as a result of collection of higher fees.

Furthermore, the ECLS itself has strict parental eligibility requirements that will prejudice families who are not working, looking for work or studying – in essence the most disadvantaged families within a community. As mentioned above, the existence of a viable labour market does not necessarily equate to full participation in that market. It is not clear how the ECLS would apply to a service that operated in an area with a viable labour market, but which had a number of families who did not meet the eligibility requirements.

ii. Child-based subsidy

Aboriginal and Torres Strait Islander ECEC services are about meeting the needs of *all* children in the community.[16] 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."[17] 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".[18] 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.[19] A subsidy allocated on a per-child basis does not support such an approach, as it specifically funds only those children attending the centre.

Furthermore, a child-based subsidy can only provide a stable service funding source when attendance rates do not fluctuate. Evidence from Aboriginal and Torres Strait Islander early years services indicates that fluctuations in enrolments/attendance frequently occur due to children being absent for cultural and/or family reasons. The pressure to maintain high enrolments could therefore mean that those who are absent for cultural and family reasons risk losing their place, or that the service receives inconsistent funding because it does maintain stable enrolment/attendance numbers, which would strongly effect service financial sustainability.

iii. Need for flexibility in service response

Directly relevant to the two points above, is the need for Aboriginal and Torres Strait Islander early years services to have flexibility in the services they provide. One significant issue with the ECLS is that it would only cover the cost of child care. Aboriginal and Torres Strait Islander early years services generally take a holistic approach based on the philosophy that early childhood education is best delivered in conjunction with a range of additional supporting programs. The ECLS subsidy would prevent this by only covering the early years education component through an narrow and inflexible funding arrangement.

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.[20] 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.[21] This requires "Flexible frameworks and service contracts to enable local service design that reflects local Aboriginal and Torres Strait Islander priorities and aspirations."[22] 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.

BBF services also represent a diverse range of service types, including includes MACS, playgroups, mobiles, long day care centres, crèches and Out-of-School-House care. Any funding model must therefore be sufficiently flexible to cater for the diverse service models types that are currently required to meet the needs of communities around Australia. 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."[23] 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.[24] 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.

iv. Children with additional needs

This fourth point examines the role Aboriginal and Torres Strait Islander early years services play through catering to a high population of children with additional needs. In doing so it directly responds to the following information requests:

> **Information request 8.1**
> *The Commission seeks further information on the nature of the barriers faced by families with children with additional needs in accessing appropriate ECEC services and the prevalence of children with additional needs who have difficult accessing and participating fully in ECEC. Information on the additional costs of including children with additional needs is also sought.*

> **Information Request 12.9**
> *The Commission seeks information on whether there are other groups of children that are developmentally vulnerable, how they can be identified, and what the best way is to meet their additional needs.*

Aboriginal and Torres Strait Islander services provide care for the most disadvantaged communities in Australia, and therefore generally cater for a large proportion of children with additional needs, including health and developmental issues.[25]. The extent of Aboriginal and Torres Strait Islander peoples experiencing poverty ranges from between 40 to more than 50 per cent across Australia, both in remote and urban areas.[26] 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.[27] The causes of high rates 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.[28] The Western Australian Aboriginal Health Survey[29] (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.

Recent SNAICC research noted that most Aboriginal and Torres Strait Islander early years services had high numbers of children with additional needs – both diagnosed and undiagnosed - including:
- speech
- hearing
- behavioural
- occupational therapy
- developmental delays
- post traumatic stress disorder (PTSD)[30]

Whilst some direct funding is currently provided for children with additional needs, this funding only applies where a child has a diagnosed additional need. No support is available for the significant number of Aboriginal and Torres Strait Islander children with complex behavioural or developmental disorders who have not received formal diagnosis.

Aboriginal and Torres Strait Islander children experience trauma which may not be a specific diagnosed condition, but is inter-generational, linked to family violence, family breakdown, poverty and culture loss. The Healing Foundation describes this,

> Aboriginal and Torres Strait Islander children and young people may experience trauma through direct experience or secondary exposure. Direct experience occurs through abuse, neglect and exposure to violence (AIHW 2011). Secondary exposure for Aboriginal and Torres Strait Islander children and young people occurs through bearing witness to the past traumatic experiences of their family and community members as a result of colonisation, forced removals and other government policies. A key consequence of secondary exposure to traumatic experiences is intergenerational trauma (Atkinson, Nelson & Atkinson 2010).[31]

Children become the direct recipients of intergenerational trauma,

> Childhood trauma has the potential to interrupt the normal physical, physiological, emotional, mental and intellectual development of children and can have wide-ranging, and often life-long implications for their health and wellbeing (van der Kolk 2005 & 2007). Prolonged exposure to chronic stress and trauma alters a child's brain development, continually activates a stress response and leads to hyper-arousal. The capacity to learn and concentrate, develop trusting, reciprocal relationships, regulate behaviour and make use of self-soothing or calming strategies is all severely impaired in children who have experienced trauma, including intergenerational trauma (Victorian Government Department of Human Services 2010). Without the necessary skills, many children grow into young people and adults who struggle with self-destructive, pain-based behaviours including aggression and violence, substance misuse, criminal acts, suicide, sexual promiscuity and inactive lifestyles (Atkinson, Nelson & Atkinson 2010; van der Kolk 2007)."[32]

Addressing intergenerational trauma is a community issue requiring a specialised and more strongly resourced response from services for those communities. Early intervention and support is critical if the cycle is to be broken; "If this generation of children and young people are to have a different experience from their parents and grandparents, we must act to acknowledge and address their healing needs. Unless children and young people are able to heal from their own experience of trauma, many will go on to create a traumatic environment for their own children and the cycle of intergenerational trauma will continue."[33]

Aboriginal and Torres Strait Islander early years services are critical spaces for the provision of community and family support and healing. They create nurturing, family-style environments that support children and their families to overcome trauma. This unique approach requires more intensive staff support. From discussions and consultations with services SNAICC understands that most services endeavour to manage the higher needs of their children by providing higher staff-child ratios to ensure that children with additional needs are receiving appropriate support. These costs must be absorbed within already-stretched service budgets.

Example

Noogaleek Multifunctional Aboriginal Children's Service (MACS) has approximately 30 families dealing with family violence or an incarcerated parent. A number of these children have post-traumatic stress disorder (PTSD), are not confident, and require specific support and a much higher level of care. Supporting these children is therefore a major focus at the centre, requiring increased staff attention. Staff dedicate extensive individual time to children to help them gain confidence in a non-pressured, supported environment. The Coordinator believes it is critical that this one-on-one support occurs within the ELC before a child transitions to school, as the lower teacher-child ratio at school will most likely mean that children receive much less individual support and may therefore exhibit more severe behaviour.

Example

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 high – sometimes raising them as high as one educator to two children when needed. Staff perceive that a shift to CCB would directly lessen their ability to budget for higher educator to child ratios when needed.

Example

Bubup Wilam Child and Family Centre perceive that a major deficiency within the mainstream funding 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 at least seven children with significant additional needs. Because their needs don't fit within a formal diagnostic area, these children don't qualify for an extra worker. The centre is not able to fund this independently. The service also has 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.

Aboriginal and Torres Strait Islander early years services therefore play invaluable roles in facilitating access and enabling positive development for Aboriginal and Torres Strait Islander children with additional needs. The sheer high numbers of children with additional needs attending Aboriginal and Torres Strait Islander services is yet another indication of the difference required in approach and funding allocations for Aboriginal and Torres Strait Islander early years services, which would not be met under the mainstream ECLS program.

3. Integrated services and the inclusion of Aboriginal Child and Family Centres (ACFCs)

SNAICC recommends the following amendments to the draft report:

5. **Emphasise more strongly the vital importance and significant opportunity of service integration in the early years, especially to meeting the needs of our most vulnerable children and families.**

6. **Shift the focus from which social services should not be included within ECEC funding, to call on government to provide integration resourcing, and advance cross-government approaches to ensuring access to a range of child and maternal health and family support services through early childhood services.**

7. **Describe the vital importance of early years 'hub' services to contribute to close the gap in outcomes for Aboriginal and Torres Strait Islander children, including explicitly recognising the opportunity to build on recent government investment in the 38 new Aboriginal Child and Family Centres.**

This section addresses the issue of integrated early years services, including the role of Aboriginal Child and Family Centres, and specifically responds to the following two recommendations contained with the Productivity Commission's draft report:

Productivity Commission Recommendation 5.2:
Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.

Productivity Commission Recommendation 5.3:
Australian Government ECEC funding should be limited to funding approved ECEC services and those closely integrated with approved ECEC services, and not be allocated to fund social services that largely support parents, families and communities. Any further Australian Government support for the HIPPY program should be outside of the ECEC budget allocation.

This section also seeks to address the following information request:

Information Request 8.2
a) *The extent to which integrating ECEC services with other family services and schools will deliver benefits to families and/or ECEC providers, and in particular, Indigenous and potentially other disadvantaged communities*

Firstly, SNAICC commends the Productivity Commission for its focus on and recognition of the value of integrated ECEC services. The evidence on the value of integrated services is strong. The provision of integrated programs such as health, family support and capacity building, nutrition and early intervention alongside early childhood services has been identified by families and services alike as

critical to increasing Aboriginal and Torres Strait Islander families' access and engagement with an early childhood service.[34] The excerpt below, from SNAICC's research on integrated service delivery for Aboriginal and Torres Strait Islander children and families, describes the importance of service integration to enabling access to critical family supports in the early years:

Integrating access for children and families is a central driving philosophy of service integration, based on the notion that integrated systems have the potential to respond more holistically to child and family needs by combating service fragmentation and making a range of child and family services readily available.[35] Holistic responses are facilitated both by single integrated services, as well as cooperative activities and coordinated referral systems between providers that link families to a range of supports from a single point of access to the service system.[36] An important point of clarification, not always addressed in the literature, is that while integrated systems seek to ensure access to multiple services through single access points, they are most accessible where there are multiple entry points into the integrated service system, with 'no wrong doors.'[37] These entry points should seek to engage families based on: needs at different points throughout the life cycle; practical and geographical access considerations; and with a focus on early engagement of families through primary service provision that is universally available and attractive to families, for example, early childhood education and care.[38] In this way, services which are universally available and commonly accessed serve as 'hooks', drawing families into the service system and 'laddering' them to additional supports and activities as wanted and required.[39]
Burton, J. (2012). *Integrated service delivery for Aboriginal and Torres Strait Islander children and families*. SNAICC. Melbourne, 8.

As well as encouraging and enabling access, the provision of additional programs within an integrated approach is critical to meeting broader family needs,[40] 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."[41]

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…"[42] The *National Partnership on Indigenous Early Childhood Development* further defined 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."[43] 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.[44] SNAICC research on integrated service delivery has identified that genuine and respectful partnerships are key to the provision of holistic, integrated services.[45] Effective integration requires collaboration at various distinct levels, including "regional and local service development (and) management and coordination."[46]

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."[47] Aboriginal Child and Family Centres, and many BBF services, such as the MACS, offer a strong model of this type of service provision.

A final critical feature of holistic integrated 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."[48]

Although the Draft Productivity Commission report recognises the value of integrated services, it offers only restricted support to this model in practice. In particular, it provides no direct support for the new 38 Aboriginal Child and Family Centres (ACFCs) across Australia. Only those ACFCs that deliver child care would be eligible under the draft report — which would exclude a large number of ACFCs. ACFCs operating across Australia provide vital early years support to Aboriginal and Torres Strait Islander children and their families, enabling children to begin school with the best possible chance of future success. These services are vital to closing the gap in early years outcomes between Aboriginal and Torres Strait Islander and non-Indigenous children, and should therefore be considered critical elements of the Government's future early years policy and program of action.

In summary, integrated early years services are vital to meet the needs of our most vulnerable children and families. Aboriginal and Torres Strait Islander early years services, currently grouped under the BBF and Aboriginal Child and Family Centre programs, provide valuable examples of successful integrated service models. The proposal to fund a model that excludes such service types directly contradicts evidence on the importance of integration for families' access to, participation in, and outcomes from, early years services.

4. A proposed future model

SNAICC recommends the following amendments to the draft report:

8. **Recommend a long-term block funded program specifically targeted to meet the needs of Aboriginal and Torres Strait Islander children and families, in line with the broad commitment of Australian society to heal and strengthen Aboriginal and Torres Strait Islander communities, promote Aboriginal and Torres Strait Islander culture, and close the gap in outcomes for Aboriginal and Torres Strait Islander children.**

9. **Rename the Disadvantaged Communities Program to a more appropriately strengths-based name that does not emphasise disadvantage as the main focus.**

10. **Within the Disadvantaged Communities Program, block funding of service budget is allocated through the following process:**
    - **Service to demonstrate their need for support under the (renamed) Disadvantaged**

> **Communities Program through a three year funding proposal. 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 (urban, rural, regional, remote); service type (for example long day care, out of school hours care, 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; capacity of families to pay fees.**
> - **This could be repeated on a three year basis, allowing for changing service needs over time, while providing adequate security for service planning and development.**

What is required to enable accessible, high quality, culturally appropriate early years education and care for Aboriginal and Torres Strait Islander children is a funding stream that specifically targets Aboriginal and Torres Strait Islander children. This approach must recognise that Aboriginal and Torres Strait Islander early years services do not operate as mainstream early years services, but instead have a unique role and context that requires a specific funding stream and approach. In summary the approach must acknowledge that Aboriginal and Torres Strait Islander early years services:

- Work within contexts of inter-generational disadvantage and poverty – including providing for large numbers of children with additional needs. Such entrenched disadvantage and disenfranchisement cannot be assessed upon merely whether there is a viable labour market;
- Require flexibility in funding levels and requirements in order to deliver holistic services to cater for their specific community context;
- Provide a range of services additional to traditional child care, such as parenting/family support, early intervention programs, transport, nutrition, health services and cultural programs;
- Have as their central goal to educate and nurture healthy, resilient, proud and school-ready children, as well as supporting their families; and
- Act as community development engines that seek to address the needs of all children in the community, rather than just those children who attend the service.

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[1] The Healing Foundation. *Growing Our Children Up Strong and Deadly: healing for children and young people*. Canberra, 1.

[2] 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).

[3] Department of Families, Housing and Community Services and Indigenous Affairs (FaHCSIA). (2007). Towards an Indigenous Child Care Services Plan. Canberra, 9.

[4] COAG. (2009). *National Indigenous Reform Agreement (Closing the Gap)*. Canberra, A-22.

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