

# **SNAICC 2025-26 PRE-BUDGET SUBMISSION TO THE AUSTRALIAN GOVERNMENT**

January 2025

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## Acknowledgement

SNAICC shows respect by acknowledging the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities. SNAICC head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally. SNAICC acknowledges Traditional Owners of all lands and waters across this continent, and pays respects to Elders past and present. We acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted.

## About SNAICC

SNAICC is the national non-government peak body for Aboriginal and Torres Strait Islander children. We work for the fulfilment of the rights of our children, to ensure their safety, development, and well-being.

SNAICC has an active membership of Aboriginal and Torres Strait Islander community-based child care agencies, Multi-functional Aboriginal Children's Services, crèches, long day care child care services, pre-schools, early childhood education services, early childhood support organisations, family support services, foster care agencies, family reunification services, family group homes, services for young people at risk, community groups and voluntary associations, government agencies and individual supporters.

Since 1981, SNAICC has been a passionate national voice representing the interests of Aboriginal and Torres Strait Islander children and families. SNAICC champions the principles of community control and self-determination as the means for sustained improvements for children and families, which has been at the heart of SNAICC's work — whether on child protection and wellbeing or early childhood education and development. Our work comprises policy, advocacy, and sector development. We also work with non-Indigenous services alongside Australian, State and Territory Governments to improve how agencies design and deliver supports and services for Aboriginal and Torres Strait Islander children and families.

As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with and is informed by its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences, needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations.

## Executive Summary

Aboriginal and Torres Strait Islander communities and cultures have provided holistic care and support for children and their families for thousands of generations and are imbued with the cultural knowledge and strengths that are essential to supporting young children to thrive. Despite these strengths, Aboriginal and Torres Strait Islander children experience greater vulnerability than non-Indigenous children as demonstrated by their overrepresentation in the child protection and youth justice systems and gaps in health and education outcomes. This greater vulnerability has been created by the continuing impacts of colonisation that have caused generations of harm and trauma for Aboriginal and Torres Strait Islander people.

Aboriginal and Torres Strait Islander children experience the vulnerabilities that come from being children alongside the vulnerabilities created by colonisation, which compound across the social determinants of health and wellbeing. The promotion and protection of Aboriginal and Torres Strait Islander children's rights are critical for healing from the ongoing legacy of colonisation and for the continuation of the world's longest surviving cultures.

Successive governments have committed to addressing these inequities, including recently through the 2020 National Agreement on Closing the Gap. Despite these commitments, the Productivity Commission's first review of the National Agreement shows that governments are not adequately delivering the changes needed to make a meaningful difference in Aboriginal and Torres Strait Islander life outcomes.

SNAICC calls on the Australian Government to bring to life the commitments they have made through the National Agreement on Closing the Gap by investing in the policy reform, programs and structural change needed to support Aboriginal and Torres Strait Islander children and families to heal and to thrive. SNAICC strongly supports the recent announcements of the Australian Government to advance towards a universal child care system and a number of our proposals reinforce and complement those announcements with a focus on the specific needs of Aboriginal and Torres Strait Islander children and communities. SNAICC also strongly supports the agenda for transformative change to Australia's child protection system through self-determined policies, programs and services, as set out in *Safe and Supported: The National Framework for Protecting Australia's Children*. Our proposals complement these partnership initiatives between government and Aboriginal and Torres Strait Islander peoples to advance the safety and wellbeing of children. Proposals set out below would also assist to alleviate cost of living pressures felt by Aboriginal and Torres Strait Islander families by increasing service supports for families experiencing financial stress, increasing employment opportunities in education, health and social services, and lowering the cost of early education and care.

SNAICC is calling for the Australian Government to invest in the following initiatives in its upcoming Budget:

**1. Supporting Aboriginal and Torres Strait Islander children to thrive in their early years through:**

- 1.1 Implementation of a dedicated funding model for ACCO integrated early years services
- 1.2 Removal of the Child Care Activity Test and increased subsidised access to child care for all Aboriginal and Torres Strait Islander children
- 1.3 Nest and Nurture Model for new ACCO early years services
- 1.4 SNAICC Early Years Support Continuation and Expansion
- 1.5 Expansion of the Connected Beginning program
- 1.6 Increasing Aboriginal and Torres Strait Islander early educator workforce
- 1.7 Aboriginal and Torres Strait Islander ECEC workforce development innovation fund
- 1.8 Continuing and expanding Aboriginal and Torres Strait Islander Playgroups

**2. Supporting Aboriginal and Torres Strait Islander children to be safe and well, and connected to their families, communities, cultures, and Country through:**

- 2.1 Resourcing and implementing Safe and Supported: The National Framework for Protecting Australia's Children
- 2.2 National ACCO prevention and early support program funding
- 2.3 Implementing Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence
- 2.4 Sustainable, ongoing funding for the Office of the National Commissioner for Aboriginal and Torres Strait Islander Children and Young People

## Strategic Context

### Self-Determination

SNAICC advocates for the full enactment of self-determination in all legislation, policies, and strategies. Self-determination describes the right of Aboriginal and Torres Strait Islander peoples to autonomy and self-governance.<sup>1</sup> The United Nations Expert Mechanism on the Rights of Indigenous People under UNDRIP connects the capacity of Indigenous peoples to meet their children's needs with their ability to exercise self-determination<sup>2</sup>.

The Australian Government has taken important steps towards recognising the rights of Aboriginal and Torres Strait Islander peoples to self-determination in matters relating to children. *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031* commits to progressive systems transformation that has Aboriginal and Torres Strait Islander self-determination at its centre and defines self-determination as:

*a collective right of Aboriginal and Torres Strait Islander peoples to determine and control their own destiny. It is a right of Aboriginal and Torres Strait Islander peoples to exercise autonomy in their own affairs and to maintain and strengthen distinct political, legal, economic, social and cultural institutions.*<sup>3</sup>

For too long, governments have decided what works and what doesn't for Aboriginal and Torres Strait Islander people and communities without delivering meaningful and tangible positive change for our children and families. Enacting self-determination is critical to designing and implementing effective policies that achieve better outcomes for Aboriginal and Torres Strait Islander children.

### National Agreement on Closing the Gap

In July 2020, the Australian Government, all state and territory governments, and the Coalition of Peaks signed the National Agreement on Closing the Gap (National Agreement). The National Agreement seeks to overcome the entrenched inequalities faced by Aboriginal and Torres Strait Islander people, pushing for equality in life outcomes for all Australians.

The National Agreement is built around four Priority Reforms to change the way governments work with Aboriginal and Torres Strait Islander communities, organisations, and people across the country. The Priority Reforms are based on what Aboriginal and Torres Strait Islander people

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<sup>1</sup> SNAICC 2022, 'The Family Matters Report 2022: Measuring trends to turn the tide on the over-representation of Aboriginal and Torres Strait Islander children in out-of-home care'. Retrieved from: <https://www.familymatters.org.au/wp-content/uploads/2022/11/20221123-Family-Matters-Report-2022-1.pdf> pg. 90.

<sup>2</sup> United Nations Human Rights Council 2021, 'Rights of the Indigenous child under the United Nations Declaration on the Rights of Indigenous Peoples'. Retrieved from: [G2121979.pdf \(un.org\)](https://www.un.org/ruhrdocid.aspx?ref=G2121979), pg. 2

<sup>3</sup> Department of Social Services 2021, 'Safe and Supported: the National Framework for Protecting Australia's Children 2021-2031 (the National Framework)'. Retrieved from: [https://www.dss.gov.au/sites/default/files/documents/12\\_2021/dess5016-national-framework-protecting-childrenaccessible.pdf](https://www.dss.gov.au/sites/default/files/documents/12_2021/dess5016-national-framework-protecting-childrenaccessible.pdf), pg. 51.



have been saying for a long time is needed to improve the lives of our people, and have been committed to by all Australian, state and territory governments.

The Priority Reforms must inform all government action including legislation, policy, and practice, whether these actions are targeted for Aboriginal and Torres Strait Islander peoples or impact them as part of the general population. The Priority Reforms are listed below.

### **1. Formal Partnerships and Shared Decision Making**

Aboriginal and Torres Strait Islander people are empowered to share decision-making authority with governments to accelerate policy and place-based progress on Closing the Gap through formal partnership arrangements.

### **2. Building the Community Controlled Sector**

There is a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector delivering high quality services to meet the needs of Aboriginal and Torres Strait Islander people across the country.

### **3. Transforming Government Organisations**

Governments, their organisations and their institutions are accountable for Closing the Gap and are culturally safe and responsive to the needs of Aboriginal and Torres Strait Islander people, including through the services they fund.

### **4. Shared Access to Data and Information at a Regional Level**

Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to set and monitor the implementation of efforts to close the gap, their priorities and drive their own development.<sup>4</sup>

## **Productivity Commission Review of the National Agreement on Closing the Gap**

As part of the National Agreement, parties agreed that the Productivity Commission would undertake a comprehensive review of progress ever three years. This will be complemented by an Aboriginal and Torres Strait Islander led review.

The Productivity Commission delivered the final study report of the Closing the Gap Review to Joint Council on 24 January 2024. The report found that government progress on the implementation of the National Agreement is limited, largely due to a lack of follow-through from governments on established commitments against the four Priority Reforms.

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<sup>4</sup> Australian Government, 'Closing the Gap Priority Reforms'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/priority-reforms>

In particular, the review found that governments are not understanding or buying into the large-scale, fundamental change required to implement the National Agreement. They are instead pursuing piecemeal changes to the status quo that has not had meaningful impact. A transformational shift to government ways of working, including a substantial shift in investment, is required to deliver on the intent of the National Agreement.

The Productivity Commission recommended:

1. Power needs to be shared
2. Indigenous Data Sovereignty needs to be recognised and supported
3. Mainstream government systems and culture need to be fundamentally rethought
4. Stronger accountability is needed to drive behaviour change.

The Productivity Commission acknowledged that Aboriginal and Torres Strait Islander peak bodies and the ACCO sector play an essential role in improving outcomes for Aboriginal and Torres Strait Islander people, but that their role was limited by a lack of sustainable investment. In particular, the Review identified that an essential action for governments was to 'adequately resource Aboriginal and Torres Strait Islander people and organisations to ensure they are able to apply their knowledges and expertise in the implementation of the Agreement. This includes funding for the design and delivery of programs and services but also funding for participation in government processes to ensure that Aboriginal and Torres Strait Islander knowledges and expertise are central in these processes' (action 1.4).



## Section 1: Supporting Aboriginal and Torres Strait Islander children to thrive in their early years

Investment proposals in this section address the policy, systems and service reforms that require Australian Government funding to deliver improved outcomes in early education, development and wellbeing for Aboriginal and Torres Strait Islander children in their early years.

### 1.1 Implementation of a dedicated funding model for ACCO integrated early years services

#### Proposal

The Commonwealth Government should commit to partnering with states and territories and Aboriginal and Torres Strait Islander people to fully fund a dedicated national funding model, as recommended by the Productivity Commission and outlined in [SNAICC's Funding Model Options for ACCO Integrated Early Years Services Report](#). This new funding model should:

- incorporate block- and needs-based funding as core features, enabling services to provide a range of integrated supports matched to the needs of their communities, including ECEC, family support, allied health, disability support, child and maternal health, and cultural and community programs
- provide long-term certainty, control and sustainability so ACCOs can determine how best to meet the service needs for their communities; and
- explicitly and systematically provide for backbone support to ensure ACCOs have necessary supports for business, practice, policy and workforce development.

Funding amounts should be scaled in alignment with population size, remoteness and vulnerability. Funding will also be required for service planning and expansion to address the gaps in availability of ACCO early years services across the country.

The new funding model for ACCO integrated early years services should be funded and delivered through a co-contribution model between Commonwealth, State and Territory Governments with clear roles, responsibilities and long-term funding security established through a national policy framework embedded within a national partnership agreement.

#### Key messages

- ACCO-led integrated early years services provide the wraparound, holistic supports needed in their communities ensuring that Aboriginal and Torres Strait Islander children and families can access the early education and development services they need, when they want and need them.

- Current funding approaches do not reflect the full cost of this service delivery or support ACCOs to deliver the services most needed in their communities.
- Closing the Gap targets to improve developmental outcomes for Aboriginal and Torres Strait Islander children in their early years are off track. Meeting ACCOs' funding needs can positively shift early learning and development outcomes and deliver cost-efficiency for government.
- Multiple recent systemic inquiries have recommended the development of supply side funding models for ACCO early education and integrated services, including the Australian Competition and Consumer Commission Childcare Inquiry (2024), and the Productivity Commission Early Childhood Education and Care Inquiry (2024).
- All Governments, through the Joint Council on Closing the Gap, have committed to exploring the design and implementation of a national, systemic and sustainable approach to funding ACCO-led integrated early years services.
- “A new funding model for Aboriginal community-controlled organisations delivering ECEC, alongside culturally safe mainstream ECEC services, would support Aboriginal and Torres Strait Islander children and families to thrive in services that understand and respond to their needs and preferences” (Productivity Commission 2024)

## **Rationale**

The connection and accountability that ACCOs have to community makes them uniquely placed to identify the services and supports that are most needed or wanted on a local level. When a need in the community is identified, ACCOs respond to the need by connecting services together to provide wraparound support that prioritises cultural care and connection.

Aboriginal and Torres Strait Islander families value culturally safe early learning for their children to support their child's cultural identity, knowledge, and connection, and to foster a strong sense of belonging and identity. ACCO early years services strongly value and embed this culture within their services, providing the holistically focused approach to learning and development required to meet the needs of Aboriginal and Torres Strait Islander children. ACCOs are also uniquely placed to provide high quality, culturally safe programs consistent with Aboriginal and Torres Strait Islander cultural ways of child rearing, including practices such as storytelling, play-based learning, lifelong learning, and collective education with multiple care givers.

Current one-size-fits-all funding approaches do not meet the needs of ACCOs and, by extension, Aboriginal and Torres Strait Islander children and families. Many Aboriginal and Torres Strait Islander children miss out on accessing quality early years education which is culturally safe and responsive.<sup>5</sup> The result is that Aboriginal and Torres Strait Islander children are disproportionately

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<sup>5</sup> SNAICC 2023, 'Funding model options for ACCO integrated early years services: Final Report.' Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/05/240507-ACCO-Funding-Report.pdf>.

disadvantaged in early development and education outcomes; one in three Aboriginal and Torres Strait Islander children are developmentally vulnerable on two domains or more, compared to one in five non-Indigenous children.<sup>56</sup> This rate of developmental vulnerability has increased for Aboriginal and Torres Strait Islander children since 2018, while the rate is declining for non-Indigenous children.<sup>67</sup>

Engagements have highlighted a broad range of features of the Commonwealth Child Care Subsidy (CCS) and associated Child Care Safety Net that discourage and limit engagement of Aboriginal and Torres Strait Islander children in early years education and care and contribute to funding challenges for ACCOs. These challenges include:

- **Administrative barriers:** The CCS creates administrative complexities for both families and services. Families experience challenges to enrol, access subsidies, and engage with Centrelink. ACCOs invest substantial resources to support families with administrative processes with no allocated funding to provide this support.
- **Funding not matched to holistic supports required:** While ACCO early years services aim to provide outreach and holistic supports that address multiple barriers for families to access learning and development services, subsidy funding is narrowly targeted to limited educational supports.
- **Stigma and fear of accessing Additional Child Care Subsidy (ACCS):** Requiring a child to be “vulnerable or considered to be at risk of harm, abuse or neglect” is a stigmatising definition that makes parents fearful of contact with culturally unsafe statutory systems and discourages families from accessing the additional support available.
- **System orientation barriers:** The CCS funding model promotes a perception and reality of services being primarily or only available for working families and discourages the participation of the most vulnerable children and families.
- **Market failure:** The market-based funding model is ineffective to ensure services reach and are tailored for the most vulnerable children and families who stand to gain the most from consistent access to early years services. The model also perpetuates childcare deserts in many areas where Aboriginal and Torres Strait Islander children reside.

In addition to the Commonwealth Child Care Package, ACCOs access funding from multiple other sources. Each funding stream has different aims, objectives, eligibility criteria, compliance obligations and reporting requirements dependent on the funding department and/or jurisdiction. This mixture of funding streams across departments, agencies and jurisdictions creates the following challenges:

<sup>6</sup> Australian Early Development Census 2021. Retrieved from: <https://www.aedc.gov.au/data-explorer/>.

<sup>7</sup> Ibid.

- **Inequitable funding:** There are often large disparities in funding between ACCOs funded through state-funded integrated early years programs in some jurisdictions, and those that receive more limited funding through the CCCFR program.
- **Administrative burden:** Services often have to manage multiple and different reporting and acquittal processes to comply with the requirements of each funding source. These rarely have consistent formats, information requirements or reporting periods.
- **Difficulty securing funding:** Competitive grant and tender processes disadvantage ACCOs, especially smaller ACCOs, because larger non-Indigenous organisations have the advantage of economies of scale that can mean lower costs of delivery but not culturally safe or responsive services. Smaller ACCOs also have limited resources to dedicate to grant and tender processes, that are often time intensive and require analysis of data and evidence to secure the continuation of successful existing services.
- **Lack of funding certainty:** Funding contracts are too short (less than 5 years), constraining ACCOs from building relationships and setting up programs based on the underpinning principles that are fundamental to their success.
- **Restrictive use of funding:** Grant and program funding is often awarded under strict programmatic guidelines, meaning that funding can only be used under pre-determined activities and timeframes. In most cases these guidelines do not cover the type of support that ACCOs know are most useful and effective within their communities.
- **Lack of ‘backbone’ support:** Funding across programs does not include backbone support for ACCO business, policy, workforce and program development. This has been felt more acutely across multiple jurisdictions since the discontinuation of the Indigenous Professional Support Unit program.

Current ways of working are leaving Aboriginal and Torres Strait Islander children behind. Patchwork and piecemeal funding results in inequitable access to services, with the children and families most in need most often missing out.

A renewed, national, systemic and sustainable approach to funding ACCO-led integrated early years services will ensure that Aboriginal and Torres Strait Islander children and families have equitable access to the holistic, culturally safe, wraparound supports that allow them to thrive both in childhood and throughout their lives.

## Funding requirements

**\$245 million** in recurrent funding per annum is required to sustain and grow an existing group of approximately 100 Aboriginal and Torres Strait Islander integrated early years service providers. This would not be all new funds, and includes repurposing funds from existing ECEC funding streams available to these services, including CCS and CCCFR fundings, as well as the potential

for contributions from existing funding in integrated service streams such as allied health, disability, foundational support, inclusion support, and family services.

**Additional funding is required** for service planning, infrastructure development, and new service development to address gaps in available ACCO integrated early years service delivery. Other proposals in this budget submission support this required activity.

## **1.2 Removal of the Child Care Activity Test and increased subsidised access to child care for all Aboriginal and Torres Strait Islander children**

### **Proposal**

To improve access to early childhood education and care (ECEC) and outcomes for Aboriginal and Torres Strait Islander children and families, the Australian Government should implement and fully fund the removal of the child care activity test and increase hours of subsidised care to 100 hours per fortnight for all Aboriginal and Torres Strait Islander children. These changes align to announcements of the Australian Government in December 2024.

Additionally, the Australian Government should implement other components of recommendation 6.1 of the Productivity Commission Early Childhood Education and Care Inquiry including raising the CCS rate to 100% for families earning \$80,000 or less, and should extend the 100% subsidy rate to all Aboriginal and Torres Strait Islander families.

### **Key messages**

- SNAICC supports the resounding calls of our members, Aboriginal and Torres Strait Islander families and communities, and many leading experts and sector stakeholders for the provision of free universal early childhood education and care.
- As an important step toward universal child care, this proposal seeks cessation of the child care activity test in determining and limiting access to CCS for families and communities. This will help reorient the Australian ECEC system to have a central focus on children's education and development, alongside workforce participation goals for parents.
- Providing 100 hours per fortnight of subsidised care for all Aboriginal and Torres Strait Islander children will address inequities for Aboriginal and Torres Strait Islander children that are leading to increasing gaps in developmental outcomes.
- SNAICC strongly supports the proposed Child Care Subsidy reforms announced by the Australian Government in December 2024, and additionally calls for families earning less than \$80,000 and all Aboriginal and Torres Strait Islander families to receive a 100% subsidy rate to address social and systemic inequities.
- These reforms must be delivered in parallel with much needed funding reform for ACCO integrated early years services that are uniquely positioned to improve early childhood development outcomes at scale for Aboriginal and Torres Strait Islander children (see section 1.1 for further detail).

### **Rationale**

The current ECEC funding system undermines access and affordability for families. Despite all governments committing to closing the gap in early childhood development and increasing the proportion of Aboriginal and Torres Strait Islander children who are developmentally on track in



all five AEDC domains to 55% by 2031 (Socioeconomic Outcome 4), Aboriginal and Torres Strait Islander children are more likely to be developmentally vulnerable than non-Indigenous children.

Recent data shows just 34.3% of Aboriginal and Torres Strait Islander children were on track in all five domains compared to 56.2% of non-Indigenous children, and one in three Aboriginal and Torres Strait Islander children are developmentally vulnerable on two domains or more, compared to one in five non-Indigenous children.<sup>8</sup>

The demand-driven ECEC funding system, underpinned by the CCS and the activity test, is driving this inequity. For myriad reasons, this system inadvertently excludes many Aboriginal and Torres Strait Islander families from the services they need for their children to grow up strong in culture, developmentally on track, ready to start school well, and to thrive.

The activity test, and systemic complexity, prevent many socioeconomically disadvantaged families from accessing the CCS as they are less likely to meet required activity levels to access the subsidy.<sup>9</sup> The ACCC estimates that 126,000 children across Australia may miss out on ECEC as a result of the activity test, the majority of these children are likely to experience socioeconomic disadvantage.<sup>3</sup> The disqualifying or discouraging effects of the activity test are especially acute for Aboriginal and Torres Strait Islander families, particularly those experiencing domestic violence, extreme poverty, or other socioeconomic disadvantage interrupting capacity to meet activity test requirements.<sup>10</sup>

Recalibrating the system to ensure equity and drive outcomes over the life course, including future economic participation, is vital. Australia's early learning services are much more expensive than international norms, ranking 26<sup>th</sup> out of 32 OECD countries on out-of-pocket early learning costs as a proportion of household income.<sup>11</sup> Those fees are increasing at more than double the rate (20.6%) of the OECD average (9%).<sup>12</sup>

<sup>8</sup> Australian Early Development Census 2021. Retrieved from: <https://www.aedc.gov.au/data-explorer/>.

<sup>9</sup> Kalb, G et al 2018. 'Who is left behind under the new child care subsidy? Australian Families are increasingly relying on childcare but a change in policy may leave those who need it most locked out. Retrieved from: [https://www.pc.gov.au/inquiries/completed/childhood/report](https://pursuit.unimelb.edu.au/articles/who-is-left-behind-under-the-new-child-care-subsidy#:~:text=Families%20where%20the%20secondary%20earner,dollar%20amount%20of%20childcare%20assistance; Productivity Commission 2024, 'ECEC Inquiry Report data tables: Figures 6.12 and 6.4.' Retrieved from: <a href=)

<sup>10</sup> Impact Economics and Policy 2022, 'Child Care Subsidy Activity Test: Undermining child development and parental participation.' Retrieved from: [https://static1.squarespace.com/static/61e32e62c8c8337e6fd7a1e6/t/630de5c741a8de08ad48d593/1661855185396/Undermining+Child+Development+And+Parental+Participation+Report\\_FINAL.pdf](https://static1.squarespace.com/static/61e32e62c8c8337e6fd7a1e6/t/630de5c741a8de08ad48d593/1661855185396/Undermining+Child+Development+And+Parental+Participation+Report_FINAL.pdf) p. 4.

<sup>11</sup> Australian Competition and Consumer Commission 2023. 'Childcare inquiry: Final Report.' Retrieved from: <https://www.accc.gov.au/system/files/ACCC%20Childcare%20Inquiry-final%20report%20December%202023.pdf>, p. 207.

<sup>12</sup> Ibid.

Investment in equitable ECEC is essential for improving outcomes. All children have the right to high quality early childhood education and care, setting the foundation for lifelong learning and wellbeing. In the first years of their lives, children grow 90% of their brain, developing the capabilities they need to be happy and healthy.<sup>13</sup> A robust evidence base has established that participation in quality early learning and development for children during these years enhances their language, cognitive and social-emotional capabilities, with lasting impacts on developmental, educational and wellbeing trajectories.<sup>14</sup>

A study quantifying the economic benefits of ECEC in the year before school found a return of more than \$2 for each dollar spent, provided investments lead to high quality service provision.<sup>15</sup> This return attributes to:

- improvements in workforce participation of parents
- improved literacy and numeracy resulting in education cost savings and higher educational attainment
- improved employment resulting in increased lifetime earnings, with positive impact on taxation and the government welfare spend
- reductions in interactions with criminal justice systems
- reductions in healthcare costs

This proposal aligns with Australian Government commitments to supporting Aboriginal and Torres Strait Islander children to thrive in their early years under Goal 2 of the National Aboriginal and Torres Strait Islander Early Childhood Strategy, and Outcomes 3 and 4 of the National Agreement on Closing the Gap.

## Funding requirements

- The Productivity Commission modelled that scrapping the activity test and increasing the CCS to 100% will cost \$4.7 billion per annum and see 45,100 more children participating in ECEC.

<sup>13</sup> Moore, T. et al 2017, 'The First Thousand Days: An evidence paper. Retrieved from: <https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/CCCH-The-First-Thousand-Days-An-Evidence-Paper-September-2017.pdf>

<sup>14</sup> Campbell, F et al. (2014). 'Early childhood investments substantially boost adult health.' *Science* 3434 1478-1485. Retrieved from: <https://pubmed.ncbi.nlm.nih.gov/24675955/>; dandolopartners 2023, 'Evidence on optimal hours of ECEC for Aboriginal and Torres Strait Islander children: Literature review.' Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/07/240715-Evidence-review-on-optimal-hours-of-ECEC.pdf>, p. 10.

<sup>15</sup> PricewaterhouseCoopers 2019, 'A smart investment for a smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia.' Retrieved from: <https://www.thefrontproject.org.au/images/downloads/ECO%20ANALYSIS%20Full%20Report.pdf>.

- SNAICC assumes that the Australian Government is undertaking further detailed costing of its December 2024 commitment to provide 100 hours of subsidised child care for all Aboriginal and Torres Strait Islander families.

## **1.3 Nest and Nurture Model for new ACCO early years services**

### **Proposal**

To ensure Aboriginal and Torres Strait Islander children have access to culturally safe early education and supports, new Aboriginal and Torres Strait Islander Community Controlled (ACCO) early years services need supports for establishment, growth and development.

This proposal seeks Commonwealth investment to co-design and pilot a new and innovative 'nest and nurture' model through a national Aboriginal and Torres Strait Islander early years provider. This model would cultivate and support new ACCO early years services to enhance ACCO early years delivery nationally.

### **Key messages**

- Evidence shows ACCO ECEC services are best placed to deliver high-quality, culturally responsive services that achieve the best outcomes for Aboriginal and Torres Strait Islander people. This includes critical early years services.
- The number and capacity of ACCO ECEC services does not come close to meeting the need of Aboriginal and Torres Strait Islander children, families and communities, with current services estimated to be reaching less than a quarter of Aboriginal and Torres Strait Islander children.
- Investment to expand and grow the Aboriginal and Torres Strait Islander early years sector will be critical to address gaps in coverage of culturally safe services and reduce child care deserts. Effective supports for service establishment and development will be essential to success.
- This proposal seeks Commonwealth investment for a national Aboriginal and Torres Strait Islander early years provider to work with the ACCO ECEC sector, and Aboriginal and Torres Strait Islander communities to co-design, develop and pilot a nest and nurture business development model to support accelerated growth in the number and capacity of ACCO ECEC services, to support children and families where they are desperately needed.
- Nest and nurture offerings would be equitable, adaptable to need and capability, and to community and organisational readiness. Governance and decision-making would be structured in a bespoke way for each new provider, ensuring that the heart of community-control and autonomy is retained and drives design and delivery in their community.

### **Delivery model and plan**

Establishment and implementation of a new Nest and Nurture model can be achieved through dedicated funding for:

1. The co-design of an ACCO ECEC Nest and Nurture service model, including comprehensive risk assessment and financial modelling (noting this phase of activity is already well-progressed);
2. Targeted needs analyses to identify communities and potential providers for the expansion of ACCO ECEC;
3. Registering a national ACCO approved provider to enable streamlined establishment processes for new providers
4. Providing short to medium term establishment and oversight, auspicing or nurturing of 13 new and emerging ACCO ECEC services (including existing ACCOs expanding their service scope into ECEC)
5. Provision of operational and governance functions for approximately 36 ACCO providers, including newly established services (e.g. finance, legal, governance, assessment and rating support, and human resources functions)
5. Expansion of training and resource development and delivery, facilitating sustainable long-term leadership, data and business development training package, delivered through a train the trainer model
6. Funding to support continuous quality improvement, and operational evaluation

SNAICC has undertaken significant preparatory work to deliver this model, and is well-positioned to lead and deliver the nest and nurture model in partnership with the Commonwealth Government. SNAICC has well-established and trusted relationships with ACCOs, proven expertise and capacity to effectively strengthen and grow the ACCO early years sector and its workforce.

In parallel, this proposal seeks Commonwealth investment to stand up new and emerging ACCO ECEC services, including costs of establishment and fit-for-purpose infrastructure. Collectively these components, will accelerate and scaffold sustainable ACCO ECEC sector growth, increase Aboriginal and Torres Strait Islander workforce participation and improve access to high-quality ECEC services for our children.

## **Rationale**

The Commonwealth's initiatives in backbone support for the ACCO early years sector have been highly successful. This is exemplified by SNAICC's work in Connected Beginnings and Early Years Support. These initiatives supporting and establishing services has contributed heavily to the Commonwealth's actions to close the gap in early learning and development outcomes. While many communities have had success in improving outcomes through ACCO-led ECEC services, Closing the Gap targets remain off-track, highlighting the need to translate these successes through large scale amplification of capacity.

Child care deserts persist across the country, and gaps in the availability of culturally safe, ACCO led services are even more pronounced. While SNAICC commonly hears from communities about their aspirations to expand early years services, the complexity and cost of establishing a service and meeting regulatory requirements are regularly identified as barriers to moving forward. Smaller ACCOs and community groups that want to build their early years offerings often lack the capital, infrastructure, and back-of-house functions to progress necessary business development.

Previous and existing program funding for ACCO ECEC capacity building has supported small scale growth, however resources to support long-term sustainability, viability or capacity building has been limited. Extending the reach and impact of the ACCO early years sector to an additional 13 ACCOs over four years, provides the opportunity for a coordinated acceleration of access and outcomes for Aboriginal and Torres Strait Islander children. The establishment of the national ACCO operator would also provide ongoing capacity for expansion of the ACCO sector over the medium to long-term. This is consistent with the overarching policy context of the National Agreement on Closing the Gap.

SNAICC engaged Social Ventures Australia to undertake a feasibility study for establishing this nest and nurture model, supporting streamlined establishment processes for new providers and facilitating rapid, safe and supported sector growth and ability to better meet demand for quality ACCO ECEC services. Consultations and analyses support establishment of a national operator model.

## **Funding requirements**

The Australian Government should invest \$21.6 million over 4 years (2025-26 to 2028-29) to pilot a first of its kind model for nesting, establishing and sustaining 13 new ACCO early years services in childcare deserts. Additional parallel investment is required to stand up new and much needed ACCOs.

Funding requirements outlined below have been modelled within feasibility studies, and do not include fee-for-service revenue that could be generated within the current child care system to offset establishment and operational costs.

<b>2025-26 FY</b>	<b>2026-27 FY</b>	<b>2027-28 FY</b>	<b>2028-29 FY</b>
\$1,100,000	\$6,200,00	\$6,800,000	\$7,500,000



## 1.4 SNAICC Early Years Support Continuation and Expansion

### Proposal

To ensure that Aboriginal and Torres Strait Islander children have access to culturally safe early education and supports, Aboriginal and Torres Strait Islander Community Controlled (ACCO) early years services need tailored supports to enable the delivery of the best possible education and care for our children. This proposal seeks Commonwealth investment to continue and build upon its investment in SNAICC's Early Years Support (EYS) Program. Continued and recurrent funding for an expanded EYS Program will ensure that this highly valued program can expand its reach and positively impact the quality, viability and growth of ACCO early years services and drive improved outcomes for children<sup>16</sup>.

### Key messages

- The Australian Competition and Consumer Commission (Sept 2023 Childcare Inquiry Interim Report) highlighted the need for sustaining and expanding supply-side support options for ACCOs that provide childcare and additional support services for Aboriginal and Torres Strait Islander children, parents and guardians. The report recognised that current child care market forces are driving supply to more advantaged areas and market forces alone are 'unlikely to ensure equitable educational and developmental outcomes across all children and households.'
- SNAICC's EYS Program is an Aboriginal and Torres Strait Islander community co-designed program providing on-the-ground support, professional development, custom resources and more to ACCOs operating ECEC services.<sup>17</sup>
- Deloitte Access Economics undertook an evaluation of the EYS Program (2024), showing the EYS Program has: reduced administrative burden on services; kept services open and compliant; built trust and provided valuable avenues for connection between ACCOs; strengthened ACCO funding systems and increased financial sustainability; strengthened ACCO service leadership and further developed the ACCO workforce; contributed to lifted quality of service delivery in ACCO ECEC services, with services improving their ratings under the National Quality Standards as a result of the EYS Program's support.
- In 2024-25 MYEFO, the Commonwealth Government extended its funding of the EYS Program for 1 year (now ceasing December 2025). While this funding arrangement is welcome, short-term funding arrangements result in sector and workforce uncertainty and hamper outcome improvement.
- This proposal seeks long-term, recurrent and strengthened Commonwealth investment for SNAICC's highly valued EYS program to:

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<sup>16</sup> Deloitte Access Economics 2024, 'Emerging impact insights report – SNAICC Early Years Support evaluation'.

<sup>17</sup> SNAICC website. Retrieved from: <https://www.snaicc.org.au/our-work/early-childhood-development/early-years-support/>

- Continue and build upon the vital supports available to currently serviced jurisdictions (New South Wales, Victoria and Western Australia)
- Strengthen access to these vital supports, and drive improved outcomes for Aboriginal and Torres Strait Islander children, through a national expansion, phased over four years.

## Rationale

The Commonwealth's initiatives in backbone supports for the ACCO early years sector have been highly successful in the communities and jurisdictions in which they operate. This is exemplified by SNAICC's work in Connected Beginnings and the EYS Program. These initiatives supporting and establishing services have contributed heavily to the Commonwealth's actions to close the gap in early learning and development outcomes. While many communities have had success in improving outcomes for Aboriginal and Torres Strait Islander children through ACCO-led ECEC services, Closing the Gap targets remain off-track, highlighting the need to build upon these successes.

Commonwealth funding for the pilot program ceases in December 2025, and philanthropic investment in this program has reduced over time. Without sustainable and secure Commonwealth investment beyond 2025, there is real and significant risk that momentum will be lost in both outcomes for Aboriginal and Torres Strait Islander children and communities, and sustainability of the ACCO ECEC sector in these jurisdictions.

The EYS Program structure prioritises co-design and Aboriginal and Torres Strait Islander-led governance, and enabling and scaffolding community-led solutions, in strong alignment with the Commonwealth Government's commitments across two Priority Reforms and at least six Targets of the National Agreement on Closing the Gap.<sup>18</sup>

Research shows the importance of the early years in strengthening children's developmental health and wellbeing during childhood and over their life course. Research also shows a significant return on investment (ROI) from early years spending. Investment in ECEC generates an ROI of *at least* \$2 for every \$1 spent.<sup>19</sup> Due to the many wraparound services provided by ACCO ECECs, ROI in these services is likely to be more in line with that of the Commonwealth-funded Connected Beginnings program; an ROI of up to \$4.24 for every \$1 spent.<sup>20</sup> This equates to an ROI to the Commonwealth Government of up to \$228.5 million under this proposal.

<sup>18</sup> Joint Council on Closing the Gap 2020, 'National Agreement on Closing the Gap'. Retrieved from: <https://www.closingthegap.gov.au/sites/default/files/files/national-agreement-ctg.pdf>

<sup>19</sup> The Front Project PVC 2019, 'A Smart Investment for a Smarter Australia: Economic analysis of universal early childhood education in the year before school in Australia'. Retrieved from [https://elacca.org.au/wp-content/uploads/2020/02/ECO\\_ANALYSIS\\_Full\\_Report.pdf](https://elacca.org.au/wp-content/uploads/2020/02/ECO_ANALYSIS_Full_Report.pdf)

<sup>20</sup> Inside Policy 2023, 'Connected Beginnings Mid-Term Evaluation: Final Report'. Retrieved from: <https://www.education.gov.au/early-childhood/resources/evaluation-connected-beginnings-midterm-report-2023>

ACCO early years workforce is vital to improve outcomes for children. The ECEC sector is currently experiencing a workforce crisis, amplified in the ACCO sector. ACCO ECEC services face operational challenges and barriers to accessing sufficient funding<sup>21</sup>, and operate within a mainstream policy and regulatory environment which hinders their ability to fully meet the needs of Aboriginal and Torres Strait Islander children and families.

Many Closing the Gap targets are not on track, unchanged or worsening,<sup>22</sup> demonstrating an ongoing need for targeted Commonwealth Government efforts to close the gap. This proposal provides an opportunity for Government to make a long term commitment to ACCO ECEC sector supports in alignment with the recommendations of the National Aboriginal and Torres Strait Islander Early Childhood Strategy and the Early Childhood Care and Development Sector Strengthening Plan.

## Funding requirements

The funding requirements represent a staged expansion of the EYS Program, involving:

- an ongoing core service offering for ACCO ECEC services in all jurisdictions, building on the strengths and successes of the EYS Pilot Program
- an ongoing National Support Team to continue providing coordination, leadership, national advocacy and strong 2-way local-national information flow across jurisdictions, and
- a temporary (18 month) Establishment Unit to support SNAICC EYS's transition into remaining States and Territories.

Over the 2025-26 to 2028-29 financial years, this corresponds to the following amounts:

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$9,050,875	\$13,126,376	\$15,045,241	\$15,639,898

## Indicative implementation timeframes

Activity	Timeframe
Continuation of the EYS program in the three existing jurisdictions; Expansion into one additional jurisdiction	Across 2025
Expansion into two additional jurisdiction	Across 2026
Expansion into two remaining jurisdictions	Across 2027
Continuation of the EYS program in all jurisdictions	From 2028

<sup>21</sup> SNAICC 2024, 'Funding Model Options for ACCO Integrated Early Years Services: Final Report'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/05/240507-ACCO-Funding-Report.pdf>

<sup>22</sup> Productivity Commission 2024, 'Closing the Gap: Annual data compilation report'. Retrieved from: <https://www.pc.gov.au/closing-the-gap-data/annual-data-report/closing-the-gap-annual-data-compilation-july2024.pdf>

## 1.5 Expansion of the Connected Beginning program

### Proposal

To close the gap in early learning and development outcomes, improved culturally-responsive access to early childhood, maternal and child health and family support services is need for Aboriginal and Torres Strait Islander children, families and communities. This proposal seeks ongoing Commonwealth investment to continue and expand the Connected Beginnings Program, including backbone supports, to sustainably enhance outcomes for Aboriginal and Torres Strait Islander children in their early years and over their life course.

### Key messages

- Independent evaluations have continually demonstrated the value of the Connected Beginnings program in improving access to supports for Aboriginal and Torres Strait Islander children, families and communities. Continuation of Connected Beginnings, including backbone supports is supported by the independent mid-term evaluation, finalised in 2023<sup>23</sup>.
- Since 2016, Connected Beginnings sites have been established across all jurisdictions. The number and capacity of current Connected Beginnings sites does not reflect the need of Aboriginal and Torres Strait Islander children, families and communities.
- SNAICC is funded, until 30 June 2025 as the backbone support for Connected Beginnings sites, including through supporting establishment, and providing ongoing tailored support for existing sites to establish and embed their work in line with community priorities.
- Connected Beginnings approaches should not be set and forget. Existing backbone support funding is insufficient to provide the ongoing and tailored support the 50 established sites need to operate effectively and drive long-term outcomes.
- Ongoing and long-term rolling funding is sought to maintain and enhance the Connected Beginnings program, through, but not limited to:
  - Enhanced backbone supports, commensurate with current and future demand
  - Strengthened scope for existing Connected Beginnings sites (empowering communities to consider expansion of scope or scale)
  - Phased large-scale expansion to 100 Connected Beginnings sites over 7 years
  - Enhance screening and assessment, and data capability of Community Partners and Connected Beginnings sites
  - Continuation of multi-modal communities of practice and national gatherings, inclusive of the current First Nations Working Group

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<sup>23</sup> [Connected Beginnings Mid-Term Evaluation 2023, Inside Policy for Commonwealth Department of Education](#)

## Rationale

The Commonwealth's initiatives in backbone supports for the ACCO early years sector have been highly successful in the communities and jurisdictions in which they operate. This is exemplified by SNAICC's work in Connected Beginnings and the Early Years Support Program. These initiatives supporting and establishing services have contributed heavily to the Commonwealth's actions to close the gap in early learning and development outcomes. While many communities have had success in improving outcomes for Aboriginal and Torres Strait Islander children through Connected Beginnings, more investment is needed to maintain the momentum in these communities and promulgate these empowering initiatives and their outcomes.

This proposal seeks sustained and ongoing investment in Connected Beginnings, and in the futures of Aboriginal and Torres Strait Islander children, essential for overcoming the cultural and systemic barriers that prevent Aboriginal and Torres Strait Islander children from fully accessing the services and supports they need.

Prioritising place-based and community-led approaches, such as Connected Beginnings, reinforces cultural identity and safety for children, promoting better developmental outcomes. The AEDC data highlights the need for this investment, showing a decline in the Aboriginal and Torres Strait Islander children assessed as developmentally on track, from 35.2% in 2018 to 34.3% in 2021.<sup>24</sup>

In the Mid-Term Evaluation, finalised in 2023<sup>25</sup>, Inside Policy recommended the continuation of Connected Beginnings and its backbone supports, and found that early educational and well-being outcomes for Aboriginal and Torres Strait Islander children are being supported. There are qualitative examples of increased school readiness in Connected Beginnings communities, supported children's and mothers' health and wellbeing, children's increased exposure to culture, parents feeling empowered to support child health, development and early learning, and families being holistically supported.

As part of the mid-term evaluation, a Cost-Benefit Analysis, in line with Office of Impact Analysis (OIA) methods, was undertaken. The Current analyses has shown that there is a potential impact amounting to positive return on Commonwealth investment into Connected Beginnings, with a Benefit-Cost Ratio of between 2.12 and 4.24, meaning that for every dollar invested, potential positive outcomes and impact amounting to a return of between \$2.12 and \$4.24.

## Funding requirements

\$167.1 million over five years (2025-26 to 2029-30) is sought to continue the Community Partner role and significantly increase the reach of the Connected Beginnings Program. The costings below

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<sup>24</sup> Australian Government Productivity Commission 2021, 'Closing the Gap Information Repository: Socio-economic outcome area 4'. Retrieved from: <https://www.pc.gov.au/closing-the-gap-data/dashboard/se/outcome-area4>

<sup>25</sup> [Connected Beginnings Mid-Term Evaluation 2023, Inside Policy for Commonwealth Department of Education](#)

include establishment and operational costs for 24 of the 50 new sites to be established over the next 7 years, as well as Community Partner supports for new and existing sites as outlined above. The operational funds for the existing 50 sites have not been included in this costing.

<b>2025-26 FY</b>	<b>2026-27 FY</b>	<b>2027-28 FY</b>	<b>2028-29 FY</b>
\$24,840,809	\$31,519,954	\$32,780,752	\$39,719,281



## 1.6 Increasing Aboriginal and Torres Strait Islander early educator workforce

### Proposal

Ensuring that all Aboriginal and Torres Strait Islander children have access to the care and supports that they want, need and deserve, is vital to achieving parity of outcomes. Aboriginal and Torres Strait Islander early years educators play a critical role in the provision of culturally-responsive education, care and development.

This proposal seeks Commonwealth investment to increase Aboriginal and Torres Strait Islander ECEC workforce, through funding of 500 Aboriginal and Torres Strait Islander paid and fully-subsidised tertiary education courses nationally, flexible to the workforce needs of the ACCO ECEC sector, ACCO-led backbone support to support implementation, and delivery of a 10 year blueprint to achieve workforce parity.<sup>26</sup>

### Key messages

- The Productivity Commission in their ECEC Inquiry Final report identifies workforce shortages and raises the risk of perpetuation of these shortages if immediate steps are not taken:
  - Improved career pathways for Aboriginal and Torres Strait Islander people (3.9)
  - More placements in Aboriginal and Torres Strait Islander services (3.10)
- The Australian Competition and Consumer Commission Childcare Inquiry found that workforce shortages were most acute in remote and very remote areas, a major barrier to the supply of ECEC services in these areas.
- In efforts to address ACCO ECEC workforce shortages and to increase access to culturally-responsive early education and care for Aboriginal and Torres Strait Islander children, this proposal seeks funding for:
  - 500 paid and fully-subsidised tertiary education places for Aboriginal and Torres Strait Islander early educators within the ACCO ECEC sector, with qualifications designed to meet the specific cultural and educational needs of each community.
  - comprehensive support through an ACCO-led backbone
  - delivery of a 10-year blueprint to achieve ACCO ECEC workforce parity, considering the findings and action recommendations from the Productivity Commission's inquiry into Australia's early childhood education and care system, and the Australian Competition and Consumer Commission's Childcare Inquiry.

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<sup>26</sup> SNAICC 2024, 'Shaping Our Future Workforce Project FA2-1 Final Report'.

## **Rationale**

Culturally safe learning environments, mentoring and supports are needed to attract and support Aboriginal and Torres Strait Islander people enrol in and complete their ECEC qualifications, ultimately increasing and facilitating their economic participation.

SNAICC and the ACCO ECEC sector have long advocated for the investment in, and support of the Aboriginal and Torres Strait Islander workforce given their crucial role in the culturally responsive support for families and children to achieve their developmental milestones.

This proposal aligns with findings of the Productivity Commission and ACCC in identifying severe workforce shortages and need for targeted investment to improve career pathways within the ACCO ECEC sector, acknowledging the unique cultural knowledge, skills and capabilities of Aboriginal and Torres Strait Islander educators. Further, this proposal aligns with Commonwealth Government commitments in national policy, including the National Agreement on Closing the Gap, and its Early Years Strategy, in acknowledging that a supported and sustainable workforce, which is valued and respected is central to maintaining high-quality early childhood education and care services.

The Government has shown its commitment to rebuilding a strong and sustainable Aboriginal and Torres Strait Islander health worker and health practitioner workforce through the First Nations Health Worker Traineeship Program, and its national ACCO-led coordination and backbone supports<sup>27</sup>. 500 Aboriginal and Torres Strait Islander trainees are comprehensively supported through the FNHWTP, and qualifications are designed to meet the specific cultural and clinical needs of the communities they serve.

## **Funding Requirements**

\$62 million is required for comprehensive support and delivery of this proposal.

There is existing funding through Commonwealth and State Education Departments to support delivery of this initiative, and offset by cashing out mainstream employment programs and the former CDP scheme. Additionally, investing in local workforce pathways generates downstream savings in Commonwealth income support.

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<sup>27</sup> [First Nations Health Worker Traineeship Program - NACCHO](https://www.naccho.org.au/fnhwtp/). Retrieved from: <https://www.naccho.org.au/fnhwtp/>

## 1.7 Aboriginal and Torres Strait Islander ECEC workforce development innovation fund

### Proposal

Ensuring that all Aboriginal and Torres Strait Islander children have access to the care and supports that they want, need and deserve, is critical to optimal outcomes over their life course. Where we see childcare deserts, we also see a sparse landscape of ACCO-led solutions to ECEC workforce shortages.

This proposal asks that the Commonwealth fund Aboriginal and Torres Strait Islander community-controlled organisation-led (ACCO-led) establishment and delivery of a flexible innovation fund pilot to be delivered across 12 communities in childcare deserts. This pilot aims to enhance culturally safe learning environments, mentoring and supports needed to attract and support Aboriginal and Torres Strait Islander people to complete ECEC qualifications, and ensure the ACCO ECEC sector is strong and sustainable into the future.

### Key messages

- Cost of enrolment is not the sole barrier to completion of tertiary study, with Aboriginal and Torres Strait Islander enrolments significantly outweighing completion rates. Aboriginal and Torres Strait Islander completion rates are further outweighed by those of non-Indigenous students.
- The barriers to completion are various and unique to each community. Community-led approaches to addressing barriers to completion are needed to ensure Aboriginal and Torres Strait Islander ECEC workforce capacity is retained and expanded.
- This proposal seeks Commonwealth funding for the ACCO ECEC innovation fund pilot as a targeted strategy to overcome barriers to entry to, and completion, of study for prospective Aboriginal and Torres Strait Islander educators, including those in regional, remote and very remote communities.
- The fund will:
  - support the delivery of ACCO ECEC workforce development initiatives, prioritising initiatives which can be adapted, scaled or transferred regionally or nationally, including partnerships with other ACCOs/mainstream institutions
  - support partnerships between ACCOs and tertiary education providers that build sustainable local workforce pathways and supports for Aboriginal and Torres Strait Islander early educators
  - empower communities to address their chronic shortages in early years educators and staff, and provide much-needed local career pathways for prospective Aboriginal and Torres Strait Islander early years workforce.

- include sufficient resources for independent impact evaluation to develop the evidence base of recommended workforce development practice with implications for learning in related domains, e.g. health and education.
- Interventions through the fund will contribute to a blueprint to strengthen and sustain ACCO ECEC workforce.

## Rationale

Recent research shows that ‘childcare deserts’ continue to exist across Australia’s early years system, particularly in regional and remote locales, and regions with higher incidence of socioeconomic disadvantage.<sup>28</sup> Childcare deserts significantly overlap with the distribution of Aboriginal and Torres Strait Islander communities.

Aboriginal and Torres Strait Islander people encounter many barriers to undertaking early years qualifications, including:

- the RTO-based mainstream training system which lacks culturally responsive and safe delivery and supports
  - the requirement to undertake training away from communities, Country, and the various personal and caring obligations which many Aboriginal and Torres Strait Islander people carry
  - inadequate bilingual training options
- lack of Aboriginal and Torres Strait Islander-led RTOs

Culturally safe learning environments, mentoring and supports are needed to attract and support Aboriginal and Torres Strait Islander people enrol in and complete their ECEC qualifications, ultimately increasing and facilitating their economic participation. A professional and highly qualified Aboriginal and Torres Strait Islander ECEC workforce creates greater capacity to provide culturally responsive care and increase child and family engagement in ECEC services.

Recent inquiries into the ECEC sector have identified workforce challenges and the need for sustainable approaches to attraction and retention for the Aboriginal and Torres Strait Islander ECEC workforce. The Productivity Commission in their ECEC Inquiry report identifies workforce shortages and the perpetuation of these shortages if immediate steps are not taken. These steps include investing in existing educators and teachers and expanding the ACCO ECEC workforce to meet future demand. The Australian Competition and Consumer Commission Childcare Inquiry found that workforce shortages were most acute in remote and very remote areas, and this was a major barrier to the supply of ECEC services in these areas.

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<sup>28</sup> The Front Project 2024, ‘Paving the Path: Addressing market imbalances to achieve quality and affordable childcare in more places.’ Retrieved from: <https://www.thefrontproject.org.au/images/research/Paving%20the%20path%20-%20final%20report%20TFP.pdf>; Mitchell Institute 2024, ‘Mapping the deserts: Childcare accessibility in Australia.’ Retrieved from: <https://www.vu.edu.au/mitchell-institute/childcare-accessibility-australia>.

## Funding Requirements

Costing assumes the innovation fund would fund pilots in 12 communities across four years (2025-26 to 2028-29) at \$0.5m per community, per annum, with a supported local program design phase followed by a three-year implementation period. The below funding requirements assume increased resourcing required at establishment and finalisation phases of the project. Learnings will contribute to a contemporary blueprint for ACCO ECEC workforce long-term growth and enhancements.

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$11,280,000	\$10,691,200	\$11,118,800	\$12,563,600

## 1.8 Continuing and expanding Aboriginal and Torres Strait Islander Playgroups

### Proposal

Community-controlled playgroups and programs embedded in culture play a critical role in early learning and development of Aboriginal and Torres Strait Islander children. Increased investment in Aboriginal and Torres Strait Islander playgroups and dedicated supports are required to sustainably enhance access to culturally appropriate support for Aboriginal and Torres Strait Islander children and families.

This proposal seeks Government investment to continue and expand the First Nations Playgroup Pilot to 50 playgroups and comprehensive backbone supports over four years.

### Key messages

- For Aboriginal and Torres Strait Islander children, ACCO-led playgroups are the most culturally safe, cost efficient and appropriate option that aligns with the Government's commitment under the National Agreement on Closing the Gap.<sup>29</sup>
- ACCO-led playgroups provide an effective entry point into early childhood education and care (ECEC), helping Aboriginal and Torres Strait Islander children to build their cultural identity, wellbeing and connections within communities.
- Since 2022, the Commonwealth Government has invested in playgroups nationally, with \$2.1 million specifically allocated to the First Nations Playgroup Pilot, funding 13 Aboriginal and Torres Strait Islander-led playgroups across the country.
- While funding in Aboriginal and Torres Strait Islander playgroups to date has been welcomed, the majority of playgroups funded under the First Nations Playgroup Pilot reported that funding was insufficient to deliver the holistic, culturally responsive and quality support that Aboriginal and Torres Strait Islander children and families need and meet the real and hidden demand within communities.
- This proposal seeks continued and strengthened Commonwealth investment in First Nations Playgroups, to increase the number, capacity and impact for Aboriginal and Torres Strait Islander children. Funding arrangements should be long-term (5-7 years), reflect the full cost of establishment and sustainable provision; and expand eligibility to community-led playgroups.

### Rationale

ACCO-led playgroups provide an effective entry point into ECEC and soft-entry into other vital wrap around supports, including developmental screening and assessment. These culturally and community-centred initiatives help Aboriginal and Torres Strait Islander children build their

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<sup>29</sup> Australian Government Productivity Commission 2024, 'Closing the Gap review: Study report'. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report>



cultural identity, wellbeing and connections within communities. Such positive experiences establish the foundations for Aboriginal and Torres Strait Islander children to thrive in ECEC and transition to big school.

On a broader scale, ACCO-led playgroups deliver significant social, economic, and developmental benefits. By prioritising and investing in early intervention, engagement and screening, playgroups help reduce long-term costs for state and federal public systems. This proactive, culturally centred approach not only supports the Government's sustainability and cost-efficiency goals but also alleviates future pressure and demand on the education and healthcare sectors across the lifespan.

65% of ACCOs report insufficient funding to reliably and effectively operate playgroups for their communities. This proposal seeks to address this gap through long-term grant funding (5-7 years) for new and existing ACCO playgroups that fully covers operational costs, cultural activities, and fair compensation for cultural knowledge sharing.

Prioritising such place-based approaches reinforces cultural identity and safety for children, promoting better developmental outcomes. The Australian Early Development Census (AEDC) data underscores the need for this investment, showing a decline in the Aboriginal and Torres Strait Islander children assessed as developmentally on track, from 35.2% in 2018 to 34.3% in 2021.<sup>30</sup>

Beyond educational benefits, investing in ACCO-led playgroups could reduce demand and costs across public health and social service sectors. The need for preventative measures is exemplified through the cost-benefit ratio of the National Disability Insurance Scheme (NDIS) from 2022-23, where net costs reached \$15.8 billion, with a net benefit of \$7.6 billion.<sup>31</sup> Adequate funding for ACCO-led playgroups would increase their capacity to deliver holistic support services and early interventions for children and families, potentially alleviating future costs and pressures on the NDIS and public health sector.

## **Funding requirements**

Feedback from ACCO-led playgroups highlights that demand far outstrips funding limitations, and additional funds are required to support increased service capacity and wraparound support. Funding, reflective of true cost of delivery, sought to increase the number and reach of the First Nations Playgroups Pilot to 50 (additional 37 playgroups nationally). The funding requirements below reflect a phased rollout.

In parallel, and in addition, the Commonwealth should increase its investment in Aboriginal and Torres Strait Islander-led playgroups more broadly.

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<sup>30</sup> Australian Government Productivity Commission 2021, 'Closing the Gap Information Repository: Socio-economic outcome area 4'. Retrieved from: <https://www.pc.gov.au/closing-the-gap-data/dashboard/se/outcome-area4>

<sup>31</sup> Taylor Fry 2023, 'NDIS Review – Costs, benefits and frameworks: Final Report' (pg.116). Retrieved from: [https://www.ndisreview.gov.au/sites/default/files/2023-11/Taylor\\_Fry\\_NDIS%20Review\\_Cost\\_Benefit\\_Analysis.pdf](https://www.ndisreview.gov.au/sites/default/files/2023-11/Taylor_Fry_NDIS%20Review_Cost_Benefit_Analysis.pdf)

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$7,750,000	\$14,105,000	\$20,956,000	\$21,794,240

### Indicative implementation timeframes

Activity	Timeframe
Continuation of current First Nations Playgroups Pilot sites and expansion of 7 additional sites (20)	Across 2025-26
Expansion of 15 additional sites (35)	Across 2026-27
Expansion of 15 additional sites (50)	Across 2027-28
Continuation of First Nations Playgroups in all jurisdictions	From 2028

## **Section 2: Supporting Aboriginal and Torres Strait Islander children to be safe and well, connected to their families, communities, cultures and Country**

Investment proposals in this section address the policy, systems and service reforms that require Australian Government funding to deliver improved outcomes in child and family safety and wellbeing, ensuring Aboriginal and Torres Strait Islander children grow up safe and connected to their families, communities, cultures and Country.

### **2.1 Resourcing and implementing Safe and Supported: The National Framework for Protecting Australia's Children**

#### **Proposal**

The Australian Government should provide funding of \$52.36 million (excl. GST) over four years (2025-26 to 2028-29) to support implementation of Safe and Supported. This includes funding for specific initiatives and to provide policy support for Aboriginal and Torres Strait Islander leaders to fully participate in policy development and a shared approach to implementation. This funding should be directed primarily towards the Aboriginal Community Controlled sector to ensure policy work impacting on Aboriginal and Torres Strait Islander people and communities is led by those communities, in line with the National Agreement on Closing the Gap.

Funding is required for:

- policy support for the Aboriginal and Torres Strait Islander Leadership Group and flexible funding to drive work on Safe and Supported in line with its Partnership Agreement and the National Agreement on Closing the Gap
- Data sovereignty and data development, in line with commitments under the First Aboriginal and Torres Strait Islander Action Plan.
- Development of a targeted ACCO Workforce Strategy.

#### **Key messages**

- Safe and Supported and its Action Plans were developed in partnership between Aboriginal and Torres Strait Islander leaders and all governments, setting a transformative agenda for reform of Australia's child protection and family service systems to address the overrepresentation of Aboriginal and Torres Strait Islander children in out-of-home care.
- Aboriginal and Torres Strait Islander people must have an equal say in developing policy and planning for initiatives on issues that impact their lives. Work delivered in line with the

Partnership Agreement for Safe and Supported has demonstrated the strength and value of this shared approach to delivering high-quality policy to improve outcomes for Aboriginal and Torres Strait Islander children and young people.

- Current funding for secretariat and policy support is not sufficient to fully engage across the breadth of actions under Safe and Supported and ensure the expertise of Aboriginal and Torres Strait Islander leaders and experts is fully utilised to inform and determine approaches.
- Increasing funding available to ACCOs, including national, state and territory peaks, to support the policy design and implementation of actions under Safe and Supported will deliver more efficient and stronger outcomes under this critical national plan.
- Increased investment will drive progress on critical actions including development of a targeted ACCO Workforce Strategy and data sovereignty and data capability development for ACCOs. Flexible funding will also be able to be used to drive progress on a number of actions which are currently stalled

## **Rationale**

Safe and Supported is the key strategy supporting national efforts to make progress under Target 12 of the National Agreement on Closing the Gap, which aims to reduce the rate of over-representation of Aboriginal and Torres Strait Islander children in out-of-home care by 45% over 10-years (by 2031). It is being delivered through two 5-year Action Plans, setting out a 10-year strategy to improve the lives of children, young people and families experiencing disadvantage or who are vulnerable to abuse and neglect. Aboriginal and Torres Strait Islander peoples have their own Action Plan (Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan 2023-2026) that covers all aspects of Safe and Supported.

Target 12 is currently off track and worsening, reflecting a lack of progress on implementation of the Safe and Supported Action Plans, with many actions stalled or running far behind committed delivery dates. Many of the off-track actions have limited or no dedicated investment to support their delivery at Commonwealth, state or territory level. The processes and planning for delivering these actions in partnership between governments and Aboriginal and Torres Strait Islander people also lack adequate investment and support.

Since the development and implementation of Safe and Supported, SNAICC has received funding to provide Secretariat and some policy support to the Aboriginal and Torres Strait Islander Leadership Group for Safe and Supported. SNAICC has also been funded to deliver specific activities from the Action Plan including a Legal Supports Scoping Study, National Child and Family Investment Strategy, and design report for a National Centre for Excellence in Child and Family Support.

SNAICC has supported the Leadership Group to make significant contributions to a range of actions under Safe and Supported including the establishment of a National Commissioner for Aboriginal and Torres Strait Islander children and young people, progressing delegated authority in child protection, a review of the supports available to carers, a refresh of the National Out of Home Care Standards, and development of a Monitoring and Evaluation Strategy and Indicator Frameworks. The development and quality of these initiatives has demonstrated the importance and value of this work being done in partnership with or led by ACCOs.

Policy support for the Leadership Group would support their full participation in shared decision-making as intended under the Partnership Agreement for Safe and Supported. It would help to address a number of recommendations of the Productivity Commission's Review of Closing the Gap, which noted the need to adequately resource Aboriginal and Torres Strait Islander people and organisations to apply their knowledges and expertise in implementation of the Agreement.

Funding to support data sovereignty and the data capability of ACCOs would directly address Priority Reform 4 of the National Agreement, as well as Action 3 of the Aboriginal and Torres Strait Islander First Action Plan which commits governments to build Aboriginal and Torres Strait Islander infrastructure for data sovereignty. While the Aboriginal and Torres Strait Islander Leadership Group for Safe and Supported are undertaking work to develop detailed proposals in relation to data sovereignty, funding support will be critical to develop mechanisms and infrastructure to support data capability of ACCOs.

A strong ACCO workforce is fundamental to achieving better outcomes for Aboriginal and Torres Strait Islander children and young people. Funding a Workforce Strategy would be a significant step in the commitment under the National Agreement to building the ACCO sector, as well as Action 2 of the *Aboriginal and Torres Strait Islander First Action Plan* which commits to co-design a strategy to strengthen ACCOs. It would also address and align with priorities identified in the National Child and Family Investment Strategy, as well as work to recommission family support services to achieve quarantined, proportional funding directed to ACCOs.

## Funding requirements

Funding of \$52.36 million (excl. GST) over four years (2025-26 to 2028-29) is needed to provide policy and implementation support to the Aboriginal and Torres Strait Islander Leadership Group for Safe and Supported and to implement key government commitments under the Safe and Supported Action Plans, specifically:

- **\$6.05 million to provide policy support for Aboriginal and Torres Strait Islander led policy development** (2025-26 to 2028-29) – located within ACCOs in each state and territory, including peak organisations where relevant, enabling Aboriginal

and Torres Strait Islander leaders to drive policy development under Safe and Supported activities.

- **\$4 million** (2025-26 to 2026-27) for a flexible pool of funding to be utilised to drive progress on Safe and Supported commitments which will otherwise stall.
- **\$41.71 million to support data sovereignty and capability for ACCOs** (2025-26 to 2028-29) – funding to develop and implement the mechanisms and infrastructure to support data sovereignty for ACCOs, driving Action 3 of the Aboriginal and Torres Strait Islander First Action Plan.
- **\$0.6 million to develop a Workforce Strategy to support a strong child and family services ACCO workforce.**

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$14,055,616	\$13,986,695	\$12,346,295	\$12,664,565

### Indicative implementation timeframes

Activity	Timeframe
Policy support for Leadership Group	2025 - ongoing
Flexible funding pool to drive Safe and Supported implementation	2025-27 (to end of Safe and Supported First Action Plans)
Data sovereignty and capability	2025-6 – 2028-29
Workforce Strategy	2025-26



## **2.2 National ACCO prevention and early support program funding**

### **Proposal**

The Australian Government should invest approximately \$434.2 million over 4 years to grow early and tailored supports for Aboriginal and Torres Strait Islander children and families that prevent child protection intervention through culturally strong children and family services delivered by ACCOs. This proposal supports the Australian Government commitment to collaborative implementation with states and territories of activities under Action 2 of the Safe and Supported Aboriginal and Torres Strait Islander First Action Plan (2023-2026) (the Action Plan). This Action commits all governments to increasing their investment in the Aboriginal and Torres Strait Islander community-controlled child and family sector, aiming to shift towards adequate and coordinated funding of early, targeted and culturally safe supports for Aboriginal and Torres Strait Islander children and families. This proposal also seeks Australian Government commitment to transition a proportion of existing Commonwealth child and family services funding to the ACCO sector in line with child and family needs.

### **Key messages**

- Increased investment is required in early and tailored supports for families to reverse worsening trends in over-representation in out-of-home care and ensure Aboriginal and Torres Strait Islander children grow up safe and cared for in connection with family, community, culture and Country.
- The National Child and Family Investment Strategy (the Strategy), which delivers Action 2(a) of the Action Plan and is soon to be finalised, will provide a roadmap to shift investment towards earlier supports for Aboriginal and Torres Strait Islander children and families, delivered by Aboriginal and Torres Strait Islander community-controlled organisations (ACCOs).
- Significant investment at the Commonwealth, state and territory level is required to ensure the Strategy is implemented, including to fulfil Safe and Supported commitments to strengthen ACCOs, and transition and recommission services to ACCOs in partnership with Aboriginal and Torres Strait Islander people.
- The Strategy will provide a set of principles, system elements and best practice activities to help guide the approach to shifting investment to earlier supports delivered by ACCOs.
- Alongside investment to ensure the Strategy is implemented, the Commonwealth has an ongoing responsibility to recommission existing child and family support service funding to ACCOs in line with Priority Reform 2 of the National Agreement on Closing the Gap.

### **Rationale**

Nationally in 2022-23, only 15.4% of child protection expenditure went to family support services (including intensive supports), while the remainder was directed to funding statutory interventions and out-of-home care services.<sup>32</sup> This lack of investment in prevention has dire consequences for Aboriginal and Torres Strait Islander children, who continue to be over-represented in the child protection system, being 10.8 times more likely to be in care than non-Indigenous children.<sup>33</sup> Lack of prevention costs governments in the long-term. In 2022-23, a total of \$9.37 billion was spent by Australian, state and territory governments on child protection.<sup>34</sup> Greater investment in prevention means that families are supported to stay together, meaning that over time there would be an anticipated reduction in the removal of children and use of out-of-home care.<sup>35</sup> Economic modelling in Victoria has highlighted that an annual investment of approximately \$1.9 million in early intervention would result in an annual net saving of up to \$2 billion in child protection and out-of-home care system costs, and prevent up to 1,460 children from entering out-of-home care each year.<sup>36</sup> This would also have a subsequent impact on youth justice systems, as evidence shows children in youth detention are more likely to have been in out-of-home care.<sup>37</sup>

For Aboriginal and Torres Strait Islander children and families, support services delivered by Aboriginal Community Controlled Organisations (ACCOs) are most effective,<sup>38</sup> as these organisations employ more Aboriginal and Torres Strait Islander staff, are accountable to their local communities, and deliver culturally safe services that address families' holistic needs. This means they ensure higher levels of engagement from Aboriginal and Torres Strait Islander children and families, as opposed to non-Indigenous services which understandably are less trusted given the ongoing impacts of colonisation, racism and child removal.<sup>39</sup> Australian evidence shows that Aboriginal Community Controlled Health Organisations (ACCHOs) deliver better health outcomes for Aboriginal and Torres Strait Islander people through culturally safe care and use of Aboriginal understandings of health and wellbeing.<sup>40</sup>

Action 2 of the Safe and Supported Aboriginal and Torres Strait Islander Action Plan (2023-2026) acknowledges this need for investment in earlier supports and the ACCO sector. With the near

<sup>32</sup> Productivity Commission (2024) Report on Government Services

<sup>33</sup> SNAICC (2024) Family Matters Report 2024

<sup>34</sup> Ibid

<sup>35</sup> Burns, J. et al. (2008) *Preventing youth disengagement and promoting engagement*. Australian Research Alliance for Children and Youth

<sup>36</sup> Social Ventures Australia (2020) Keeping families together through COVID-19: the strengthened case for early intervention in Victoria's child protection and out-of-home care system, *Research Paper*

<sup>37</sup> AIHW (2022c) 'Young people under youth justice supervision and their interaction with the child protection system 2020–21'. Australian Institute of Health and Welfare, Australian Government.

<sup>38</sup> Sullivan, P. (2010) The Aboriginal community sector and the effective delivery of services: Acknowledging the role of Indigenous sector organisations. 1-20.

<sup>39</sup> SNAICC (2023) Stronger ACCOs, Stronger Families Report

<sup>40</sup> Campbell et al (2016) Contribution of Aboriginal Community-Controlled Health Services to improving Aboriginal health: an evidence review, *Australian Health Review* 42(2) 218-226 <https://doi.org/10.1071/AH16149>

finalisation of the National Child and Family Investment Strategy (Activity a), there is significant momentum to deliver on activities B-G under Action 2, which relate to strengthening ACCOs, transitioning funding, and progressing Aboriginal and Torres Strait Islander community-led place-based commissioning models. The Australian Government has a significant role to play in funding these activities, alongside state and territory governments. Without investment and leadership from the Australian Government, there is the real risk of action stalling and commitments under Safe and Supported not being delivered upon.

Delivery of Action 2 of Safe and Supported, and implementation of the Strategy, also furthers a range of policies, strategies, frameworks and commitments to support children and families – Aboriginal and Torres Strait Islander and non-Indigenous alike. This includes commitments under the national Early Years Strategy and the National Aboriginal and Torres Strait Islander Early Childhood Strategy, which both highlight the importance of communities designing and delivering local solutions and aim to drive actions towards all families having access to high-quality, integrated and holistic approaches to maternal and child health, parenting support and early learning services.

Priority Reform 2 of the National Agreement on Closing the Gap, to build the Community-Controlled Sector, is a foundational pillar of this work. Clause 55 of the National Agreement commits government parties to implement measures that increase the proportion of services delivered by Aboriginal and Torres Strait Islander organisations, particularly community-controlled organisations. The Australian Government provides significant funding to child and family services and has a responsibility to ensure that an adequate proportion of this investment flows to ACCOs, to align with the needs of Aboriginal and Torres Strait Islander children and families. As outlined by SNAICC in our 2025 Submission to the Families and Children (FaC) Activity Review, the Australian Government should commit to transitioning 30-40% of FaC funding to the ACCO sector in 2026 in alignment with family and community needs.

## Funding requirements

The Australian Government should prioritise funding to ensure Activities under Action 2 are fully implemented in collaboration between Commonwealth, state and territory governments (contingent upon states and territories also committing funding). There are also other activities under Action 2 that could attract separate funding solely from the Australian Government, such as activity E that could involve funding to ACCOs to develop place-based commissioning models. SNAICC conservatively estimates that the total funding from Australian, state and territory governments for delivery of Action 2 is \$585 million, and has then calculated the Australian Governments contribution as:

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$19.1 million	\$19.6 million	\$20.2 million	\$20.7 million

The Australian Government also has an imperative to invest directly in ACCO-led programs for children and families. As outlined above, prevention and early intervention support means fewer children are removed from families into out-of-home care, which long-term reduces the cost of interventions by health and welfare systems that the Commonwealth has significant responsibility for. Below SNAICC has estimated adequate annual Commonwealth funding for child and family programs delivered by ACCOs, which would be in addition to state and territory investments, as well as existing Commonwealth funding programs to ACCOs such as DSS' Improving Multidisciplinary Responses program. This would not all be new investment with the potential to recommission a portion of funding from existing Commonwealth funded early support programs for children and families.

<b>2025-26 FY</b>	<b>2026-27 FY</b>	<b>2027-28 FY</b>	<b>2028-29 FY</b>
\$85 million	\$87.4 million	\$89.8 million	\$92.4 million

## 2.3 Implementing Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence

### Proposal

The Australian Government should invest \$2 billion over the next five years to implement Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence. This includes investment in development and implementation of two five-year action plans, investment in Aboriginal and Torres Strait Islander governance and investment in Aboriginal Community Controlled Organisations providing services to women, children and families. This investment builds on the \$3.4 billion committed to date under the *National Plan to End Violence Against Women and Children 2022-32*<sup>[41]</sup> and \$153 million under the *Aboriginal and Torres Strait Islander Action Plan 2023-2024*<sup>[42]</sup> that set the foundations for Our Ways – Strong Ways – Our Voices.

### Key messages

- Family, domestic and sexual violence continues to be prevalent in society and is a highly complex issue due to the multifaceted drivers and the intersectionality of family, domestic and sexual violence. Aboriginal and Torres Strait Islander families and communities are disproportionately impacted, with Aboriginal and Torres Strait Islander women 31 times more likely to be hospitalised for family violence related assaults.<sup>41</sup>
- Violence against women and their children is estimated to cost the economy \$26 billion each year, with victim-survivors services and programs accounting for approximately 50% of that cost.<sup>42</sup>
- Our Ways – Strong Ways – Our Voices is the first dedicated national plan for addressing family, domestic and sexual violence in Aboriginal and Torres Strait Islander communities and aims to achieve Target 13 of the National Agreement on Closing the Gap.
- Our Ways – Strong Ways – Our Voices shifts away from top-down government approaches towards community-led, place-based responses to increase safety and promote healing for Aboriginal and Torres Strait Islander women, children and communities.
- Through the project steering committee Aboriginal and Torres Strait Islander leaders have worked closely with Commonwealth, state and territory government to engage with communities, the family violence sector, academic experts and Aboriginal and Torres Strait

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41 [Our Watch \(2024\) Quick facts about violence against women](#), website page

42 [DSS \(2022\) National Plan to End Violence Against Women and Children 2022-2032](#)

Islander people with lived experience to develop a truly community-centred response to family, domestic and sexual violence.

- Our Ways – Strong Ways – Our Voices prioritises the voices and knowledge of Aboriginal and Torres Strait Islander people to develop their own solutions to address issues impacting their communities.
- If Our Ways – Strong Ways – Our Voices is not fully funded across its 10-year lifespan, family domestic and sexual violence will continue to ravage lives and communities across Australia. Existing funding levels have been piecemeal and inconsistent across the country and not grounded in community experience or control.

## **Rationale**

Family, domestic and sexual violence affects every Aboriginal and Torres Strait Islander community in Australia. The roots of FDSV are deeply embedded in the ongoing effects of the violence of colonisation. Achieving Target 13 requires a whole of government, whole of community effort to support people experiencing and using violence and to promote healing.

The disproportionate effects of family, domestic and sexual violence on Aboriginal and Torres Strait Islander people are well documented. Aboriginal and Torres Strait Islander women and children are 33 times more likely to be hospitalised due to violence than non-Indigenous women and 7 times more likely to die because of family violence. Family violence is also a key driver in Aboriginal and Torres Strait Islander child removal, homelessness, and in the overrepresentation of Aboriginal people throughout the criminal justice system.

Aboriginal and Torres Strait Islander women are disproportionately impacted by FDSV. The Senate Inquiry into Missing and Murdered First Nations Women and Children found that Aboriginal and Torres Strait Islander women represented 16% of all Australian women homicide victims, despite comprising between 2–3% of the adult female population.

A national approach that is flexible and responsive to the diversity of Aboriginal and Torres Strait Islander communities and experiences is the only way to reduce violence and allow healing.

Our Ways – Strong Ways – Our Voices centres Aboriginal and Torres Strait Islander people in developing local solutions to violence in their communities. The evidence is overwhelming that community centred and community-driven solutions work. There are already projects across Australia where Aboriginal and Torres Strait Islander people are working to support women and children experiencing FDSV

Our Ways – Strong Ways – Our Voices builds on the work being done under the Aboriginal and Torres Strait Islander Action Plan 2023-25, and the National Plan to End Violence Against Women



and Children 2022-32. It is the key strategy to achieve Outcome 13 under the National Agreement on Closing the Gap. It responds to the recommendations of many reports and inquiries including Wiyi Yani U Thangani (Women's Voices) (AHRC, 2020). It is also consistent with the recommendations of the Productivity Commission's Review into the National Agreement on Closing the Gap.

Current funding under the National Plan and the 2023 Aboriginal and Torres Strait Islander Action Plan is insufficient to prevent continued escalation of violence in Aboriginal and Torres Strait Islander communities.

### **Funding requirements**

It is estimated that \$2 billion over 5 years will be required to implement Our Ways- Strong Ways – Our Voices. This is commensurate with investment in the *National Plan to End Violence Against Women and Children 2022-32*, reflecting the enormously disproportionate impacts of violence on Aboriginal and Torres Strait Islander women and children. A portion of this investment may be achieved by the targeting of existing funding streams to support Aboriginal and Torres Strait Islander communities and the transfer or recommissioning of existing services to be community-controlled in line with Priority Reform 2 of the National Agreement. Over 2025-26 and 2026-27 significant investment will be required to develop and fund the first five-year action plan, this should include:

- urgent resourcing to the sector for prevention, response and healing programs, with a focus on investment in ACCO services
- investment to establish and operate a governance structure for Our Ways – Strong Ways – Our Voices that reflects shared decision-making between governments and Aboriginal and Torres Strait Islander people
- investment to deliver incomplete actions from the existing Aboriginal and Torres Strait Islander Action Plan
- funding for the establishment and operation of the Aboriginal and Torres Strait Islander peak body for family safety planned to be established, and
- investment over 2027-29 to develop and resource the second five-year action plan and support ongoing Aboriginal and Torres Strait Islander governance and oversight.

## **2.4 Sustainable, ongoing funding for the Office of the National Commissioner for Aboriginal and Torres Strait Islander Children and Young People**

### **Proposal**

The Australian Government should provide increased and longer-term funding – over the full duration of the forward estimates – for the Office of the National Commissioner for Aboriginal and Torres Strait Islander Children and Young People (the National Commissioner), which was established in January 2025 to provide a critical systems oversight role to improve outcomes for Aboriginal and Torres Strait Islander children. The expansion of funding for the National Commissioner would ensure the office has functional independence, can fulfill its core purposes and is able to deliver functions aligned to the Paris Principles for National Human Rights Institutions.

### **Key messages**

- The Australian Government's commitment to appoint a National Commissioner for Aboriginal and Torres Strait Islander Children and Young People, made in February 2024, is a crucial step towards upholding the rights of Aboriginal and Torres Strait Islander children and young people.
- However, the 2024-25 Federal Budget has only committed funding to the Office of the National Commissioner for two years (through to June 2026). Further, the amount budgeted annually is significantly less (by about \$1.4 million, or 18%) than the amount SNAICC has estimated to be needed for the National Commissioner to properly carry out their full range of essential functions.
- In our 2024-25 Budget submission, SNAICC conservatively costed the Office of the National Commissioner as requiring an annual budget of \$5.2 million to fund a cohort of 26 full-time equivalent staff. We are calling for this amount to be funded.
- The National Commissioner must have sufficient and stable resourcing to be fully effective in protecting the oft-infringed rights of Aboriginal and Torres Strait Islander children and young people. This role is too important to be put at risk by short-term funding cycles.

### **Rationale**

For many years, SNAICC has called for governments to fund explicit mechanisms that will increase focus and accountability for upholding the distinct rights, wellbeing and safety of Aboriginal and Torres Strait Islander children. A key focus of this advocacy has been the call for a dedicated National Commissioner for Aboriginal and Torres Strait Islander Children and Young People (independent from government, fully resourced and empowered by legislation) to address the gap in accountability created by the current incomplete patchwork of accountability mechanisms across the country.

Aboriginal and Torres Strait Islander children and young people often fall through the cracks of the federal system – children are negatively impacted by ‘buck passing’ between levels of government and different agencies within each level, as well as the absence of a dedicated accountability mechanism for the Australian Government on its responsibilities and obligations to Aboriginal and Torres Strait Islander children. The Australian Government has committed to strengthening government and sector accountability for their role in upholding the rights of Aboriginal and Torres Strait Islander children and achieving the Closing the Gap targets, including through *Safe and Supported: The National Framework for Protecting Australia's Children 2021–2031*. This is an unparalleled opportunity to embed a National Commissioner role that has the resourcing and longevity required to genuinely effect generational systemic change.

SNAICC has undertaken extensive research in partnership with King and Wood Mallesons to detail model options for establishing a National Commissioner, providing a strong evidence base for the value of the role and guidance for next steps for implementation.<sup>43</sup> The resulting Options Paper proposes a recommended model for the National Commissioner, outlining key requirements for the role mapped to the United Nations Principles Relating to the Status of National Human Rights Institutions (the ‘Paris Principles’), and drawing on best practice from national and international models. This model envisages the National Commissioner’s role as having the following functions:

- Accountability and reporting
- Data, research and evidence development
- Complaints investigation and handling
- Community and stakeholder engagement.

In February 2024, the Australian Government announced a commitment to fund and appoint a National Commissioner, expanding on the commitments made under Activity 7a of the *Safe and Supported First Aboriginal and Torres Strait Islander Action Plan 2023–2026*. This represents a crucial step towards upholding the rights of Aboriginal and Torres Strait Islander children and young people. However, currently, the National Commissioner has only been funded for two financial years, with a total of \$5.9 million allocated over 2024-25 and 2025-26. This reflects a shortfall of approximately \$1.4 million compared to the budget SNAICC estimates is required to deliver the necessary functions of the National Commissioner.

The key Paris Principle relevant to this submission is ‘*Adequacy of funding: The National Commissioner should have both financial independence and adequate resources to perform the mandated duties.*’ In other words, the National Commissioner’s office, in addition to core

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<sup>43</sup> SNAICC and King & Wood Mallesons 2020, *Options Paper: Models for a National Commissioner for Aboriginal and Torres Strait Islander Children and Young People*. Retrieved from: <https://www.snaicc.org.au/call-for-a-national-commissioner-for-aboriginal-and-torres-strait-islander-children-and-young-people-options-paper/>

operational functions, will require sufficient resourcing for *each* of the above functions. It is also critical that this funding has stability and predictability over the forward estimates so that the National Commissioner is able to appropriately exercise the full breadth and depth of their powers, including through methods such as systemic inquiries, which are likely to require much more than 18 months to complete.

## Funding requirements

This proposal calls for funding commitments to match the annual total budget submitted by SNAICC to the 2024-25 Federal Budget process – \$5,209,500 per annum, recurrent from 2025-26 to 2028-29, indexed annually to CPI. This total has been calculated to fund Australian Public Service salaries and on-costs for a cohort of 26 full-time equivalent (FTE) staff, including the National Commissioner, distributed over the following functions:

- Accountability and reporting – 5 FTE
- Data, research and evidence development – 4 FTE
- Complaints investigation and handling – 8 FTE
- Community and stakeholder engagement – 2 FTE
- Executive (Commissioner and Head of Office) – 2 FTE.

Over the 2025-26 to 2028-29 financial years, this corresponds to the following amounts:<sup>44</sup>

2025-26 FY	2026-27 FY	2027-28 FY	2028-29 FY
\$5,355,366 <i>total</i> – including funding already committed in 2024-25 budget	\$5,505,316	\$5,659,465	\$5,817,930

<sup>44</sup> Note: These totals are based on the initial annual budget proposed by SNAICC in 2024-25 Federal Budget submissions (\$5,209,500) inflated by the Consumer Price Index as at September 2024 (annual change from September 2023; weighted average of eight capital cities; all groups CPI; per [Australian Bureau of Statistics 2024](#)). This assumes inflation remaining constant over the forward estimates.