

SENATE INQUIRY INTO THE QUALITY AND SAFETY OF AUSTRALIA'S EARLY CHILDHOOD EDUCATION AND CARE SYSTEM

Senate Education and Employment References Committee

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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 wellbeing.

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 childcare 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

The early years are a critical period in a child's development, creating the foundations for lifelong learning and wellbeing¹. Participation in quality early learning environments positively impacts a child's life outcomes and supports them to realise their full potential.² Evidence indicates that experiences and environments during early childhood have life-long impacts, affecting educational engagement along with health, social and wellbeing outcomes over their life course.³

Aboriginal and Torres Strait Islander peoples have cared for and educated their children on these lands for millennia, leading the way in the delivery of quality early education through innovative practices such as storytelling, cultural education and pedagogies, supporting lifelong learning, holistic child development approached, and collective education with multiple caregivers and kin.⁴ This approach to raising children not only reflects deep cultural knowledge but also aligns best practice in child development; Australia's ECEC system would benefit immeasurably by reflecting, building on and celebrating these quality, culturally safe forms of early education.

SNAICC welcomes the *Senate Inquiry into the Quality and Safety of Australia's Childhood Education and Care System* and the opportunity this Inquiry presents to improve early education and development outcomes for Aboriginal and Torres Strait Islander children, families and broader communities. We look forward to engaging further with the Inquiry, and in partnership with the Australian Government on all matters of safety, quality and access in early education and care.

Culture is a powerful protective factor for Aboriginal and Torres Strait Islander children, and a quality ECEC system must allow our children to feel culturally safe in early education

Aboriginal and Torres Strait Islander children have an inherent right to feel culturally safe, valued, and affirmed within early childhood education and care (ECEC) settings. For these children, a truly universal early years system must be underpinned by the availability and accessibility of services delivered by Aboriginal and Torres Strait Islander community-controlled organisations (ACCOs). These organisations are uniquely positioned to provide culturally safe, responsive, and holistic early years services that are grounded in Aboriginal and Torres Strait Islander ways of knowing, being, and doing. Cultural safety within ACCO-led ECEC services is not an optional extra or a 'nice-to-have' – it is foundational. It is embedded across all aspects of service delivery, including curriculum design, language inclusion, environmental design, pedagogical approaches, and organisational values. These services foster a deep sense of belonging, spiritual and emotional safety, and cultural pride. They reflect and

¹ Campbell, F., Conti, G., Heckman, J., Moon, S. H., Pinto, R., Pungello, E., & Pan, Y. (2014). Early childhood investments substantially boost adult health. *Science*, 343(6178), 1478-1485. <https://doi.org/10.1126/science>

² Moore, T., Arefadib, N., Deery, A., & West, S. (2017). *The First Thousand Days: An Evidence Paper*. Parkville, Vic.: Centre for Community Child Health, Murdoch Children's Research Institute

³ Heckman J. and Mosso, S. (2014) *The Economics of Human Development and Social Mobility*, Working Paper 19925, DOI 10.3386/w19925.

⁴ 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>

uphold Aboriginal protocols, songlines, kinship systems, and cultural responsibilities, creating environments that feel like home and affirm children's identities from the earliest years.

Funding reform is required to fully enable ACCO integrated early years services to meet the diverse needs of their communities, children and families.

Current mainstream funding models are ill-suited to the integrated, culturally responsive service delivery model of ACCOs. These models are fragmented, administratively burdensome, and fail to reflect the true cost of delivering holistic, wraparound supports that meet the complex and diverse needs of Aboriginal and Torres Strait Islander children and families.

Without targeted funding reform, ACCOs are constrained in their ability to expand services, respond to community needs, and support children's cultural and developmental outcomes – essential elements of safe and high-quality early childhood service provision. A dedicated, long-term, and fit-for-purpose funding model is urgently required – one that recognises the value of cultural identity in early childhood development and supports the sustainability and growth of ACCO-led services. Such reform would also address systemic challenges such as workforce shortages and service gaps in high-need communities.

Investment in the Aboriginal and Torres Strait Islander early educator workforce is an essential pillar of quality and safety in the ECEC sector

A strong, culturally capable Aboriginal and Torres Strait Islander early years workforce is essential to delivering high-quality, culturally safe ECEC. Aboriginal and Torres Strait Islander educators play a critical role in fostering cultural identity, resilience, and learning outcomes for children. However, the sector continues to face significant workforce shortages, particularly in the recruitment and retention of Aboriginal and Torres Strait Islander staff.

To address this, there must be greater investment in culturally safe training pathways, mentoring, and workplace supports that enable Aboriginal and Torres Strait Islander people to enter, remain, and thrive in the ECEC workforce. This includes embedding cultural safety in training environments and ensuring that qualifications are accessible, flexible, and community-informed.

There is a need for greater investment in quality uplift and cultural capability across the ECEC sector

There remains a significant gap in the availability of culturally responsive ECEC services across Australia. To close this gap, there must be sustained investment in building the cultural capability of the broader ECEC sector. This includes embedding Aboriginal and Torres Strait Islander perspectives in curricula, supporting Aboriginal-led service models, and ensuring that all children and families experience culturally affirming, inclusive, and high-quality early learning environments.

Data collected as part of the initiative must align with Indigenous Data Sovereignty (IDS) principles

All data collected through early years initiatives must align with the principles of Indigenous Data Sovereignty (IDS). Aboriginal and Torres Strait Islander peoples must have control over the creation, collection, access, analysis, interpretation, stewardship, and dissemination of data relating to their communities. Upholding IDS principles is essential to ensuring that data is used ethically, transparently, and in ways that support self-determination and community-led decision-making.

Below we articulate a set of recommendations, progressing existing priorities, gaps and opportunities, which if properly implemented, will improve the quality and safety of the early years sector for Aboriginal children and their families and move Australia closer to achieving the targets outlined in the National Agreement and Closing the Gap.

Recommendations

Aboriginal and Torres Strait Islander children have a right to quality, safe ECEC services which give them the best possible start in life

1. The Australian government, in partnership with the states and territories, commits to developing and fully implementing a dedicated supply-side, needs-based, reliable and sustainable funding model for early years ACCOs, drawing on the foundational development of the model completed through the Early Childhood Care and Development Policy Partnership.
2. The Australian Government adequately funds comprehensive sector scaffolding and backbone support to ensure ACCOs have the necessary supports for business, practice, policy and workforce development.
3. The Australian Government Department of Education commits 20% of unallocated funds in the Building Early Education Fund to build and establish new ACCO integrated early years services. This allocation is designed to reflect a 'meaningful proportion' of new investment aligned to clause 55 of the National Agreement on Closing the Gap based on population, need, addressing inequities, and prioritising Closing the Gap outcomes.

A strong, skilled, supported and fairly-paid Aboriginal and Torres Strait Islander workforce is integral to a high-quality, safe ECEC system for Aboriginal and Torres Strait Islander children

4. The Australian Government increases the ECEC Worker Retention Payment to 25% of pre-WRP wage levels, and works in partnership with Aboriginal and Torres Strait Islander community-controlled organisations and peak bodies to design and implement a fit-for-purpose funding option for ACCOs to access the increase.

5. The Australian Government commits to development and full implementation of an Aboriginal and Torres Strait Islander Early Years Workforce Strategy which aims to achieve full workforce parity in remuneration and employment.
6. The Australian Government partners with the ACCO ECEC sector to fund at least 500 fully subsidized tertiary education pathways 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.
7. The Australian Government funds the ACCO ECEC Workforce Innovation Fund 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 should enable and support the delivery of:
 - a) Build on foundational work done by SNAICC in development of the Workforce Innovation Fund style guide,
 - b) ACCO ECEC workforce development initiatives, with initiatives that can be adapted, scaled or transferred regionally or nationally prioritised,
 - c) Partnerships between ACCOs and tertiary education providers that build sustainable local workforce pathways and supports for Aboriginal and Torres Strait Islander early educators.
 - d) Community-led solutions to address chronic workforce shortages that provide much needed local career pathways for prospective Aboriginal and Torres Strait Islander people looking to enter the ECEC workforce.
 - e) Independent impact evaluation to develop the 'workforce development practice' evidence base.

Regulatory responses on their own will not produce a high-quality and safe ECEC system

8. The Australian Government commits to an independent review of the National Quality Framework in partnership with Aboriginal and Torres Strait Islander community-controlled organisations and their peaks, with the objective of fully recognise and improving quality and cultural safety for Aboriginal and Torres Strait Islander children across the ECEC system.
9. The Australian Government commits to developing a national cultural safety framework for Aboriginal and Torres Strait Islander children and families for the ECEC sector, in partnership with Aboriginal and Torres Strait Islander community controlled organisations and peak bodies. Development framework should be ACCO-led to determine what is required for non-Indigenous services to meet culturally safe standards, and which centre Aboriginal and Torres Strait Islander ways of knowing, being and doing.

10. The Australian Government implements a National ECEC Commission to act as a system steward and oversee reform and provide national leadership. The development and design of the Commission should be done in partnership with Aboriginal and Torres Strait Islander peak bodies to ensure it meets the unique needs of ACCO ECEC services.

Importantly, this process should not displace current models of shared decision-making between Aboriginal and Torres Strait Islander leaders and government including for example the Early Childhood Care and Development Policy Partnership (the ECCDPP).

The data practices of the ECEC system must uphold Aboriginal and Torres Strait Islander people's right to data sovereignty

11. The Australian Government works with the forthcoming Data Policy Partnership and Aboriginal and Torres Strait Islander Centre for Excellence in Child and Family Supports to embed Indigenous Data Sovereignty principles and Aboriginal and Torres Strait Islander leadership in determining and implementing socio-economic measures that engage with early education and unique wellbeing indicators for Aboriginal and Torres Strait Islander children, particularly connection to culture, Country and kin.
12. The Australian Government establishes an Independent Indigenous Data Agency, to respond to recommendations to improve the implementation of Priority Reform Four (improve data and information sharing).^{5,6}

⁵ Gray, Eva, Bray and Schmider (2024), 'Closing the Gap Priority Reforms Performance Measurement Project 2023- 2024', ANZSOG and ANU.

⁶ Productivity Commission (2024), 'Review of the National Agreement on Closing the Gap', Commonwealth of Australia, Canberra, p. 77. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>.

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.⁷ 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-determination⁸.

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.*⁹

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 have been saying for a long time is needed to improve the lives of our people, and have been

⁷ 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.

⁸ United Nations Human Rights Council 2021, 'Rights of the Indigenous child under the United Nations Declaration on the Rights of Indigenous Peoples'.

⁹ 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, pg. 51.

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.¹⁰

Reviews of the National Agreement

Productivity Commission

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.

In particular, the report found that governments are not understanding or buying into the large-scale, fundamental change required to implement the National Agreement. They are instead pursuing

¹⁰ Australian Government, 'Closing the Gap Priority Reforms'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/priority-reforms>

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).

Independent Aboriginal and Torres Strait Islander-led review

The Closing the Gap Independent Aboriginal and Torres Strait Islander Led Review (the Review) was required under Section D of the National Agreement on Closing the Gap and finalised in June 2025. The Review was completed by the Jumbunna Institute for Indigenous Education and Research at the University of Technology Sydney.

The Review identified twelve key findings. It concluded that while the National Agreement’s architecture is broadly sound, its progress is hampered by inaction and an imbalance of resources and responsibilities. Communication and educational efforts about the National Agreement were deemed both inappropriate and insufficient; with governments ultimately yet to commence genuine transformative work to achieve the targets. The Review noted that funding reform is urgently needed, alongside expanded efforts to strengthen the Aboriginal and Torres Strait Islander community-controlled sector. Finally, the Review stressed that the National Agreement must be grounded in global human rights standards, including self-determination and non-discrimination. These findings are aligned to those published by the Productivity Commission, particularly the lack of consistent and comprehensive follow-through from governments on their commitments to the National Agreement.

The Review also made nine recommendations to transform implementation of the National Agreement. The recommendations re-emphasise the urgent need for funding reform and stronger resourcing of the Aboriginal and Torres Strait Islander community-controlled sector, recognising that under-resourcing remains a systemic barrier to delivering culturally safe and strong service systems. The recommendations also centre the need for clear and community-driven communication about the

National Agreement, ensuring that communities are engaged regularly. A strong focus is also placed on Indigenous Data Sovereignty, with a recommendation for governments to build data capability and support ACCOs to lead in collecting and interpreting data on children and families to improve service delivery. Finally, the Review calls for expanding the scope of the National Agreement to better reflect intergenerational wellbeing especially in relation to socio-economic targets.

Aboriginal and Torres Strait Islander children have a right to quality, safe ECEC services which give them the best possible start in life

All Aboriginal and Torres Strait Islander children have the right to feel safe, nurtured and valued and to grow up healthy and strong in positive, physically and culturally safe, environments.¹¹ Meaningful connection to and engagement with culture is a protective factor for Aboriginal and Torres Strait Islander children. Their safety is directly linked to the security and wellbeing of their families and broader community, and their collective capacities to raise their children strong in their cultures. Paramount to safety within the individual, family and community is a robust and culturally safe system of early childhood services and supports. Time and again, Aboriginal and Torres Strait Islander community-controlled organisations (ACCOs) have proven that they are best placed to support Aboriginal and Torres Strait Islander children and their families by offering holistic, integrated and culturally safe care and support.

The early years are a critical period in a child's development, creating the foundations for lifelong learning and wellbeing.¹² In the first years of their lives, children grow 90% of their brain, developing the capabilities they need to be happy and healthy.¹³ A robust evidence base has established that participation in quality, inclusive 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.¹⁴

Additionally, the Aboriginal and Torres Strait Islander understanding of development, socioeconomic wellbeing, and health is holistic. Aboriginal and Torres Strait Islander health and wellbeing does not mean the physical wellbeing of an individual, but refers to the social, emotional, and cultural wellbeing

¹¹ United Nations. (1989). *Convention on the Rights of the Child*. Retrieved from, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

¹² 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/>.

¹³ 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>

¹⁴ 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.

of the whole community.¹⁵ It encompasses the importance of land, culture, spirituality and ancestry, and the relationships of every individual and broader community.¹⁶ It is therefore integral that ECEC services have a sound understanding of this unique relationship between child, family and broader community, when working to support the health and safety outcomes for Aboriginal and Torres Strait Islander children.

ECEC services need to be inclusive and celebrating of Aboriginal and Torres Strait Islander culture, as when they fail to strengthen the cultural identities of Aboriginal and Torres Strait Islander children, outcomes often include substantially lower engagement levels, contributing towards disparities in developmental outcomes and trajectories, and poorer educational outcomes for Aboriginal and Torres Strait Islander children than their non-Indigenous peers.¹⁷

Unfortunately, the early years services available to many Aboriginal and Torres Strait Islander children often do not bear these characteristics, leading to many children missing out. A wide range of complex and persistent barriers stand between many Aboriginal and Torres Strait Islander families and these early years services, including wide geographic service gaps, shortfalls in cultural safety, and chronic workforce challenges.¹⁸

The result is that Aboriginal and Torres Strait Islander children are disproportionately disadvantaged in early development and education outcomes. The 2024 AEDC reports that the percentage of Aboriginal and Torres Strait Islander children on track on five domains is 33.9%. This shows that Australia is not on track to achieve Target 4 of the National Agreement on Closing the Gap, which aims for 55% of Aboriginal and Torres Strait Islander children to be developmentally on track on five domains by 2031.¹⁹

Since culture is central to understanding a child's development, health and wellbeing, and shapes their relationship to self, Country, family and community, we know that children's outcomes are improved when they are supported by a strong ACCO ECEC system. ACCO's providing early childhood education and care are best placed to support Aboriginal children as they operate under the governance of Aboriginal and Torres Strait Islander communities. They maintain strong representation of Aboriginal and Torres Strait Islander staff, are embedded within community contexts and ensure that culture, the impacts of ongoing colonisation and intergenerational trauma are all embedded as guiding principles across governance frameworks and service delivery. ACCO's integrate health as a foundational principle within their services. This rights-based approach ensures the delivery of care

¹⁵ Australian Institute of Health and Welfare (2024). [Health and wellbeing of First Nations people](#), AIHW, Australian Government, accessed 22 September 2025

¹⁶ Gee G, Dudgeon P, Schultz C, Hart A and Kelly K (2014) 'Social and emotional wellbeing and mental health: an Aboriginal perspective', in Dudgeon P, Milroy H and Walker R (eds) *Working together: Aboriginal and Torres Strait Islander mental health and wellbeing principles and practice* (2nd edn), Department of the Prime Minister and Cabinet, Australian Government, Canberra.

¹⁷ 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>

¹⁸ 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>.

¹⁹ Australian Early Development Census (AEDC) (2024), *AEDC National Report 2024*, Commonwealth of Australia, ISSN 2206-284X (Online). Retrieved from: https://www.aedc.gov.au/docs/default-source/default-document-library/aedc_national-report-2024_da7-409a37b9d-95ce-43e7-af00-51aa604cf0b3.pdf?sfvrsn=b56015ba_1

and support that is culturally safe and responsive. The unique wrap around support ACCOs provide assists both the child and the family as a whole unit in a culturally safe environment. It is because of this approach that ACCOs are best placed to identify and understand the needs of children in their communities and deliver services and supports that will have the most impact for families.²⁰

The current ECEC system does not uphold and advance the rights of Aboriginal and Torres Strait Islander children

The ACCO early years sector is essential to providing Aboriginal and Torres Strait Islander children with the forms of culturally appropriate early education and care proven to keep them safe and set them on positive life trajectories. ACCO's embed cultural safety into everything they do. They build cultural reciprocity and humility, and positive meaningful relationships with their children and families; identify the 'whole child' and provide integrated wrap around services which supports children and families experiencing significant disadvantage in areas of health and wellbeing; have higher rates of Aboriginal and Torres Strait Islander staff employed as educators and other positions within the service and typically have a strong Aboriginal and Torres Strait Islander governance. Educators and staff within ACCO's provide a strong sense of compassion and cultural awareness, which creates a welcoming atmosphere and a strong sense of belonging - "a sense of feeling like home".²¹

For Aboriginal and Torres Strait Islander children, a truly universal early years system is predicated on the availability of early years services provided by ACCOs. ACCOs, which are led by and accountable to their communities, deliver culturally safe, holistic and relationship-based early years services and supports required by many Aboriginal and Torres Strait communities. ACCO integrated early years services enable children to learn and develop within the supportive contexts of their families and communities, providing nurturing early learning and development experiences and environments which can have life-long impacts on educational, health, developmental and wellbeing outcomes.

For these reasons, early childhood development and education outcomes improve when ACCOs are empowered and sufficiently resourced. ACCOs know their communities and their needs best. This local knowledge drives their effectiveness, developing relationships and trust with families, engaging them in the development and wellbeing of their children, and delivering quality services which meet family expectations.

ACCOs are accountable to their communities, investing deeply in building relationships and trust with families, and being there consistently. This ensures higher levels of engagement with service users and makes them the preferred provider in their communities. The well-recognised strengths and benefits of ACCO services are as follows:

- ACCOs deliver services based on trust and relationships, with strong continuity of care and attention to the unique priorities and aspirations of families.

²⁰ 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>.

²¹ SNAICC, Aboriginal Cultural Safety Framework for Early Childhood Education, Phase 1 Final Report, October 2022

- ACCOs take strengths-based, child-centred and family-led approaches, and empowering families to independently determine what supports they need is an intrinsic feature of their work with families.
- ACCOs deliver place-based services which involve deep collaboration in line with community need.
- ACCOs embed culture in all elements of their services, the importance of which cannot be overstated.
- ACCOs deliver a broad, holistic range of services which is much broader than mainstream models of early education and care, do not fit neatly into typical service silos, and respond directly to community needs.

ACCOs are essential to the realisation of self-determination and are central to improving population-wide early childhood outcomes. These services do so much more than provide ECEC. They bridge culture and mainstream pedagogies, preparing children for school while nurturing cultural strengths.

Many ACCO ECEC providers deliver integrated services within their communities regardless of whether they are funded to operate in this way, highlighting the insufficiency of current funding arrangements. Recent inquiries have found chronic under-funding of ACCO early education and integrated early year services significantly limits their capacity to respond flexibly or effectively to community needs and recommended supply-side funding models to address this under-funding²².

The Productivity Commission's recent assessment confirmed what ACCOs have been saying for many years; that mainstream government commissioning approaches continue to sideline ACCOs through transactional, limited, short and inflexible contracting arrangements which strip control from ACCOs, introduce unnecessary overheads, and deprive them of the secure funding base they need.²³ In the current landscape ACCOs access funding from multiple sources through fragmented, inconsistent, and inflexible administrative arrangements. Further, short-term and siloed funding cycles prevent continuity and limit innovation. This ultimately undermines their ability to deliver holistic, integrated, child-centred services needed to support Aboriginal and Torres Strait Islander children and families to thrive.

Through the ECCDPP, SNAICC has worked with ACCOs to design a framework for a dedicated, reliable and adequate [funding model for ACCO integrated early years services](#). This framework outlines the architecture of a supply-side funding model which would meet the services' needs, meaning they can better support their communities and children. It also provides adequate funding for ACCO services to attract, train, develop and retain educators and practitioners capable of meeting their children's needs.

²² Australian Competition and Consumer Commission (2024), *Childcare Inquiry Final report*, Commonwealth of Australia. Retrieved from: <https://www.accc.gov.au/about-us/publications/childcare-inquiry-final-report>; Productivity Commission 2024, *A path to universal early childhood education and care*, Inquiry report no. 106, Vol. 1, Canberra. Retrieved from: <https://www.pc.gov.au/inquiries/completed/childhood/report>.

²³ Productivity Commission 2024, 'Closing the Gap review: Study report.' Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report>, pp. 49-53.

There is no commitment or investment the Australian Government can make into the quality and safety of ECEC services that is more important than by funding them effectively and sufficiently to deliver the types of holistic care and early learning environments which are characteristic of ACCO services.

The unduly complex, disconnected and administratively burdensome nature of the funding landscape²⁴ also creates huge need for ‘backbone’ support for ACCOs. Backbone support services work with ACCOs in the early years sector to navigate regulatory compliance readiness, transition through accreditation and continuous approval, policy and program development, service leadership capacity building and administrative and financial reporting. One example is SNAICC’s Early Years Support Program, which we profile below.

SNAICC’s Early Years Support program

Since its establishment in 2021, SNAICC’s Early Years Support (EYS) program has been instrumental in strengthening the ACCO early years sector nationally. The EYS program currently provides backbone support and scaffolding to more than 40 ACCO integrated early years services across Western Australia, Victoria and New South Wales.

The EYS program comprises a diverse range of sector-strengthening offerings, including direct locally contextualised business and regulatory compliance support; service design and governance refinement advice; workforce support to the ECEC sector (including designing and developing resources and training); and cross-jurisdictional knowledge sharing/exchange to enable further efficiencies to be realised. Additionally, EYS offers invaluable assistance in securing sustainable funding, ensuring that these crucial services can continue to thrive and provide supports to their children, families and communities.

For example, EYS advisors supported ACCOs in navigating recent workforce funding reforms delivered through the Early Childhood Education and Care Worker Retention Payment. Along with our National Workforce Advisor and policy advisers, EYS has been travelling across the country through 2025 to support services to access the 15% pay increase legislated in late 2024.

An independent evaluation of the program delivered by Deloitte Access Economics concluded that ACCO services that participated in the program believed it to be successful in creating a positive impact. The evaluation found that 79% of ACCO services agreed or strongly agreed that Aboriginal and Torres Strait Islander children benefited from their engagement with EYS.

SNAICC EYS was one of the first Australian Government funded programs to be Aboriginal and Torres Strait Islander designed, developed and delivered, with SNAICC provided autonomy and flexibility to drive this process in a way that was new for Australian Government service procurement. This autonomy is observed to have been highly instrumental in providing the space and resources for SNAICC EYS to develop a culturally responsive delivery model that strongly aligned with service needs and build trusted service relationships so quickly.

²⁴ 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>.

In 2024, there were only 107 (0.59%) Aboriginal and/or Torres Strait Islander community-controlled ECEC services²⁵ operating in the broader landscape of approximately 18,000 ECEC services²⁶. The scale and coverage of specialised ACCO early years' services falls well short of demand. Recent research also shows that 'childcare deserts'²⁷ continue to exist across Australia's early years system, particularly in regional and remote locales, and regions with higher incidence of socioeconomic disadvantage.²⁸ Childcare deserts significantly overlap with the distribution of Aboriginal and Torres Strait Islander communities. The lack of ACCOs means that in most instances, Aboriginal and Torres Strait Islander families cannot send their children to a service run by their community, in their community, and consequently cannot access a safe service that best responds to their children's early development, educational, health and wellbeing needs. This speaks of the need to create new integrated ACCO ECEC services to address demand/access and provide Aboriginal and Torres Strait Islander children and families with safe and quality ECEC.

The Australian Government, along with all state and territory governments have committed both to building a strong ACCO sector, and to closing the gap in early childhood outcomes through targeted measures to improve access to quality services and supports. In a positive move, the Australian Government in May 2024 released the first *Early Years Strategy* (the Strategy), outlining a commitment to universal access to quality ECEC. While the Strategy recognises the critical role ACCOs play in delivering holistic, wraparound supports, real progress will depend on sustained investment and genuine partnership. Thus in order to meet these commitments and achieve desired outcomes, it is critical that the Australian Government implements a dedicated supply-side funding model, shifting the ACCO ECEC sector from a CCS-based funding model which abjectly fails to meet service' needs, to one that is designed to support Aboriginal and Torres Strait Islander-led ECEC services, and, crucially, their children's developmental outcomes and journeys.

Since the Australian Government introduced the *Child Care Package* in 2018, market forces have shaped the availability of ECEC services to the detriment of Aboriginal and Torres Strait Islander families, and those living in regional, remote and socially disadvantaged metropolitan areas. While we recognise that the 2018 reforms aimed to make childcare more accessible, affordable, and flexible for families by simplifying the payment system and targeting assistance to families with different incomes; the years since have shown that their reliance on a public-private market-based approach to early childhood services has, regrettably, done the opposite.²⁹

²⁵ Productivity Commission 2025, *Closing the Gap Information Repository*, Canberra. Retrieved from: <https://pc.gov.au/closing-the-gap-data> (accessed 26 August 2025).

²⁶ Number of ECEC services approved to operate under the National Quality Framework (as of 1 July 2025) see Australian Children's Education & Care Quality Authority (ACECQA) 2025, *NQF Online Snapshot*, <https://snapshots.acecqa.gov.au/Snapshot/index.html> (accessed 26 August 2025).

²⁷ A childcare desert is a populated area where there are more than three children per childcare place, or less than 0.333 places per child aged four or under see Hurley, P., Matthews, H., & Pennicuik, S. 2022, *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University. Retrieved from: <https://www.vu.edu.au/sites/default/files/how-accessible-is-childcare-report.pdf>.

²⁸ 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>; Hurley, P., Matthews, H., & Pennicuik, S. 2022, *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University. Retrieved from: <https://www.vu.edu.au/sites/default/files/how-accessible-is-childcare-report.pdf>.

²⁹ Hurley, P., Matthews, H., & Pennicuik, S. 2022, *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University. Retrieved from: <https://www.vu.edu.au/sites/default/files/how-accessible-is-childcare-report.pdf>.

The system's incentives, misplaced as they are to improve equity in early education, has meant that providers operate where there are the lowest risks and greatest rewards. As such, there is little economic incentive to venture into regional, remote and socially disadvantaged metropolitan areas for the over half of providers (54%) operating on a for-profit model.³⁰ This is because of the significant capital outlay required to establish services and the inability of providers to charge higher fees. Rather, such providers continue to operate in largely 'advantaged' metropolitan areas, charging higher fees in spite of the competition³¹. The Australian Competition and Consumer Commission (ACCC) stressed that such forces if left to their own devices are 'unlikely to ensure equitable educational and or developmental outcomes across all children and households'³².

In practice, this means that Aboriginal and Torres Strait Islander children who live in Australia's most disadvantaged communities, and who stand to gain the most from quality ECEC, are least likely to have access to it. This is not an anomaly within the market-based ECEC system but a feature of it. Thus, demonstrating that the marketised system is structurally incapable of meeting the needs of many Aboriginal and Torres Strait Islander families, particularly those who live in regional and remote communities where access to a culturally strong, high-quality ECEC service is simply not a reality.

SNAICC commonly hears from communities about their aspirations to expand early years services, however the complexity and cost of establishing a service and meeting regulatory requirements are regularly identified as barriers to moving forward. Without reform, funding insufficiency and regulatory complexity risks reinforcing disadvantages by limiting the creation of new ACCOs and the ability of existing ACCOs to expand services.

While SNAICC welcomed the Australian Government's announcement³³ that it will invest \$1 billion to establish the Building Early Education Fund to build early childhood education and care centres, including in the regions and outer suburbs; it is unclear what proportion of the funding will be allocated to expanding the ACCO ECEC sector. A clear commitment to an ACCO 'carve out' will support the Australian Government in fulfilling its commitments under the National Agreement to build the ACCO sector, thus recognising the sectors unique capacities to close the gap in early childhood outcomes.

Recommendation 1

The Australian government, in partnership with the states and territories, commits to developing and fully implementing a dedicated supply-side, needs-based, reliable and sustainable

³⁰ The data indicates private for-profit providers operate 54% of children's education and care services that have been approved under the National Quality Framework (NQF) see Australian Children's Education & Care Quality Authority 2025, *NQF Online Snapshot*, <https://snapshots.acecqa.gov.au/Snapshot/index.html> (accessed 26 August 2025).

³¹ Hurley, P., Matthews, H., & Pennicuik, S. 2022, *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University. Retrieved from: <https://www.vu.edu.au/sites/default/files/how-accessible-is-childcare-report.pdf>.

³² Australian Competition and Consumer Commission (2024), *Childcare Inquiry Final report*, Commonwealth of Australia. Retrieved from: <https://www.accc.gov.au/about-us/publications/childcare-inquiry-final-report>.

³³ Australian Government Department of Education (2024), *Fact Sheet - Building Early Education Fund*. Retrieved from: <https://www.education.gov.au/about-department/resources/building-early-education-fund>.

funding model for early years ACCOs, drawing on the foundational development of the model completed through the Early Childhood Care and Development Policy Partnership.

Recommendation 2

The Australian Government adequately funds comprehensive sector scaffolding and backbone support to ensure ACCOs have the necessary supports for business, practice, policy and workforce development.

Recommendation 3

The Australian Government Department of Education commits 20% of unallocated funds in the Building Early Education Fund to build and establish new ACCO integrated early years services. This allocation is designed to reflect a 'meaningful proportion' of new investment aligned to clause 55 of the National Agreement on Closing the Gap based on population, need, addressing inequities, and prioritising Closing the Gap outcomes.

A strong, skilled, supported and fairly-paid Aboriginal and Torres Strait Islander workforce is integral to a high-quality, safe ECEC system

The ECEC workforce (including educators, teachers, directors and other professionals) are the foundation of the sector. Children and families value their relationships with educators and teachers more than any other aspect of the ECEC system. However, there are acute workforce shortages across the ECEC sector, and nowhere is this felt more acutely than in Aboriginal and Torres Strait Islander communities and community-controlled service contexts. As presently constituted, the vocational system is not capable of supporting development of the Aboriginal and Torres Strait Islander ECEC workforce at levels capable of meeting demand.

These workforce challenges have a significant impact on Aboriginal and Torres Strait Islander children's access to ACCO ECEC services. Aboriginal and Torres Strait Islander workers comprised only 3.8% of the total ECEC workforce³⁴. The data reflects the severe shortages identified by the Productivity Commission³⁵ and the ACCC³⁶ and is indicative of the need to improve career pathways into the ACCO ECEC sector.

Culturally safe learning environments, mentoring and support are needed to attract and support Aboriginal and Torres Strait Islander students to enroll in and complete their ECEC qualifications,

³⁴ Australian Government 2024, *2024 Early Childhood Education and Care National Workforce Census National Report*. Retrieved from: <https://www.education.gov.au/download/19099/2024-early-childhood-education-and-care-national-workforce-census-report/40926/document/pdf>.

³⁵ Productivity Commission 2024, *A path to universal early childhood education and care*, Inquiry report no. 106, Vol. 1, Canberra. Retrieved from: <https://www.pc.gov.au/inquiries/completed/childhood/report>.

³⁶ Australian Competition and Consumer Commission (2024), *Childcare Inquiry Final report*, Commonwealth of Australia. Retrieved from: <https://www.accc.gov.au/about-us/publications/childcare-inquiry-final-report>.

ultimately increasing and facilitating their economic participation. While data indicates that a higher proportion of the Aboriginal and Torres Strait Islander workforce (30.2%) hold qualifications at the Certificate III or IV level compared to non-Indigenous staff (25.7%)³⁷; the inverse is true for qualifications at the Advanced Diploma (28.7% compared to 37.0%)³⁸ and bachelor's degree and above levels (9.0% compared to 14.7%)³⁹. These data follow a similar pattern to data reported in the 2021 ECEC National Workforce Census.⁴⁰ Highlighting the need to support growth in the attainment of higher-level qualifications for the Aboriginal and Torres Strait Islander workforce.

This investment would benefit the ECEC sector in manifold ways. Aboriginal and Torres Strait Islander educators, whether recognised with tertiary qualifications or not, bring enormous skills, experience and knowledge in educational and child raising practices cultivated over generations. It is with this recognition that the Early Childhood Care and Development Sector Strengthening Plan, committed to by all governments, contains a suite of actionable measures to invest in, and build on the enormous strengths of, the Aboriginal and Torres Strait Islander early childhood workforce.

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. 'Shaping Our Future: A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022-2031' (Shaping Our Future) mapped some of the factors impacting Aboriginal and Torres Strait Islander students' attainment of qualifications. At the crux of the issues highlighted is the lack of cultural safety offered to Aboriginal and Torres Strait Islander people in tertiary institutions, including Registered Training Organisations (RTOs), with this exacerbated by teaching staff lacking cultural capability⁴¹. Shaping Our Future also considers some of the positive program elements that support the development of Aboriginal and Torres Strait Islander students:

- adopting a strengths-based approach
- offering a combination of on Country, online and campus tuition
- providing access to local mentors and study groups
- offering face to face visits from lecturers/trainers
- financial support for study costs, and

³⁷ See Table 26 Qualifications of Aboriginal and/or Torres Strait Islander and non-Aboriginal and/or Torres Strait Islander paid staff, Department of Education (2025), *2024 Early Childhood Education and Care National Workforce Census National tables*, Australian Government. Retrieved from: <https://www.education.gov.au/early-childhood/resources/2024-early-childhood-education-and-care-national-workforce-census-national-tables>.

³⁸ See Table 26 Qualifications of Aboriginal and/or Torres Strait Islander and non-Aboriginal and/or Torres Strait Islander paid staff, Department of Education (2025), *2024 Early Childhood Education and Care National Workforce Census National tables*, Australian Government. Retrieved from: <https://www.education.gov.au/early-childhood/resources/2024-early-childhood-education-and-care-national-workforce-census-national-tables>.

³⁹ See Table 26 Qualifications of Aboriginal and/or Torres Strait Islander and non-Aboriginal and/or Torres Strait Islander paid staff, Department of Education (2025), *2024 Early Childhood Education and Care National Workforce Census National tables*, Australian Government. Retrieved from: <https://www.education.gov.au/early-childhood/resources/2024-early-childhood-education-and-care-national-workforce-census-national-tables>.

⁴⁰ See Table 3.6.1: Qualifications of Indigenous paid contact staff, by service type – Australia, Department of Education (2025), *2024 Early Childhood Education and Care National Workforce Census National tables*, Australian Government. Retrieved from: <https://www.education.gov.au/early-childhood/resources/2024-early-childhood-education-and-care-national-workforce-census-national-tables>.

⁴¹ Education Services Australia (2021). *Shaping Our Future: A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022–2031*. Retrieved from: <https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>.

- deep involvement of teaching staff that specialise in Aboriginal and Torres Strait Islander education⁴².

In addition to workforce attraction issues, there are also challenges with workforce retention. The Productivity Commission analysed attitudinal data⁴³ which indicated that almost 40% of ECEC educators considered their pay to be poor or very poor. While some ACCO ECEC services are able to offer slightly above award wage they are simply unable to compete with the higher wages and flexibility offered by mainstream for-profit services.

SNAICC welcomed the funding of the *Early Childhood Education and Care Worker Retention Payment*⁴⁴, however the design and rollout of the payment has not been without its challenges. For ACCO ECECs the process has added to the administrative burdens of operation, with the need for ACCOs to ensure 'compliant' workplace instruments are in place for all staff. SNAICC has heard from ACCOs that the complexity stems from the grant's unique eligibility criteria (i.e., built to fit the non-ACCO ECEC sector) and a lack of consultation with the ACCO sector prior to the grant rollout. As we have expressed to the Department of Education a number of times, this has risked the underrepresentation of community-controlled services. The rollout of this payment should be a timely reminder of the need to consult early and often with the ACCO ECEC sector on workforce retention initiatives, lest they fail to achieve their purpose due to poor design and application.

There also needs to be a fundamental shift to truly recognise the value of the ECEC workforce and the role they play in shaping the early experiences and development of children. This is even more important for the Aboriginal and Torres Strait Islander workforce because they play an additional and critical role in supporting Aboriginal and Torres Strait Islander children to grow up strong in culture. Such a shift will help to ensure resourcing and wages are calibrated to the complexity of the work undertaken. Innovation funds for example may go some way to both alleviating the pressures that childcare deserts are creating for Aboriginal and Torres Strait Islander communities (especially those in remote/ very remote areas) and recalibrating resourcing to reflect value of the ECEC workforce thereby improving attraction and retention issues. The type of innovation fund envisioned here is one predicated on the acknowledgement that ACCOs and their communities know what they need to do to ensure their children and families are supported by trained, qualified and experienced members of their own communities and what resources they need to do it.

Recommendation 4

The Australian Government increases the ECEC Worker Retention Payment to 25% of pre-WRP wage levels, and works in partnership with Aboriginal and Torres Strait Islander

⁴² Education Services Australia (2021). *Shaping Our Future: A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022–2031*. Retrieved from: <https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>.

⁴³ Data was collected via a voluntary sample of 5,643 ECEC educators see Productivity Commission 2024, *A path to universal early childhood education and care*, Inquiry report no. 106, Vol. 2, Supporting papers, Canberra, p. 31. Retrieved from: <https://www.pc.gov.au/inquiries/completed/childhood/report>.

⁴⁴ *Early Childhood Education and Care Worker Retention Payment delivers a 10% pay increase from December 2024 and a further 5% increase from 2025*.

community-controlled organisations and peak bodies to design and implement a fit-for-purpose funding option for ACCOs to access the increase.

Recommendation 5

The Australian Government commits to development and full implementation of an Aboriginal and Torres Strait Islander Early Years Workforce Strategy which aims to achieve full workforce parity in remuneration and employment.

Recommendation 6

The Australian Government partners with the ACCO ECEC sector to fund at least 500 fully subsidized tertiary education pathways 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.

Recommendation 7

The Australian Government funds the ACCO ECEC Workforce Innovation Fund 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 should leverage foundational work done by SNAICC in development of the Workforce Innovation Fund business case to enable and support the delivery of:

- a) ACCO ECEC workforce development initiatives, with initiatives that can be adapted, scaled or transferred regionally or nationally prioritised.
- b) Partnerships between ACCOs and tertiary education providers that build sustainable local workforce pathways and support for Aboriginal and Torres Strait Islander early educators.
- c) Community-led solutions to address chronic workforce shortages that provide much needed local career pathways for prospective Aboriginal and Torres Strait Islander people looking to enter the ECEC workforce.
- d) Independent impact evaluation to develop the 'workforce development practice' evidence base.

Regulatory responses on their own will not produce a high-quality and safe ECEC system

We welcome the Australian Government's decision to strengthen the regulatory and quality uplift legislation and apparatus of the ECEC system, though SNAICC has consistently stated our position that regulatory change *on its own* is not an effective measure to build a safe, equitable and accessible ECEC system. More regulation and compliance requirements represents a useful but somewhat blunt instrument to improve quality and safety system-wide, and risks imposing challenging compliance burdens on services already stretched thin by an adverse funding system.

The passing of the *Early Childhood Education and Care (Strengthening Regulation of Early Education) Bill 2025* is encouraging. By taking some sensible regulatory steps and allocating greater powers to the Secretary of the Department of Education to immediately respond to childcare providers who are operating below safety and quality standards, this will hopefully reduce the number of instances of unlawful behaviours and provide greater safety and care for children. It is important to note, however, that these regulatory changes are being imposed on an already overburdened system.

While we acknowledge that an effective regulatory system promotes better outcomes, as well as child safety, for actual quality uplift across Aboriginal and Torres Strait Islander populations, there needs to be greater acknowledgement of and investment in targeted supports that we know lead to better outcomes for Aboriginal and Torres Strait Islander children. We know what genuinely keep children safe in ECEC. It is such factors as having services embedded in and accountable to communities, governed by community members, having a highly skilled, trained and supported Aboriginal-led workforce, developing and implementing curricula which strengthens cultural identities, and child- and family- centred practices which make children feel welcome and cared for.

While we recognise that the National Quality Framework has led to positive uplift of ECEC standards nationally, we do not believe that it is fit for purpose for the unique contexts of Aboriginal and Torres Strait Islander communities. SNAICC was subcontracted by Deloitte Access Economics in 2024 to consult with ACCOs and other Aboriginal and Torres Strait Islander stakeholders on the Regulatory Impact Statement for ACECQA's Child Safety Review. Through those consultations it became clear that the NQF fails to adequately recognise cultural understandings of quality and what is needed to successfully and safely support Aboriginal and Torres Strait Islander children and families.

Culture is a protective factor for Aboriginal and Torres Strait Islander children and is intimately connected to developmental outcomes. While NQS Quality Area 5 (promoting relationships with children that promote children's sense of security and belonging) and Quality Area 6 (promoting collaborative partnerships with families and communities where the expertise, culture, values and beliefs of families are respected) highlight critical elements of quality ECEC, there is currently no specific provision in the NQF and NQS regarding how these standards will be implemented or assessed, including on cultural competence and safety. Moreover, under the NQF, there is no explicit requirement for ECEC services to embed culture into their curriculum, raising critical questions regarding the suitability, cultural safety and inclusivity of 'mainstream' ECEC services for Aboriginal and Torres Strait Islander children and families. This is problematic because ECEC services that do not reflect the culture and knowledge of the local Aboriginal and Torres Strait Islander community are not seen as culturally safe and tend not to be used by families in those communities.⁴⁵ Furthermore,

⁴⁵ Linda J Harrison, Sharon Goldfeld, Eliza Metcalfe and Tim Moore (2012), *Early learning programs that promote children's developmental and educational outcomes*. Canberra: AIHW. Retrieved from: <https://www.aihw.gov.au/reports/indigenous-australians/early-learning-programs-that-promote-children-s-de/summary>

evidence indicates that Aboriginal and Torres Strait Islander children may experience adverse long-term consequences if ECEC services are not responsive to their unique cultures and needs.⁴⁶

While the overarching NQF Framework is at the national level, the implementation of the NQF, including the assessment process, lies within the individual state and territory jurisdictions. We have heard from SNAICC members that the issue of cultural bias is evident in the assessment process, with non-Indigenous assessors making judgements regarding staff competency and ability without truly understanding the cultural context within the service. For example, in remote Western Australia, where educators in ECEC services predominately speak the local language of Creole (which is also the primary language spoken by the children and families accessing the service), in interactions with assessors, staff come across as 'shy' or 'less competent' as they don't have the language skills to converse with the assessor, which leads to the service receiving a lower score in that particular area. Yet in reality the staff are, highly proficient ECEC educators.

Furthermore, the NQF does not fully acknowledge the significance of wrap-around family supports as a key component of quality ECEC. For ACCO ECEC services which fall within the scope of the NQF, the current quality framework fails to acknowledge or address the unique needs and circumstances of Aboriginal and Torres Strait Islander families and does not value how the unique wrap-around family supports they provide address the social determinants of wellbeing. Providing cognitively stimulating and rich learning environments that optimise children's experiences is a key component to high quality ECEC. However, quality does not stop there. In addition to providing optimal centre-based learning environments and opportunities, quality ECEC services recognise the significant role that social determinants play in children's development and actively work toward supporting families by providing parents /caregivers with supports that are likely to strengthen their parenting capacity.⁴⁷

While Australia's ECEC policies acknowledge education as a social determinant of wellbeing, they largely fail to acknowledge that when children return to caregivers experiencing distress, poverty, and inadequate housing, education loses much of its power as the great equaliser. Evidence shows that home learning environments can have up to twice the impact of early childhood programs, limiting the extent to which even high-quality ECEC can mitigate shortfalls in the child's home environment.⁴⁸ Research demonstrates that the best outcomes occur when both the home environment and ECEC promote the child's development.⁴⁹ ECEC services located in Australia's most disadvantaged

⁴⁶ Early Childhood Australia and SNAICC (2019), 'Discussion Paper Ensuring Equality For Aboriginal and Torres Strait Islander Children In The Early Years'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2019/02/SNAICC-ECA-Discussion-Paper-Feb2019.pdf>

⁴⁷ Axford, N and Albers, B 2019, 'Improving the Early Learning of Children Growing Up in Poverty: A Rapid Review of the Evidence'. Retrieved from: <https://pure.plymouth.ac.uk/ws/portalfiles/portal/39569289/Improving%20the%20Early%20Learning%20Outcomes%20of%20Children%20Growing%20Up%20in%20Poverty%20-%20A%20Rapid%20Review%20of%20the%20Evidence.pdf>; Heckman, JJ and Mosso, S 2014, 'The Economics of Human Development and Social Mobility'. Retrieved from: https://www.nber.org/system/files/working_papers/w19925/w19925.pdf; Melhuish, E. 2014, 'The impact of early childhood education and care on improved wellbeing'. Retrieved from: <https://ro.uow.edu.au/ndownloader/files/50428299>; Shuey, EA. and Kankaras, M. 2018, 'The Power and Promise of Early Learning' OECD Education Working Papers No. 186. Retrieved from: https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/11/the-power-and-promise-of-early-learning_f338f874/f9b2e53f-en.pdf

⁴⁸ Melhuish, E. 2014, 'The impact of early childhood education and care on improved wellbeing'. Retrieved from: <https://ro.uow.edu.au/ndownloader/files/50428299>

⁴⁹ Moore, TG. and Arefadib, N. 2022, 'Tasmanian Play2Learn+ Trial: Evidence Review'. Retrieved from: https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/2212_CCCH_TAS-Play2Learn.pdf

communities are more likely to serve Aboriginal and Torres Strait Islander families who experience multiple and concurrent vulnerabilities, including poverty and family violence.⁵⁰ How an ECEC service responds to and supports families through such experiences is a true indicator of the quality of that service and will have a significant impact on shaping outcomes for the most vulnerable children.

For these reasons, SNAICC and the ACCO ECEC sector have long advocated for a review of the NQF, which reflects and incorporates Aboriginal and Torres Strait Islander views, experiences and practices of quality. This position was backed by the Productivity Commission in the 2024 ECEC inquiry, which recommended a review of the NQF (Recommendation 8.2) and the way in which services are assessed against the NQS and found there is scope to align the NQS with a stronger focus on cultural safety and responsiveness.⁵¹

Further, while ACCO led ECEC is the optimal service delivery model for Aboriginal and Torres Strait Islander children, we recognise that for various reasons, some children do not have access to ACCO-led ECEC. Therefore, there is a need for substantial investment in building the cultural capability and safety of the whole ECEC system, so that those children and families who are not accessing ACCO services, know that they can show up to services and have their children supported and cared for.

Quality uplift of the mainstream ECEC sector may include investment in and dissemination of a trauma informed cultural capability training, such as Waterways. Waterways has been developed by SNAICC in partnership with [AbSec](#), [KWY](#), [QATSICPP](#), [VACCA](#) and [Yamurrah](#) to support mainstream services across Australia that work with Aboriginal and Torres Strait Islander children and families. The training is a two-day, face-to-face workshop that supports organisations to build trauma-informed, culturally safe and anti-racist practice. It supports services to reflect on their roles and responsibilities, change harmful systems and practices, and uphold the rights, strengths and cultures of Aboriginal and Torres Strait Islander peoples. The training package is designed for mainstream and non-Indigenous organisations that work with Aboriginal and Torres Strait Islander children, families and communities.

Recommendation 8

The Australian Government commits to an independent review of the National Quality Framework in partnership with Aboriginal and Torres Strait Islander community-controlled organisations and their peaks, with the objective of fully recognise and improving quality and cultural safety for Aboriginal and Torres Strait Islander children across the ECEC system.

Recommendation 9

The Australian Government commits to developing a national cultural safety framework for Aboriginal and Torres Strait Islander children and families for the ECEC sector, in partnership with Aboriginal and Torres Strait Islander community controlled organisations and peak bodies.

⁵⁰ Victorian Agency for Health Information, 'Family Violence in Victoria Findings from the Victorian Population Health Survey 2017'. Retrieved from: <https://vahi.vic.gov.au/sites/default/files/2021-12/Family-violence-in-Victoria%20-%20November%202020.pdf>

⁵¹ Australian Government Productivity Commission, 'A path to universal early childhood education and care', Finding 2.3 and Recommendation 8.2. Retrieved from: <https://www.pc.gov.au/inquiries/completed/childhood/report/childhood-volume1-report.pdf>

Development framework should be ACCO-led to determine what is required for non-Indigenous services to meet culturally safe standards, and which centre Aboriginal and Torres Strait Islander ways of knowing, being and doing.

Recommendation 10

The Australian Government implements a National ECEC Commission to act as a system steward and oversee reform and provide national leadership. The development and design of the Commission should be done in partnership with Aboriginal and Torres Strait Islander peak bodies to ensure it meets the unique needs of ACCO ECEC services.

Importantly, this process should not displace current models of shared decision-making between Aboriginal and Torres Strait Islander leaders and government including for example the Early Childhood Care and Development Policy Partnership (the ECCDPP).

The data practices of the ECEC system must uphold Aboriginal and Torres Strait Islander people's right to data sovereignty

Indigenous Data Sovereignty refers to the right of Aboriginal and Torres Strait Islander peoples to exercise ownership over Indigenous data. Ownership of data can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination and reuse of Indigenous data.⁵² Western approaches to data and the existing data infrastructure does not currently recognise or privilege Aboriginal and Torres Strait Islander knowledge and worldviews and does not meet the current and future need. It is not strengths based, nor is it culturally safe and/or appropriate.

While we recognise that data collection and information dissemination is vital for evidence informed policy, it is important to acknowledge that the data collected often reflects the cultural values and norms of the wider community. When data is collected about Aboriginal and Torres Strait Islander people, there can be biases inherent in those data and statistics that impact on the ways in which Aboriginal and Torres Strait Islander are understood by the broader population.

Although there have been some positive changes to provide greater context around educational and socio-economic outcomes, current administrative system data continues to perpetuate deficit narratives. By contrast, Aboriginal and Torres Strait Islander-led research privileges appropriate and accurate measurement of socio-economic outcomes through relevant indicators of wellbeing.

⁵² Maïam Nayri Wingara (2018), *Indigenous Data Sovereignty, Communiqué*, Indigenous Data Sovereignty Summit 2018, Canberra.

To ensure that the ECEC system delivers better outcomes for children and families, a system stewardship approach is needed, with the Australian, state and territory governments acting as the primary stewards for the system. However, a lack of effective coordination mechanisms across governments and limited government accountability for system-wide outcomes, at present, hampers the effective use of a system stewardship model.

The Productivity Commission recommends the establishment of a Bureau of Indigenous Data to advance Indigenous Data Governance (IDG).⁵³ An Independent Indigenous Data Authority (IIDA) would be valuable to undertake and coordinate data projects, address the data gaps prevalent in Closing the Gap reporting and build Indigenous Data Sovereignty (IDS).⁵⁴ To embed IDS and IDG in Closing the Gap measurement and evaluation, the Commonwealth Government should prioritise progress towards establishing a dedicated, Aboriginal and Torres Strait Islander-led data body, working with the Data Policy Partnership on design and transition.

Recommendation 11

The Australian Government works with the forthcoming Data Policy Partnership and Aboriginal and Torres Strait Islander Centre for Excellence in Child and Family Supports to embed Indigenous Data Sovereignty principles and Aboriginal and Torres Strait Islander leadership in determining and implementing socio-economic measures that engage with early education and unique wellbeing indicators for Aboriginal and Torres Strait Islander children, particularly connection to culture, Country and kin.

Recommendation 12

The Australian Government establishes an Independent Indigenous Data Agency, to respond to recommendations to improve the implementation of Priority Reform Four (improve data and information sharing).^{55;56}

⁵³ Productivity Commission (2024), 'Review of the National Agreement on Closing the Gap', Commonwealth of Australia, Canberra, p. 77. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>.

⁵⁴ Gray, Eva, Bray and Schmider (2024), 'Closing the Gap Priority Reforms Performance Measurement Project 2023 - 2024', ANZSOG and ANU, p. viii.

⁵⁵ Gray, Eva, Bray and Schmider (2024), 'Closing the Gap Priority Reforms Performance Measurement Project 2023- 2024', ANZSOG and ANU.

⁵⁶ Productivity Commission (2024), 'Review of the National Agreement on Closing the Gap', Commonwealth of Australia, Canberra, p. 77. Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report/closing-the-gap-review-report.pdf>.