



Secretariat of National Aboriginal and Islander Child Care

**Submission on the Early Childhood Development Workforce
Draft Research Report
Productivity Commission, June 2011**

13 September 2011

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1. Background

The Secretariat of National Aboriginal and Islander Child Care (**'SNAICC'**) welcomes the opportunity to provide comments on the Early Childhood Development Workforce Draft Research Report, dated June 2011 (**'ECD Workforce Report'**).

SNAICC was established as a non-governmental, not-for-profit organisation in 1981 as the national peak body in Australia representing the interests of Aboriginal and Torres Strait Islander children and families. It was originally conceived as a national representative body for the state-funded Aboriginal and Torres Strait Islander community based child care agencies (**'AICCAs'**), and has grown to include in its membership base foster care agencies, link up and family reunification services, family group homes, services for young people at risk, Multi-functional Aboriginal Children's Services (**'MACS'**), family support services, long day care child care services, playgroups, pre schools, early childhood education services, community groups and voluntary associations.

SNAICC also has a network and subscriber list of over 1500 community groups: mostly Aboriginal and Torres Strait Islander organisations, but also significant numbers of non-Aboriginal and Torres Strait Islander community-based services, government agencies and individuals with an interest in Aboriginal and Torres Strait Islander families and children. Further information on SNAICC is available online at www.snaicc.asn.au.

Workforce development is a critical issue for improving access and quality of early childhood education and care services to Aboriginal and Torres Strait Islander children. The current demands for early childhood education and care services for Aboriginal and Torres Strait Islander children are being grossly under-met. The quality of Aboriginal and Torres Strait Islander focused services continues to be undermined through insufficient and poorly directed Government funding while the accessibility of mainstream services to Aboriginal and Torres Strait Islander children remains unacceptable. This is despite the profound effect, shown through national and international research, of high quality early childhood education and care to children from disadvantaged backgrounds and the adverse affects of poor quality services.¹

SNAICC strongly supports the ECD Workforce Report. The broad consultations conducted by the Productivity Commission are reflected in the comprehensive coverage of key issues confronting the early childhood education and care

¹ Early Childhood Development Sub-group 2008, *A national quality framework for early childhood education and care: a discussion paper*, Productivity Agenda Working Group – Education, Skills, Training and Early Childhood Development, Canberra, p. 8. Also see Development Steering Committee 2009b, *Regulation Impact Statement for Early Childhood Education and Care Quality Reforms* (COAG Consultant RIS), July, Council of Australian Governments (COAG), Canberra, p. 6. Enormous benefits recognised across a range of indicators including health, development, learning and well being by the Department of Education, Employment and Workplace Relations submission on the ECD Workforce Report, March 2011, p. 6.

workforce, including those affecting Aboriginal and Torres Strait Islander workers, and the accessibility and quality of services targeted at our children.

In particular, SNAICC supports the Productivity Commission's clear recommendation for the inclusion of Indigenous-focused services within the National Quality Standards (*'NQS'*) and the urgency it places on priority of increased funding to ensure their capacity to comply with the NQS. The National Quality Standards currently excludes the services attended by most Aboriginal and Torres Strait Islander children. The draft ECD Workforce Report rightly recognises that this will lead to a widening of the gap between the quality of mainstream services and those provided for Indigenous children.

Essentially it puts those children who are in most need at the bottom once again and directs resources away from those services in abject need. The exclusion of Indigenous focused services from the National Quality Standards sits directly against Government policies to close the gap in Indigenous disadvantage and requires urgent redress.

While SNAICC generally applauds the ECD Workforce Report, there are a number of areas which SNAICC would like to discuss further with the Productivity Commission in order to more thoroughly reflect the realities faced by the Aboriginal and Torres Strait Islander ECD workforce. SNAICC believes that the report, while recognising the importance of many critical issues, needs stronger recommendations to ensure necessary improvements if the Closing the Gap targets are to be taken seriously.

2. Overview of key issues

SNAICC considers that workforce development strategies can only be capable of supporting the effective implementation of recent reforms in the early childhood development sector if they redress significant barriers experienced by vulnerable Aboriginal and Torres Strait Islander children and families in accessing early childhood education and care (*'ECEC'*) services.

Workforce development initiatives will benefit from existing services and practices that are showing promise in overcoming these barriers. Research demonstrates that holistic, community designed, run and implemented programs and services that have strong collaborative partnerships with complementary services best encourage uptake and ongoing engagement of our vulnerable families. SNAICC urges that the ECD Workforce Report reflect this evidence in its recommendations, including through the allocation of adequate resources for Aboriginal and Torres Strait Islander community controlled services (such as Multifunctional Aboriginal Children's Services).

This position is reinforced by the paradigm shift to a public health model, which is reflected in the National Framework for Protecting Australia's Children (2009-2020) and has significant implications for ECD workforce orientation and needs. In particular the strong focus on prevention must be reflected in policies and

strategies to strengthen the ECD workforce in order to provide appropriate and adequate services for our children who are most at risk.

In adopting a public health approach, the National Framework for Protecting Australia's Children prioritises the availability of universal support for all families,² or the 'services that seek to benefit families by improving their ability to care for children and to strengthen family relationships.'³ This requires consideration of how 'access' and 'engagement' of Indigenous families with ECD services is currently facilitated, as well as the strengths and areas for improvement.⁴ This is a crucial aspect of policy formulation and program funding, for simply increasing the number, scope and capacity of services targeting Aboriginal and Torres Strait Islander families will not necessarily result in higher levels of access or engagement.⁵

While inadequate data prevents conclusive statements on accessibility of Aboriginal and Torres Strait Islander children to universal services, studies indicate that Aboriginal and Torres Strait Islander access to comparable family or human services is low.⁶ Government records report that access to early childhood services by our families is half the rate of other families.⁷ The findings also suggest that where our families and children do access child and family services, these services are more likely to be Aboriginal and Torres Strait Islander specific than mainstream ones.⁸ These issues are explored in a recent SNAICC paper "*Towards Aboriginal and Torres Strait Islander access and engagement: overcoming barriers to child and family services*," June 2010.⁹

The ECD Workforce Report importantly refers to the under representation of Indigenous children in mainstream childcare (at pp.265-266). The Report *Overcoming Indigenous Disadvantage: Key Indicators 2011*, released in August 2011, also confirmed major issues outstanding in Aboriginal and Torres Strait

² Council of Australian Governments, *Protecting children is everyone's business: National framework for protecting Australia's children 2009-2020* (2009) Council of Australian Governments <http://www.coag.gov.au/coag_meeting_outcomes/2009-04-30/docs/child_protection_framework.pdf> at 20 June 2010, p.7.

³ Australian Institute of Health and Welfare, *Family Support Services in Australia* (2000), p.xi.

⁴ Natasha Cortis, Ian Katz and Roger Patulny, 'Engaging hard -to-reach families and children,' Occasional Paper No 26, National Evaluation Consortium, 2009, p.3.

⁵ Saul Flaxman, Kristy Muir, and Ioana Oprea, 'Indigenous families and children: coordination and provision of services' (Occasional Paper No 23, National Evaluation Consortium, 2009), p.vi; see further SNAICC, *Towards Aboriginal and Torres Strait Islander access and engagement: overcoming barriers to child and family services*, June 2010.

⁶ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Social Justice Report 2006* (2007).

⁷ Australian Bureau of Statistics & Australian Institute of Health and Welfare, *The health and welfare of Australia's Aboriginal and Torres Strait Islander peoples* (2005).

⁸ For example, 79 percent of the proportion of children attending MACS identify as Aboriginal and Torres Strait Islander: Saul Flaxman, Kristy Muir, and Ioana Oprea, 'Indigenous families and children: coordination and provision of services' (Occasional Paper No 23, National Evaluation Consortium, 2009), p.10.

⁹ See document online at <http://www.snaicc.asn.au/policy-advocacy/dsp-default-e.cfm?loadref=117&txnid=1155&txnctype=resource&txncstype=document>.

Islander engagement with service delivery.¹⁰ Some of these points are relevant to ground recommendations in the ECD Workforce Report and could be integrated.

SNAICC is concerned that the ECD Workforce Report comprehensively redress recognised challenges for ECEC services in engaging Aboriginal and Torres Strait Islander children and families that relate to workforce issues.¹¹ These were identified in SNAICC's original submission on the Early Childhood Development Workforce Issues Paper and extend across individual, service provider, program and social factors.

Best practice responses for overcoming challenges to engaging Aboriginal and Torres Strait Islander clients,¹² alongside pertinent Government reports,¹³ stress that the appropriate provider approach must be determined by the local context and community it seeks to serve, and must be based on genuine consultation with this community. Support via sustainable, consistent funding and flexible policy frameworks are also crucial in gearing services for success.

An overview of most successful child and family service providers incorporated the following considerations:¹⁴

- Community responsibility, design, development and delivery of services and programs. This means that programs are based on a direct response to client needs (e.g. such as outreach programs, provision of transport and food programs).
- Program facilitation by Aboriginal and Torres Strait Islander staff trusted by the local community.

¹⁰ See pp.11.36 – 11.49.

¹¹ These are outlined in SNAICC, *"Towards Aboriginal and Torres Strait Islander access and engagement: overcoming barriers to child and family services," June 2010, pp.7-8.*

¹² See for example Secretariat of National Aboriginal and Islander Child Care Inc, *Footprints to Where We Are* (2005) for a resource manual for Aboriginal and Torres Strait Islander children's services; Secretariat of National Aboriginal and Islander Child Care Inc, *Foster their Culture* (2008) for foster carers of Aboriginal and Torres Strait Islander children and Secretariat of National Aboriginal and Islander Child Care Inc, *Working and Walking Together* (2010). Early Childhood Australia, *Walking Respectfully* (2008); Jenny Higgins and Nikki Butler, 'Characteristics of promising Indigenous out-of-home care programs and services' (Promising Practices in Out-of-Home Care for Aboriginal and Torres Strait Islander Carers, Children and Young People: Profiling Promising Programs Booklet 1, Australian Institute of Family Studies and the Secretariat of National Aboriginal and Islander Child Care, 2007); Leah Bromfield, Jenny Higgins, Daryl Higgins and Nick Richardson, 'Barriers, incentives and strategies to enhance recruitment of Indigenous carers' (Promising Practices in Out-of-Home Care for Aboriginal and Torres Strait Islander Carers, Children and Young People: Strengths and Barriers Paper 2, Australian Institute of Family Studies and the Secretariat of National Aboriginal and Islander Child Care, 2007); Aboriginal and Torres Strait Islander Social Justice Commissioner, *Social Justice Report 2006* (2007), p.37.

¹³ Pat Anderson and Rex Wild, *Ampe akelyernemane meke mekarle - Little children are sacred. Report of the Northern Territory Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse* (2007) 7; See for example, Tom Calma, 'Addressing family violence and child sexual assault in Indigenous communities – A human rights perspective' (Speech delivered at the Aboriginal Child Sexual Assault Forum, New South Wales Parliament House, 5 December 2006).

¹⁴ Saul Flaxman, Kristy Muir, and Ioana Oprea, 'Indigenous families and children: coordination and provision of services' (Occasional Paper No 23, National Evaluation Consortium, 2009), p.23, See full outline SNAICC *"Towards Aboriginal and Torres Strait Islander access and engagement: overcoming barriers to child and family services," June 2010, pp.10-12.*

- A holistic response, including a range of programs that may be universal, secondary or tertiary.
- Building on pre-existing relationships within communities
- Awareness of social norms and encouraging involvement from all family members.
 - The promotion of services through informal environments and strengths based models, acknowledging strengths rather than deficits.
 - The existence of multiple service providers, both Aboriginal and Torres Strait Islander and mainstream services with cultural competency policies.
- Informal and flexible entry to services, whether through mobile playgroups, health clinics, child care centres or schools.
- bridging strategies, such as home visits and longer service hours.
- Partnership and collaboration between services, providing a full continuum of programs, promoting a holistic approach.
- Ensuring flexible program delivery, including recognising expertise of parents and extended family.
- Ensuring that program and parenting information was embedded with Aboriginal and Torres Strait Islander cultural and historical material, including materials in local languages and tailored to local cultures and knowledge.
- Services celebrating Aboriginal and Torres Strait Islander child rearing approaches.
- Working with existing frameworks of care, including a whole of family approach.
- Non-Aboriginal and Torres Strait Islander staff with cultural competency training.
- Use of venues where participants felt safe and comfortable.
- Limited staff turnover and continuity of staff-client relationships.
- Strong involvement of community mentors and role models, reflecting client group.
- Consistent, sustainable government policies and funding.
- Recognition that ‘effective community engagement takes time’¹⁵

These practices that strengthen services received by Aboriginal and Torres Strait children most in need have major implications for the ECD workforce. SNAICC implores the Productivity Commission to ensure that these implications are more comprehensively redressed in the ECD Workforce Report.

3. Summary of Key Recommendations

¹⁵ Noting that the four year funding period for the *Communities for Children* model was inadequate and ‘insufficient’ and did not enable ‘input by a diversity of community members [or establish] trust and community sanction,’ Saul Flaxman, Kristy Muir, and Ioana Oprea, *Indigenous families and children: coordination and provision of services* (Occasional Paper No 23, National Evaluation Consortium, 2009), p. 8.

Recommendation 1: Adopt the term *“Aboriginal and Torres Strait Islander”* children rather than *“Indigenous”* children throughout the ECD Workforce Report.

Recommendation 2: Expand and strengthen Recommendation 9.1 to recognise that developing a capacitated local workforce is the most sustainable and effective strategy for the provision of ECEC services in rural and remote areas.

Recommendation 3: Include a further recommendation in Chapter 11: *“Given current lack of comprehensive and accurate data on the Indigenous workforce or the needs of Indigenous children for ECEC services, in the context of persistent, stark Indigenous disadvantage, the Government must urgently commission Indigenous expertise to establish accessible and easy to use data collection and monitoring systems for ready use across Australia.”*

Recommendation 4: Add as a further point to Draft Recommendation 11.1: *“Prioritises funding, strategies and action for an expanded and capable Indigenous workforce.”*

Recommendation 5: Include a recommendation in Chapter 12 for funding allocation for ECEC services to engage occupation and speech therapists, two-three days per week, depending on size and circumstances of the service.

Recommendation 6: Reflect Draft Finding 14.1 in a Recommendation, such as: *“Efforts must be prioritised to ensure that accessible and flexible systems are developed and implemented Australia-wide to provide disaggregated data on:*

- (a) Aboriginal and Torres Strait Islander staff and their qualifications across all ECEC services; and*
- (b) access of Aboriginal and Torres Strait Islander children and families to ECEC services, indigenous focused and otherwise. “*

Recommendation 7: Reflect the concern expressed in Chapter 14 that *“Indigenous-focused ECEC services have poorer infrastructure and resources than mainstream services”¹⁶* in a recommendation for the allocation of separate funds for resource investment to ensure equality in infrastructure for Indigenous-focused and other services.

Recommendation 8: Include Draft Finding 14.2 as a Recommendation in the following form: *“Governments should allocate increased resources for the development of alternative community-driven models of Aboriginal and Torres Strait Islander-focused ECEC services, and the expansion of such models which have demonstrated potential for quality outcomes for Aboriginal and Torres Strait Islander children.”*

Recommendation 9: Include a recommendation in Chapter 14 as follows: *“In recognition of the importance of strengthened Aboriginal and Torres Strait*

¹⁶ ECD Workforce Report, p.268.

Islander community controlled services to meet the ECEC needs of Aboriginal and Torres Strait Islander children, governments should provide additional and multi-year funding in order for Multifunctional Aboriginal Children's Services ('MACS') and other Indigenous-focused services to be better situated to meet the enormous challenges they face and the high unmet demand for their services."

Recommendation 10: Include a recommendation in Chapter 14 for *"the Commonwealth Government to amalgamate CFCs within the MACS Charter"* and more accurately reflect the situation in relation to MACS and Children and Family Centres in Box 14.2.

Recommendation 11: Add to Draft Recommendation 14.2 *"ECEC services must meet cultural competency standards to receive National Quality Standard endorsement"* a strengthened second part to read: *"The Australian Children's Education and Care Quality Authority should, through consultation with relevant stakeholders, develop clear and effective Indigenous cultural competency guidelines for ECEC services with Indigenous children to receive this endorsement, including a clear definition of cultural competency, and specific outcome based measuring framework."*

Recommendation 12: Include an additional sub-point to Draft Recommendation 14.3 as follows: *"Allocate additional funding as a priority to attract, train and retain more Indigenous staff for Indigenous focused ECEC services. In particular funding for provision of short-term training courses in local communities and mentor oriented on-the-job training is required."*

Recommendation 13: More concretely and strongly articulate Draft Recommendation 14.8 on additional funding for Indigenous Professional Support Units to reflect the need for IPSUs to work with services intensively and over a long period in order to achieve their goals, as well as to be more coherently organised, coordinated, monitored and supported for consistency and quality in services.

Recommendation 14: SNAICC reiterates its recommendation for an addition to Recommendation 14.3 to *"Allocate additional funding as a priority to attract, train and retain more Indigenous staff for Indigenous focused ECEC services. In particular funding for provision of short-term training courses in local communities and mentor oriented on-the-job training is required."*

Recommendation 15: Strengthen Draft Recommendation 14.4 by including the following points:

- (a) "prioritise" a specific plan to build the Indigenous ECEC workforce;*
- (b) carry out detailed workforce planning to assess the workforce increase and demands that will be required to meet policy targets – based on various factors including population projections, current levels of access, population age structure etc and*
- (c) include clear targets and measurements for accountability to the goal of expanding and strengthening the Indigenous ECEC workforce."*

Recommendation 16: Include a recommendation in Chapter 14 for allocation of funding for backfill for staff from Aboriginal and Torres Strait Islander focused services to participate in trainings locally off-site to enhance benefits of learning.

Recommendation 17: Articulate Recommendation 14.5 more strongly as *“ECEC services should offer more flexible employment arrangements, such as access to additional leave, with adjusted pay arrangements for legitimate absences, to attract and retain Indigenous staff.”*

Recommendation 18: Include within Draft Recommendation 15.4 reference to cultural proficiency and the need for the Aboriginal and Torres Strait Islander workforce to reflect its clients and needs that are being serviced.

Recommendation 19: *“Processes and systems should be developed and implemented nationally to ensure meaningful community participation in the development, design and delivery of integrated ECD services. MACS provide a clear and effective model for adoption.”*

Recommendation 20: Integrated ECD services are particularly important for disadvantaged families, having shown potential to overcome some of the major barriers to service accessibility and engagement. Effectiveness of integrated services however requires close consultation with communities and responsiveness to their needs. Governments should therefore ensure that mechanisms for community control are integrated within integrated ECD services, particularly for service to Aboriginal and Torres Strait Islander services.

Recommendation 21: SNAICC considers that more explicit linkages to sections within other relevant chapters, specifically chapters 9 and 14, could strengthen this chapter. For example, there are a number of relevant recommendations (including 14.3 and 14.8) in chapter 14 that connect to the statement that *“government should adequately fund these services in areas of disadvantage to provide appropriate professional development to staff.”*

Finally, SNAICC suggests that MACS be included within the Box 15.4 on Integrated ECD services given the importance of MACS in reaching Aboriginal and Torres Strait Islander children and families.

4. General Recommendations

Recommendation 1: SNAICC strongly urges the Productivity Commission to adopt the term *“Aboriginal and Torres Strait Islander”* children rather than *“Indigenous”* children throughout the ECD Workforce Report. The term Indigenous overlooks the many different Aboriginal nations with their own defined territories, languages and customs that flourished across Australia prior to European settlement. It is a general term, not connected to any country or land, and gives rise to different possible (mis)interpretations. Aboriginal and Torres Strait Islander is the more specific and preferred reference.

5. Chapter 9: The ECEC Workforce in rural and remote areas

Recommendation 2: SNAICC suggests that the Productivity Commission expand and strengthen Recommendation 9.1 to recognise that developing a capacitated local workforce is the most sustainable and effective strategy for the provision of ECEC services in rural and remote areas.

To meet the workforce goals of the COAG ECEC Reforms, rural and remote areas will need to attract and retain more workers. Government should prioritise targeted recruitment of workers from rural and remote backgrounds, in particular locally based workers.

Significant increased funding should be invested in:

- (a) targeted recruitment of workers from rural and remote backgrounds, particularly locally to the identified need;
- (b) the delivery of training in remote and rural locations. Collaborative partnerships with local TAFEs and RTOs are showing great success (See Attached as Annexure A - Gundoo Day Care Centre Workforce Development Strategy, September 2011, which highlights local training and support provided over 10 years to enable a 24 of 25 member Aboriginal and Torrens Strait Islander staff providing high quality, holistic ECEC services);
- (c) on-site mentor based programs for on-the-job training, which recognise that the time and funding for mentoring must be reflected in funding structures of the service;
- (d) support Indigenous formulation of job profiles that build on strengths of informal carers, recognise the skills of community knowledge and relationships and carers' ability to work effectively with the community children and their ways of learning and understanding. This may include a "skilling-up" plan if necessary to complement existing skills;
- (e) Training up relief workers to provide back up where necessary and prevent burn out;
- (f) Invest in managers: management skills, experience, qualifications in early childhood are critical for developing strong services that are capable of providing necessary mentoring to staff and a positive working culture. This is vital to increase accessibility for Indigenous workers to the service as a "*preferred employer*";
- (g) Include financial provision for backfill while staff undertake training and professional development off-site at a local location to accelerate benefits of learning; and
- (h) Enforced additional start up time for staff from outside of the community to get to know the community and its ways before commencing formal ECEC employment.

6. Chapter 11: Planning the Early Childhood Education and Care Workforce

The Productivity Commission should include a recommendation in Chapter 11 on the critical need for developing accessible and easy to use data collection and monitoring systems for accurate data on the Indigenous workforce and Aboriginal and Torres Strait Islander children who attend or do not attend Indigenous targeted and mainstream services. This remains an urgent planning issue for ECEC services for Indigenous children. The following is suggested as an appropriate recommendation for inclusion in the ECD Workforce Report.

Recommendation 3: A further recommendation that provides that: *“Given current lack of comprehensive and accurate data on the Indigenous workforce or the needs of Indigenous children for ECEC services, in the context of persistent, stark Indigenous disadvantage, the Government must urgently commission Indigenous expertise to establish accessible and easy to use data collection and monitoring systems for ready use across Australia.”*

The Early Years Development Workforce strategy should include specific reference to the needs of the Indigenous workforce in order to ensure that it receives the necessary attention and priority.

Recommendation 4: Add as a further point to Draft Recommendation 11.1:

- *“Prioritises funding, strategies and action for an expanded and capable Indigenous workforce.”*

7. Chapter 12 – Child Health Workforce

Recommendation 5: SNAICC urges for funding allocation for ECEC services to engage occupation and speech therapists, two-three days per week, depending on size and circumstances of the service.

Funding through early childhood funding rather than health ensures that therapists are on the ground in the services, rather than inaccessible in hospitals.

Changes in allocation of funding between health and early childhood education and care have broadened the gap between early childhood and health services for Aboriginal and Torres Strait Islander children.

8. Chapter 14: ECD Workforce for Indigenous Children

SNAICC considers that the profile of the Aboriginal and Torres Strait Islander population included in the ECD Workforce Report is useful context for the discussion on Indigenous ECD workforce issues. The ECD Workforce Report outlines the Government commitments reflected in the Closing the Gap National Partnership Agreement on Indigenous Early Childhood Development and the National Partnership Agreement on Early Childhood Education. SNAICC suggests that the Productivity Commission’s recent data released on the progress against

indicators in Closing the Gap in Indigenous disadvantage would also be relevant here.¹⁷

The Report also refers to the \$59.4 million allocation (over 4 years) to increase staff qualification levels and staff-to-child ratios in budget based funded Indigenous-focused ECEC services. The vast majority of funds have been directed to Western Australia and the Northern Territory. While focus is needed on services in these jurisdictions, other Budget-based services cannot be forgotten on the way. In this regard, SNAICC stresses that this level of funding is utterly inadequate, over a 4-year period, to close the gap between mainstream and budget-based services.

SNAICC firmly supports the Productivity Commission's call for Indigenous-focused services to be brought into the National Quality Framework with accompanying realistic timeframes, funding and temporary exclusions in meeting requirements.¹⁸ SNAICC agrees that exclusion of Aboriginal and Torres Strait Islander-focused services will lead to further disadvantage and only widen existing developmental gaps and that *"The lack of commitment to specific qualification and staff-to-child ratio targets for Indigenous-focused services risks other future priorities taking precedence"*.¹⁹ Aboriginal and Torres Strait Islander children's access to resources and the quality of services that are widely available to other children will be further reduced by the exclusion.²⁰

Without appropriate resources, services will not be able to meet the standards however and thus priority funding and support to equip Indigenous focused services is critical.

SNAICC highlights also the importance of recognition of the unique nature of Aboriginal and Torres Strait Islander- focused services, such as MACS, in the National Quality Standards rating system. SNAICC would be happy to support the Government to draft appropriate quality assessment criteria for MACS.

SNAICC strongly supports concern the Productivity Commission expresses about limited data availability on Indigenous-focused ECEC services. SNAICC remains deeply concerned at the persistent data limitations which prevent a description of Aboriginal and Torres Strait Islander children's participation in Indigenous-focused ECEC services and the Aboriginal and Torres Strait Islander workforce in ECEC services. This is a fundamental issue requiring redress: it is a prerequisite in properly determining outstanding need for Indigenous-Focused ECEC services. The Chairman of the Productivity Commission noted recently in the Report *Overcoming Indigenous Disadvantage: Key Indicators*: *"Despite ongoing improvements in data collections, for one third of the indicators in this edition*

¹⁷ Overcoming Indigenous Disadvantage: Key Indicators, <http://www.pc.gov.au/gsp/reports/indigenous/key-indicators-2011> accessed on 30 August 2011.

¹⁸ ECD Workforce Report, pp. 259, 276-277.

¹⁹ ECD Workforce Report, pp. xxii and 278.

²⁰ Productivity Commission 2011, p. xx.

*adequate data were not available to measure changes over time.*²¹ The extent of data limitations in relation to Indigenous disadvantage needs to be fully reflected in the ECD Workforce Report.

SNAICC highlights the need for quantitative, longitudinal studies on the impact of early childhood education and care for Aboriginal and Torres Strait Islander children. Currently anecdotal evidence demonstrates fundamental shifts achieved through quality ECEC services. This requires further validation through such studies.

Recommendation 6: SNAICC supports the concern expressed on data in Draft Finding 14.1, however strongly believes that this should be reflected in a Recommendation. The following form may be appropriate: *“Efforts must be prioritised to ensure that accessible and flexible systems are developed and implemented Australia-wide to provide disaggregated data on:*

- (c) Aboriginal and Torres Strait Islander staff and their qualifications across all ECEC services; and*
- (d) access of Aboriginal and Torres Strait Islander children and families to ECEC services, indigenous focused and otherwise. “*

While SNAICC recognises the difficulties around obtaining accurate and complete data, the current level of data unavailability on Aboriginal and Torres Strait Islander disadvantage is unacceptable.

Strengthening Indigenous-focused services

As discussed in section 2 above, a fundamental ECD workforce issue is improving the access to and engagement with ECEC services by Aboriginal and Torres Strait Islander children and families. While Chapter 14 of the ECD Workforce Report recognises their under representation, SNAICC suggests that the report expand this section, including the evidence detailed in section 2 above. SNAICC also urges the Productivity Commission to include further recommendations to redress this issue, as detailed below.

Recommendation 7: The Productivity Commission recognises that *“Indigenous-focused ECEC services have poorer infrastructure and resources than mainstream services”*²² but stops short of making any finding or recommendation on this important question. SNAICC recommends that this issue be reflected in a Recommendation for the allocation of separate funds for resource investment to ensure equality in infrastructure for Indigenous-focused and other services.

Recommendation 8: SNAICC applauds the attention the Productivity Commission gives to innovative approaches to service delivery in Indigenous communities and urges the shift Draft Finding 14.2 to a Recommendation in the

²¹ Gary Banks, Chairman, Steering Committee for the Review of Government Service Provision 2011, *Overcoming Indigenous Disadvantage: Key Indicators 2011*, Commonwealth of Australia, Melbourne. Accessed 30 Aug 2011, <http://www.pc.gov.au/gsp/reports/indigenous/key-indicators-2011>, p. iii.

²² ECD Workforce Report, p.268.

following form: *“Governments should allocate increased resources for the development of alternative community-driven models of Aboriginal and Torres Strait Islander-focused ECEC services, and the expansion of such models which have demonstrated potential for quality outcomes for Aboriginal and Torres Strait Islander children.”*

The ECD Workforce Report provides general statements about the importance of community engagement for effective service delivery to Indigenous communities.²³ However there is no recommendation or finding on this critical issue.

The Multifunctioning Aboriginal Children’s Services (**‘MACS’**) model has demonstrated the greatest impact in improving early childhood outcomes for Aboriginal and Torres Strait Islander children. For example, the Productivity Commission recognises in **Draft Finding 14.3** the importance of ongoing support for Indigenous children to make the transition to formal schooling. MACS have demonstrated success in these and other more holistic services that go beyond direct support to children in the service centre (see practice example on Gundoo Day Care Centre). There is a need to explore further how MACS do and can potentially work at the community level to support the development of Aboriginal and Torres Strait Islander children, including with families who never attend child care. MACS are critical not just for increased ECEC service *delivery* to Aboriginal and Torres Strait Islander children but to support the broader cultural and development needs of these children and their families.

SNAICC again urges for greater reflection in the Report of the strong evidence-base on the importance of community controlled services for accessibility to vulnerable Aboriginal and Torres Strait Islander children and families. In addition, SNAICC strongly recommends that the Productivity Commission include a specific recommendation on the importance of strengthened Aboriginal and Torres Strait Islander community controlled services.

The Productivity Commission recognises that MACS are currently hindered significantly by lack of, and short-term, funding. SNAICC highlights the Australian National Audit Office recommendation for a transition from single-year to a multiple-year funding model, especially as most MACS continue to be operated largely by the same service providers.²⁴ This is recognised in the ECD Workforce Report (at p.281-282) and responded to in Draft Recommendation 14.3. **SNAICC supports Draft Recommendation 14.3.** SNAICC considers that this recommendation should include reference to the following:

Recommendation 9: *“In recognition of the importance of strengthened Aboriginal and Torres Strait Islander community controlled services to meet the ECEC needs of Aboriginal and Torres Strait Islander children, governments should*

²³ ECD Workforce Report, p.280.

²⁴ Australian National Audit Office 2010, *Multifunctional Aboriginal Children's Services (MACS) and Creches*, ANOA Audit Report No.8 2010-11, Commonwealth of Australia (Attorney-General's Dept), Barton, accessed 25 May 2011, <http://www.anao.gov.au/Publications/Audit-Reports/2010-2011/Multifunctional-Aboriginal-Childrens-Services-MACS-and-Creches>, p. 18.

provide additional and multi-year funding in order for MACS and other Indigenous-focused services to be better situated to meet the enormous challenges they face and the high unmet demand for their services.”

This issue is of particular concern in light of the unexplained apparent Government investment shift from MACS to Children and Family Centres (*'CFCs'*). SNAICC is extremely concerned that without clear direction for community controlled services, the potential for the enormous funding currently being invested in CFCs will not only not meet its potential for outcomes for Aboriginal and Torres Strait Islander children, but will undermine effective services currently serving our children. Key to ensuring access and engagement of vulnerable Aboriginal and Torres Strait Islander families is the provision of appropriate service choice to match identified needs, through both Aboriginal and Torres Strait Islander controlled community services and culturally competent mainstream services. SNAICC is concerned that this shift may significantly further reduce this choice.

MACS provide an effective model for the CFCs and should guide their development. In particular, CFCs must be set up in a way that is responsive to their target community needs and is accessible to this community. Given that COAG state that the National Partnership Agreement on Indigenous Early Childhood Development (*'IECD NP'*) concentrates on priority areas where the evidence shows a high level of impact can be achieved to improve the outcomes for Aboriginal and Torres Strait Islander children.²⁵ COAG also stresses that the IECD NP will contribute to the “Closing the Gap” outcome for Aboriginal and Torres Strait Islander families to have ready access to suitable and culturally inclusive early childhood and family support services (p.7). CFCs are the primary initiative introduced under the IECD NP and Outcome 5 of the National Framework for the Protection of Australia’s Children 2009 - 2020. SNAICC considers that to seriously reflect these commitments, it is imperative that CFCs are set up and operated in a way that is consistent with existing MACS, and is accessible to and supports the outstanding needs of Aboriginal and Torres Strait Islander children and families for holistic ECD services.

Recommendation 10: SNAICC considers it important that the ECD Workforce Report include a recommendation for *“the Commonwealth Government to amalgamate CFCs within the MACS Charter.”* This provides sustainability for CFCs, for which there is no guaranteed state or federal funding after the initial three year period, and grounds them in a holistic approach responsive to needs of Aboriginal children. It also reinforces the importance of Aboriginal community control for Indigenous targeted ECEC services and is the only way in the current context for governments to meet the *Service Delivery Principles for Services for Indigenous Australians* agreed to by COAG.²⁶

²⁵ Council of Australian Governments (COAG) 2008, p.4.

²⁶ Council of Australian Governments (COAG) 2008, *National Indigenous Reform Agreement (Closing the Gap)*, p.A-22.

SNAICC also urges the Productivity Commission to ensure the accuracy of the information on MACS contained in the ECD Workforce Report. We accordingly suggest that Box 14.2 be amended to reflect the following.

- (a) the reference to *“From MACS to Children and Family Centres”* is problematic and continues to undermine the position of MACS. SNAICC urges that it be removed from Box 14.2.

Funding for MACS has not been increased annually as alleged. The Australian National Audit Office found in 2010 that current budget-based funding levels have remained at much the same level despite an increase in the number of Aboriginal and Torres Strait Islander children and demand for Indigenous childcare services over the last 20 years.²⁷ The only substantive increase was a 20% increase granted in 2007. Many MACS have had to reduce the scope of services provided and currently struggling to remain open in an effort to ensure fees are affordable.

The Australian National Audit Office also detailed a number of factors which the Productivity Commission may consider including: namely,

- the significant administrative workload for both the department and service providers;
- service providers’ reduced certainty and ability to plan for the future;
- reduced flexibility to meet diverse service providers’ needs; and
- reduced ability to respond to localised needs.²⁸

The Audit concluded that this model also *“enables DEEWR to influence the activities of Indigenous child care service providers.”*²⁹

- (b) MACS are the primary community-controlled services for Aboriginal and Torres Strait Islander children and families. As discussed above, strong community controlled services are integral to effective Aboriginal and Torres Strait Islander access to and engagement with ECEC services. The ECD Workforce Report does not reflect this situation and SNAICC urges the Productivity Commission to include in its discussion evidence that supports this position.

- (c) There is no clear indication that CFCs will replace MACS. As stated, this would also be highly detrimental to reaching and achieving Government targets on Indigenous disadvantage, and a distressing set back to efforts to meet the pressing needs of Aboriginal and Torres Strait Islander children.

- (d) It is also not necessarily the case that *“CFCs will not be operated by Indigenous communities.”* There is no requirement that CFCs are community controlled, however there are a number of CFCs already

²⁷ Australian National Audit Office 2010, p. 18 & 44.

²⁸ Australian National Audit Office 2010, pp. 18, 42 & 60.

²⁹ Australian National Audit Office 2010, p. 20.

where this is the case or where Aboriginal and Torres Strait Islander communities are behind the set up of CFCs. Along this line and as previously stated, while SNAICC acknowledges that the ECD Workforce Report states that: “community engagement is recognised as integral to their [CFCs] success,” SNAICC believes that a stronger statement on real community participation is necessary.

Increasing cultural competency of the ECEC workforce

Many of the barriers of access and engagement to ECEC services by Aboriginal and Torres Strait Islander children and families concern a weakness in attuning services to the cultural needs of all its clients. The Aboriginal and Torres Strait Islander Social Justice Commissioner has observed that ‘cultural practices and social arrangements are also important determinants of the lower uptake, relative to the wider population, of mainstream services by Indigenous peoples in urban areas.’³⁰ In fact it is now established that cultural proficiency for childcare services is required to ensure supportive and culturally safe learning environments for Aboriginal and Torres Strait Islander children.³¹ A culturally safe service can potentially increase attendance or access to services: it can support and nurture the children’s cultural identities, support language development and lead to improved education, health and well being outcomes for Aboriginal and Torres Strait Islander peoples.³²

The ECD Workforce Report recognises that “*Even where quality early childhood education is offered, culturally appropriate programs for Indigenous children are required to positively affect their attendance and readiness for school.*” SNAICC supports recognition of the importance of culturally appropriate programs for accessibility to Aboriginal and Torres Strait Islander children, and believes that the Productivity Commission needs to more comprehensively articulate this issue.

Efforts are advancing in the governmental and non-governmental sector on frameworks and tools for developing cultural proficiency within ECEC services. Yet further effort is still required. SNAICC considers that this would be vastly assisted through national policy standards and frameworks, as well as support services and resources, that ensure cultural competency is not a box to be ticked but embedded in the institutions, processes and practices of all early childhood

³⁰ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Social Justice Report 2006* (2007), p35.

³¹ Cultural proficiency can be summarised through 3 core principles: Principle 1: We support, respect and incorporate cultural identities of Aboriginal and Torres Strait Islander children, including language and traditions, in ECEC delivery; Principle 2: We understand that culture is embedded in all that we do and don’t do, and acknowledge the privilege granted to the dominant culture; and Principle 3: We engage in positive, mutually supportive and equal partnerships with Aboriginal and Torres Strait Islander families, communities and organisations (see further: SNAICC (2011) *Cultural Proficiency and Early Childhood Education and Care Service Delivery, paper no.1: literature review*, and SNAICC (forthcoming) *Cultural Proficiency and Early Childhood Education and Care Service Delivery, paper no. 4: final paper*).

³² SNAICC (2011) *Cultural Proficiency and Early Childhood Education and Care Service Delivery, paper no.1: literature review*, p.2.

services catering for Indigenous children. Adequate cultural competency training must be seen as a component of cultural competency not the pathway to it.

Additional funding for substantive Aboriginal and Torres Strait Islander operated learning processes is required to ensure this happens. Support is required to ensure the skills of training providers, and structured and meaningful trainings that cover all necessary components for developing cultural proficiency. This includes:

- promoting and respecting Aboriginal and Torres Strait Islander culture and child rearing practices;
- staff training in cultural awareness;
- respecting Aboriginal and Torres Strait Islander self determination;
- working in respectful partnership with Aboriginal and Torres Strait Islander community controlled organisations – as service partners, not service competitors;
- engaging with Aboriginal and Torres Strait Islander communities and their organisations in respectful and culturally appropriate ways; and
- supporting our staff in non-Aboriginal and Torres Strait Islander specific organisations and creating culturally supportive workplaces.

SNAICC would welcome the opportunity to discuss cultural competency and cultural proficiency in more depth on this issue. SNAICC is currently working on a framework for cultural proficiency.³³

SNAICC supports strong investment in innovative training programs which are demonstrating results to upscale and outreach to other areas, for example Yorganop Association Inc. in Western Australia, which has been used by services in Queensland and elsewhere. Effective mentorship programs for management, such as Mentorships 1, Southern Cross University at Lismore, funded through DEEWR, are also recommended as a highly effective resource.

This also has implications for the definition and measurement frameworks for cultural competency, which must be far more specific and outcome-based. No service should obtain the National Quality Standard rating unless it demonstrates real cultural competency in practice.

Recommendation 11: SNAICC strongly supports Draft Recommendation 14.2 that *“ECEC services must meet cultural competency standards to receive National Quality Standard endorsement.”* SNAICC considers that the second part of this recommendation must be strengthened however to read: *“The Australian Children’s Education and Care Quality Authority should, through consultation with relevant stakeholders, develop clear and effective Indigenous cultural competency guidelines for ECEC services with Indigenous children to receive this endorsement, including a clear definition of cultural competency, and specific outcome based measuring framework.”*

³³ SNAICC (forthcoming) *Cultural Proficiency and Early Childhood Education and Care Service Delivery, paper no. 4: final paper.*

Recommendation 12: As noted above, SNAICC supports Draft Recommendation 14.3. However, SNAICC considers that this recommendation should also include the following as a sub-point, building on the clear statements in the ECD Workforce Report on the inadequacy of funding for Indigenous-focused services:

“Allocate additional funding as a priority to attract, train and retain more Indigenous staff for Indigenous focused ECEC services. In particular funding for provision of short-term training courses in local communities and mentor oriented on-the-job training is required.”³⁴

Recommendation 13: SNAICC also supports Draft Recommendation 14.8 on additional funding for Indigenous Professional Support Units (*IPSUs*), however believes that it could be more concretely and strongly articulated. In order to make sustainable improvements in program quality and service stability of Indigenous focused ECEC services and for sufficient support for Aboriginal and Torres Strait Islander staff, IPSUs must work with services intensively and over a long period.

SNAICC stakeholders have also indicated that IPSUs need to be more coherently organised, coordinated, monitored and supported for consistency and quality in services. They must further be located more locally where possible to be available to services requiring support. The lack of coordination of IPSUs, and their grossly inadequate funding, is limiting their capacity to meet the needs of ECEC services.

Increasing and strengthening the Indigenous workforce

SNAICC supports the ECD Workforce Report focus on recruiting, retaining and training of staff in Indigenous-focused services, and the overview provided of difficulties in attracting, retaining and training Aboriginal and Torres Strait Islander staff. SNAICC feels that further recommendations are essential however to reflect the Productivity Commission’s recognition that “...increased employment of Indigenous workers is a critical factor in the delivery of services for Indigenous children” and that “this is particularly important in rural communities.”³⁵ In particular, SNAICC considers that the priority of increasing and strengthening the Aboriginal and Torres Strait Islander workforce as the most effective, cost-efficient and sustainable way to meet the needs of Indigenous children, particularly in rural and remote areas, must be further articulated and enforced in clear recommendations.

The Government must invest in innovative community-based strategies to recruit and retain suitably qualified Aboriginal and Torres Strait Islander staff.

This demands additional funding for on-the-job and mentor focused training, flexible trainings for relevant qualifications conducted in remote areas and

³⁴ This issue is expanded further below on increasing and strengthening the Indigenous ECEC workforce.

³⁵ ECD Workforce Report, p.272.

flexible working arrangements. Funding for backfill to enable staff to participate in trainings is a critical component which is overlooked and which is often a prerequisite for training taking place. Local knowledge, relationships with local communities and understanding of effective learning methods for Aboriginal and Torres Strait Islander children cannot be under estimated and must be properly recognised.

Recommendation 14: SNAICC reiterates its recommendation for an addition to Recommendation 14.3 to *“Allocate additional funding as a priority to attract, train and retain more Indigenous staff for Indigenous focused ECEC services. In particular funding for provision of short-term training courses in local communities and mentor oriented on-the-job training is required.”*

Recommendation 15: SNAICC supports Draft Recommendation 14.4 and suggests that it:

- (d) *“prioritise” a specific plan to build the Indigenous ECEC workforce;*
- (e) *carry out detailed workforce planning to assess the workforce increase and demands that will be required to meet policy targets – based on various factors including population projections, current levels of access, population age structure etc and*
- (f) *include clear targets and measurements for accountability to the goal of expanding and strengthening the Indigenous ECEC workforce.”*

Recommendation 16: SNAICC urges the allocation of funding for backfill for staff from Aboriginal and Torres Strait Islander focused services to participate in trainings locally off-site to enhance benefits of learning.

SNAICC also reemphasises that workforce planning needs to operate primarily from the local level and on building the local workforce.

Recommendation 17: SNAICC supports Recommendation 14.5 however recommends that it be articulated more strongly as *“ECEC services should offer more flexible employment arrangements, such as access to additional leave, with adjusted pay arrangements for legitimate absences, to attract and retain Indigenous staff.”*

SNAICC supports Recommendations 14.6 and 14.7 on student centred design principles to design and delivery of courses for Indigenous students and priority Government funding for certificate I and II training to assist Indigenous students to prepare for study to qualify to work in ECEC settings, particularly in remote areas.

SNAICC also supports stronger incentives through payment of HECS fees and Study grants for recruiting Aboriginal and Torres Strait Islander workers.

9. Chapter 15: The Integrated ECD Services Workforce

SNAICC congratulates the Productivity Commission again on this chapter, which provides comprehensive coverage of the key issues.

SNAICC supports Draft Recommendation 15.4 and agrees that there is a need for developing a set of common core skills and knowledge for all early childhood professionals to support delivery of integrated services.

Recommendation 18: SNAICC believes that this recommendation would be strengthened by reference to cultural proficiency and the need for the Aboriginal and Torres Strait Islander workforce to reflect its clients and needs that are being serviced.

Recommendation 19: The ECD Workforce Report highlights the need for thorough community consultation (p.294), but stops short of a recommendation on this issue. SNAICC feels that it is important that this is reinforced concretely through a recommendation and suggests the following:

“Processes and systems should be developed and implemented nationally to ensure meaningful community participation in the determination, design and delivery of integrated ECD services. MACS provide a clear and effective model for adoption.”

Recommendation 20: Integrated ECD services are particularly important for disadvantaged families, having shown potential to overcome some of the major barriers to service accessibility and engagement. Effectiveness of integrated services however requires close consultation with communities and responsiveness to their needs. Governments should therefore ensure that mechanisms for community control are integrated within integrated ECD services, particularly for service to Aboriginal and Torres Strait Islander services.

Recommendation 21: SNAICC considers that more explicit linkages to sections within other relevant chapters, specifically chapters 9 and 14, could strengthen this chapter. For example, there are a number of relevant recommendations (including 14.3 and 14.8) in chapter 14 that connect to the statement that *“government should adequately fund these services in areas of disadvantage to provide appropriate professional development to staff.”*

Finally, SNAICC suggests that MACS be included within the Box 15.4 on Integrated ECD services given the importance of MACS in reaching Aboriginal and Torres Strait Islander children and families.

Thank you for the opportunity to contribute to this very important process. Please don't hesitate to contact me if you have any questions or comments, or if SNAICC can assist in any way.

Yours sincerely,

Frank Hytten
Chief Executive Officer
SNAICC