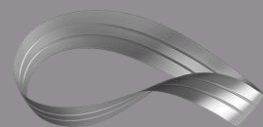

THE DRAFT EARLY YEARS STRATEGY 2024-2034

INDEPENDENT SCHOOLS AUSTRALIA
SUBMISSION

22 January 2024



INDEPENDENT
SCHOOLS
AUSTRALIA



Independent Schools Australia is the national peak body and the voice for the Independent school sector. Our membership and board are comprised of the state and territory Associations of Independent Schools. We work closely with our members to promote choice, diversity and partnership in education, and advocate for ongoing and sustainable levels of Australian Government support through effective policy and fair funding.

Through these Associations, ISA represents more than 1,209 schools and 688,638 students, accounting for 17 per cent of Australian school enrolments and a workforce of 115,090 people.

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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1. EXECUTIVE SUMMARY

The Draft Early Years Strategy 2024-2034 (the Strategy) provides an opportunity for stakeholders to work together to develop a national policy roadmap that aims to achieve the Vision, that *All children in Australia thrive in their early years. They reach their full potential, nurtured by empowered and connected families, who in turn are supported by strong communities.*

All families deserve equitable access to affordable quality early childhood education and care and allied health services. This includes Aboriginal and Torres Strait Islander children, children from regional and remote areas and children with disability. It is important that a national strategy encompasses the social determinants of health and wellbeing to allow young children to thrive and grow in ways that meet their individual needs.

Independent Schools Australia (ISA) supports the Australian Government's commitment to break down service silos in the early years and encourage stakeholder collaboration, development of stronger strategic relationships, and a holistic approach to supporting young children and their families.

As ISA suggested in our response to the Early Years Strategy Discussion Paper in May 2023, the following key policy priorities will create healthy foundations for all Australian children:

- a child-centred approach to policy decision-making
- a coordinated interagency approach to support young children from birth to five years
- equitable opportunities and access to quality early childhood education and care services, especially in regional and remote areas
- address workforce issues including the shortage of qualified staff and staff retention strategies, especially in regional and remote areas
- targeted support for vulnerable and disadvantaged communities
- culturally responsive strategies
- focus on health and wellbeing with access to early intervention for young children
- sharing of data as appropriate to inform strategy and improve outcomes.

Early childhood education and care services, including those in the Independent school sector, operate in a complex environment. Strategies to reduce this complexity and provide greater clarity to stakeholders is welcomed and it is pleasing to see the Strategy aims to address the above priorities and provide increased transparency and collaboration between services, government agencies and communities.

Realisation of each Priority Focus Area and improved integrated service provision models will be dependent upon collaboration with the early childhood education and care sector, within an effective model of holistic, integrated service delivery. ISA welcomes formal recognition and support of these relationships.

2. RECOMMENDATIONS

ISA makes the following recommendations in response to the Strategy:

2.1 That a sixth Priority Focus Area: *Grow, strengthen and maintain the early childhood education and care workforce* be included in the Strategy.

2.2 That the Strategy provides a clear overview of the purpose and form of the proposed Outcomes Framework. The overview could include a visual representation of key relationships between early childhood services, agencies and policy.

2.3 That Action Plans are developed in consultation with the early childhood education and care sector and other key stakeholders. ISA strongly recommends that Action Plans articulate a clear approach to ensure consistency and accessibility of agency supports and the important role of early childhood education and care services within an integrated approach.

2.4 That existing policies, programs, frameworks and agency supports are identified and mapped to show integrated relationships between the Australian Government and states and territories to provide greater understanding for all stakeholders. These relationships should be clearly recognised in the Strategy and Action Plans to realise the Vision.

2.5 That Priority Focus Area 2.3 provides greater detail to support equity and inclusion, in particular to be more specific about:

- inclusion and support for children with disability
- equity for regional and remote, disadvantaged, and Aboriginal and Torres Strait Islander children and their families.

2.6 That a national equitable model of funding be developed for all early childhood education and care services to equitably support the inclusion of children with disability, including the provision of reasonable adjustments required under the Disability Standards for Education 2005.

2.7 That there is cross-sectoral representation of the early childhood education and care sector on the Steering Committee's expert advisory body.

ISA anticipates ongoing collaboration with the Australian Government to provide further input into the Strategy and Action Plans.

3. ABOUT ISA

ISA is the national peak body representing the Independent school sector. It includes the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISA represents more than 1,200 schools and 690,000 students, accounting for 17 per cent of Australian school enrolments.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the Independent school sector on national issues.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. Many Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community.

Independent schools include:

- Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Quaker and Seventh Day Adventist schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Aboriginal and Torres Strait Islander community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other factors.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran schools. Systemic schools account for 20 per cent of schools in the Independent school sector. Four out of five schools in the sector are autonomous non-systemic schools.

4. INTRODUCTION

ISA prepared this submission in response to the Australian Government's Draft Early Years Strategy 2024-2034. ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

ISA welcomes the opportunity to contribute to the development of the Strategy to help shape the future of early childhood education and care in Australia.

Independent schools develop positive relationships with their families and communities and provide high-quality, affordable early childhood education and care for young children.

Early childhood education and care services in the Independent school sector include children from babies to school age. The Strategy's aim to support children in their first 1000 days and adopt a child-centred approach to support these early years is welcomed by the Independent school sector.

The majority of Independent school early childhood providers operate early learning services for three- to five-year-olds. Most Independent schools that offer early childhood services provide a preschool program for one or two years before formal schooling. Some Independent schools operate both Long Day Care (LDC) and sessional kindergarten/preschool and may have Outside School Hours Care (OSHC) available for both preschool and school-aged children.

Based on AIS 2022 data, ISA estimates that two-thirds of Independent schools provide early childhood services, which equates to approximately 790 schools.

Australian Bureau of Statistics data shows that in 2022, there were 8,251 four- and five-year-olds enrolled at Independent schools. This represents approximately seven per cent of the total number of preschool enrolments across all sectors and states and territories and almost eleven per cent of the total number of preschool enrolments in the non-government sector.

5. VISION

The Vision reflects the nature of young children being life-long learners to reach their full potential. The significant role of early childhood education and care in collaboration with families and other services is essential to develop the important physical, cognitive, and social-emotional skills that provide children with a sense of identity and belonging.

The Strategy aims to provide a strong foundation for all young children. ISA supports the Strategy's vision that *All children in Australia thrive in their early years. They reach their full potential, nurtured by empowered and connected families, who in turn are supported by strong communities.*

It is vital that all children have equitable opportunities to access and participate in early years education and care. ISA agrees that it is important to develop national policies that support every child's health, education and wellbeing so they can reach their full potential.

6. STRATEGY OVERVIEW

Child wellbeing and development occurs in interconnected, complex ecologies.¹ There are many factors that contribute to healthy development and an ability to thrive, such as a sense of belonging and identity, sense of safety, nurturing environments, equitable access to education and health services and caring, well-resourced communities.

To achieve the above, ISA supports the Strategy's recognition of the critical need for integrated quality early childhood service provision and community support.

Early childhood education and care services create a community outside the immediate family unit for those with young children. The Independent school sector supports the holistic approach of the Strategy, noting that early childhood education and care services engage as much as possible with available external services to access wrap-around support to meet the identified needs of their communities, families and children.

Concerningly, the Mitchell Institute's 2015 report demonstrates that the achievement gap between advantaged and disadvantaged students is widening.² Identified barriers to the participation of "at risk" families in early childhood education and care include language and cultural barriers (especially for refugee families),³ cost,⁴ access, transport and service hours that do not reflect the needs of families.⁵

Children in disadvantaged areas have a higher need for support yet are less able to access them. The presence of risk factors is associated with lower rates of participation in early childhood education and

¹ Bronfenbrenner, U., & Morris, P. A. (2006). *The Bioecological Model of Human Development*. In R. M. Lerner & W. Damon (Eds.), *Handbook of child psychology: Theoretical models of human development* (pp. 793–828). John Wiley & Sons, Inc.

² Lamb, S., Jackson, J., Walstab, A., & Huo, S. (2015). *Educational opportunity in Australia 2015: Who succeeds and who misses out*. Retrieved from <https://vuir.vu.edu.au/30829/1/Educational-opportunity-in-Australia-2015-Who-succeeds-and-who-misses-out-19Nov15.pdf>

³ New, R., Guilfoyle, A., & Harman, B. (2015). Children's school readiness: The experiences of African refugee women in a supported playgroup. *Australasian Journal of Early Childhood*, 40(1), 55-62.

⁴ Skattebol, J. (2016). Taking advantage of early childhood education and care: The priorities of low-income families in their children's early years. *Families, relationships and societies*, 5(1), 109-125.

⁵ Jackiewicz, S., Saggars, S., & Frances, K. (2011). Equity of Access: Requirements of Indigenous Families and Communities to Ensure Equitable Access to Government-Approved Childcare Settings in Australia. *Australasian Journal of Early Childhood*, 36(3), 100-108.

care⁶ and quality preschool programs.⁷ Supports are most beneficial when provided during the early years' developmental 'window of opportunity',⁸ and where strong relationships with non-parent caregivers contribute significantly to a child's development.⁹

The Productivity Commission's recent draft report¹⁰ acknowledges barriers to accessing early childhood education and care services. These may include complex funding streams, increased costs to operate services, workforce shortage, increased demand, limited availability of places and lack of support or allied health services for students with disability or additional needs.

ISA acknowledges that there are significant challenges to increasing both the early childhood education and care workforce and access to early learning services, particularly in regional and remote communities. With some states and territories planning to increase access and hours for young children to attend preschool, retention of the current workforce and plans to increase the number of early childhood educators is a national priority.

As equitable access to early education and care, intergenerational social mobility, and quality outcomes for children are dependent upon a stable, qualified and skilled early childhood workforce,¹¹ a Strategy that furthers the growth, development and professionalisation of the early childhood workforce would be welcomed by the Independent school sector.

7. GUIDING PRINCIPLES

ISA values ongoing consultation and collaboration with the Australian Government, the early childhood sector and key stakeholders in developing the Draft Early Years Strategy 2024-2034 and associated policy development.

Independent schools support co-design with educators, communities, children, and families to create successful strategies that meet the needs of stakeholders and builds positive partnerships.

ISA supports the five Guiding Principles that will shape activity under the Priority Focus Areas:

- Child and family-centred
- Strengths-based
- Respect for families and the community
- Equitable, inclusive, and respectful of diversity

⁶ Gilley, T., Tayler, C., Niklas, F., & Cloney, D. (2015). Too late and not enough or some children: early childhood education and care (ECEC) program usage patterns in the years before school in Australia. *International Journal of Child Care and Education Policy*, 9(1).

⁷ Biddle, N., Crawford, H., & Seth-Purdie, R. (2017). Risk burden, participation in early childhood education and care, and child outcomes. *Australasian Journal of Early Childhood*, 42(1), 49-59.

⁸ Moore, T.G., Arefadib, N., Deery, A., & West, S. (2017). *The First Thousand Days: An Evidence Paper, 2017*. Parkville, Victoria: Centre for Community Child Health, Murdoch Children's Research Institute. Retrieved from <https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/CCCH-The-First-Thousand-Days-An-Evidence-Paper-September-2017.pdf>

⁹ National Scientific Council on the Developing Child (2004). *Young children develop in an environment of relationships*. Retrieved from <https://developingchild.harvard.edu/resources/wp1/>

¹⁰ Australian Government Productivity Commission (2023). *A path to universal early childhood education and care: Draft report*. Retrieved from <https://www.pc.gov.au/inquiries/current/childhood/draft>

¹¹ National Children's Education and Care Workforce Strategy (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>

- Evidence-informed

ISA acknowledges the Strategy's stated commitment to activities required to realise these principles and ensure accessible, collaborative, and integrated service provision, including:

- commitment to equity and inclusion
- building and improving an improved national evidence base to support development and implementation of supports and services
- ensuring culturally safe and appropriate supports and services.

Due to the essential nature of a robust early childhood workforce to support the Vision, ISA recommends that this area is made explicit as a sixth Priority Focus Area to grow, strengthen and maintain the early childhood education and care workforce. This would align with the National Children's Education and Care Workforce Strategy.¹²

8. OUTCOMES

Children have the right to the best start in life and a healthy and safe childhood that supports them to be life-long learners. ISA supports the reduction of systemic and multi-generational disadvantage through a multi-tiered, collaborative approach to improving outcomes for children, where relationships between all elements impacting child development and wellbeing are considered. ISA recognises the interconnectedness and complexity of multiple contexts, environments, and systems in ensuring child wellbeing and development.

When the material basics are available to children and families, and communities are connected and supported, children can thrive. Early childhood education and care services are integral and often primary connection points for families and communities. Investment in early childhood education and care builds strong, welcoming, and inclusive communities that support young to learn, grow, play, and connect.

Early childhood education and care services provide key non-familial relationships and support access to other economic, social and health services where possible. Approaches and resources related to family- and community-focused outcomes should take into account the important relationship and role of early childhood education and care services to attain these outcomes.

ISA provides feedback on the following five outcomes:

8.1 Children are nurtured and safe

The Independent school sector agrees that child safety and protection strategies are critical outcomes to include in the Strategy, linked to the National Child Safety Principles that promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.¹³

¹² National Children's Education and Care Workforce Strategy. Retrieved from <https://www.education.gov.au/early-childhood/early-childhood-workforce/national-childrens-education-and-care-workforce-strategy>

¹³ Australian Human Rights Commission (2008). *National Principles for Child Safe Organisations*. Retrieved from https://childsafef.humanrights.gov.au/sites/default/files/2019-02/National_Principles_for_Child_Safe_Organisations2019.pdf. p.6

Adverse events, prevalence of risk factors and limited protective factors can affect child development.¹⁴ As stated in the Strategy, 'stacking the scales' with protective factors will drive positive outcomes for children. ISA supports the recognition of the importance of contextualised approaches which provide additional protective and cultural factors and reduce risk for young children and their families.

Children thrive when they have a strong connection to their own culture. The Strategy's focus on the importance of respect and understanding for Aboriginal and Torres Strait Islander children and their families and the need for children from culturally and linguistically diverse backgrounds to remain connected to their own culture is valued as this respects diversity of communities and their families.

Acknowledging diversity in the strategy is critical and ISA supports the references to respect for biological mothers and fathers, adoptive and LGBTIQ+ parents, kinship and other carers, and extended family members so that all these groups feel heard and supported.

8.2 Children are socially, emotionally and physically healthy

ISA supports outcomes that provide healthy physical, social emotional and cognitive development and a sense of identity and belonging for young children to equip them with a foundation for health, mental health and wellbeing, educational attainment, employment, and positive relationships.

Participation in high-quality early childhood programs provides an opportunity for early intervention and screening to identify early support requirements.¹⁵ Early intervention and access to targeted support are vital for children and their families and are particularly important for vulnerable children and children with disability.

8.3 Children are learning

ISA supports increased opportunities for young children to enrol in preschool. Quality early childhood education and care provides children with important developmental opportunities and prepares them for future learning. Research shows that children who arrive at school 'ready' are more likely to do well in future years.¹⁶

The 2016 Mitchell Institute report, *Preschool - Two years are better than one*¹⁷ strongly advocates that two years of preschool has more impact than one, especially for the children most likely to be developmentally vulnerable. They argue for a national commitment for all 3- and 4-year-olds to have access to two years of quality early childhood education to develop the necessary foundational skills before entering school. The Independent school sector has many early childhood education and care

¹⁴ Higgins, D., & Dean, A. (2020). *A population approach to early intervention and prevention: Ensuring all children get the best start in life*. Australian Institute of Family Studies. Retrieved from <https://aifs.gov.au/resources/short-articles/ensuring-all-children-get-best-start-life>

¹⁵ Harrison, L., Goldfeld, S., Metcalfe, E., & Moore, T. (2012). *Early learning programs that promote children's developmental and educational outcomes*. Australian Institute of Family Studies. Retrieved from <https://www.aihw.gov.au/getmedia/86b877c6-6b06-49b5-8078-f02b98310276/ctgc-rs15.pdf.aspx?inline=true>

¹⁶ Australian Institute of Health and Welfare (2022). *Australia's Children, Early Childhood Education and Care*. Retrieved from <https://www.aihw.gov.au/reports/children-youth/australiaschildren/contents/education/early-childhood-education-and-care>.

¹⁷ Fox, S., & Geddes, M. (2016). *Preschool – Two years are better than one: Developing a preschool program for Australian 3 year olds – evidence, policy and implementation*. Mitchell Institute Policy Paper No. 03/2016. Melbourne, Victoria: Mitchell Institute

services that offer two years of preschool and see the value and benefits this provides. for young children to be school-ready.

Language and literature rich environments are essential for young children's learning.^{18,19} A national early language strategy as proposed by the National Early Language and Literacy Coalition (NELLC)²⁰ to establish a coordinated national approach to enhancing infants' and children's early language and literacy learning and development before they start school could prioritise education in first language development, particularly for Aboriginal and Torres Strait Islander children.

Many regional and remote communities have limited access to early childhood education and care services therefore it is imperative that the needs of these communities are made explicit in the Priority Focus Areas, Outcomes and Action Plans.²¹

8.4 Children have strong identities and connections to culture

ISA agrees that all children should have opportunities to grow up in environments where they experience connection to culture, language and beliefs so they can form strong identities.

Strategies that further support Aboriginal and Torres Strait Islander communities, acknowledging the impact of intergenerational trauma and the importance of working in close partnership with Aboriginal and Torres Strait Islander families and early childhood staff in services and agencies are critical.

ISA agrees that the Strategy should:

- address issues impacting Aboriginal and Torres Strait Islander communities and family disadvantage
- build greater cultural safety for Aboriginal and Torres Strait Islander families, children and staff
- foster positive relationships between families and services
- improve attendance rates and early childhood education and care access for Aboriginal and Torres Strait Islander children
- develop culturally sensitive approaches that aim to Close the Gap.²²

8.5 Children have the opportunity to play and imagine

Young children have a right to learn about their world through explorative and imaginative play, rich language opportunities and positive social interaction. The intentional play-based approach of the Early Years Learning Framework²³ enables concepts and learning to be embedded and explored in a developmentally supportive manner, avoiding the implementation of approaches designed for primary education settings.

¹⁸ Australian Government (2014). *The Forrest Review: Creating Parity*. Retrieved from <https://www.pmc.gov.au/sites/default/files/publications/Forrest-Review.pdf>

¹⁹ The National Early Language & Literacy Coalition (2018). *Getting Early Language and Literacy Right — policy brief*. Retrieved from https://earlylanguageandliteracy.org.au/wp-content/uploads/2020/10/Getting-Early-Language-and-Literacy-Right_policy-brief2018.pdf

²⁰ The National Early Language and Literacy Coalition. Retrieved from <https://earlylanguageandliteracy.org.au>

²¹ Baxter, J. & Hand, K. (2013). *Access to early childhood education in Australia*. Retrieved from <https://aifs.gov.au/research/research-reports/access-early-childhood-education-australia>

²² Closing the Gap. Retrieved from <https://www.closingthegap.gov.au>

²³ The Early Years Learning Framework. Retrieved from [The Early Years Learning Framework - Department of Education, Australian Government](https://www.education.gov.au/early-years-learning-framework)

ISA welcomes the Strategy's approach to protecting childhood by recognising the right of children to learn through play, to imagine and to express themselves creatively. It is important to ensure that early childhood education and care remains developmentally appropriate and protects childhood, especially in the early formative years.

ISA looks forward to further collaboration to provide input into strategies to achieve the above outcomes.

9. PRIORITY FOCUS AREAS

9.1 Priority Focus Area 1 - Value the early years

9.1.1 Raise awareness about why early childhood matters

ISA supports the Strategy's strong focus on building a shared community understanding of the critical importance of the early years in terms of child development and wellbeing. Children thrive when individuals, families, communities, and services around them experience collective efficacy, and as a result are equipped and empowered to play a positive, informed and enabled role in their lives.²⁴

9.1.2 Embed the voices of children and their families

The Independent school sector supports the Strategy's approach to active consultation with children and families. In response to the National Quality Framework, Independent schools plan and deliver child-centred educational programs responsive to each child's current knowledge, strengths, ideas, culture, abilities and interests.²⁵ Independent schools serve diverse communities and as such, it is pleasing to see the Strategy recognise and support the importance of a contextualised, intentional approach.

9.2 Priority Focus Area 2 - Empower Parents and Caregivers

9.2.1 Empower parents, families and caregivers with skills, resources and capabilities

The Independent school sector values strong family partnerships and as much as possible, supports families and carers to access the services they need, and manage complex financial, agency, and consultative processes and systems.

9.2.2 Support parents to connect with other parents and the local community

Responsive, culturally safe and inclusive services are dependent upon sustainable staffing models and services working together with parents and caregivers to provide them with the resources and knowledge they need to support healthy child development. Many Independent early childhood education and care services provide opportunities for parent education and support, collaboration between home and service, and social community-building opportunities. Often, the early childhood service becomes a community hub where parents can meet and find new connections.

²⁴ L'Hôte, E., Hawkins, N., Kendall-Taylor, N. & Volmert, A. (2020). *The core story of early childhood development in Australia: Supplement on research methods and evidence*. Retrieved from <https://www.frameworksinstitute.org/wp-content/uploads/2020/08/CoLab-Research-Supplement.pdf>

²⁵ National Quality Framework (2022). Retrieved from <https://www.acecqa.gov.au/national-quality-framework/guide-nqf/section-3-national-quality-standard-and-assessment-and-rating/quality-area-1-educational-program-and-practice>

9.2.3 Make supports and services responsive and inclusive to children and their parents

Children with disability have the right to receive the same opportunities as children without disability. Early childhood education and care services within the Independent school sector provide significant administrative, communication and planning supports, in addition to adjustments required to support the access of children with disability. Younger children are less likely to have received a diagnosis or have accessed early intervention therefore there can be complexity for early childhood education and care services to work with families and external agencies to identify and meet the needs of children in the early years.

While school funding models fund adjustments for students with disability through the Nationally Consistent Collection of Data and take measures of disadvantage into account and fund accordingly, the early years do not benefit from such direct or consistent funding models. Whilst all additional support is welcomed, the Inclusion Support Program (ISP), available for Child Care Subsidy (CCS) approved services that provide Centre-Based Daycare, Family Daycare or Outside School Hours Care does not directly support the funding of adjustments and can be limited in scope.

A national commitment to ongoing models of funding and resourcing enabling early childhood education and care services to provide adjustments for children who require them to participate on the same basis as their peers is essential. Access to funding for the inclusion of children with disability requires additional administrative and practice-based activity in addition to the identification and provision of reasonable adjustments. ISA strongly recommends that an equitable model of funding be developed to equitably support the inclusion of children with disability in early childhood education and care services, including the provision of reasonable adjustments required under the Disability Standards for Education 2005.

9.2.4 Chart the course towards universal access to Early Childhood Education and Care

Current models of funding for early years education and care vary widely across jurisdictions and the type of service, resulting in inconsistent support services and funding.

Children from disadvantaged backgrounds are the most developmentally vulnerable and experience barriers to accessing early education and care and support services.²⁶ ISA supports approaches enabling greater access and participation of all children, especially those experiencing vulnerability and disadvantage and located in areas with less access to services, such as regional and remote areas.

To achieve equitable access to inclusive early childhood education and care services, including universal access for 3-year-old children further strategic planning, resourcing and commitment to addressing early childhood workforce challenges such as retention, sustainability and growth will need to be put in place.

9.3 Priority Focus Area 3 Support and work with communities

9.3.1 Place-based approaches

The Independent school sector recognises the need to respond to community contexts, and welcomes locally flexible and responsive systems, resources and supports. ISA looks forward to further consultation and details regarding:

²⁶ Baxter, J. & Hand, K. (2013). *Access to early childhood education in Australia*. Retrieved from <https://aifs.gov.au/research/research-reports/access-early-childhood-education-australia>

- locally led, evidence-informed mechanisms supporting place-based approaches and governance solutions
- responses to disparity between metropolitan and remote or regional outcomes and service provision
- sustainable funding models, including funding to support key outcomes.

Place-based approaches require a qualified and responsive early childhood education workforce, particularly in relation to addressing disadvantage in regional and remote areas.

9.3.2 Shared decision-making

Early childhood education and care services in the Independent school sector respond to the learning and developmental needs of young children through culturally inclusive approaches, recognising the individual needs of their community members and valuing collaboration with parents and caregivers as partners.

ISA supports a shared decision-making focus to improve services through co-design and user-led design for more effective design and delivery of policies, programs and equitable services.

9.4 Strengthen accountability and coordination

9.4.1 Integration, collaboration and coordination

The Independent school sector welcomes efforts to ensure a seamless approach to accessing Australian Government funded early childhood education and health services, including universally accessible preschool programs and the Child Care Subsidy. ISA agrees that efforts to improve integration, collaboration and coordination are essential to ensure clarity and transparency among agencies and services and clear understanding from communities so they can access essential services.

9.4.2 Data, research, evaluation

The Independent school sector supports a well-resourced, non-comparative, evidence-informed Outcomes Framework reflecting the integrated, complex and diverse nature of the early years education and care sector and allied services. Measurement tools should empower early childhood services to proactively plan for and monitor the achievement of related outcomes through contextual, culturally relevant, site-based approaches. Measurement tools must be evidence-informed and provide feedback to Australian Government agencies regarding outcomes achieved, whilst being mindful of any additional workload impact on staff and services.

To provide greater clarity in a complex sector, a visual representation of relationships between the various programs and measures such as the proposed Outcomes Framework, Preschool Attendance Measure, Preschool Reform Agreement, Preschool Outcomes Measure, Learning Progressions, Preschool Reform Agreement and the National Quality Framework would be of great benefit.

As the Productivity Commission Inquiry, '*A Path to Universal Early Childhood Education and Care*²⁷ is currently underway, aligning the Strategy to recommendations from the final report may influence Action Plan development for greater consistency of national policy and programs.

²⁷ Productivity Commission Inquiry. Retrieved from [Early childhood education and care - Public inquiry - Productivity Commission \(pc.gov.au\)](https://www.pc.gov.au/inquiries/reports/early-childhood-education-and-care)

10. CONCLUSION

Research has clearly established the first five years of life as critical for building the foundations of brain development, life-long learning, wellbeing and health.²⁸ It is also clear that participation in high quality early childhood education and care builds strong foundations for learning and has a positive influence on the development of independence, life skills, a sense of belonging and school readiness.

Providers of early childhood education and care operate in a complex sector where arrangements differ according to jurisdictions, sector and types of early childhood service. National investment in early learning is an ongoing priority for the Australian Government and state and territory governments and is essential if the Strategy's Vision Is to be realised.

ISA welcomes an overarching national early years strategy that clearly outlines the principles, strategies and targeted actions, which combined with interagency collaboration and stakeholder consultation, will improve outcomes for all young children and their families.

ISA looks forward to ongoing consultation and collaboration in the development and delivery of the Action Plans, to identify the needs and strengths of early childhood education and care services in the Independent school sector, and to contributing to realise the Strategy's vision.

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²⁸ Carter-Smith, G. (2020). *Why Early Childhood Education Is Important to You*. Retrieved from <https://education.unimelb.edu.au/news-and-events/news/2020/teaching/why-early-childhood-education-is-important-to-you>