



# PARLIAMENTARY INQUIRY INTO THE THRIVING KIDS INITIATIVE

House Standing Committee on Health, Aged Care and Disability

October 2025

## Contents

Acknowledgement .....	3
About SNAICC.....	3
Executive Summary.....	5
Recommendations.....	6
A note on language .....	8
Strategic Context .....	9
Self-determination.....	9
Human rights foundations.....	9
The unique rights of Aboriginal and Torres Strait Islander children .....	10
National Agreement on Closing the Gap.....	11
Development and implementation of the Thriving Kids Initiative in partnership with Aboriginal and Torres Strait Islander people .....	13
Development and implementation of the Thriving Kids Initiative must be undertaken with shared decision-making and in formal partnership with Aboriginal and Torres Strait Islander people and organisations.....	13
The Thriving Kids Initiative must be developed to deliver appropriate and holistic developmental supports in natural settings .....	15
The Thriving Kids Initiative must prioritise and share decision-making power with ACCOs.....	17
Design of the Thriving Kids Initiative must redress existing failures of the NDIS .....	23
The Thriving Kids Initiative must come with dedicated and sufficient funding to build and develop local Aboriginal and Torres Strait Islander early years workforces.....	24
A central objective of the Thriving Kids Initiative must be cultural safety in program design and delivery.....	26
Implementation of the Thriving Kids Initiative must uphold Indigenous Data Sovereignty .....	28

## Acknowledgement

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

## About SNAICC

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

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

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

As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences,



needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations.

## Executive Summary

SNAICC welcomes the Thriving Kids Initiative, a new program designed to provide children with mild to moderate developmental delay or autism robust supports needed to thrive, and the opportunity presented by this dedicated approach to supporting Aboriginal and Torres Strait Islander children at risk of developmental delay or disability. In its design, development and implementation, the Australian government and state and territory government partners have the opportunity to develop a system of essential supports with children at its centre. SNAICC welcomes the opportunity to participate in this consultation process, and for further opportunities to engage with all governments on how the Thriving Kids Initiative can best support our children.

Aboriginal and Torres Strait Islander children stand to benefit disproportionately from the Thriving Kids Initiative

Among Aboriginal and Torres Strait Islander children we see disproportionately high rates of developmental vulnerability and disability. Despite this, Aboriginal and Torres Strait Islander children and their families regularly miss out on the service systems put in place to support early assessments, identification and delivery of developmental supports for children who need them. There are persistent service gaps and barriers to access in ECEC, which mirror those in the disability services, allied health and early childhood intervention ‘markets.’ Even when services are available, they are often not culturally safe for Aboriginal and Torres Strait Islander children and families. The development of the Thriving Kids Initiative presents a significant opportunity to redress these inequities and systemic failures, by developing new pathways and service experiences and remedy current service gaps and inequities. SNAICC urges the Australian government to fully grasp this opportunity.

The development and implementation of the Thriving Kids Initiative must be developed in partnership with Aboriginal and Torres Strait Islander people

Aboriginal and Torres Strait Islander people have been raising our young ones developmentally, educationally and culturally strong for millennia. We are experts in what our children, people and communities need, and governments acknowledged this when they committed to the National Agreement on Closing the Gap (National Agreement). For the Initiative to best work for Aboriginal and Torres Strait Islander children and families, governments across all levels must uphold their commitments under the National Agreement to working in partnership and engaging in shared decision-making with Aboriginal and Torres Strait Islander people and their representative organisations.

The Thriving Kids Initiative must build on the strengths of the ACCO integrated early years sector

Aboriginal and Torres Strait Islander community-controlled (ACCO) integrated early childhood services provide crucial community-based, trusted, culturally appropriate, integrated services in ECEC settings. They really do set the gold standard in early childhood service delivery. With unique cultural and community knowledge, ACCOs must be supported to extend their service delivery to include the

Thriving Kids Initiative, and prioritised in its commissioning programs. This means ensuring ACCOs are provided with appropriate and sustained funding to provide these services. It also means government funding to establish new ACCO integrated early years services in communities with service gaps in ECEC, early childhood intervention services and disability support services. Finally, long-standing workforce issues must be addressed through bespoke capacity building and upskilling, prioritising ACCO-led and Aboriginal and Torres Strait Islander student-centred approaches.

The Thriving Kids Initiative must articulate and implement cultural safety for Aboriginal and Torres Strait Islander children as a central objective

Cultural safety is essential for Aboriginal and Torres Strait Islander families and children to effectively use systems and services intended to support their development, health, wellbeing and safety.

Culturally safe systems are experienced by Aboriginal and Torres Strait Islander people when they encounter a system in which Aboriginal and Torres Strait Islander identities and cultures are normative, positively recognised and celebrated. Unfortunately, the experience of cultural unsafety is acute for Aboriginal and Torres Strait Islander people with a disability. Cultural safety should be a central pillar in the design, development and implementation of Thriving Kids for Aboriginal and Torres Strait Islander people. This must be coupled with specific actions to improve cultural safety in mainstream services along with clear, meaningful and measurable indicators of cultural safety, including fully adopting, embedding and resourcing the new [Best Practice Framework in Early Childhood Intervention](#).

Data collected as part of the Initiative must align with Indigenous Data Sovereignty principles

The Thriving Kids Initiative holds promise to improve and develop our collective understanding of the drivers of developmental vulnerability and delay, and what can be done to support those children. However, data collected by programs under the Thriving Kids Initiative must align with IDS principles, giving Aboriginal and Torres Strait Islander people ownership over data so they can exercise sovereignty in relation to data creation, collection, access, analysis, interpretation, stewardship, dissemination, reuse and infrastructure. Any data collection and use must be designed with Aboriginal and Torres Strait Islander communities to be accessible, relevant and detailed to develop actionable insights.

Below we articulate a set of recommendations progressing existing priorities, gaps and opportunities that together, will create a Thriving Kids Initiative that will effectively meet the needs of Aboriginal and Torres Strait Islander children with mild and moderate development delays or autism, and their families.

## Recommendations

1. The design, development and implementation of the Thriving Kids Initiative is undertaken with shared decision-making and in formal partnership between Commonwealth, state and territory governments and Aboriginal and Torres Strait Islander people and their representative peak

- organisations, including but not limited to the First Peoples Disability Network, the National Aboriginal Community Controlled Health Organisation, SNAICC and the Coalition of Aboriginal and Torres Strait Islander Peak Bodies.
2. Commonwealth, state and territory governments integrate the Thriving Kids Initiative into integrated early years service settings through place-based and locally specific approaches, in order to provide natural and holistic settings for developmental supports in children's early years.
  3. The Thriving Kids Initiative is designed, developed and implemented such that no Aboriginal and Torres Strait Islander family is without free, high quality and culturally safe early childhood developmental support services, regardless of the remoteness of where they live, their income level or any other socioeconomic determinant or factor. To achieve this vision:
    - a. all Australian governments must prioritise early years ACCOs as providers of first choice for programs under the Thriving Kids Initiative for Aboriginal and Torres Strait Islander people.
    - b. all governments must commit to developing and fully implementing a dedicated supply-side, needs-based, reliable and sustainable funding model for early years ACCOs, drawing on the foundational work completed through the Early Childhood Care and Development Policy Partnership (ECCDPP).
    - c. all Australian governments must commit to providing funding to establish ACCO integrated early years services capable of delivering the Thriving Kids Initiative in communities without ACCO services.
  4. The Thriving Kids initiative is designed and implemented such that families currently accessing the NDIS can transition seamlessly to programs under the Thriving Kids Initiative to ensure that no child is left without the crucial supports they need.
  5. Commonwealth, state and territory governments provide dedicated and sufficient funding to build and develop local Aboriginal and Torres Strait Islander early years workforces to deliver programs under the Thriving Kids Initiative in their communities.
  6. In the design, development and implementation of the Thriving Kids initiative, Commonwealth, state and territory governments:
    - a. fully adopt and embed the National Best Practice Framework for Early Childhood Intervention.
    - b. fully adopt, embed and implement in all policy, systems, institutions and workforces the forthcoming recommended practice framework for supporting children with disability and developmental vulnerability.
    - c. centre Aboriginal and Torres Strait Islander ways of knowing, being and doing, their unique conceptions of disability, and their child rearing practices.
    - d. fully embed culturally safe service provision as a primary objective of the Thriving Kids Initiative.

- e. where available, utilise culturally appropriate diagnostic tools like the ASQ-TRAK.
  - f. commit to developing culturally appropriate material supporting children and families that have children with mild and moderate developmental delays, developed through a truly co-designed approach with Aboriginal and Torres Strait Islander people, communities and representative organisations.
  - g. provide sufficient funding for improvements in the cultural capability of all participating institutions, practices, systems and workforce of the Thriving Kids Initiative.
7. Data collected by programs under the Thriving Kids Initiative are aligned with Indigenous Data Sovereignty principles, giving Aboriginal and Torres Strait Islander people ownership over data so they can exercise sovereignty in relation to data creation, collection, access, analysis, interpretation, stewardship, dissemination, reuse and infrastructure.

Any data presented to communities is co-designed and must be accessible, relevant and detailed to develop actionable insights.

## A note on language

In this submission the term '(integrated) early years services' refers to services that provide childcare, early learning and pre-school services (ECEC) alongside integrated child and family health, wellbeing, development and social supports with a focus on supporting the education and development of children.

Further, our consultations show that many families also benefit from integrated health services provided by Aboriginal and Torres Strait Islander community-controlled health organisations (ACCHOs). While we note the importance of an integrated community-controlled service system comprised of both ACCOs and ACCHOs working together, for the purposes of this submission we largely constrain our recommendations to the ACCO early years sector.

Additionally, in SNAICC's consultations with Aboriginal and Torres Strait Islander community-controlled early years services and peaks on development of a new 'early childhood intervention' practice framework, participants commonly said they do not use the term 'early childhood intervention' because of its negative connotations for Aboriginal and Torres Strait Islander families and communities. 'Intervention' is widely associated in our communities with statutory child protection regimes that lead to the removal of children from families. As a result, for the purposes of this submission, we have used the term 'early childhood developmental supports' to refer to early childhood developmental assessment and intervention practices and services.

## Strategic Context

### Self-determination

SNAICC advocates for the full enactment of self-determination in all legislation, policies, and strategies. For too long, governments have decided what works and what doesn't for Aboriginal and Torres Strait Islander people and communities without delivering meaningful and tangible positive change for our children and families. Enacting self-determination is critical to designing and implementing effective early childhood education, development and care systems policies that achieve better outcomes for Aboriginal and Torres Strait Islander children.

Self-determination describes the right of Aboriginal and Torres Strait Islander peoples to autonomy and self-governance.<sup>1</sup> The *Safe and Supported, National Framework for Protecting Australia's Children 2021-2031 (Safe and Supported)* commits to progressive systems transformation that has Aboriginal and Torres Strait Islander self-determination at its centre and defines self-determination as:

*a collective right of Aboriginal and Torres Strait Islander peoples to determine and control their own destiny. It is a right of Aboriginal and Torres Strait Islander peoples to exercise autonomy in their own affairs and to maintain and strengthen distinct political, legal, economic, social and cultural institutions.*<sup>2</sup>

In alignment with the *National Agreement on Closing the Gap*, SNAICC advocates for the full enactment of self-determination in all legislation, policies, and strategies. The United Nations Expert Mechanism on the Rights of Indigenous People under UNDRIP connects the capacity of Indigenous peoples to meet their children's needs with their ability to exercise self-determination.<sup>3</sup>

### Human rights foundations

Australia has ratified seven international human rights treaties including the Convention on the Rights of the Child (UNCRC) and the Convention on the Rights of Persons with Disabilities (UNCRPD).<sup>4</sup> Australia has also endorsed the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).<sup>5</sup>

International frameworks are important because they provide guidance for governments on how they should approach legislation, policy, and practice for upholding human rights. They are also useful for measuring how much or how little Australia is protecting human rights. All Australian governments

---

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

<sup>2</sup> Department of Social Services 2021, 'Safe and Supported: the National Framework for Protecting Australia's Children 2021-2031 (the National Framework)'. Retrieved from: [https://www.dss.gov.au/sites/default/files/documents/12\\_2021/dess5016-national-framework-protecting-childrenaccessible.pdf](https://www.dss.gov.au/sites/default/files/documents/12_2021/dess5016-national-framework-protecting-childrenaccessible.pdf), pg. 51.

<sup>3</sup> United Nations Human Rights Council 2021, 'Rights of the Indigenous child under the United Nations Declaration on the Rights of Indigenous Peoples'. Retrieved from: [G2121979.pdf \(un.org\)](https://www.unhcr.org/refugees/files/2021/09/G2121979.pdf), pg. 2

<sup>4</sup> Attorney-General's Department, 'International Human Rights System'. Retrieved from: [https://www.ag.gov.au/rights-and-protections/human-rights-and-anti-discrimination/international-human-rights-system#:~:text=Australia%20is%20a%20party%20to,Forms%20of%20Racial%20Discrimination%20\(CERD\)](https://www.ag.gov.au/rights-and-protections/human-rights-and-anti-discrimination/international-human-rights-system#:~:text=Australia%20is%20a%20party%20to,Forms%20of%20Racial%20Discrimination%20(CERD))

<sup>5</sup> Ibid.

have an obligation to ensure that all Australians have full enjoyment of their rights. Specifically, the Australian Government has a critical role to play in protecting children's rights, from creating a culture where these rights are valued, to ensuring that all children and families have the resources, supports and services they need to ensure equitable enjoyment of rights such as rights to culture, education and care, health, housing and safety.<sup>6</sup> Despite these obligations, many rights remain unprotected in Australia because they have not been fully reflected in Australian legislation.

Within Australia, Aboriginal and Torres Strait Islander children experience greater vulnerability than non-Indigenous children, as demonstrated by their stark overrepresentation in the child protection and youth justice systems, and worse health and education outcomes. Aboriginal and Torres Strait Islander children's rights are critical for healing from the ongoing legacy of colonisation and for the continuation of the world's longest surviving cultures. Aboriginal and Torres Strait Islander children with disabilities experience greater socioeconomic vulnerability resulting from ableist discrimination and stigma which remains prevalent in Australian society, culture and institutions.

### The unique rights of Aboriginal and Torres Strait Islander children

Aboriginal and Torres Strait Islander children's rights include those owed to all children as well as their unique rights as Indigenous Peoples. The rights of all children are set out in the UNCRC and are specific to children, their contexts, and needs. The convention contains 54 articles and is based on four core principles:

- Non-discrimination
- Devotion to the best interests of the child
- The right to life, survival and development and
- Respect for the views of the child.<sup>7</sup>

The UNCRC also contains articles that are especially important to Aboriginal and Torres Strait Islander children such as the right to enjoy their culture, and to learn and use the language and customs of their Indigenous Nations. The United Nations Committee on the Rights of the Child has provided important guidance on how the UNCRC must be implemented to protect the rights of Indigenous children. This guidance reaffirms that the active protection of Indigenous children's rights requires dedicated attention and the application of special measures.

Among a wide range of rights obligations to which Australia has signed on, the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) contains articles on the rights of children with a disability to an inclusive education system at all levels and lifelong learning opportunities, and that children with disabilities are enabled to access education on equal basis with others in the communities in which they live. Moreover, the Convention articulates an obligation on all Australian governments to take all necessary measures and supports to ensure the full enjoyment by

<sup>6</sup> Australian Human Rights Commission, 'An Introduction to Human Rights'. Retrieved from: <https://humanrights.gov.au/our-work/education/introduction-human-rights#:~:text=their%20human%20rights,-,Human%20rights%20are%20a%20set%20of%20principles%20concerned%20with%20equality,from%20fear%2C%20harassment%20or%20discrimination.>

<sup>7</sup> UNICEF 2019, 'Four principles of the Convention on the Rights of the Child'. Retrieved from: [Four principles of the Convention on the Rights of the Child | UNICEF](#)

children with disabilities of all human rights and fundamental freedoms on an equal basis with other children, and in the general education system.<sup>8</sup>

The Commonwealth Government has a pivotal role to play in protecting Aboriginal and Torres Strait Islander children's rights. In the development of the Thriving Kids Initiative, it is essential that the unique rights of Aboriginal and Torres Strait Islander children and families are upheld and advanced, through:

- building and supporting inclusive natural settings for all Aboriginal and Torres Strait Islander children to learn and develop at their own pace, alongside their peers, and in ways that strengthen their cultural identities, health and social and emotional wellbeing
- investment in the Aboriginal and Torres Strait Islander community-controlled sector, as a practical expression of self-determination
- commitment to building systems and institutions which are culturally safe for all Aboriginal and Torres Strait Islander children and families, celebrates their identities and culture, are absent of systemic racism or discrimination, and empower and enable them to contribute and feel safe to be themselves.

## National Agreement on Closing the Gap

In July 2020, the Australian Government, all state and territory governments, and the Coalition of Peaks signed the National Agreement on Closing the Gap (National Agreement). The National Agreement's Priority Reforms seek to change the way governments work with Aboriginal and Torres Strait Islander communities, organisations, and people across the country. They have strong alignment with a number of rights recognised in the UNDRIP.

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

### 1. Formal Partnerships and Shared Decision Making

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

### 2. Building the Community-Controlled Sector

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

---

<sup>8</sup> United Nations 2006, 'Convention on the Rights of Persons with Disabilities.' Retrieved from: <https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>

### 3. Transforming Government Organisations

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

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

Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to set and monitor the implementation of efforts to close the gap, their priorities and drive their own development.<sup>9</sup>

Despite commitments by all governments to make significant, deliberate progress on the Priority Reforms, the Productivity Commission's Closing the Gap review found that governments are not adequately delivering on these commitments. The review found that governments are, by-and-large and despite isolated instances of good practice, continuing-with-business as usual without prioritising a systematic approach to reform, are unwilling to share power with Aboriginal and Torres Strait people, and are too readily making decisions which contradict the National Agreement, leading to no noticeable or meaningful change in the Priority Reforms or socioeconomic outcome areas.<sup>10</sup>

---

<sup>9</sup> Australian Government, 'Closing the Gap Priority Reforms'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/priority-reforms>

<sup>10</sup> Productivity Commission 2023, 'Review of the National Agreement on Closing the Gap: Study report.' Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review#report>.

## Development and implementation of the Thriving Kids Initiative in partnership with Aboriginal and Torres Strait Islander people

Development and implementation of the Thriving Kids Initiative must be undertaken with shared decision-making and in formal partnership with Aboriginal and Torres Strait Islander people and organisations

Priority Reform One of the National Agreement on Closing the Gap commits all Australian governments to “building and strengthening structures that empower Aboriginal and Torres Strait Islander people to share decision-making authority with governments to accelerate policy and place-based progress against Closing the Gap.”<sup>11</sup> This commitment recognises the critical importance of Aboriginal and Torres Strait Islander knowledge, perspectives and community priorities to succeed in endeavours to close the gap.

Alongside five policy partnerships established to formalise shared decision-making and drive key actions for priority outcome areas, including early childhood education and care, disability has been identified as a cross-cutting outcome. Policy partnerships provide mechanisms for shared decision-making on policy and funding reform, and to embed accountability between Commonwealth, state and territory departments and peak bodies and civil society. However, governments cannot only rely on policy partnerships to embed shared decision-making and joined-up approaches to meeting the Closing the Gap outcomes. Formal partnerships and shared decision-making must be embedded in all aspects of government policy across all content areas.

As yet, no equivalent policy partnership has been established with a focus on Aboriginal and Torres Strait Islander people with a disability, though this by no means eliminates or reduces the requirement that governments engage fully and formally in partnership with Aboriginal and Torres Strait Islander people with disabilities, leaders, communities and organisations on matters which affect them, such as the development of the Thriving Kids Initiative.

Similarly, the Disability Sector Strengthening Plan (DSSP), developed by First Peoples Disability Network (FPDN) on behalf of Aboriginal and Torres Strait Islander communities, has been acknowledged as a cross-cutting area of the National Agreement by the Joint Council on Closing the Gap, setting out actions to guide government policy and program design. It sets out a holistic vision and approach for building the capacity of community-controlled organisations to support their community members managing disabilities or developmental challenges. In their development and implementation of the Thriving Kids Initiative, we expect all governments to uphold their commitment to the DSSP.

---

<sup>11</sup> National Agreement on Closing the Gap, Chapter 6, cl. 28. <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/6-priority-reform-areas/one>

SNAICC and other Aboriginal and Torres Strait Islander community-controlled peak bodies have regularly experienced the voice of their members and communities being left out of the key policy decisions which affect them. This results in poor policy which does not meet the needs of the people it affects; we cannot afford for this to happen in the development of the Thriving Kids Initiative, with the huge promise that it holds for our children. This presents a decisive opportunity to advance equitable early childhood development outcomes for Aboriginal and Torres Strait Islander children nationally.

Shared decision-making is a practical approach to designing policy which fulfils stated objectives effectively, and in cost-efficient ways. Committing to shared decision-making in this way will ensure that the Thriving Kids Initiative is comprehensively aligned to the National Agreement and all its Priority Reforms, as well as other relevant frameworks like the National Aboriginal and Torres Strait Islander Early Childhood Strategy. In turn, this will provide a structure for efficient use of resources through:

- increased investment into and support for community-controlled services and sectors that deliver culturally safe, accessible and inclusive services
- Aboriginal and Torres Strait Islander communities having access to and the capacity to use data and information about early childhood development, service exposure and access
- adequate universal coverage of mainstream organisations and services which are culturally safe, accessible and inclusive, and disability-rights informed, including ECEC, child and maternal health, the National Disability Insurance Scheme (NDIS), hospitals, schools and government agencies.

Given the strategic framework and mechanisms supporting shared decision-making for all disability- and early years-related priorities, SNAICC highlights the importance of embedding shared decision-making in practice, across all stages of design, development and implementation of the Thriving Kids Initiative.

In line with their obligations, SNAICC expects all levels of governments to work in true partnership with Aboriginal and Torres Strait Islander communities, representative organisations and peaks, including but not limited to FPDN, NACCHO, SNAICC and the Coalition of Aboriginal and Torres Strait Islander Peak Bodies to develop the long-term vision and overarching policies of the Thriving Kids Initiative as well as the specific, place-based practice and programs under the Initiative.

#### Recommendation 1

The design, development and implementation of the Thriving Kids Initiative is undertaken with shared decision-making and in formal partnership between Commonwealth, state and territory governments and Aboriginal and Torres Strait Islander people and their representative peak organisations, including but not limited to FPDN, NACCHO, SNAICC and the Coalition of Aboriginal and Torres Strait Islander Peak Bodies.

## The Thriving Kids Initiative must be developed to deliver appropriate and holistic developmental supports in natural settings

Building a universal system of early childhood developmental supports in which all families and children have access to supports under the Thriving Kids Initiative, regardless of formal diagnosis or NDIS eligibility, is best done by integrating those supports into the early years service settings which families and children know best.

Given the importance of children's earliest years as the years in which the foundations for lifelong learning and wellbeing<sup>12</sup> are laid, this submission outlines the factors that would enable the provision of high-quality, culturally appropriate early childhood developmental supports and services for Aboriginal and Torres Strait Islander children, with mild to moderate developmental delays or disabilities. In this, culture is a crucial consideration.

Definitions of disability and developmental delay varies greatly between mainstream 'western' perspectives and Aboriginal and Torres Strait Islander culture, knowledge and perspectives. This is reflected in the fact that many Aboriginal and Torres Strait Islander languages do not have direct equivalents for the word 'disability'<sup>13</sup> and by extension, 'developmental delay'. This highlights the importance of understanding Aboriginal and Torres Strait Islander definitions of health and wellbeing, anchored in culture and community. This is distinct from the Western perspective that frames disability as a deficit or as a condition to be fixed, rehabilitated, or prevented.

The ongoing impact of colonisation results in Aboriginal and Torres Strait Islander people with disability experiencing different forms of discrimination such as racism, ableism and intersectional and structural discrimination, significantly impacting on their rights, health, safety and wellbeing. Aboriginal and Torres Strait Islander people with disability, after experiencing these different forms of discrimination, can often respond with what is known as 'apprehended discrimination'; a fear of encountering prejudice that causes social avoidance and makes them reluctant to access disability supports and participate in the broader community. This intersectional disadvantage and 'double discrimination' leads to major barriers to access in ECEC settings, barriers that results in poorer treatment and outcomes for Aboriginal and Torres Strait Islander children with disability.

Despite its promise, for many Aboriginal and Torres Strait Islander people, the NDIS has been held back by the ways that it has inadvertently served to individualise and stigmatise Aboriginal and Torres Strait Islander participants, privileging medicalised models of disability and requiring formal diagnoses and 'treatment' in clinical settings. This is fundamentally at odds with the ethic of 'culture is inclusion.'

---

<sup>12</sup> Campbell, F et al. (2014). 'Early childhood investments substantially boost adult health.' *Science* 3434 1478-1485. Retrieved from: <https://pubmed.ncbi.nlm.nih.gov/24675955/>.

<sup>13</sup> Avery, S. (2018). *Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability*. First Peoples Disability Network (Australia). Sydney, Australia.

SNAICC refers the Committee to Scott Avery's compelling account of this ethic and way of knowing, being and doing. Literature on autism<sup>14</sup> reveals extensive systemic and practice-level limitations in recognising and supporting autism among Aboriginal and Torres Strait Islander peoples. Studies report lower diagnostic rates among Aboriginal and Torres Strait Islander populations compared with non-Indigenous groups. However, these differences may be reflective of restricted service access and inadequate cultural inclusion rather than actual prevalence discrepancies. Aboriginal and Torres Strait Islander children face additional barriers including the absence of culturally safe diagnosis, insufficient tailored services and the absence of autism-specific data.

In the design, development and implementation of the Thriving Kids Initiative, utmost care needs to be taken to ensure these barriers are not replicated. Aboriginal and Torres Strait Islander children with mild to moderate developmental delays, and their families, should be able to access the requisite developmental supports they need, delivered in a culturally appropriate manner, in an environment where they feel comfortable, surrounded by their own community. Though some Aboriginal and Torres Strait Islander children with more profound disability or developmental vulnerabilities may require specialised, evidence-based early childhood developmental supports, nevertheless screenings, referral and navigation supports, and allied health provision should be delivered in natural early years settings to the degree possible.

For this to happen, the Thriving Kids Initiative needs to be delivered in integrated early years services where children learn and develop in community, alongside their friends, and in view of caring adults and educators. Community-led and place-based models are essential to achieving this. They are especially important given the fragmented and confusing nature of current early years and disability support services available to all families, and especially for Aboriginal and Torres Strait Islander families, and those living regionally or remotely. Place-based approaches are community-led, collaborative and sustained. They support and resource communities to flourish by partnering with them to respond to local challenges with local solutions. These approaches involve strong interagency and multidisciplinary connections, bringing multiple services to the child and family in one location through a no-wrong-door approach, rather than the family having to attend multiple locations.

It is important to note that in several communities, ACCOs/ACCHOs are already providing such integrated, child and family centred, culturally appropriate services. In order to extend the integrated services approach, the Thriving Kids initiative must work in partnership with ACCOs wherever possible.

Implementation of the Thriving Kids Initiative so it is integrated into existing early years services, and is place-based and locally responsive, will unlock a range of elements critical to the system's success. These are likely to include:

- children and families receiving proactive and preventative additional supports required for children with disabilities and developmental vulnerabilities at the earliest possible opportunity.

---

<sup>14</sup> Bailey, B., & Arciuli, J. (2020). Indigenous Australians with autism: A scoping review. *Autism* 24(5), 1031-1046.  
<https://doi.org/10.1177/1362361319894829>

- reliable opportunities to introduce assessments and developmental supports such as parental capacity building, therapeutic services, educational programs, and peer support groups as early as possible.
- allied health supports, therapy services and psychological supports tailored to families' and children's needs.
- strong family-centered practice, working in ways that build families' and parents' capacities to support children's development at home and in community, developing independence from service systems.
- strengthened information flows and the building of strong continuous relationships, enabling educators and practitioners to ensure families are educated regarding developmental milestones.
- access to regular antenatal education, and development of the relationship during the antenatal period, to increase uptake and connection with services postpartum.
- development of strong familiarity between educators and practitioners and the local cohort of families and children; to find out what's going on at home for families, follow their lead, and to offer wraparound supports for the whole family in the way that works best for them without judgement, blame or shame.

In practice, building service systems which are responsive to local contexts, providing child- and family-centric practice which is well integrated and therefore easily navigable means that families will remain engaged and build up trust in the service, leading to improved downstream outcomes.

## Recommendation 2

Commonwealth, state and territory governments integrate the Thriving Kids Initiative into integrated early years service settings through place-based and locally specific approaches, in order to provide natural and holistic settings for developmental supports in children's early years.

## The Thriving Kids Initiative must prioritise and share decision-making power with ACCOs

It is essential that the development of the Thriving Kids Initiative gives priority to ACCOs to lead design and delivery of programs in their communities. This must be underpinned by a dedicated, flexible, needs-based and recurrent funding model for ACCOs which enables adequate provision of supports to all Aboriginal and Torres Strait Islander children according to their developmental support needs.

Closing the gap begins with our children. Holistic and structural solutions are required to redress socioeconomic disparities, beginning in children's earliest years and earliest educational and

developmental experiences.<sup>15</sup> A core element of these solutions are early years services which provide opportunities for early assessment and identification, and appropriate and timely supports which enhance the early learning and development of children showing early signs of disability or developmental vulnerability. For Aboriginal and Torres Strait Islander children, early learning settings also provide opportunities to learn about and grow strong in culture, a critical element of their development, identities and self-esteem, and which strengthens their overall health and wellbeing.<sup>16</sup>

However, the early years services which make a difference must be genuinely universal – available, accessible, staffed by skilled workers capable of strengthening their children’s cultures and wellbeing, high quality so as to lead to positive outcomes, and culturally safe so as to foster families’ continued engagement, not alienate them from the system for good.<sup>17</sup> The Thriving Kids Initiative must add to and enhance the early years service ecosystem, addressing identified gaps and reaching previously excluded groups of Aboriginal and Torres Strait Islander children with inclusive, tailored supports, both general and targeted.

The early years are a critical period in a child’s development, creating the foundations for lifelong learning and wellbeing.<sup>18</sup> In the first years of their lives, children grow 90% of their brain, developing the capabilities they need to be happy and healthy.<sup>19</sup> A robust evidence base has established that participation in quality, inclusive early learning and development for children during these years enhances their language, cognitive and social-emotional capabilities, with lasting impacts on developmental, educational and wellbeing trajectories.<sup>20</sup>

Unfortunately, the early years services available to many Aboriginal and Torres Strait Islander children often do not bear these characteristics, leading to many children missing out. A wide range of complex and persistent barriers stand between many Aboriginal and Torres Strait Islander families and these early years services, including wide geographic service gaps, shortfalls in cultural safety, and chronic workforce challenges.<sup>21</sup>

The result is that Aboriginal and Torres Strait Islander children are disproportionately disadvantaged in early development and education outcomes; one in three Aboriginal and Torres Strait Islander children

<sup>15</sup> National Indigenous Australians Agency and SNAICC 2021, ‘National Aboriginal and Torres Strait Islander Early Childhood Strategy.’ Retrieved from: <https://www.niaa.gov.au/sites/default/files/documents/publications/niaa-early-years-strategy-5.pdf>, p. 5.

<sup>16</sup> Elek, C. et al (2020). ‘Can early childhood education programs support positive outcomes for Indigenous children? A systematic review of international literature.’ *Educational Research Review* 31. Retrieved from: <https://findanexpert.unimelb.edu.au/scholarlywork/1469168-can-early-childhood-education-programs-support-positive-outcomes-for-indigenous-children%3F-a-systematic-review-of-the-international-literature>.

<sup>17</sup> Baxter, R 2024, ‘Open Letter to Minister for Education Jason Clare.’ Retrieved from:

<sup>18</sup> Campbell, F et al. (2014). ‘Early childhood investments substantially boost adult health.’ *Science* 3434 1478-1485. Retrieved from: <https://pubmed.ncbi.nlm.nih.gov/24675955/>.

<sup>19</sup> Moore, T. et al 2017, ‘The First Thousand Days: An evidence paper. Retrieved from: <https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/CCCH-The-First-Thousand-Days-An-Evidence-Paper-September-2017.pdf>

<sup>20</sup> Campbell, F et al. (2014). ‘Early childhood investments substantially boost adult health.’ *Science* 3434 1478-1485. Retrieved from: <https://pubmed.ncbi.nlm.nih.gov/24675955/>; dandolopartners 2023, ‘Evidence on optimal hours of ECEC for Aboriginal and Torres Strait Islander children: Literature review.’ Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/07/240715-Evidence-review-on-optimal-hours-of-ECEC.pdf>, p. 10.

<sup>21</sup> SNAICC 2023, ‘Funding model options for ACCO integrated early years services: Final Report.’ Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/05/240507-ACCO-Funding-Report.pdf>.

are developmentally vulnerable on two domains or more, compared to one in five non-Indigenous children.<sup>22</sup> This rate of developmental vulnerability has increased for Aboriginal and Torres Strait Islander children since 2018, while the rate is declining for non-Indigenous children.<sup>23</sup>

Notably, there is a significant relationship between the level of socioeconomic disadvantage and geographic remoteness and rates of developmental vulnerability, with rates rising steadily with increasing remoteness and/or socioeconomic disadvantage.<sup>24</sup> This is important because we know that Aboriginal and Torres Strait Islander children are more likely than their non-Indigenous counterparts to reside in areas with a greater concentration of persistent poverty and socioeconomic disadvantage (and are more likely to live in remote and very remote areas (17%) than all Australian children (2.4%).<sup>25</sup> This ‘double jeopardy’ phenomenon means that because Aboriginal and Torres Strait Islander children are more likely to experience concurrent disadvantages, they are more likely to experience inferior developmental outcomes compared to their non-Indigenous counterparts who face fewer disadvantages.

This early childhood development disadvantage is further exacerbated by an alarming trend toward a widening gap in the quality of ECEC services between Australia’s most advantaged and disadvantaged communities. Evidence shows that disadvantaged children benefit most from attending high quality ECEC programs but gain nothing and may even be harmed by attending low quality programs.<sup>26</sup> Recent research shows that ‘childcare deserts’ continue to exist across Australia’s early years system, particularly in regional and remote locales, and regions with higher incidence of socioeconomic disadvantage.<sup>27</sup>

The nature and characteristics of the competition-driven ECEC market means that ECEC services set up where demand is greatest, and where they can charge higher fees; namely, wealthier and more populous locales. Many Aboriginal and Torres Strait Islander families live on Country in regional, rural and remote parts of Australia, where early years services are too far away or nonexistent. Aboriginal and Torres Strait Islander children and families in more urban settings also face barriers to access to quality, culturally safe early years services. In practice, this means that Aboriginal and Torres Strait Islander children who live in Australia’s most disadvantaged communities, and who stand to gain the most from quality ECEC, are less likely to have access to it.

Additionally, Aboriginal and Torres Strait Islander children are significantly overrepresented among children with a diagnosed disability. If you are an Aboriginal or Torres Strait Islander person, you are

<sup>22</sup> Australian Early Development Census 2021. Retrieved from: <https://www.aedc.gov.au/data-explorer/>.

<sup>23</sup> Ibid.

<sup>24</sup> Moore, T and Arefadib N 2017, ‘The state of children’s health and development in rural and remote Australia. Retrieved from: [https://www.researchgate.net/publication/323166399\\_Reporting\\_the\\_Health\\_and\\_Development\\_of\\_Children\\_in\\_Rural\\_and\\_Remote\\_Australia](https://www.researchgate.net/publication/323166399_Reporting_the_Health_and_Development_of_Children_in_Rural_and_Remote_Australia)

<sup>25</sup> Australian Institute of Health and Wellbeing 2023, ‘Early childhood and transition to school.’ Retrieved from: <https://www.aihw.gov.au/reports/australias-welfare/childcare-and-early-childhood-education>

<sup>26</sup> Moore, T and Arefadib, N 2022, ‘Tasmanian Play2Learn+ Trial: Evidence Review,’ Retrieved from: [https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/2212\\_CCCH\\_TAS-Play2Learn.pdf](https://www.rch.org.au/uploadedFiles/Main/Content/ccchdev/2212_CCCH_TAS-Play2Learn.pdf)

<sup>27</sup> The Front Project 2024, ‘Paving the Path: Addressing market imbalances to achieve quality and affordable childcare in more places.’ Retrieved from: <https://www.thefrontproject.org.au/images/research/Paving%20the%20path%20-%20final%20report%20TFP.pdf>; Mitchell Institute 2024, ‘Mapping the deserts: Childcare accessibility in Australia.’ Retrieved from: <https://www.yu.edu.au/mitchell-institute/childcare-accessibility-australia>.

more than twice as likely to be living with a diagnosed disability than a non-Indigenous person. Latest data indicates that 45% of Aboriginal and Torres Strait Islander people are living with disability or a long-term health condition.<sup>28</sup> Concerning children in particular, the NDIS Review reported that one in five Aboriginal and Torres Strait Islander children aged under the age of eighteen have a disability, compared to one in twelve children among the general population. Of these, physical, sensory, psychosocial and intellectual disabilities are the most common types of impairment. Moreover, Aboriginal and Torres Strait Islander children are known to have high rates of undiagnosed conditions such as fetal alcohol spectrum disorder (FASD) and other neurological conditions.

The ECEC system's service gaps are mirrored in another market-based system, the NDIS. Despite their overrepresentation among people with a disability, only three out of every five Aboriginal and Torres Strait Islander NDIS participants are actually receiving any daily supports, particularly those who live remotely. Even in town and cities where Aboriginal and Torres Strait Islander NDIS participants may expect to find sufficient NDIS service presence, many services are not culturally safe for Aboriginal and Torres Strait Islander people with disability, at times forcing them to choose between supports that are not culturally safe, or receiving no supports at all.<sup>29</sup>

Aboriginal and Torres Strait Islander children with developmental vulnerabilities in cognitive, physical, adaptive, communication and social and emotional skills stand to benefit enormously from early identification and developmental support or therapy. However, at present, these children regularly and disproportionately miss out on these early childhood developmental support pathways. In 2024, SNAICC led consultations with ACCOs delivering early childhood developmental supports for a project refreshing the national practice framework for 'early childhood intervention'.

Through this, we consistently heard that ACCO services contend with challenges finding available therapists and practitioners in allied health disciplines to visit their communities or refer their families to.<sup>30</sup> While we welcome plans to introduce new early childhood developmental support pathways, it is critical that new pathways account for and remedy current service gaps which mean Aboriginal and Torres Strait Islander children continually miss out of targeted early developmental supports, particularly in regional and remote locales.

The high rates of developmental vulnerability, preventable developmental conditions and disabilities among Aboriginal and Torres Strait Islander children and adults indicates decades of missed opportunities for early assessment, identification and provision of developmental supports. In many cases, this is the result of inaccessible or nonexistent early years services where people live; market failures of universal service systems. It is essential that the Thriving Kids Initiative does not mirror these failures.

<sup>28</sup> Australian Bureau of Statistics 2016, 'National Aboriginal and Torres Strait Islander Social Survey.' Retrieved from:

<sup>29</sup> Independent Review into the National Disability Insurance Scheme 2023, *Working together to deliver the NDIS: Independent Review into the National Disability Insurance Scheme*. Retrieved from:

<sup>30</sup> SNAICC and University of Melbourne 2024, 'Review of Best Practice in Early Childhood Intervention: Findings from the SNAICC Engagements.' Retrieved from: [https://healthy-trajectories.com.au/wp-content/uploads/2024/11/Review-of-Best-Practice-in-ECI\\_-Findings-from-SNAICC-Engagements\\_v1.0\\_November-2024.pdf](https://healthy-trajectories.com.au/wp-content/uploads/2024/11/Review-of-Best-Practice-in-ECI_-Findings-from-SNAICC-Engagements_v1.0_November-2024.pdf)

As such, SNAICC recommends that the design, development and implementation of the Thriving Kids Initiative must begin with a guarantee of genuinely universal provision of culturally safe early childhood developmental supports to all children according to their needs, and *regardless of any geographic or socioeconomic factor*.

For Aboriginal and Torres Strait Islander children, a truly universal early years system is predicated on the availability of early years services provided by Aboriginal and Torres Strait Islander community-controlled organisations for all families who need or want this. ACCOs deliver the culturally safe, holistic and relationship-based early years services and supports required by many Aboriginal and Torres Strait communities.

In many communities around Australia, families are supported by an existing, impactful and significant ACCO early years sector. However, the number and coverage of ACCOs does not come close to meeting demand. We estimate that ACCOs service approximately one quarter of Aboriginal and Torres Strait Islander children when broader integrated early years service responses are considered, while ACCO long day care services reach closer to just 5% of those children.

As such, SNAICC recommends that the design, development and implementation of programs under the Thriving Kids Initiative supports must begin with a guarantee of genuinely universal provision of culturally safe developmental supports to all children according to their needs, and *regardless of any geographic or socioeconomic factor*.

ACCOs successfully provide such services *in spite of* the systemic challenges of the ECEC funding system, not because of them. The early years funding system underpinned by the Child Care Subsidy (CCS) and other piecemeal funding sources focused largely on ECEC activities does not reflect the full cost of delivering the integrated early years services most needed in Aboriginal and Torres Strait Islander communities.

This limits ACCOs' capacities to respond adequately, quickly or flexibly to community needs. Critically, ACCOs need to be resourced to meet the diverse and complex needs of their communities and children. ACCOs from all jurisdictions have reported that they care for large numbers of Aboriginal and Torres Strait Islander children with complex, additional needs resulting from developmental or cognitive challenges, disabilities, histories of trauma, adverse mental health, persistent interactions with child protection and youth justice systems, and behavioural issues.

Nor do current funding sources take seriously the importance of strengthening Aboriginal and Torres Strait Islander children's culture by exposing them to wide and rich cultural experiences which serve to reinforce their cultural identities in the early years. As a result, they circumscribe ACCOs' capacity to embed culture in all service delivery.<sup>31</sup>

---

<sup>31</sup> SNAICC 2023, 'Funding model options for ACCO integrated early years services: Final Report.' Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/05/240507-ACCO-Funding-Report.pdf>, p. 70

Not only is funding insufficient for the integrated services ACCOs deliver, it is unduly complex, patchwork, uncertain, and highly administratively burdensome. It lacks the flexibility required for ACCOs to respond to unexpected costs such as infrastructure upgrades and maintenance, and transportation requirements.<sup>32</sup> Giving ACCOs control over the design and delivery of developmental support programs under the Thriving Kids Initiative must not counter-productively introduce still more contracting complexity for those services to reckon with.

The Productivity Commission's recent assessment confirmed what ACCOs have been saying for many years: that mainstream government commissioning approaches continue to sideline ACCOs through transactional, limited, short and inflexible contracting arrangements which strip control from ACCOs, introduce unnecessary overheads, and deprive them of the secure funding base they need.<sup>33</sup> Both the Productivity Commission (Recommendation 7.7, Inquiry into ECEC) and the NDIS Review (Recommendation 14) recognised and endorsed the need for a dedicated commissioning approach to *both* ECEC and developmental supports under the Thriving Kids Initiative for Aboriginal and Torres Strait Islander children, particularly those living regionally and remotely.

Prioritising ACCOs must be accompanied with significant funding reform for the ACCO integrated early years sector. Integrating the Thriving Kids Initiative seamlessly into early years services is not a matter of adding an additional layer of contracting onto an already unduly complex early years funding system. In development of the commissioning approach for the Thriving Kids Initiative it is imperative that the lead commissioning jurisdiction(s) integrates funding for Thriving Kids into broader funding reform for ECEC.

Through the ECCDPP, SNAICC has worked with ACCOs to design a framework for a dedicated, reliable and adequate [funding model for ACCO integrated early years services](#). This framework outlines the architecture of a supply-side funding model which would meet the services' needs, meaning they can better support their communities and children. It also provides adequate funding for ACCO services to attract, train, develop and retain educators and practitioners capable of meeting their children's needs. As such, commissioning approaches for the Thriving Kids Initiative must include provisions for the attraction, development and retention of Aboriginal and Torres Strait Islander staff qualified in required disciplines, including ECEC, allied health, psychology and occupational therapy.

We recommend that Commonwealth, state and territory governments begin to operationalise this guarantee by developing and fully resourcing a strategy to establish new ACCO integrated early years services empowered to provide the Thriving Kids Initiative, in un- or underserved communities. This must be done in partnership with Aboriginal and Torres Strait Islander people, with the ECCDPP the most appropriate forum, and in partnership with other relevant peak organisations including FPDN and NACCHO. ACCOs should be established with long-term funding security through a dedicated supply-side funding model.

---

<sup>32</sup> Ibid, pp. 72-73.

<sup>33</sup> Productivity Commission 2024, 'Closing the Gap review: Study report.' Retrieved from: <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report>, pp. 49-53.

SNAICC also recommends that commissioning approaches to the Thriving Kids Initiative must be tied into and taken in tandem with implementation of a dedicated model for ACCO integrated early years services. In developing the Thriving Kids Initiative strategy and system, Commonwealth, state and territory government should partner with Aboriginal and Torres Strait Islander communities and organisations, particularly SNAICC and the FPDN, to develop an appropriate commissioning approach to the Thriving Kids Initiative which aligns with and enhances the ACCO integrated early years funding model.

### Recommendation 3

The Thriving Kids Initiative is designed, developed and implemented such that no Aboriginal and Torres Strait Islander family is without free, high quality and culturally safe early childhood developmental support services, regardless of the remoteness of where they live, their income level or any other socioeconomic determinant or factor.

To achieve this vision:

- a) all Australian governments prioritise early years ACCOs as providers of first choice for programs under the Thriving Kids Initiative for Aboriginal and Torres Strait Islander people.
- b) Commonwealth, state and territory governments commit to developing and fully implementing a dedicated supply-side, needs-based, reliable and sustainable funding model for early years ACCOs, drawing on the foundational work completed through the Early Childhood Care and Development Policy Partnership (ECCDPP).
- c) all Australian governments commit to providing funding to establish ACCO integrated early years services capable of delivering the Thriving Kids Initiative in communities without ACCO services.

## Design of the Thriving Kids Initiative must redress existing failures of the NDIS

The Disability Royal Commission (DRC) has found that Aboriginal and Torres Strait Islander people with disability are 28% less likely to receive access to care via the NDIS than non-Indigenous people with disability<sup>34</sup>. Literature examining the experiences of Aboriginal and Torres Strait Islander people with disability finds the predominance of culturally unsafe, ineffective and inaccessible services<sup>35</sup>, which further entrenches disadvantage experienced by Aboriginal and Torres Strait Islander people with disability. It is essential that for children managing developmental delays or disabilities, this is not replicated by the Thriving Kids Initiative.

<sup>34</sup> Deloitte. (2023). Research report – Options to improve service availability and accessibility for First Nations people with disability.

<sup>35</sup> Bailey, B., & Arciuli, J. (2020). Indigenous Australians with autism: A scoping review. *Autism* 24(5), 1031-1046. <https://doi.org/10.1177/1362361319894829>

Furthermore, Aboriginal and Torres Strait Islander children with disability and developmental delay, face significant overrepresentation in the child protection and youth justice systems. They are also disproportionately affected by suspensions and exclusions from the education system. Undiagnosed disability and developmental delay are often unaddressed, placing children and young people at greater risk of discrimination, inequitable treatment and inadequate support from public institutions and systems. Parents with disability also experience systemic discrimination, including oversurveillance and a lack of government support. These barriers increase the risk of child removal and separation from family, Community, Culture and Country. The lack of timely and culturally appropriate disability and psychosocial supports for both children and their families perpetuates the intergenerational cycle of disadvantage and systemic inequality.

The DRC report also states that the growing demand for services, particularly in remote communities, the small number of Aboriginal and Torres Strait Islander-focused service providers, lower average payment amount per participant received by Aboriginal and Torres Strait Islander -focused providers compared to non-Indigenous service providers, and predicted shortage of culturally skilled workforce are expected to increase service access gaps for Aboriginal and Torres Strait Islander people in coming years<sup>36</sup>.

The Thriving Kids Initiative has the unique opportunity to learn from the well-documented shortcomings of the NDIS for Aboriginal and Torres Strait Islander people, and apply these to the design, development and implementation of a program that is culturally safe, accessible and sustained in the long-term. Finally, even as we look at opportunities for the future, utmost care needs to be taken to ensure that parents and children currently accessing the NDIS do not face any disruption in their supports. This can be done through transition safeguards, including pausing adverse reviews until the Thriving Kids Initiative is live.

#### Recommendation 4

The Thriving Kids Initiative is designed and implemented such that families currently accessing the NDIS can transition seamlessly to programs under the Thriving Kids Initiative to ensure that no child is left without the crucial supports they need.

**The Thriving Kids Initiative must come with dedicated and sufficient funding to build and develop local Aboriginal and Torres Strait Islander early years workforces**

Aboriginal and Torres Strait Islander educators and teachers are central to supporting children to grow up strong in culture and developmentally on track. The Aboriginal Community-Controlled

<sup>36</sup> Deloitte. (2023). Research report – Options to improve service availability and accessibility for First Nations people with disability.

Organisation (ACCO) early years workforce brings deep cultural knowledge and trusted relationships within their communities, enabling service delivery grounded in care, empathy, and genuine connection.

A professionally trained and well-supported Aboriginal and Torres Strait Islander early years workforce significantly enhances the capacity to deliver culturally safe care. This, in turn, drives stronger engagement from children and families with early childhood development services. Both service providers and families consistently report that the employment of local Indigenous staff is a key enabler of Aboriginal and Torres Strait Islander participation in early years services, particularly in early childhood education and care (ECEC). For this reason, SNAICC has long championed increased investment in growing and sustaining this vital workforce.

Despite the clear need, recent national inquiries — including the ACCC Childcare Inquiry, the Productivity Commission Inquiry into the ECEC sector, and the NDIS Review — have highlighted a critical and growing shortage of Aboriginal and Torres Strait Islander professionals in the early years sector. These findings underscore the urgent need for sustained, targeted investment to build and retain this essential workforce.

As the Thriving Kids Initiative is integrated into early years services, it is imperative that the existing Aboriginal and Torres Strait Islander workforce is not overburdened. Instead, the initiative must be accompanied by strategic investment in quality training and ongoing professional development for early childhood educators, allied health professionals, and related practitioners. This is foundational to delivering inclusive, high-quality developmental support systems.

To ensure long-term success, the Thriving Kids Initiative must incorporate a workforce strategy that prioritises Aboriginal and Torres Strait Islander leadership. This includes bespoke training pathways that equip educators and practitioners to conduct developmental assessments with cultural safety, skill, and care.

Such investment must be co-designed and delivered in partnership with Aboriginal and Torres Strait Islander peak bodies. It should include:

- Adequate funding for VET placements tailored to community needs
- Support for ACCO-led, place-based workforce development initiatives
- Professional development pathways to upskill the existing integrated early years workforce

Building a strong, culturally safe, and community-led early years workforce is not only a matter of equity — it is essential to improving developmental outcomes for Aboriginal and Torres Strait Islander children.

## Recommendation 5

Commonwealth, state and territory governments provide dedicated and sufficient funding to build and develop local Aboriginal and Torres Strait Islander early years workforces to deliver programs under the Thriving Kids Initiative in their communities.

## A central objective of the Thriving Kids Initiative must be cultural safety in program design and delivery

Cultural safety is essential for Aboriginal and Torres Strait Islander families and children to effectively use systems and services intended to support their development, health, wellbeing and safety. Without it, the potential impact of social services will invariably be diminished. It is well-documented that mainstream systems and service providers do not current provide culturally safe services, continuing to impose a deficits-based, prescriptive worldview that seeks to “diminish, distort, limit, and misrepresent Aboriginal and Torres Strait Islander people, both historically and currently”<sup>37</sup>.

The experience of cultural unsafety is acute for Aboriginal and Torres Strait Islander people with a disability. In their concluding observations on the combined second and third periodic reports for Australia, the United Nations Committee on the Rights of Persons with Disabilities highlighted the substantial barriers to accessing culturally safe supports faced by Aboriginal and Torres Strait Islander people with disability.<sup>38</sup>

Culturally safe systems are experienced by Aboriginal and Torres Strait Islander people when they encounter a system in which Aboriginal and Torres Strait Islander identities and cultures are normative, positively recognised and celebrated. It is more than just the absence of racism or discrimination and more than ‘cultural awareness’ and ‘cultural sensitivity.’ It empowers Aboriginal and Torres Strait Islander people and enables them to contribute and feel safe to be themselves.<sup>39</sup>

SNAICC is a partner in the University of Melbourne-led consortium which has developed a new practice framework for supporting children with developmental concerns, delay or disability (the ECI Practice Framework Project). We refer the Committee to the submission made by the consortium, led by the University of Melbourne and endorsed by Gretchen Young, Executive Director of Programs at SNAICC.

We recommend that the [National Best Practice Framework for Early Childhood Intervention](#) is fully adopted by all governments in roll out of the Thriving Kids Initiative.

Ensuring practices contribute to cultural safety is a core principle of the new framework. The system of Thriving Kids should reflect and align with the framework which can guide practice across all service

<sup>37</sup> Mohamad, J et al 2024, ‘Discussion Paper: Cultural Safety in Australia.’ Retrieved from: <https://www.lowitja.org.au/resource/cultural-safety-in-australia/>

<sup>38</sup> United Nations Committee on the Rights of Persons with Disabilities 2019, ‘Concluding observations on the combined second and third periodic reports of Australia.’ Retrieved from: <file:///C:/Users/Nick%20Davis/Downloads/G1930705.pdf>

<sup>39</sup> Ibid

systems. In developing the framework, we consulted with ACCOs delivering developmental supports to their communities.

Additionally, we heard from participants that cultural safety must be embedded in both systemic and practice-based characteristics of the Thriving Kids Initiative through:

- recognising the millennia of successful Aboriginal and Torres Strait Islander child rearing practices, and engage with the wisdom of Elders to create opportunities for children and young people to learn from them, including by inviting them into educational settings.
- ensuring that children are included in early learning and development at their own pace and among their peers in everyday settings, giving effect to the principle that ‘culture is inclusion’ that Aboriginal and Torres Strait Islander conceptions of disability are inherently inclusive and accepting, rather than alienating or individualising.<sup>40</sup>
- recognising that many families have experiences of personal and intergenerational trauma, often caused by interacting with culturally unsafe systems, and ensuring all system and institutional actors are working in trauma-informed ways.
- building trusted relationships at a pace set by families and children, in order to allay well-founded fears leading back to culturally unsafe child protection systems, and tailor support to children and families holistically, regardless of programmatic or service boundaries.
- decolonising diagnostic and assessment tools or frameworks, many of which are not culturally appropriate, and preferencing the development and utilisation of tools and frameworks grounded in Aboriginal and Torres Strait Islander cultures, practices and strengths. Examples provided by participants include the ASQ-TRAK.

The list above is a non-exhaustive set of measures which Commonwealth, state and territory governments should take to dismantle harmful attitudes and behaviors, ensure that the cultural capability of the system of programs under the Thriving Kids Initiative is continually improving, and that Aboriginal and Torres Strait Islander children and families have recourse to a system of developmental supports which is culturally safe and, therefore, effective.

SNAICC recommends that cultural safety for Aboriginal and Torres Strait Islander people is articulated as an essential pillar in the design, development and implementation of the Thriving Kids Initiative. This should be coupled with specific actions to improve cultural safety in mainstream services, along with clear, meaningful and measurable indicators of cultural safety. Such actions and measures should be co-designed with Aboriginal and Torres Strait Islander communities and organisations and must be adequately and sustainably resourced and enabled by governments.

---

<sup>40</sup> See Avery, S. (2018). Culture is Inclusion: A narrative of Aboriginal and Torres Strait Islander people with disability. First Peoples Disability Network (Australia). Sydney, Australia. Retrieved from: <https://disability.royalcommission.gov.au/publications/exhibit-8-00305-exp002000010001-s-avery-culture-inclusion-narrative-aboriginal-and-torres-strait-islander-people-disability-first-peoples-disability-network-australia-sydney-2018>.

## Recommendation 6

In the design, development and implementation of the Thriving Kids Initiative, Commonwealth, state and territory governments:

- a. fully adopt and embed the National Best Practice Framework for Early Childhood Intervention.
- b. fully adopt, embed and implement in all policy, systems, institutions and workforces the forthcoming recommended practice framework for supporting children with disability and developmental vulnerability.
- c. centre Aboriginal and Torres Strait Islander ways of knowing, being and doing, their unique conceptions of disability, and their child rearing practices.
- d. fully embed culturally safe service provision as a primary objective of the Thriving Kids Initiative.
- e. where available, utilise culturally appropriate diagnostic tools like the ASQ-TRAK
- f. commit to developing culturally appropriate material supporting children and families that have children with mild and moderate developmental delays, developed through a truly co-designed approach with Aboriginal and Torres Strait Islander people, communities and representative organisations.
- g. provide sufficient funding for improvements in the cultural capability of all participating institutions, practices, systems and workforce of the Thriving Kids Initiative.

## Implementation of the Thriving Kids Initiative must uphold Indigenous Data Sovereignty

To deliver meaningful and equitable outcomes for Aboriginal and Torres Strait Islander children, the Thriving Kids Initiative must be firmly grounded in the principles of Indigenous Data Sovereignty. This ensures that Aboriginal and Torres Strait Islander communities retain ownership, control, and agency over the data that directly impacts their lives.

Indigenous Data Sovereignty affirms the right of Aboriginal and Torres Strait Islander peoples to govern the creation, collection, access, analysis, interpretation, and dissemination of data in ways that reflect their cultural values, community priorities, and lived experiences. It is a cornerstone of self-determination and a critical mechanism for restoring trust in systems that have historically excluded, marginalised, or misrepresented Indigenous voices.

To be effective, data collected through Thriving Kids must be co-designed with communities. Co-design enables the generation of insights that reflect holistic understandings of child development, encompassing connection to culture, Country, kinship, and language. In contrast, existing administrative datasets often reinforce deficit-based narratives, framing Aboriginal and Torres Strait

Islander children and families through lenses of deficiency and disadvantage. As noted in national health reporting, such data frequently perpetuates a narrative of “negativity, deficiency, and failure.” By embedding Indigenous Data Sovereignty, Thriving Kids can shift towards strengths-based measures of wellbeing that are more accurate, culturally grounded, and empowering. These approaches better reflect Aboriginal and Torres Strait Islander ways of knowing, being, and doing, and are essential to improving developmental outcomes.

Importantly, Indigenous Data Sovereignty is a key component of Priority Reform 4 under the National Agreement on Closing the Gap. Its implementation within Thriving Kids not only aligns with national commitments but also strengthens the initiative’s capacity to deliver transformative change for children, families, and communities.

#### Recommendation 7

Data collected by programs under the Thriving Kids Initiative are aligned with Indigenous Data Sovereignty principles, giving Aboriginal and Torres Strait Islander people ownership over data so they can exercise sovereignty in relation to data creation, collection, access, analysis, interpretation, stewardship, dissemination, reuse and infrastructure.