

ELACCA submission to: Inquiry into the Thriving Kids initiative

October 2025



The Early Learning and Care Council of Australia welcomes the opportunity to provide a submission to the House of Representatives Standing Committee on Health, Aged Care and Disability, for its inquiry into the Thriving Kids initiative.

About ELACCA

The Early Learning and Care Council of Australia (ELACCA) was established to promote the value of quality early learning and care as an integral part of Australia's education system. Our 17 CEO members include some of the largest early learning providers in the country, representing both not-for-profit and for-profit services.

ELACCA members operate 1,980 long day care services, 316 preschool/kindergarten services and 83 outside school hours care (OSHC) services, covering every state and territory. They offer one-quarter of all the long day care places in Australia. Together, our members serve 360,870 children and their families, and employ more than 58,316 staff.

As well as promoting the value of quality early learning and the need for greater public investment, ELACCA advocates for the right of all children to access quality early learning and care, particularly children facing disadvantage. We do this by drawing on the knowledge and practical experience of our members and representing their views to decision makers in government, the media and the public.

Submission to the inquiry into the Thriving Kids initiative

This submission provides advice to the Committee on how the early learning and care sector can be a trusted adviser, and a central structural element, in the Thriving Kids initiative. As an almost-universal system (and one on the path to universal provision), early learning and care is uniquely positioned to connect with children, families and other professionals and services. As a national peak body representing large providers, ELACCA is well-placed to support and engage with government departments to inform the design and implementation of the initiative.

Intentional, play-based learning is a vital part of children's development in their early years, and is well supported and planned for in quality early learning and care services. ELACCA supports a child-first approach to the Thriving Kids initiative that includes early learning and care at the centre of its ecosystem. We support a system where early childhood intervention services are delivered in a child's natural environment, such as their early learning and care setting, and through family-centred practices.

The approach to early childhood outlined in the NDIS Guidelines notes the importance of children with a developmental delay or disability being included in everyday activities, and being afforded the same opportunities as all children to develop friendships, play and be part of their community.¹ Early learning and care services are often a comfortable, familiar space for young children to receive therapeutic and other allied health support and services. It is important to highlight that early learning and care services are not just sites for therapy provision – they are an existing strong and equal partner in facilitating additional support to children and their families.

Early learning and care services already play a vital role in providing information and support to families in the realm of child development, health and wellbeing – including for children with delays, differences and disabilities. In high-quality services, early childhood teachers and educators, and managers:

- **adapt** the educational program and/or the physical environment to meet the needs of each child
- **initiate** discussions with parents and carers on developmental issues
- **inform** parents and carers about health and allied health services, and diagnostic pathways
- **refer** parents and carers to other services or practitioners (including NDIS early childhood partners)
- **seek and administer** funding to support the inclusion of children with developmental delay or additional needs in the early learning and care service

¹ National Disability Insurance Agency (Australia). (2024). The early childhood approach for children younger than 9, <https://www.ndis.gov.au/understanding/families-and-carers/early-childhood-approach-children-younger-9#our-guidelines> (accessed 29 September 2025).

- **explain** the National Disability Insurance Scheme (NDIS) to families.

This is a strong foundation for future work. However, the early learning and care sector can only fulfil its potential within the Thriving Kids initiative with further investment. While the NDIS reform process is guided by clear fiscal goals (savings), it will only achieve the right outcomes if accompanied by new types of expenditure. Some of the savings in the NDIS budget must be reinvested in the early learning and care sector, to ensure the success of Thriving Kids.

Table 1 provides an overview of the types of investment that will support success.

System asset	Existing strengths	Development priorities
Access to children	1.24 million children aged 0-8 years attend early learning and care services – this includes 72% of all 3-year-olds. ²	Many of the children who would benefit most from early learning and care do not attend services – including children with additional needs, First Nations children and children from culturally and linguistically diverse backgrounds. ³ Connecting these children to early learning and care must be a priority.
Professional knowledge	Early childhood educators and teachers must hold qualifications, which include units in early childhood development and inclusion.	Professional knowledge can only be maintained via ongoing training. Research translation (by universities) and communities of practice (for educators) will support this effort.
Relationships with families	Educators provide a regular touchpoint for the 1 million families that use early learning and care services (including school-aged care).	High turnover of educators disrupts relationships with children and families. More work is required to build educator retention. ⁴
Transitions between settings	‘Transition to school’ processes support children to start school well, with their needs and strengths understood by their new school.	Transition processes can be highly inconsistent (across sites and over time). Investment in evidence-based practices, to build relationships and understanding between families and educators, is required to support children well as they start school. ⁵

Table 1: The early learning and care system as a Thriving Kids partner: strengths and development priorities

² Department of Education (Australia). (2025a). Child Care Subsidy data report – March quarter 2025, <https://www.education.gov.au/early-childhood/about/data-and-reports/quarterly-reports/child-care-subsidy-data-report-march-quarter-2025>

³ Productivity Commission. (2024). A path to universal early childhood education and care, Inquiry report no. 106, Vol. 1. Canberra: Productivity Commission, pp. 13-24.

⁴ Australian Government. (2024). The Future of the Early Childhood Education Profession: Early Childhood Education and Care Workforce Capacity Study. Canberra, Jobs and Skills Australia; Fenech, M., Wong, S., Boyd, W. et al. (2022). ‘Attracting, retaining and sustaining early childhood teachers: an ecological conceptualisation of workforce issues and future research directions’, Australian Educational Researcher (49), 1–19, <https://doi.org/10.1007/s13384-020-00424-6>.

⁵ Australian Education Research Organisation. (2023). Transitions to school for children with disability or developmental delay – evidence summary, <https://www.edresearch.edu.au/sites/default/files/2023-08/transitions-to-school-children-with-disability-summary-aa.pdf>.

Responses to the terms of reference

This submission addresses the following issues, contained in the terms of reference for the inquiry:

- (a) The effectiveness of current (and previous) programs and initiatives that identify children with development delay, autism or both, with mild to moderate support needs and support them and their families, in the context of early learning and care services
- (b) Gaps in workforce support and training required to deliver Thriving Kids
- (c) Mechanisms that would allow a seamless transition through mainstream systems for all children with mild to moderate support needs.

(a) Programs and initiatives to identify and meet children's needs in early learning and care services

Experienced early childhood educators are well-placed to identify areas of concern or difference – including delays – in a child's development, and to initiate discussions with parents and carers about their child's learning, development and wellbeing. While this is a core part of an educator's practice, there are limitations on the capacity of early learning and care services to take on a formalised role in identifying disability and developmental delay among children. These limitations include:

- **Scope of professional practice:** educators are not qualified to diagnose disability or other conditions
- **Experience of educators:** noticing issues of concern in a child's development relies on an educator's experience – but retention of educators is a challenge in the sector
- **Knowledge of local services:** educators and service leaders may not have the capacity to maintain current knowledge of local health and allied health services, and appropriate referral pathways
- **Demands and time constraints:** the demands and the mental load on educators are already significant, leaving them little opportunity to take on additional responsibilities.

For children with diagnosed disability, developmental delay and other needs, ELACCA supports a system where early childhood intervention services are delivered in a child's natural environment, and through child- and family-centred practices. Early learning and care services can be a comfortable, familiar space for young children to receive therapeutic and other allied health support and services.

Each early learning and care service has its own context, philosophy and pedagogical practices, and these will shape its participation in Thriving Kids. So will the particular needs of the children in its care. Across the board, early learning and care services are spaces for 'shared learning' in social settings, where teachers and educators seek to meet the needs of each child. This means that teachers and educators navigate a complex range of goals and needs (group and individual), within the time and resources available. Thriving Kids will need to allow flexibility, to ensure that early learning and care services can plan and deliver the educational programs they want, with the support they need, for the benefit of every child.

Currently, children receiving support under the NDIS may receive therapeutic services at their early learning service – in a group environment, in a private location, or a combination of both. Beyond receiving therapies, a child with additional needs will also learn in group settings alongside their peers, with teachers and educators adjusting their practices (and/or working with additional colleagues) to suit the child's requirements. We need to continue – and extend – this flexibility.

The Thriving Kids initiative has the potential to drive further innovation and partnerships in the early learning and care sector, to build inclusion. Examples might include:

- Digital tools and platforms for communication: to share information and advice between a child's family, educators and health practitioners

- New roles in the early learning sector: such as ‘linker’ roles, which build and share knowledge about health or support services and provide coordination.⁶

Finally, the design and delivery of Thriving Kids in early learning and care settings must be evidence-based. If a commissioning system is established, it is vital to ensure that integrity and rigour are built in. The identification and dissemination of good practice will be an ongoing task, involving university researchers (across disciplines), early learning and early intervention professionals.

Key message: Early learning and care services may be ideal sites for delivering supports under Thriving Kids – provided the system allows for flexibility, encourages collaboration and insists on evidence, as well as delivering the necessary resourcing.

(b) The early learning and care workforce

Early childhood teachers and educators can play a vital role in supporting children with additional needs. Every effort should be made to harness the expertise of the early learning and care workforce, reinforce their unique relationships with children and families, and build their capacity to support children.

Across Australia, early learning and care services employ more than 211,000 people, and around 90% of them work directly with children.⁷ If early childhood educators are to be ‘frontline workers’ in the Thriving Kids initiative, they will require both agency and resourcing. This means giving teachers and educators design and decision-making roles, and providing investment so they can implement, evaluate and improve supports for children.

Building the knowledge and capacity of the early learning and care workforce is a prerequisite for success. This requires adequate, targeted investment, in the following:

- Time ‘off the floor’ for planning, critical reflection and development of inclusion strategies
- Professional learning about disability and developmental delay with allied health professionals, including early childhood intervention specialists
- Training in transdisciplinary practice, to build the capacity and capability of educators to collaborate with other professionals, to support children
- Holistic support for educators, to ensure that all children with disability and developmental delay can access the supports they need within their local community.
- Building awareness and understanding of cultural safety, including co-designing with First Nations experts and others
- Skills development in how to support families, including communication strategies
- Peer support across early learning and care services, using a place-based approach
- Collaboration with training providers and universities, to support best practice and innovation.

Fixing the current structure of inclusion support could also deliver substantial gains in workforce practices. One of the biggest barriers to strong inclusive practice in early learning services is the Commonwealth’s Inclusion Support Program (ISP), which is marred by poor design, resourcing and administration. The ISP not only fails to support children well – it robs their educators of time, and may be a net drain on the overall resourcing of inclusion.

The government-commissioned review of the ISP identified ‘significant challenges in relation to the Program’s application process, documentation requirements and current resourcing (both levels and mechanisms)’.⁸ The review highlighted the needless complexity and administrative burden of a funding system that is failing to support children

⁶ Linkers ‘work around the gaps, limitations and insufficiencies of the service system’, helping clients through ‘individualised, relationship-based practices’. Paul Ramsay Foundation and dandolopartners. (2022). Understanding Linkers. https://cdn.prod.website-files.com/62b998c0c9af9f65bba26051/63226c71ff22770ad22f3fc0_PRF-Dandolo-Linkers-Final.pdf

⁷ Australian Government. (2025). 2024 Early Childhood Education and Care National Workforce Census National Report, p. 12.

⁸ Deloitte Access Economics. (2023). Review of the Inclusion Support Program - final report.

<https://www.education.gov.au/download/17404/review-inclusion-support-program-final-report/35230/document/pdf>

with additional needs in early learning and care settings. The review delivered clear findings, which should guide the design of the Thriving Kids initiative:

Finding 3: Discrepancies between eligibility and program requirements across federal and state inclusion programs have resulted in **increased complexity and administrative burdens** for ECEC services operating across multiple policy jurisdictions.

Finding 8: Eligibility requirements and support provided to children with disability and/or additional needs are **inconsistent** across different government programs that target similar objectives, participants and activities.

Finding 9: There are **no identified data linkage** arrangements between ECEC services and other government programs and initiatives supporting children experiencing vulnerability and/or additional needs.

Finding 12: The application process for additional educator funding is **burdensome** and requires a **large investment of time** by ECEC staff.⁹

The productivity loss generated by the ISP is immense. Time spent on paperwork is time taken away from children. The Thriving Kids initiative should only be delivered in early learning and care services if it is accompanied by sweeping changes to the ISP, and if it avoids the pitfalls of the ISP. ELACCA supports the Productivity Commission's proposal of a new inclusion funding mechanism - the Mainstream Inclusion Stream – as part of the solution to this problem.¹⁰ We also note the release of updated ISP Guidelines on 1 October 2025, and the Department of Education's statement that this update will 'make the program easier to understand and apply'.¹¹

Key message: Early childhood educators are essential in building inclusion and strong outcomes for children – and they need more funding, more time, ongoing development and better administrative systems to do this.

(c) Transitions through mainstream systems

The mainstream systems that children and families encounter – including education, health and social services – are often poorly designed for end users, and ill-equipped to deliver coordinated or 'wraparound' supports.

When parents and carers seek support for a child with additional needs, they are often faced with a complex, disconnected network of services, featuring multiple agencies, application processes and funding streams. This is a formidable barrier to accessing early intervention supports.

In the immediate term, we cannot make the intervention service system simple for families to navigate (although this must be a medium-term goal, attracting policy attention). In the meantime, the Thriving Kids initiative should build in navigation supports for families. The role of 'navigator' or 'linker', situated within the early learning system, could have a profound positive impact for families, helping them to make sense of the service system and bridging the gaps between 'silos'.

Within the education system, the transition from early learning to school is a pivotal moment for all children – and is especially important for those with disability and additional needs. In research conducted in conjunction with Monash University, the Australian Education Research Organisation (AERO) highlighted the dearth of evidence to support high-quality transition practices for children with additional needs.¹² Thriving Kids should heed this call, and commission research into effective practices to support children making the transition to school.

⁹ Deloitte Access Economics, op. cit., emphasis added.

¹⁰ Productivity Commission. (2024). A path to universal early childhood education and care – Inquiry report, volume 1. Report no. 106 – 28 June 2024. Canberra: Productivity Commission.

¹¹ Department of Education (Australia). (2025b). 'Inclusion Support Program', accessed 3 October 2025, <https://www.education.gov.au/early-childhood/providers/extra-support/inclusion-support-program>

¹² Australian Education Research Organisation. (2023). Transitions to school for children with disability or developmental delay – evidence summary. <https://www.edresearch.edu.au/sites/default/files/2023-08/transitions-to-school-children-with-disability-summary-aa.pdf>

Key message: The mainstream service system may seem ‘universal’, but access and coordination are often difficult for families. Navigation supports are essential, and could be located within the early learning and care system.

Reinforcing existing early learning sector reforms

In building the Thriving Kids system, the Australian Government will be operating in an already complex environment. This is particularly the case for the early learning and care sector, which has been engaged in a series of cross-cutting inquiries and reform processes in the last two years, including:

- The Productivity Commission inquiry into early childhood education and care
- The Australian Competition and Consumer Commission inquiry into early childhood education and care pricing
- Child safety reforms, involving Commonwealth and state agencies and legislatures
- The Commonwealth review of the ISP
- Industrial reform, including the introduction of the Worker Retention Payment.

Many of these reform processes are (or should be) mutually reinforcing. ELACCA urges the Australian Government to build on the findings and recommendations of recent inquiries into the early learning system, to help ensure that Thriving Kids addresses, rather than reinforces, barriers to the participation of children with additional needs in early learning and care. The current reforms in the early learning and care sector must align with reforms in the disability sector, particularly in the context of a workforce already under stress.