



Commissioner for Children and Young People
Western Australia

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Dear Dr Craik

Thank you for the opportunity to contribute to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning. I welcome the inquiry and am pleased to provide the following submission.

Role of the Commissioner for Children and Young People Western Australia

In December 2013 I was appointed Acting Commissioner for Children and Young and People pursuant to the *Commissioner for Children and Young People Act 2006* (the Commissioner's Act). The role of Western Australia's Commissioner for Children and Young People is one of broad advocacy: the Commissioner has a responsibility to advocate for, and promote and monitor the wellbeing of, Western Australians younger than 18 years of age, and to monitor and review written laws, draft laws, policies, practices and services affecting the wellbeing of children and young people.

The work of the Commissioner is underpinned by a reliance on the best available evidence, consultations with children and young people, and engagement with stakeholders.

The *Commissioner for Children and Young People Act 2006* sets out guiding principles which must be observed, including that *the views of children and young people on all matters affecting them should be given serious consideration and taken into account*.¹ Priority and special regard must also be given to the interests and needs of Aboriginal and Torres Strait Islander children and young people, and to those who are vulnerable or disadvantaged for any reason.²

The Commissioner is also required to have regard to the United Nations Convention on the Rights of the Child (UN Convention). As a signatory to the UN Convention, Australia's obligations include ensuring that in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration (Article 3).

¹ *Commissioner for Children and Young People Act 2006* (WA), section 4(c).

² *Commissioner for Children and Young People Act 2006* (WA), section 20(1(a)).

Caring for the future growing up today

The significance of early childhood

As many submissions to this inquiry have articulated, it is difficult to overstate the importance of early childhood. As outlined in this office's Early Childhood Issues Paper³, early childhood is a particularly sensitive time due to the extent to which brain development is occurring.⁴ Early childhood development is the foundation for later development in all domains of wellbeing and sets the trajectory for learning, physical and mental health, behaviour and wellbeing through childhood, adolescence and into adulthood.^{5 6 7} From before birth through early childhood a child's physical, emotional and cognitive skills and capacities develop at a rate which exceeds that of any other stage of life.⁸

A range of longitudinal studies provide strong evidence of the way experiences in early childhood have life-long impacts, including on later achievements, social adjustments, mental health, physical health and longevity of individuals⁹. Neurobiological and social science research has established that, in interaction with their genes, children's environments and experiences in early childhood have a major impact on the development of the brain and therefore on all domains of development – physical, cognitive, language, social and emotional.^{10 11}

Given the importance of early childhood, it is crucial that policies, programs and services support the healthy development of our young children and prioritise their needs and those of their parents.¹² Public investment in high quality early childhood care and education will have positive impacts on the health and wellbeing of children who access these services and deliver significant social and economic returns over time.

The Commissioner's Wellbeing Monitoring Framework

On 14 July 2014 I released the second editions of two important Western Australian reports that provide a framework for monitoring the wellbeing of Western Australia's

³ Commissioner for Children and Young People, Western Australia, April 2013, *Issues Paper 11 – Early Childhood*, [www.cyp.wa.gov.au/content/Early-childhood-\(0-to-8-years-of-age\).aspx](http://www.cyp.wa.gov.au/content/Early-childhood-(0-to-8-years-of-age).aspx)

⁴ National Research Council Institute of Medicine 2000, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, eds JP Shonkoff & D Phillips, National Academy Press, Washington DC.

⁵ National Scientific Council on the Developing Child 2007, *The Science of Early Childhood Development, Centre on the Developing Child*, Boston.

⁶ Schroeder J et al 2009, *Creating Communities for Young Children: A Toolkit for Change, Human Early Learning Partnership*, Vancouver.

⁷ Royal Society of Canada & Canadian Academy of Health Sciences Expert Panel 2012, *Early Childhood Development: adverse experiences and developmental health*, eds M Boivin & C Hertzman, Royal Society of Canada, Ottawa.

⁸ National Research Council Institute of Medicine 2000, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, eds JP Shonkoff & D Phillips, National Academy Press, Washington DC.

⁹ Moore, T. 2014 *Understanding the nature and significance of early childhood: New evidence and its implications*, Centre for Community Child Health, Presentation at Centre for Community Child Health seminar, Investing in Early Childhood—the future of early childhood education and care in Australia, The Royal Children's Hospital, Melbourne, 25 July 2014. See, for example, Christchurch Health and Development Study, British Cohort Study, Adverse Childhood Experiences Study, and the Longitudinal Study of Australian Children.

¹⁰ National Research Council Institute of Medicine 2000, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, eds JP Shonkoff & D Phillips, National Academy Press, Washington DC.

¹¹ National Scientific Council on the Developing Child 2007, *The Science of Early Childhood Development, Centre on the Developing Child*, Boston.

¹² Centre for Community Child Health 2006, *Policy Brief No 1 2006: Early childhood and the life course*, Royal Children's Hospital, Melbourne, p. 3.

children and young people. The first of these reports, *The State of Western Australia's Children and Young People*, provides a picture of how children and young people in WA are faring according to 40 key measures of wellbeing, and the second, *Building Blocks: Best practice programs that improve the wellbeing of children and young people*, lists and describes 126 best practice and promising programs from around Australia that improve the wellbeing of children and young people.

The data collected in *The State of Western Australia's Children and Young People* show that most Western Australian children are healthy and their material and physical needs are well met. Generally, WA compares well against national and international data. However, the report identifies some areas of wellbeing where Western Australian children and young people are behind national and international trends. Of most concern, the report identifies the ongoing and, at times, significant disadvantage which continues to be experienced by many Aboriginal children and young people.

The report details that in 2013 there were more than 570,000 children and people younger than 18 years living in WA. Over the last decade, the number of 0 to 17 year-olds in Western Australia increased by almost 90,000, or 18.5 per cent. The largest increase (28.5%) occurred in the early childhood age group of 0 to eight years.¹³ The large increase in the number of young children in the population has direct relevance for early childhood service delivery and the availability of childcare places.

Early education is one of 40 wellbeing measures identified and discussed in *The State of Western Australia's Children and Young People*. The report shows that in 2013 there were more than 35,000 enrolments in Kindergarten programs and more than 34,000 enrolments in Pre-primary programs across WA. More than 98 per cent of four-year olds in WA are enrolled in Kindergarten.¹⁴

Of concern are data demonstrating that twenty-three per cent of five year-old children in WA were considered developmentally vulnerable on one or more domains in 2012. While this is an improvement on the percentage of 24.7 per cent reported in 2009, it is an area which continues to demand the attention of government, and is particularly relevant to considerations of early childhood education and care policy.

Around 6.4 per cent of Kindergarten students and 6.8 per cent of Pre-primary students are Aboriginal children. Aboriginal children are significantly more likely to be developmentally vulnerable when entering school – 49 per cent were considered developmentally vulnerable on at least one domain in 2012.

Aboriginal students are also significantly less likely to attend regularly than their non-Aboriginal peers. In 2013 only around 35 per cent of Aboriginal children enrolled in Kindergarten or Pre-primary programs were recorded to attend regularly¹⁵, compared with over 70 per cent of non-Aboriginal children.¹⁶

¹³ Commissioner for Children and Young People Western Australia, 2014, *The State of Western Australia's Children and Young People – Edition Two*.

¹⁴ Children in Western Australia can attend Kindergarten from the beginning of the year in which they turn four years and six months.

¹⁵ Students who attend more than 90 per cent of the time

¹⁶ Commissioner for Children and Young People Western Australia, 2014, *The State of Western Australia's Children and Young People – Edition Two*, p.170.

The data available in *The State of Western Australia's Children and Young People* point to the need to do more to ensure high quality early childhood education and care is accessible to all Western Australian children, and particularly to Aboriginal children and children who are considered developmentally vulnerable.

The second report from the Wellbeing Monitoring Framework, *Building Blocks*, is a resource of evidence-based programs that have been shown to – or have strong potential to – improve the wellbeing of children and young people. Programs detailed in the report are categorised under eight domains. Those programs described under the education domain are likely to be of greatest relevance to this inquiry. I note that the draft inquiry report refers to the positive long term outcomes provided by the targeted interventions of the Abecedarian Project in the United States,¹⁷ and I draw your attention to information in the report about the 3A Project (Abecedarian Approach Australia)¹⁸ which is a Western Australian program based on the Abecedarian approach and run by the Gumala Aboriginal Corporation in the Wakuthuni community in the Pilbara.

2014 Thinker in Residence

I would also like to draw the Commission's attention to the work of Dr Michael Ungar, international expert in child resilience. Earlier this year Dr Ungar visited Perth as the Commissioner for Children and Young People Western Australia's 2014 Thinker in Residence. During his two-week residency Dr Ungar worked with management and staff from government and non-government organisations, and parents, offering new perspectives on a community-wide approach to building resilience in children and young people, particularly those who are vulnerable and have complex needs.¹⁹ His work has direct relevance to this inquiry.

Dr Ungar uses the following definition of resilience:

In the context of exposure to significant adversity, resilience is both the capacity of individuals to navigate their way to the psychological, social, cultural, and physical resources that sustain their wellbeing, and their capacity individually and collectively to negotiate for these resources to be provided in culturally meaningful ways²⁰.

Echoing finding 8.1 from the draft inquiry report, that funding *has an important role to play in improving accessibility to ECEC for children with additional needs, or who live in locations without access to ECEC²¹*, Dr Ungar believes that services *can jumpstart processes that strengthen children's resilience²²*.

¹⁷ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.184

¹⁸ Commissioner for Children and Young People 2014, *Building Blocks: Best practice programs that improve the wellbeing of children and young people - edition two*, Commissioner for Children and Young People, p.62.

¹⁹ Dr Ungar's report on his time in Western Australia is available from the Commissioner for Children and Young People Western Australia's webpage at www.cryp.wa.gov.au/content/2014-Thinker-in-Residence-Michael-Ungar.aspx#sthash.rYG8vFCA.dpuf

²⁰ Resilience Research Centre Homepage, www.resilienceresearch.org

²¹ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.361.

²² Ungar, M., 2014 *Report of the 2014 Thinker in Residence: Resilience*, Commissioner for Children and Young People Western Australia, www.cryp.wa.gov.au/content/2014-Thinker-in-Residence-Michael-Ungar.aspx

In his summary report of his visit to Western Australia, Dr Ungar identified a number of strategies that could help strengthen children's resilience. Those of particular relevance to this inquiry include:

- *accessible, subsidised quality childcare for vulnerable children*
- *culturally appropriate spaces in schools and other public institutions*
- *coordinating in-home and community based treatment teams that provide contextually specific and culturally appropriate interventions*
- *the creation of new models of coordinated service that are appropriate for frontline professionals to use in their everyday work*
- *evaluation of new and innovative services*
- *tracking children's patterns of service use and identification of gaps in service²³.*

It is pleasing that some of these strategies are already reflected in the draft inquiry report; however, greater emphasis on ensuring culturally-appropriate service delivery, coordinating and integrating services, and ensuring the quality of services remains at the forefront of decision making, would be warranted.

A copy of Dr Ungar's report is available on my website ccyp.wa.gov.au

Integrated services

I welcome the Commission's consideration of integrating services as a strategy for improving accessibility.²⁴ There is increasing recognition of the need for greater coordination and the potential benefits in integration of services for vulnerable children and young people and their families.^{25 26} The Centre for Community Child Health at the Royal Children's Hospital Melbourne highlights the importance of integrated early childhood education and care services as 'an integral part of a wider service system that is capable of addressing the additional needs and challenges that young children and their families face'²⁷.

²³ Ungar, M., *Report of the 2014 Thinker in Residence: Resilience*, Commissioner for Children and Young People Western Australia, www.ccyp.wa.gov.au/content/2014-Thinker-in-Residence-Michael-Ungar.aspx

²⁴ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.184.

²⁵ Centre for Community Child Health 2006, *Policy Brief No 4 2006: Services for young children and families: an integrated approach*, Royal Children's Hospital, Melbourne.

²⁶ Edith Cowan University, *Child and Parent Centres on Public School Sites in Low Socioeconomic Communities in Western Australia: A Model of Integrated Service Delivery Literature Review*, www.det.wa.edu.au/redirect/?oid=com.arsdigita.cms.contenttypes.FileStorageItem-id-14350355&title=CPC+on+Public+School+Sites+in+Low+Socioeconomic+Communities+in+WA&stream_asset=true

²⁷ Moore, T.G., McDonald, M., Robinson, R., Goldfeld, S., West, S., & Oberklaid, F. (2014). *Childcare and early childhood learning: Response to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning*. Parkville, Victoria: Centre for Community Child Health, Murdoch Childrens Research Institute, The Royal Children's Hospital.

As noted in my office's *Early Childhood Issues Paper*, universal early childhood services and programs should be accessible by all young children and their families.²⁸ A model which integrates additional services for those with specific needs or who experience barriers to accessing universal services would lead to:

- less fragmented services
- improved access to services
- more effective identification and referral for those with additional needs
- a better response to emerging needs and problems
- a greater focus on prevention and early intervention.

Access to early childhood education and care

This inquiry presents an important opportunity to develop a more coordinated approach to public funding of early childhood education and care and to simplify the current system which can be extremely complex for parents to negotiate. Consultations my office has conducted across Western Australia demonstrate that the availability and affordability of childcare has a substantial impact on families. The draft inquiry finding that the design of current funding measures results in a declining proportion of assistance to lower income families who are least able to afford these services is extremely concerning and this is an area which should be addressed as a priority.²⁹

High quality childcare can be particularly beneficial for children from less advantaged backgrounds who tend to lag behind throughout their education, and can play a key role in narrowing the gap that exists between advantaged and disadvantaged children upon school entry.^{30 31} Unfortunately high quality childcare is often not easily accessible to children from low-income families. Recent research shows that lower income areas tend to have poorer quality early childhood education and care than more advantaged neighbourhoods, and that disadvantaged families are more likely to face barriers accessing and remaining engaged with early childhood education and care services.³² This needs to change if we are to fully realise the potential of all our young people and to close the gap that exists between children and young people from advantaged and disadvantaged backgrounds.

The proposal to simplify the currently complex early childhood education and care subsidy arrangements to make it easier for families, particularly more disadvantaged

²⁸ Commissioner for Children and Young People, Western Australia, April 2013, *Issues Paper 11 – Early Childhood*, [www.ccp.wa.gov.au/content/Early-childhood-\(0-to-8-years-of-age\).aspx](http://www.ccp.wa.gov.au/content/Early-childhood-(0-to-8-years-of-age).aspx)

²⁹ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.417.

³⁰ Cloney et al, 2013 cited in Moore, T.G., McDonald, M., Robinson, R., Goldfeld, S., West, S., & Oberklaid, F. (2014). *Childcare and early childhood learning: Response to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning*. Parkville, Victoria: Centre for Community Child Health, Murdoch Childrens Research Institute, The Royal Children's Hospital.

³¹ Mathers, S., Eisenstadt, N., Sylva, K., Soukakou, E. and Ereky-Stevens, K. January 2014, *Sound Foundations: A Review of the Research Evidence on Quality of Early Childhood Education and Care for Children Under Three Implications for Policy and Practice*, Sutton Trust www.suttontrust.com/news/publications/sound-foundations/

³² Moore, T.G., McDonald, M., Robinson, R., Goldfeld, S., West, S., & Oberklaid, F. (2014). *Childcare and early childhood learning: Response to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning*. Parkville, Victoria: Centre for Community Child Health, Murdoch Childrens Research Institute, The Royal Children's Hospital.

and vulnerable families, to access is welcome.³³ However, it is important that the benefits of access to childcare for disadvantaged and vulnerable families be acknowledged as an issue separate from workforce participation. Any proposals to tighten eligibility requirements (for example, activity tests) must take into account the benefits that children from disadvantaged and vulnerable families receive from access to high quality childcare. I reiterate comments made in a joint submission on the National Quality Framework for Early childhood Education and Care by Australian Commissioners with responsibility for children and young people:

*The provision of care and support services for children whose parents are not in the workforce should also be an important consideration, particularly where children and families are subject to disadvantage. High quality childcare and an evidence based learning framework can enable positive life outcomes for these children.*³⁴

While I note the proposal to explicitly exempt some families from the activity test, I am concerned that this will not go far enough to facilitating access for all vulnerable children and those who would greatly benefit from access to high quality childcare.

Children with additional needs

I support the Productivity Commission's recognition of the need to support access of children with additional needs. Requirements should be structured to ensure ease of entry for all children that require this support and allocated funds should be sufficient to meet need. I believe it is important to have a system which is flexible enough to meet the specialised needs of a wide range of children. A specific example of an area of significant unmet need in WA is young children with Fetal Alcohol Spectrum Disorder (FASD).

Despite recognition that specialist help and early intervention can result in more positive outcomes for children with FASD, there are significant barriers to them obtaining this help. Children with FASD face obstacles obtaining a diagnosis and receiving the help and support they need. Obstacles include limited diagnostic services and failure to include FASD within disability funding eligibility criteria to enable specialist interventions and supports. FASD is one example of an area in which better outcomes for children with additional needs could be realised by the provision of support for access to high quality early childhood education and care, and greater integration of health and other specialist support services.³⁵

Grandparents raising grandchildren

I would also like to make a brief comment about grandparents who take primary responsibility for raising their grandchildren. The number of children and young people who are unable to live with their parents, mostly due to child abuse and neglect, and have been formally placed in out-of-home care has almost doubled in Australia since

³³ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.534.

³⁴ Australian Capital Territory Children and Young People's Commissioner, New South Wales Commission for Children and Young People, Queensland Commission for Children and Young People and Child Guardian, Commissioner for Children Tasmania and Western Australian Commissioner for Children and Young People, 2008, *Joint submission on the National Quality Framework for Early childhood Education and Care*.

³⁵ The Parliament of the Commonwealth of Australia, 2012, *FASD: The Hidden Harm, Inquiry into the prevention, diagnosis and management of Fetal Alcohol Spectrum Disorders*, House of Representatives Standing Committee on Social Policy and Legal Affairs, November 2012.

2003.³⁶ The majority of these children and young people are living in relative or kinship care, primarily with grandparents³⁷ and this is the fastest growing form of out-of-home care across Australia³⁸. Among the range of challenges grandparent carers face are financial challenges, including accessing sufficient income to support the children in their care. Research has found that grandparent carers are financially disadvantaged compared to other families with children.³⁹ From my submission to the current Commonwealth Senate Inquiry into this topic, I believe it is incumbent on government to ensure that grandparent carers receive the support and resources they need to adequately provide for the children and young people in their care.⁴⁰ Many grandparents who care for their grandchildren need practical assistance such as financial support, access to health care and education. It is my view that any changes proposed by the early childhood education and care inquiry must not disadvantage low income grandcarers, either financially or with regard to service access.

Early childhood education and care workforce

Healthy development of children is underpinned by secure attachment and loving and responsive relationships with parents and other caregivers,^{41 42 43} and similarly by nurturing and stimulating language and learning environments.⁴⁴ Aside from parents and family, childcare workers are some of the first adults to have sustained contact with a child. This puts them in a unique position to observe the development of children under their care, and gives them the capacity to identify any particular developmental needs or areas of concern. The best interests of the child are served when these workers have the knowledge and training to recognise the needs of children in their care and to be able to access or refer the child to specialised services or supports before these issues become chronic or entrenched. Recent improvements in early childhood education and care standards and staff qualification requirements associated with the National Quality Framework are welcomed and we should be aiming to further build upon these gains.

³⁶ Australian Institute of Family Studies 2013, *Children in Care. Fact Sheet. June 2013.* www.aifs.gov.au/cfca/pubs/factsheets/a142092/index.html

³⁷ Brennan, D., Cass, B., Flaxman, S., Hill, T., Jenkins, B., McHugh, M., Purcal, C., & Valentine, K. 2013 *Grandparents raising grandchildren: Towards recognition, respect and reward (SPRC Report 14/13)*. Social Policy Research Centre (SPRC), University of New South Wales.

³⁸ Boetto, H. 2010 Kinship Care: A review of the Issues. *Family Matters* 2010 No.85 Australian Institute of Family Studies, p60-67.

³⁹ Brennan, D., Cass, B., Flaxman, S., Hill, T., Jenkins, B., McHugh, M., Purcal, C., & Valentine, K. 2013 *Grandparents raising grandchildren: Towards recognition, respect and reward (SPRC Report 14/13)*. Social Policy Research Centre (SPRC), University of New South Wales.

⁴⁰ Commissioner for Children and Young People Western Australia, 2014, *Submission to the Inquiry into grandparents who take primary responsibility for raising their grandchildren.* http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Grandparent_Carers/Submissions

⁴¹ Centre for Community Child Health 2009, *Policy Brief No 15 2009: Caring for Young Children: What Children Need*, Royal Children's Hospital, Melbourne.

⁴² National Research Council Institute of Medicine 2000, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, eds JP Shonkoff & D Phillips, National Academy Press, Washington DC, pp. 264–265.

⁴³ National Scientific Council on the Developing Child 2007, *The Science of Early Childhood Development*, Centre on the Developing Child, Boston, pp. 1–2.

⁴⁴ National Research Council Institute of Medicine 2000, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, eds JP Shonkoff & D Phillips, National Academy Press, Washington DC, pp. 161–162.

I also note the Commission's finding that *wages are relatively low and job satisfaction is mixed across the sector with widespread concerns from within the sector that ECEC workers are undervalued and under paid.*⁴⁵ This is not a new issue and my points here reflect those my office made in 2011 in a submission to the Productivity Commission's *Early Childhood Development Workforce Issues Paper* which remain pertinent to the current inquiry.

Despite their important role in supporting the early development of children, in particular in terms of social development and foundations for learning, the early childhood education and care workforce continues to be undervalued in terms of remuneration and to an extent in the way that childcare work is perceived in the general community. International research has also noted the effects of low pay on the relative quality and stability of the workforce.⁴⁶ If staff feel valued and are adequately rewarded, they are more likely to stay in the sector. Significant challenges remain in this regard, particularly in rural and remote communities where the attraction and retention of qualified staff continues to be impacted by a number of issues including lack of affordable housing and extremely high costs of living. There are particular difficulties in areas such as the north-west of Western Australia. Further challenges to the delivery of quality care are also presented by the continuing significant shortfalls in the number of qualified Aboriginal people in the sector, as well as workers who have the skills to ensure the needs of Aboriginal children and children from culturally and linguistically diverse families are met.

I note that the Commission has proposed viability assistance to support the provision of childcare in rural and remote areas.⁴⁷ This is important given the challenges faced by providers in these areas, including higher costs, fluctuating need and higher proportions of children who are developmentally vulnerable in some geographical areas. Viability assistance must be sufficient to realistically meet need and address the higher costs and other challenges associated with delivery of services in regional, rural and remote areas. Government has an important role to play in ensuring high quality services are available in vulnerable and disadvantaged communities and that these services are sustainable.

Consulting children

As noted earlier, the Commissioner for Children and Young People Western Australia must ensure that the views of children and young people on all matters affecting them are given serious consideration and taken into account.⁴⁸ Children and young people have a unique and important view point that is invaluable in understanding their issues and developing solutions to challenges. Even very young children can provide important feedback on their experiences and desires. I recommend that children be involved in the review of early childhood education and care services. When given the opportunity, children share their ideas on what makes a good early childhood education and care service, what is most important to them and give feedback on their general experience. My office has published a range of resources including guidelines and toolkits to help inform and encourage the participation of children and young

⁴⁵ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.465.

⁴⁶ UNICEF, 2008, *The child care transition: A league table of early childhood education and care in economically advanced countries*, *Innocenti Report Card 8*, UNICEF Innocenti Research Centre, Florence, pp.23 and 26.

⁴⁷ Productivity Commission 2014, *Childcare and Early Childhood Learning*, Draft Report, Canberra, p.539

⁴⁸ *Commissioner for Children and Young People Act 2006 (WA)*, section 4(c).

people in decisions that affect them. These resources are available from my website.⁴⁹ The Commissioner for Children Tasmania has also produced a guide to involving children in decision making which may be useful to the inquiry.⁵⁰

Thank you again for the opportunity to comment on the draft inquiry report. I would be pleased to contribute to any further consultations that are conducted as part of the Productivity Commission's work in this area.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jenni', with a stylized flourish at the end.

JENNI PERKINS

A/Commissioner for Children and Young People WA

26 August 2014

⁴⁹ www.cyp.wa.gov.au/content/-Participation-.aspx

⁵⁰ www.childcomm.tas.gov.au/wp-content/uploads/2013/03/Activity-booklet.pdf