



5 December 2019

## Early Learning Association Australia Submission: Child Information Sharing Scheme, Phase 2

Early Learning Association Australia (ELAA) is a peak body which works in partnership with early learning providers and parents to deliver our vision of excellence in learning for every child. Our diverse membership base of over 550 service providers managing services at nearly 1,200 locations includes early years management organisations, independent kindergartens, local governments, long day care services, government and independent schools and out of school hours care programs.

ELAA welcomes the opportunity to provide this submission on this important initiative, and to provide feedback on the Phase 2 implementation of the Child Information Sharing Scheme on behalf of our members. Please find below our responses to the consultation questions. We consent to publishing our responses in full in the consultation report.

**The Regulatory Impact Statement was developed considering the operational and financial impacts of the proposed Amendment Regulations. Are there any impacts or opportunities that have not been identified in the Regulatory Impact Statement, which you think need consideration?**

ELAA's members are supportive of the implementation of the Child Information Sharing Scheme.

ELAA and our members support the implementation of Option 2 'Targeted prescription of universal health and education services and other key service providers'. Sharing information is essential to the ability of professionals to work in the interests of the child and the child's family. Sharing information about a child's safety and wellbeing:

- protects the child as concerns can be addressed before they escalate getting the right services in place at the right time
- supports a coordinated and collaborative response to a child's needs
- delivers better outcomes as professionals share their perspectives and understandings of the issues and challenges experienced by the child and the child's family and can better respond to crises and tailor their services.

An important consideration in the implementation of Phase 2 of the scheme are any legacy issues associated with Phase 1. A member has reported that Information Sharing Entities (ISE) stopped sharing information with those services which were excluded from Phase 1, or only shared reluctantly, concerned about whether they were breaching the requirements of the scheme. Communication strategies will be needed with ISEs from both phases to ensure the broader success of the scheme.



At a recent information/consultation session at ELAA with early years management services, the Department of Education and Training outlined a proposal for implementation of the scheme which would require:

- a three-hour interactive briefing for Leaders
- a full-day practical sharing workshops for two staff in each service for example, in a stand-alone kindergarten; or each service site of an early years management service.

There are concerns about the onerous level of training required for early years management services which have whole of organisational processes in place for communication and implementation of policy and practice change. It is recommended that in the case of early years management services, training opportunities be communicated through the central administration so they can better manage the implementation and ensure that the implementation is undertaken in a cost-effective manner.

**From the perspective of your workforce or organisation, do you have any other comments on the findings of the Regulatory Impact Statement?**

Families who are applying for permanent residency can be very concerned about sharing of information which may jeopardise the outcome. For example, some families will not seek out disability supports for a child in case it affects their application. Members questioned whether there is a limit to the sharing of information which may have long-term unintended consequences.

We understand that the training will provide additional information about:

- how the scheme intersects with and supports both MARAM and Family Violence Information Sharing Scheme
- the relationship of the scheme to Child Safe Standards.

Easy access to standard resources such as request forms and lists of prescribed entities are will both save time and promote consistency. Developing a simple guide with steps and principles will also help so that teachers so they can quickly and easily make decisions about whether they are needing to request consent from parents or not. Members also questioned how to communicate the scheme to parents and children, and what best practice might look like, seeking the views of parents and children, including from Aboriginal and Torres Strait Islander families who may be reluctant to share information. Additional resources, including case examples and scenarios which reflect the engagement of early childhood services would be valued by the sector.

It is hoped that the implementation of Phase 2 of the scheme is informed by the learnings from Phase 1 of the scheme. Online modules are an essential tool for the implementation of the scheme particularly for those in rural areas or who are otherwise not able to attend the training.

We understand that feedback from Phase 1 participants was that the delay in the availability of the online resource following the roll-out of the initial training was not helpful and impacted on the quality of the implementation of the scheme.

Additionally, it is hoped that the implementation of the scheme includes changing the content of the certificate and tertiary training courses to reflect the scheme's requirements.



If you have any questions about this submission, please contact Lisa Minchin, ELAA Advocacy and Grants Lead, on:

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Lisa's days of work are Monday, Tuesday and Thursday.

Sincerely

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