

Your Ref:
Our Ref: 905

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Jenny Gale
Co-Chair, Literacy Advisory Panel
Secretary
Department of Premier and Cabinet

Professor Natalie Brown
Co-Chair, Literacy Advisory Panel
Director
Peter Underwood Centre for Educational Attainment

By email: secretary@dpac.tas.gov.au
policy@dpac.tas.gov.au

Dear Co-Chairs,

Re: Tasmania's Community-wide Framework on literacy

Thank you for the opportunity to provide a written submission to inform the development of Tasmania's Community-wide Framework ('Framework') which aims to improve literacy in Tasmania from the early years through to adulthood.

Role of the Commissioner for Children and Young People

The Commissioner for Children and Young People is an independent statutory office established under Tasmania's *Commissioner for Children and Young People Act 2016* (the CCYP Act). The general functions of my role as Commissioner are set out in [section 8](#) and the principles which I must observe in performing these functions are set out in [section 4](#). Consistent with these functions and observing these principles, my comments focus on matters relevant to promoting and protecting the rights, wellbeing and best interests of children and young people in Tasmania. My comments are not intended to be exhaustive, and I would welcome the opportunity to provide further feedback as work to develop the Framework continues.

Terminology

I have adopted the broad definition of 'literacy' adopted by the Panel in this submission.¹

¹ Literacy Advisory Panel, *Paper One Setting the Scene – Tasmania's Community-wide Framework* (Discussion Paper, 2022) 4 (*Setting the Scene*).



The right to education

As stated by the Director-General of the United Nations Educational, Scientific and Cultural Organisation, '[l]iteracy for all is at the heart of basic education for all'.² To that end, the right to education is enshrined in a number of international instruments.³ Of special relevance here is Article 28 of the *United Nations Convention on the Rights of the Child* (UNCRC) which provides, among other things, that children have the right to education on the basis of equal opportunity (see further [here](#)) and Article 24 of the *United Nations Convention on the Rights of Persons with Disabilities* (UNCRPD) which recognises the right of people with disability to education, without discrimination (see further [here](#)).

Background – the Tasmanian context

While I acknowledge that there are differences of opinion, socio-economic disadvantage is a major factor that contributes to poor educational outcomes for Tasmanian students.⁴ This was reinforced by what children and young people told me about their educational needs during consultations to inform the *We Call It Happy - Wellbeing Consultation Report* (available [here](#)). Many of the issues identified in this report serve to underline the high level of disadvantage experienced by many Tasmanian children and young people.

Analysis of the most recent data from the National Assessment Program – Literacy and Numeracy (NAPLAN) by Dr Lisa Denny reveals 'dire education outcomes for Tasmanian students over time'.⁵ It is enormously concerning that Tasmanian children have the highest level of disadvantage amongst pre-school aged children in Australia.⁶ While this disadvantage lessens in prep, more than 1 in 5 Tasmanian children (21.5 per cent) were developmentally vulnerable on one or more domains of the Australian Early Development Census (AEDC) by their first year of full-time school.⁷ A further 15.6 per cent were 'developmentally at risk'.⁸

As noted by the Grattan Institute, Tasmanian schools keep pace with other states and territories with respect to student progress on numeracy, reading and writing development if school advantage is taken into account.⁹ Yet, as Dr Denny identifies ([here](#)), further work is needed, including a much greater emphasis on achieving the expected standard of literacy and numeracy knowledge and skills in primary school. To do this, it is critical that the Tasmanian Government tackles the substantial socio-economic gap that exists between higher and lower-SES students to

² Gianna Alessandra Sanchez Moretti and Tobias Frandell, *Literacy from a Right to Education Perspective* (Report to the Director-General of the United Nations Educational, Scientific and Cultural Organisation, 2013) 1.

³ See further, Universal Declaration of Human Rights (1948); UNESCO Convention against Discrimination in Education (1960); the International Covenant on Economic, Social and Cultural Rights (1966); the Convention on the Rights of the Child (1989) among others.

⁴ Tasmanian Audit Office, *Teaching quality in public high schools* (Report of the Auditor-General No. 13, 2014); but see also Peter Goss and Julie Sonnemann, *Measuring student progress – A state-by-state report card* (Grattan Institute Report, 2018).

⁵ Lisa Denny, *InSummary: Analysis and discussion of 10 years of NAPLAN data – literacy and numeracy knowledge and skills in Tasmania* (Report, 2022).

⁶ Australian Bureau of Statistics, *Socio-economic Indexes for areas (SEIFA) 2016* (Report, 2016); Setting the Scene (n 1) 15.

⁷ Setting the Scene (n 1) 17.

⁸ Denny (n 5).

⁹ Goss and Sonnemann (n 4) 18.



ensure that all students reach the expected standards for literacy to help them to thrive and fully participate in our community.¹⁰

Support is needed early, and it needs to be ongoing

In my February 2020 report [Investing in the Wellbeing of Tasmania's Children and Young People](#) (the Wellbeing Report), I advocated for greater investment in the first 1,000 days to give all children the best start in life and lay the foundations for healthy, happy, and prosperous lives. Doing so will lead to better outcomes for children in many areas, including literacy and all the benefits that flow. Interventions in the first 1,000 days should take an evidence-based, holistic, integrated, and inclusive approach, and be delivered both universally and proportionate to need.

Problems with literacy invariably begin in early childhood.¹¹ The introduction of reading to and speaking with children in the early years of a child's life is critical for supporting their literacy development. With 80 per cent of brain development occurring in the first three years of a child's life, it is critical that the introduction of literacy development opportunities begin as early as possible.

There is a gap between what the evidence says about the importance of the first 1,000 days of a child's life, and what is known within the community.¹² A proactive approach to educate families and the wider community is necessary to bridge this gap. Further investment in organisations, like the B4 Coalition (see further [here](#)), is needed to promote best practice messages about the importance of positive early adult-child relationships and a child's brain, early language, and literacy development.¹³

Families play a crucial role in a child's development as their 'first literacy educators'.¹⁴ As the Literacy Advisory Panel notes, the evidence shows that 'what parents do with their children is more important than their own educational or occupational level'.¹⁵ However, as at least 48 per cent of Tasmanian adults are functionally illiterate,¹⁶ many families need support to fulfil this role.

I didn't realise I had to read to my child. I didn't realise it was such an important thing. I didn't really know or have the support to read to my child.

(parent of a child aged 0–4 years)

Building supports for families, children and young people to improve literacy, and beyond, requires a whole of government approach. I commend the Tasmanian Government on taking a critical step

¹⁰ Denny (n 5).

¹¹ Noushin Arefadib and Tim Moore, *The importance and lifelong benefits of the early years: An analysis of the evidence* (Centre for Community Child Health, Murdoch Children's Research Institute Report, 2018); Commission on Social Determinants of Health, *Closing the gap in a generation* (World Health Organisation Report, 2008).

¹² Nathaniel Kendall and Eric Lindland, *Modernity, Morals and More Information: Mapping the Gaps Between Expert and Public Understandings of Early Child Development in Australia* (Report, 2013).

¹³ Royal Australasian College of Physicians Paediatric Policy and Advocacy Committee, *Early Childhood: The Importance of the Early Years* (Position statement, 2019) 35.

¹⁴ Susan Spedding, Jean Harkins, Laurie Makin and Peter Whiteman, *Investigating children's early literacy learning in family and community contexts – review of the related literature* (Final Report Commissioned for the Learning Together Research Program, 2007) 5.

¹⁵ Setting the Scene (n 1) 12.

¹⁶ Juliette Mendelovits, 'Adult literacy and numeracy – what's the story' (2014) *ACER Discover*.



forward in this context with the release of the inaugural *Child and Youth Wellbeing Strategy – It Takes a Tasmanian Village* (the Wellbeing Strategy). This strategy includes several actions that seek to reduce socio-economic disadvantage, and increase supports for the first 1,000 days of a child's life. This includes programs such as:

- *Bringing Baby Home* (pre and post birth support for parents at imminent risk of being placed in care);
- *Child Health and Parenting Service* (CHaPS) Sustained Nurse Home Visiting Program for families with complex needs;
- *Kids Care Clinics* to provide access to a multidisciplinary state-wide community paediatric service for vulnerable children; and
- *The Basics Program* to provide knowledge about effective caregiving in the first 1000 days.

I welcome these new targeted initiatives, and the Government's commitment to other actions, including the scoping and delivery of a universal parenting program, a staged outreach model for Child and Family Learning Centre (CFLCs) and the adoption of a child wellbeing model in CFLSs (including free access to speech pathologists and other service) among others. As I detail further below, these services need to be available and accessible to all families, in addition to families who have been previously identified as vulnerable or as having complex needs.

Beyond the first 1,000 days, it is crucial that school-aged children continue to be supported to ensure they are achieving literacy benchmarks to set them up with the skills they will need for future employment, community participation, and wellbeing.¹⁷ In particular, we need to identify vulnerable children at school entry (or before) to ensure that appropriate supports are in place to support them to remain engaged throughout their schooling journey. If a child is vulnerable at school entry, this will typically track through to poorer literacy and numeracy outcomes in each year of schooling.¹⁸

Supporting a child to remain engaged with learning means tackling risk factors for disengagement early, including in kindergarten, especially for vulnerable children and those with disabilities. Currently, this is not adequately recognised. For example, under the current Department of Education procedures for engagement, there is provision directed at effectively engaging learners on a continuum from Tier 1 to Tier 4, the latter tiers are concerned with learners who are identified as being at 'significant risk of disengagement' (Tier 3) or who have disengaged, and efforts are directed at re-engaging learners (Tier 4). This model is limited, as provision for Tier 3 and Tier 4 programs does not include primary school aged children where, as I noted above, issues often first emerge.

I am also concerned about the use of suspensions and exclusions from education within Tasmanian schools and the effect these practices may have on literacy development. Previous work undertaken by this office (available [here](#)) found that school exclusionary practices are not effective in changing students' behaviour as they fail to address the underlying issues causing the behaviour. I also note

¹⁷ The Tasmanian #100percentliteracy Alliance, *A road map to a Literate Tasmania* (Report, 2021).

¹⁸ Tim Moore, Noushin Arefadib, Alana Deery, Sue West, *The First Thousand Days: An Evidence Paper* (Report for the Centre for Community Child Health, Murdoch Children's Research Institute, 2017) 25.



that despite reforms under the *Education Act 2016* which require principals to proceed through a continuum of alternative measures to address unacceptable behaviour at school (except in the case of immediate health and safety risks) prior to using exclusionary practices, exclusions remain a commonly used behavioural management tool in many Tasmanian schools.¹⁹

I note the Department of Education has implemented a new educational adjustments funding model for students with disability based on need.²⁰ It will be important to independently review the model to ensure its implementation is tracking as intended, particularly noting the current adapted arrangements due to COVID-19.

Going forward – what is needed

Improving literacy is about providing greater support for children, young people and their families to reduce socio-economic disadvantage and promote opportunities for literacy skills development, beginning in the first 1,000 days. This should include:

- **Expanded and sustained Child Health Nurse Home visits program** - I strongly encourage the Government to expand this service to all Tasmanian children and families. Research consistently demonstrates that maternal, baby and child health and wellbeing is improved by regular maternal and child health nurse home visits during pregnancy and until the child is at least two years old.²¹
- **Expanded mother and baby units** - Families who are experiencing challenging ante-natal and post-natal issues currently have limited access to mother and baby units. These services need to be expanded as they play a vital role in supporting parents, as well as their babies, at a critical time in their growth and development.
- **State-wide intensive residential support services for families** - Access for vulnerable parents and babies to intensive residential support services (including 24-hour wrap-around support) should be available state-wide. The Government's commitment to the *Bringing Baby Home* program is a positive step in the right direction. However, consideration should be given to ensuring that the right supports and interventions are in place for all children and parents, in addition to those parents with babies at imminent risk of being removed from their care.
- **Parenting programs for all families** - Universal positive parenting programs are needed to ensure all parents have access to services to build their capacity to provide appropriate care to their children. The overall objective of positive parenting programs is to improve the wellbeing outcomes of the child. This is achieved through increasing a parent's knowledge, skills, and capacity as a caregiver, by improving parent-child interactions, and addressing parental wellbeing and family relationships. These types of programs are beneficial for all parents, not just for those who are experiencing difficulties. I commend the Government on

¹⁹ Tasmanian Department of Education, *Key Data* (Report, March 2021).

²⁰ Tasmanian Department of Education, *Education Adjustments Disability Funding* (2020). Available at [Educational Adjustments Disability Funding - The Department of Education Tasmania](#).

²¹ Catriona May, 'More Maternal and child health nurse visits help mothers and babies thrive' (2019) *Pursuit* available at [More maternal and child health nurse visits help mothers and babies thrive | Pursuit by The University of Melbourne \(unimelb.edu.au\)](#); David L Olds, 'Home visiting nurses – preventing crime by improving pre-natal and infant health and development' (2007) *Centre for Crime and Justice Studies* 69.



its commitments in the *Wellbeing Strategy* (Action 5 and Action 38) and encourage the Government to ensure that these actions appropriately resourced.

- **Increasing access to Child and Family Learning Centres** - Child and Family Learning Centres (CFLCs) perform a vital function in providing families with access to a host of multi-disciplinary services including primary health care, midwifery, child health services, mental health services, childcare, education, and social services are critical to support children and families. I am very supportive of the place-based hub service model as the best way to address the social determinants of inequities in child development. The activities taking place in CFLCs are important to allow parents and carers to build support networks. I warmly welcome the Government's commitments to increase the number of CFLCs and to fund a range of multi-disciplinary and allied health services within the CFLCs (see Action 31 *Wellbeing Strategy*).
- **Increasing availability and accessibility of health services** - Children, young people, and their families consistently tell me that the health services they need are often not readily available or accessible. This is a particular issue for regional communities, where, in addition to lacking access to specialist health services, general health services are often unavailable. Early access to allied health professionals, including speech pathology, improves language and communication skills.²²
- **More available and accessible housing for children and families** - Young people account for a substantial proportion of those seeking specialist homeless services in Tasmania.²³ Stable housing is integral to children and young people's wellbeing; it improves family relationships and parental mental health and stress, children attend fewer schools, and have better educational performance and school completion rates.²⁴
- **Literacy campaigns** - Better promotion of and access to information and services to support children and families to support learning. Initiatives to provide families with the knowledge, tools and resources (books, information about support for adult literacy, and contacts to pose any questions to along the way) to establish a strong and supported foundation on which to strengthen the whole family's capacity to learn about and value literacy.

Children's views - the right of children to have a say

Consistent with Article 12 of the UNCRC, I urge the Panel to provide ongoing opportunities for children and young people to be heard throughout the process to develop the Framework. Children and young people are the 'experts in their own lives and feedback'.²⁵ In addition, and in line with Article 19 of the UN *Declaration on the Rights of Indigenous Peoples*, the Tasmanian Government should actively engage with and seek the views of Aboriginal children and young people.²⁶

²² Rebecca Addo, Paula Chronic, Rebecca Reeve and Leanne Dowse, Economic evaluation of the impact of speech pathology services on criminal justice outcomes (Report Commissioned for Speech Pathology Australia, 2020) 3.

²³ Australian Institute of Health and Welfare, *Specialist homelessness services 2019-20: Tasmania* (Report, 2020).

²⁴ Australian Housing and Urban Research Institute, *How does security of tenure impact on public housing tenants?* (Research and Policy Bulletin, 2006); Moore, Arefadib, Deery and West (n 18) 38.

²⁵ Australian Childhood Trauma Group, 'Why have an approach to children's participation?' (2021). Available at <https://theactgroup.com.au/childrens-participation-and-voice/>.

²⁶ Committee on the Rights of the Child, *The right of the child to be heard* (General Comments, 2009). Available at [Microsoft Word - CRC-C-GC-12 advance unedited for distribution.doc \(ohchr.org\)](#).



Participatory processes must go beyond one-off individual consultations ‘to move beyond tokenism’²⁷ and be premised on the principles of co-design.²⁸

Working closely with Tasmanian Aboriginal Community

In addition to hearing the voices of Aboriginal children and young people, greater engagement with Tasmanian Aboriginal Community-controlled organisations and people is required. Achieving the literacy targets for Aboriginal people, in line with The National Agreement on Closing the Gap, will require the Government to work closely with Tasmanian Aboriginal Community to ensure that support programs, including literacy support programs, are culturally safe and appropriate.

Impacts of COVID-19

The effects of COVID-19 on children and young people are wide-ranging. In recent months, Tasmanians have adjusted to widespread community transmission of the virus. During this transition phase, there have been measures in place to reduce the spread of COVID-19. These measures have adversely impacted on services for children, young people and their families. For example, the temporary cessation of some child health nurse services, limitations on parental participation on school sites and restrictions on programs (e.g., Launching into Learning), and virtual learning for self-isolating students and for some students with disability or children who are immune-compromised. I have advocated strongly ([here](#)) about the importance of considering the needs of children and young people in any decision-making that affects their wellbeing and minimise barriers for children, young people and families accessing support and services within the community. I urge the Panel to take into account the same considerations in the development of the Framework.

Please do not hesitate to contact me if you would like to discuss my submission further.

Yours sincerely,

Leanne McLean

Commissioner for Children and Young People

cc: The Hon Roger Jaensch, Minister for Education, Children and Youth

²⁷ Forde, Kilkelly, Kelleher and Lundy (n 6) 14. See further Deirdre Horgan, ‘Consultations with children and young people and their impact on policy in Ireland’ (2017) *Social Inclusion* 5(3) 104-112; Committee on the Rights of the Child, *The right of the child to be heard* (General Comment, 2009) paragraphs 132-133. Available at [Microsoft Word - CRC-C-GC-12 advance unedited for distribution.doc \(ohchr.org\)](#).

²⁸ The Australian Centre for Social Innovation, *Unpacking Co-design* (2022). Available at [Unpacking co-design - The Australian Centre for Social Innovation \(tacsi.org.au\)](#).