

Independent Education Union

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Dr Mike Freeland MP
Committee Chair
Standing Committee on Health, Aged Care and Disability
Australian Parliament - House of Representatives

By Email: Health.Reps@aph.gov.au

Dear Dr Freeland

RE: Inquiry into the Thriving Kids initiative

The IEUA is a federally registered union representing our state and territory IEU branches. We have approximately 75,000 members and are the only union with coverage of principals, educational leaders, teachers, school support staff and early childhood professionals.

This submission is informed by the experiences of our membership in primary schools and early childhood education and care (ECEC) settings and responds to the terms of reference most relevant to our membership. Our recommendations are included at Annex A.

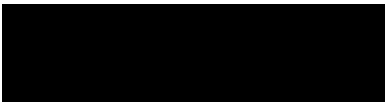
The IEUA understands Thriving Kids will be a national system of support for children excluded from the NDIS, that is, children aged 8 and under with mild to moderate developmental delays and autism. We note that Thriving Kids will be delivered by building on existing services, including schools and ECEC settings. We support parents' and advocates' calls for more information.

The national teacher workforce crisis is driven by unsustainable workloads. Schools and ECEC centres already lack sufficient funding and resources for increasing numbers of children with additional needs. Our union urges the committee to develop recommendations that prevent reduced NDIS funding and the design of Thriving Kids from exacerbating teachers' workloads.

Consultation with stakeholders including families, services, and teachers and their unions will be essential in the design and implementation of the program.

We wish the committee well in the development of its recommendations to government.

Kind regards


BRAD HAYES
IEU FEDERAL SECRETARY

Identify gaps in workforce support and training required to deliver Thriving Kids

Based on the limited available information about the Thriving Kids design there is a high risk that the program will exacerbate workforce support gaps, and that training gaps cannot be convincingly addressed given teachers are not, for example, healthcare workers.

Increasing the level of support for children with additional needs by requiring more from teachers who already have unsustainable workloads will further undermine teacher workforce stability and relative capacity. Around one in five young children experience developmental delay or autism; which indicates Thriving Kids will result in a large number of children and their families requiring more support from teachers. This teacher workload impact will in turn inevitably undermine educational and developmental outcomes for children, including those with additional needs. The impacts of further exacerbated teacher workloads will also negate or lessen the intended benefits of the Early Childhood Education and Care (Strengthening Regulation of Early Education) Bill 2025.

The design and implementation of Thriving Kids must ensure an integrated approach and sustainable workloads for the ECEC and primary school workforce through mandatory workload impact assessments such as the Teacher Workload Impact Assessment Tool contained in the National Teacher Workforce Action Plan. A review of duplicative documentation and excessive compliance regulations is also vital if the ECEC workforce is to maintain their focus on their core work of providing safe learning and care environments.

Teachers' capacity to support children with additional needs, including children with autism or developmental delays, is already hindered by inadequate resourcing and funding and a workforce attraction and retention crisis driven by unsustainable workloads. While leveraging existing services, including schools and ECEC settings, may provide a more integrated approach, it poses the risk of increasing teachers' workloads in the already time-intensive workload component of supporting children and students with additional needs, specifically the Thriving Kids cohort of children with autism and developmental delays.

The boundary between what teachers are equipped to offer – as opposed to the role of the relevant health professionals – must remain in focus in the design and implementation of Thriving Kids. If the boundaries between teachers and health professionals are disregarded or blurred then teachers, parents, and children with additional needs will be adversely affected.

The enrolment of children with additional needs in ECEC settings (and subsequently in schools) has been steadily increasing, with some of our teacher members reporting 35-60% of children enrolled at their ECEC service have learning support needs. Funding has not kept pace with the number of children presenting with diagnosed learning support needs, including autism and developmental delays.

Parental expectations may also be increased by Thriving Kids, given the program partly pivots on schools and ECEC centres providing "better support" for families and children in settings to which they are already connected.

As one of our teacher members explains, based on available information it appears that:

“... the aim of Thriving Kids is to take these kids out of the NDIS and meet their needs through the educational setting. This doesn't actually diminish their need for support, or the work providing that support... you can't just trim the money from the NDIS and expect educators/teachers to pick up the work.... A short (or even long) professional development program for teachers/educators isn't at all the same as providing time and resourcing for the actual supports for particular kids.”

Our union supports our members' views that paid training for teachers is not a substitute for appropriate funding and resources for children with additional needs in schools and ECEC settings. Training and professional development relating to Thriving Kids must be appropriate and timely and occur during paid hours with adequate relief time allocated.

Our members, who are ECEC directors also report that gaps in workforce support result in an inadequate focus on the wellbeing of teachers and educators. There is insufficient consideration of ECEC professionals' dedication, hours worked, outside hours study, time required to support families with complex needs and children with challenging behaviours and/or additional needs, all while caring for their own families.

In 2024, teachers identified 23.6% of school and ECEC age children needing further assessment due to medical, physical, behavioural, emotional, or cognitive concerns¹. This health crisis for Australian children cannot be solved by the teaching profession, and the design and implementation of Thriving Kids will fail if leveraging schools and ECEC centres results in increased workloads for teachers and childcare professionals; and in particular where any increase in workload results from governments and parents expecting teachers to deliver health supports for children with developmental delays and autism.

Identify mechanisms that would allow a seamless transition through mainstream systems for all children with mild to moderate support needs.

The IEUA wants to maximise the possibility for system-wide reforms that help children, teachers and parents.

We support the calls by other stakeholders' for reforms to address the needs of the 12.5% of Australia's child population with additional needs, to reduce inequities, and to lift our wealthy country's unacceptable child wellbeing global ranking (35th of 38).² 12.5% of Australia's children start school developmentally vulnerable in two or more development key domains, according to the 2024 Australian Early Development Census which shows the highest rate since 2009.³ Developmental vulnerability is higher in disadvantaged Australian communities, where 1 in 5 children are developmentally vulnerable on two or more key domains compared to 1 in 13 in the least disadvantaged areas. These gaps have persisted for over 15 years.

¹ Azpitarte F, Gray S, Guo S, O'Connor E, O'Connor M, Goldfeld S. Trends in teacher-reported special health care needs among children starting school in Australia and the United Kingdom over two decades. In progress.

² OECD Child Wellbeing Dashboard 2022 <https://www.oecd.org/els/family/child-well-being/data/dashboard/>.

³ Commonwealth of Australia (2025). AEDC National Report. ISSN 2206-284X (Online). Department of Education.

Our union is committed to economic and social equity and we are particularly concerned by the systemic and structural inequities that disproportionately disadvantage and increase the developmental risks for First Nations children, children from migrant and refugee backgrounds and children living in regional, rural and remote areas.

We support the ambitions for Thriving Kids to align with other current major national childhood initiatives: universal ECEC, the Building Early Education Fund, Closing the Gap, and place-based programs, which are underpinned by the Early Years Strategy and National Standards for Foundational Supports and related strategies.

Specifically, the IEUA supports calls for Thriving Kids to be centered around the Murdoch Research Institute's three core elements designed to make better use of existing service systems; and five design principles to guide this reform:

1. Uplift of mainstream health and education systems

Embedding proportionate responses in everyday settings including ECEC and schools, with additional help scaled to need.

2. Local solutions with national guardrails

Thriving Kids national mechanisms should include:

- Leverage the national network 470+ Child and Family Hubs as key local delivery points;
- Funding for partnership and integration for commissioners and providers;
- Robust data and monitoring to guide design, delivery, improvement, and evaluation.

3. Enabling parents to understand and act on best practice early intervention

Providing multiple offerings such as evidence-based advice and information, digital navigation supports, playgroups, structured family programs, and peer support.

Design principles to guide Thriving Kids reform

1. Equity and inclusiveness
2. Address social determinants and adversity
3. Prioritise evidence-based prevention and early intervention
4. Family-centred design:
5. Using data and evidence to achieve system responsiveness

The IEU's unique role and responsibility is to assess and anticipate the impacts on the teaching workforce by listening to the very real concern our teacher members are communicating about Thriving Kids in its current projected format. One of the major risks in the reduction of the funding for and scope of the NDIS is that, even with the new \$2 billion of funding for Thriving Kids and effective scaled targeted foundational supports, overall resourcing for children with disability and developmental delays is still being reduced. This is likely to adversely affect children, their families and teachers.

The IEUA supports investing Thriving Kids funding into scaled, targeted foundational supports for children with disability and developmental delay. However, this investment does not replace the need for increases in ongoing funding and resources for children presenting with additional needs in ECEC centres and primary schools.

Our union's support for Thriving Kids, remains conditional upon the program not being used as a substitute for increased funding and resourcing in schools and early childhood settings, so that teachers can meet the specific and time-intensive additional needs of children with developmental delays and autism.

The scaled, targeted foundational support for children with disability and developmental delay should be delivered in natural settings by lead practitioners within multidisciplinary teams. The effectiveness of this approach is demonstrated by existing evidence-based and scalable models that can be leveraged including a recent pilot conducted by the Brotherhood of St. Laurence. The union is of the view that such support for children with disability and developmental delay are likely to deliver better developmental outcomes for children as well as a reduction in families accessing the NDIS.

In identifying mechanisms that would allow a seamless transition through mainstream systems for all children with mild to moderate support needs the exacerbation of teacher workloads remains a primary concern for the IEU. Teachers very reasonably anticipate that the overall reduction in resourcing for children with additional needs, combined with the design of Thriving Kids, will result in ECEC centres and schools having increased workloads. As one of our members explains:

"Again, my chief issue here is the implication that educators/teachers and education institutions are about to be held responsible for another thing, or another level of some thing that they are already doing to at least some extent. Teachers can and do provide adjustments for kids, but doing so is work and that work can't just be absorbed, it needs to be funded and resourced. I imagine the inclusion and support experts responding to this inquiry will have clear ideas about how to provide support and include kids with mild to moderate support needs and government should listen carefully to what they say – and provide for it, rather than shifting the financing and labour provision to staff/schools who already have full-time jobs."

ANNEX A: RECOMMENDATIONS

1. Use the Thriving Kids investment to scale targeted, foundational supports for children with disability and developmental delay. These supports should deliver early intervention in natural settings, led by practitioners within multidisciplinary teams. Evidence-based and scalable models already exist and can be leveraged, including a recent pilot by the Brotherhood of St. Laurence, which showed strong developmental outcomes for children and reduced demand for families accessing the NDIS.
2. Ensure this scaled, targeted approach is well-funded and resourced so that the approximately one in five children with autism and developmental delays receive adequate and appropriate support.
3. Ensure this scaled, targeted approach is well-funded and resourced so that teachers' and ECEC professionals' workloads are not exacerbated and that the nature of their work with children with additional needs is appropriate to teacher training and experience.
4. Ensure sustainable workloads for primary school teachers and ECEC staff through the mandatory implementation of a Teacher Workload Impact Assessments, similar to that contained in the National Teacher Workforce Action Plan.
5. Remove excessive and duplicative documentation, data collection and compliance requirements for school and ECEC staff. Healthy developmental and educational outcomes, especially for children with additional needs, can be supported by workload changes that will allow staff to spend more time building relationships with children.
6. Government should provide free training to equip education and ECEC professionals to best educate and care for children with developmental delays and autism. Training should be paid for and occur during the working day with adequate relief time allocated. Such training can in no way be used to shift health care responsibilities onto education workers.
7. All employees that work directly with children should be required to undertake child protection training, provided free of charge by governments or at the employer's cost.
8. Staff-child ratios must be improved to ensure responsive and developmentally appropriate support for the growing number of children with additional needs. Alongside Teacher Workload Impact Assessments on new programs and initiatives, other methods should be developed to specifically measure the impact on teachers of the changed scope of the NDIS and the establishment of the Thriving Kids program.

9. Funding to support children with additional needs must be increased to reflect the full cost of providing 1:1 support for the duration of the child's attendance.
10. Australian governments must resume greater responsibility for ECEC as a public function and prioritise support for not-for-profit (NFP) and community-based providers, rather than incentivising private business actors in what is now a multi-million dollar industry. Governments should investigate further support mechanisms for NFP and community providers, recognising their consistent record of delivering safe, high-quality ECEC alongside industry-leading wages and employment practices.
11. Review the allocation of government funding and subsidies to large for-profit ECEC centres, noting that for-profit schools are already ineligible for government funding under school arrangements. Evidence shows that commercial ECEC centres consistently deliver lower quality standards and poorer employment practices. The review should set a pathway to transition all government funding support toward the NFP and community sector within a manageable timeframe, enabling the expansion of high-quality NFP services to meet the nation's early childhood education and care needs.