



Royal Commission into Early Childhood Education and Care

A submission to: The South Australian Royal
Commission into Early Childhood Education
and Care

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yourtown is a trusted provider of services for young people, with a focus on mental health and wellbeing, long-term unemployment, prevention of youth suicide, child protection, and support for those experiencing domestic and family violence. **yourtown** has evolved to helping hundreds of thousands of young people each year through a range of service offerings, supporting them through many difficult challenges.

Our South Australia services

For 29 years, **yourtown** has been supporting children, young people, and families in South Australia. Our track record in South Australia includes:

- Early Childhood Development Program, supporting pre-school aged children to transition to school in Northern Adelaide
- Care Plus (Port Pirie), an early intervention and family support service to improve children's development and wellbeing
- ParentsNext, supporting parents to join or re-enter the workforce by the time your youngest child starts school
- Penrose Young Parents Program, supporting vulnerable young parents and their children in Port Pirie
- Education, and social enterprise programs to help long-term unemployed young people reengage with education and/or employment including Flexible Learning Options (FLO), supporting young people disengaged from school (Northern Adelaide and Port Pirie) and social enterprises (Northern Adelaide and Port Pirie)
- Kids Helpline, **yourtown**'s national 24/7 helpline providing free professional counselling and support for children and young people aged 5-25, responding to over 419,600 counselling sessions via Kids Helpline from South Australia since 1993
- Free programs since 2013 to South Australian primary schools to improve student mental health literacy, resilience, and help-seeking skills through our Kids Helpline @ School BUPA-funded initiative
- My Circle, a confidential, private, online peer support network for 13–25-year-olds to share information and build coping skills, and
- **yourtown**'s Driving School service providing accessible learner driver supervision, including access to an appropriate vehicle to help young people get a driver's licence in Port Pirie.

Other services we provide

- Mental health service/s for children aged 0-11 years old and their families, with moderate mental health needs
- Domestic and family violence refuge, accommodation, and therapeutic supports for women and their children, including post-refuge support
- Accommodation and therapeutic supports for young parents and their children at high risk
- Parentline, a telephone and online counselling and support service for parents and carers in the Northern Territory and Queensland
- Employment, education, and social enterprise programs to help long term unemployed young people re-engage with education and/or employment.

Early Childhood Development Programs

We support vulnerable pre-school aged children to make a successful transition to school by using prevention and early intervention approaches to create healthy families and strong, child-friendly communities. Our Early Childhood Development Programs are available in Elizabeth, South Australia and Bridgewater, Tasmania.

This includes working with parents to better understand their child's barriers to reaching social development milestones, how to help them thrive at school, collaborative case management and support, and in-home help. In 2021, we supported 46 children 44 families.

Care Plus

We also provide early intervention and family support services to improve children's development and wellbeing and support the capacity of those in the parents/carers.

yourtown welcomes the opportunity to respond to the South Australian Royal Commission into Early Childhood Education and Care. We strongly support the approach the Royal Commission has adopted to listen to the experiences and views of families to see what can be done to better support South Australian families.

yourtown recommends the following issues be addressed within the sector to ensure South Australian children and families/carers have access to a high-quality early years' system that is fit for the future:

- developing an early years' system that takes a whole of system response including –
 - a) investing in virtual counselling services and supports specifically for parents
 - b) addressing systemic barriers to help seeking,
 - c) adopting a trauma-informed approach that is also guided by human rights
 - d) increasing collaboration between the early years' and education systems to support transition periods,
 - e) identifying and responding to children who need support to reach developmental milestones, and
- supporting parental/carer efficacy and family functioning by developing parental/carer capacity and skills.

South Australian children and the families should have access to an early years' system that supports them from the outset to gain access to the help they need when they need it. This system should be designed with inbuilt flexibility to meet children and families where they are at.

invest in virtual counselling support for parents

yourtown has been dedicated to helping children, young people, and families for more 60 years. For over 31 years, our Kids Helpline service has been providing digital mental health and wellbeing services for children and young people across Australia, including South Australia. However, we have also been supporting parents in Queensland for 26 years and parents in the Northern Territory for 18 years, through our Parentline counselling service. While South Australian parents have access to parenting guides and seminars through Parenting SA, they should have access to virtual counselling services and support. This support should be ongoing and available anytime as a safety-net for families when it's most needed, not just in the first 1,000 days.

An example of such a virtual counselling service for parents can be seen in **yourtown's** Parentline service. In 2021, parents and carers in Queensland and the Northern Territory attempted to contact Parentline over 12,000 times, with our Parentline website attracting almost 100,000 visitors.¹ **yourtown's** Parentline is an evidenced-based confidential telephone and online service that provides professional counselling, education and support for parents and carers. Our service operates within a parent-centred and child-focused relational therapeutic practice framework designed to meet the diverse needs of service users, the unique requirements of a virtual service, and to educate and support caregivers. When parents and carers are supported, children achieve better social and emotional outcomes. By supporting parents, Parentline supports children.

Telehealth and digital mental health services (such as Parentline) can bridge the gap when face to face services are unavailable due to time, location, waitlists, or limited resourcing. Digital mental health services can also reach those in rural and remote locations at times that they need them most no matter where a person lives. This includes after hours, weekends, where families may feel isolated and where local services are unavailable or closed after business hours.

¹ **yourtown**. (2022). Kids Helpline Insights Report 2021 (<https://www.yourtown.com.au/insights/annual-overviews>).

These telehealth and digital mental health services offer anonymity and confidentiality, which allows parents/carers to test whether a service is reliable. It also helps them overcome fears of being judged when they reach out for help, particularly if stigma is attached (e.g., fearful of losing their children if they present to services or supports). Often it is only once the trust is built with a service that parents/carers will feel comfortable and confident enough to start talking to a counsellor. Facilitating anonymous help-seeking behaviour in the virtual context is key to creating a safe space where parents/carers want to share and discuss their experiences and concerns.

Recommendation 1:

To strengthen the early years' system, the government should fund virtual counselling services and supports specifically directed towards supporting parents and carers

design a holistic system supported by government and the community

Systemic barriers to help seeking

yourtown provides support through our Early Childhood Development Program (ECDP) to help pre-school aged children in Northern Adelaide to make a successful transition to school. We do this through using prevention and early interventions tailored to each child, which in turn supports families to be healthy and strong, fostering child-friendly communities.

Early life experiences and exposures to differing life events are pivotal to shaping the future health and wellbeing of children and young people. Developing a high-quality early years' system that is fit for the future and supports positive early life experiences requires a whole of community response.

This should include collaborative action and alignment of priorities across all sectors, services, and between the professionals who deliver them whether in government or non-government service sectors. Adopting a systems approach that focuses on intervening early with children can provide the opportunity to set positive trajectories through to adolescence and adulthood.

Evidence also suggests that the prevalence of developmental vulnerabilities among South Australian children on one or more domains² of the Australian Early Development Census (AEDC) rises with increasing contact with the child protection system.³ In 2017, almost half of all the children in contact with the South Australian Child Protection system had their first contact by age three.⁴ Altogether, this highlights the need for better integration of early childhood development services and support and the child protection system. While Safe and Well (the South Australian Government's strategy for supporting children and families), commits to enhancing the systems that enable information sharing to protect children and young people from harm, more should be done to facilitate better collaboration between departments and across sectors.

Parents/carers attempting to access child development support face systemic barriers including restrictive eligibility criteria and must then navigate complex referral processes before they can access the help they need.

² The AEDC domains include physical health and wellbeing, social competence, emotional maturity, communication and general knowledge, and language and cognitive skills.

³ Pilkington R, Grant J, Chittleborough C, Gialamas A, Montgomerie A, Lynch J. 2017. Child Protection in South Australia. BetterStart Child Health and Development Research Group, School of Public Health, The University of Adelaide (<https://health.adelaide.edu.au/betterstart/ua/media/118/child-protection-in-sa.pdf>).

⁴ Pilkington R, Grant J, Chittleborough C, Gialamas A, Montgomerie A, Lynch J. 2017. Child Protection in South Australia. BetterStart Child Health and Development Research Group, School of Public Health, The University of Adelaide (<https://health.adelaide.edu.au/betterstart/ua/media/118/child-protection-in-sa.pdf>).

These factors significantly impact on the extent to which South Australian families can be effectively supported in the first 1,000 days of a child's life. An effective system needs to have strong referral pathways, and individualised connections between services to ensure there is cross-sector collaboration at the local and individual level across the continuum of a child's life, no matter what service or sector they are engaging with. One way could be by obtaining parental consent within the first 1000 days to share information with other service providers and break down barriers to strong referrals or collaborative work with other service providers.

The key systems challenges that need to be overcome to achieve a whole of systems approach include:

- positively addressing information sharing needs from the outset between government, or publicly or privately funded non-government services, including building in parental consent mechanisms, and
- designing and investing in an early years' system that prioritises early intervention (including ensuring access to child development assessments), and facilitates warm referrals to other support services, and warm handovers within early years' services.

Recommendation 2:

That the early years' system adopt a whole of systems approach to supporting child development to ensure South Australian children have the opportunity to set positive life trajectories.

Trauma-informed, and guided by human rights

While the Community Services Strategic Plan 2022-2026⁵ makes a commitment to trauma-informed practice, there is no clear action plan for how this will be implemented and translated into service delivery in the early years' system. Without grounding in trauma-informed practices children and their families/carers will be at risk of re-traumatisation because the system lacks the requisite knowledge and training around the sensitivities, vulnerabilities and triggers of children who have experienced or been exposed to trauma.

Trauma-informed practices that are guided by and have consideration of the human rights of the child and the family, create opportunities to rebuild a sense of control and empowerment. Children exposed to violence in the home can experience profound impacts on their physical, psychological, and emotional health and wellbeing; with ongoing exposure to trauma potentially altering the child's brain development and affecting mental, emotional, and behavioural health into adulthood.⁶ Trauma-informed practice emphasises physical, psychological, and emotional safety, and operates from the core principles of safety, trust, choice, collaboration, and empowerment, and is grounded in an understanding of the impacts of trauma.

yourtown's ECDP program adopts a child-centred, trauma-informed, and holistic approach designed to:

- provide a child- and family-friendly space as well as soft connection opportunities and engagement activities to encourage children and families to feel at ease with the program

⁵ Government of South Australia. (2022). Women's and Children's Health Network – Community Services Plan 2022-2026 (<https://cdn.wchn.sa.gov.au/downloads/WCHN/about/plans/Community-Services-Strategic-Plan-2022-2026.pdf>).

⁶ Child Welfare Information Gateway. (2017). Supporting brain development in traumatized children and youth. Washington, DC: U.S. Department of Health and Human Services, Children's Bureau (<https://www.childwelfare.gov/pubpdfs/braindevtrauma.pdf>).

- ensure appropriate and timely biopsychosocial assessments are conducted for children
- facilitate or provide the interventions necessary for children to reach key developmental and learning milestones
- equip parents/caregivers with the skills and knowledge required to provide safe, supportive, and enriching environments for their children
- support parents to have confidence and knowledge required to advocate for their children with schools and other services
- ensure each child has a comprehensive Transition to School Plan created in collaboration with parents/caregivers and key services
- encourage positive parental attitudes to their children's education, and
- support children to transition successfully from early childhood education to primary school.

To fully realise the commitments made under the Community Services Strategic Plan 2022-2026, the early years' system should prioritise implementation of a trauma-informed approach. This approach is supportive of the development of skills and aptitudes that are critical for wellbeing including communication, learning, agency, and self-advocacy.

Case study: trauma-informed practice at **yourtown**'s Early Childhood Development Program (ECDP)

Francis (not her real name) is a single mother of three children (two-and-a-half-year-old son, four-and-a-half-year-old daughter, and a son in his late teens). Francis' mental health and wellbeing issues have been exacerbated by her experiencing domestic violence in her most recent relationship.

*Francis came to **yourtown**'s ECDP after hearing about us from the local Community and Youth Service. She was seeking help for her daughter who was experiencing developmental delays and resisting attempts to take her kindergarten and childcare.*

Given the children's exposure to domestic violence, our program staff used trauma-informed practice to engage and support Francis and her children. Pet therapy was used for soft engagement and to understand sensory needs. No prior assessments had been conducted with Francis' daughter, so our Intensive Family Practitioner (IFP) conducted the Ages and Stages Questionnaire to determine her level of developmental progress. The IFP recommended Expressive Therapy for Francis' daughter. However, Francis could not afford this intervention. The IFP advocated with the kindergarten to obtain expressive therapy as part of their program. Francis' daughter participated in one year of expressive therapy during her time at kindergarten. The art, music and play elements of this intervention helped to calm Francis' daughter whose resistance to attending kindergarten and childcare gradually subsided.

We provided post transition support for six months to Francis and her daughter when she commenced school. Our IFP discussed with the school the need for a Student Support Officer and a National Disability Insurance Scheme (NDIS) package for occupational, speech and expressive therapy for Francis' daughter. During this post transition phase, our IFP spoke to Francis about the slow progress of her daughter's communication and social skills. The school did not think Francis' daughter had any issues that needed addressing because she was not displaying disruptive behaviours. We worked with Francis to advocate for her daughter with school staff, and she is now confident about talking to the school when issues arise, such as when her daughter was being bullied. Together, Francis and our IFP have been able to get a dedicated Student Support Officer for her daughter, who is talking and interacting more in social spaces.

Recommendation 3:

That the early years' system is grounded in trauma-informed practices and guided by human rights to:

- a) minimise the potential for re-traumatisation and harm, and
- b) creates an opportunity for children to build or rebuild a sense of control and empowerment.

Supporting transitions into the education system

The different levels and sub-sectors within the education system need to collaborate to facilitate seamless transitions and support for children. In particular, primary schools should work more closely and collaboratively with the early years' system (including early childhood development programs/providers) to support children with complex development needs.

Early experiences shape children's development and can have a lasting effect on mental health and wellbeing.⁷ While families are the first and most important influence on children's development; educators and the education system also play an important role in supporting and promoting positive child development.

Enabling practices and processes that support a positive transition to school for children (especially children with complex support and development needs) include:

- ensuring continuity of support throughout the transition period
- cross-sector collaboration
- service flexibility and responsiveness to each family's changing situations, and
- adaptability of services and supports to local contexts.⁸

Evidence also suggests creating a trauma-sensitive school environment supports students feel they could safely make mistakes and be more connected to the school overall.⁹ This is especially important during transition periods as they are often marked by change in supports available and where interactions between families/carers and the school can set the tone for ongoing engagement in education.¹⁰

Ensuring greater collaboration between the early years' and education systems would increase responsiveness to developmental needs (especially complex needs). Further, this approach to providing support (including from providers such as **yourtown's** ECDP) would also allow for adaptability to the changing needs and contexts of children and their families/carers.

Taking such an approach would also enable the education system to leverage existing programs that implement case management and provide early development support grounded in relational-based practice, including:

⁷ JAMA and Archives Journals. (2010, May 7). Early childhood experiences have lasting emotional and psychological effects. *ScienceDaily*. Retrieved December 15, 2022 from (www.sciencedaily.com/releases/2010/05/100503161332.htm).

⁸ Dockett, S. Perry, B. Kearney, E. Hampshire, A. Mason, J. Schmied, V. (2011). Facilitating children's transition to school from families with complex support needs Albury: Research Institute for Professional Practice, Learning and Education, Charles Sturt University (<https://www.missionaustralia.com.au/publications/research/children-and-families/57-facilitating-children-s-transition-to-school-from-families-with-complex-support-needs-2011/file>).

⁹ Atallah, D. G., Koslouski, J. B., Perkins, K. N., Marsico, C., & Porche, M. V. (2019). An Evaluation of Trauma and Learning Policy Initiative's (TLPI) Inquiry-Based Process: Year Three. Boston, MA: Boston University, Wheelock College of Education and Human Development (<https://d2jb59s61v13vs.cloudfront.net/wp-content/uploads/2020/07/Evaluation-Trauma-Learning-Policy-Initiative-Inquiry-Based-Process-Year-3-BU.pdf>).

¹⁰ Dockett, S. Perry, B. Kearney, E. Hampshire, A. Mason, J. Schmied, V. (2011). Facilitating children's transition to school from families with complex support needs Albury: Research Institute for Professional Practice, Learning and Education, Charles Sturt University (<https://www.missionaustralia.com.au/publications/research/children-and-families/57-facilitating-children-s-transition-to-school-from-families-with-complex-support-needs-2011/file>).

- post transition support for children with complex needs in the first six months of primary school to maximise their integration into the school community
- provision of support in school settings in cases where risk factors persist, and
- tailored interventions to maintain and improve a successful transition to school for the child and overall family functioning.

Recommendation 4:

The South Australian education system have greater consideration for, and be responsive to, children's development needs especially complex needs. This should include:

- a) primary schools working more closely with the early years' system to support children and,
- b) taking a trauma-informed, strengths-based, and flexible approach to supporting children and their families/carers.

Identifying and responding to children who need support to reach developmental milestones

Development checks and assessments are not readily available for South Australian children and families/carers. Currently, waiting times for assessments with the South Australian Children's Assessment Team¹¹ are 14–18 months. Waiting lists of up to 41 months occur for paediatric clinics, which sometimes operate as a first point of contact for children and families before they can be seen by a specialist.¹²

Early childhood development interventions delivered to children aged under five years' have been clearly shown to have substantial and sustained impacts on long-term cognitive and neurological outcomes^{13,14,15} and improve mental health outcomes.^{16,17} It is therefore important to identify and work towards minimising health and development issues or delays early on.

On 28 November 2022, the New South Wales Government announced it would be offering free development checks for children in preschools, to help ensure children across the state reach their full potential.^{18,19} South Australian families/carers should have access to similar

¹¹ These refer to those that have been accepted after review of referral information

¹² Government of South Australia. (2022). SA Health Specialist Outpatient Clinics Waiting Time Report Census date as at 30 June 2022 (<https://emergencies.sa.gov.au/wps/wcm/connect/3ab444a6-97d6-4565-9fa9-c26db45ee2f3/A3976791+-+Attachment+1+-+Specialist+Outpatient+Clinics+Waiting+Time+Report+-+census+date+20220630.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-3ab444a6-97d6-4565-9fa9-c26db45ee2f3-oiXvyx8>).

¹³ Black R.E. et al. (2017). Comprehensive review of the evidence regarding the effectiveness of community-based primary health care in improving maternal, neonatal and child health: 8. Summary and recommendations of the expert panel. *J Glob Health*. 7(1):010908.

¹⁴ Britto P.R. et al. (2017). Early Childhood Development Interventions Review Group, for the Lancet Early Childhood Development Series Steering Committee. Nurturing care: promoting early childhood development. *Lancet*. 389(10064):91–102.

¹⁵ Daelmans B. et al. (2015) (steering committee of a new scientific series on early child development). Effective interventions and strategies for improving early child development. *BMJ*. 351:h4029.

¹⁶ Clarke-Stewart K.A. (1973). Interactions between mothers and their young children: characteristics and consequences. *Monographs of the Society for Research in Child Development*. 38(6-7):1–109.

¹⁷ Hawthorne J. (2005). Using the Neonatal Behavioural Assessment Scale to support parent-infant relationships. *Infant*. 1(6):213–8.

¹⁸ See New South Wales Government. (2022). Free development checks to give NSW kids best start (<https://education.nsw.gov.au/news/latest-news/free-development-checks-to-give-nsw-kids-best-start>).

¹⁹ Nine preschools across New South Wales will take part in an initial study, providing free health and development tests for children before they start school with services expanded to 15 more locations in early 2023 before being offered to every NSW pre-schooler in 2024.

assessments and development checks that occur in a timely manner to ensure children can get the support they need to have a good start in life.

Recommendation 5:

That the early years' system be expanded and funded so that South Australian children are given access to:

- a) timely assessments and development checks to ensure they have a good start in life and are able to access the support they need, and**
- b) pathways to support including paediatric clinics and specialist care.**

supporting parental skills and confidence

Parents and carers of children with complex needs experience a high level of pressure to meet children's needs while maintaining family functioning and consequently, often experience reduced well-being and elevated psychological distress.²⁰

Strengthening parent/carer's skills and confidence to support the healthy development of their children empowers them to build their coping strategies, supports their ability to advocate for their child's needs, and increases their capacity to engage/connect with their peers and the broader community.

yourtown's ECDP recognises the importance of supporting the family unit (including siblings who may not part of the program because they are outside the target age range). The program takes a relational, holistic, and flexible approach that supports each individual and family according to their situation and needs within a collaborative and shared case management framework. In this way our program can affect positive change in the lives of the family unit, including supporting parents/carers to:

- build and sustain positive relationships within the family and with others in their community
- maintain the physical, social, and emotional wellbeing of themselves and their children, and
- support and respond to their children's developmental and learning needs.

Case study: taking a whole-of-family approach to supporting early years development

Amy (not her real name) is a single mother of three children (three-year-old daughter, four-and-a-half-year-old son, and six-year-old son). She has experienced sexual abuse and exploitation, family violence, and coercive control from her ex-partner. These experiences contributed to previous self-harming behaviours and ongoing mental health concerns.

Amy presented to our Early Childhood Development Program (ECDP) with her three children for the intake interview, but her oldest child was too old for this program and other similar programs for preschool aged children. Our Intensive Family Practitioner (IFP) assessed all the children in the initial interview to understand the needs of the children, ascertain the dynamics in the family, and determine the most appropriate support. Amy's children had been exposed to trauma and presented with developmental delays. Each child differed in their trauma responses and behaviours and required tailored interventions. In particular, the eldest child had been the victim of child abuse and would display volatile and maladaptive behaviours, including threatening violence and self-harm, at home and school. Amy and the

²⁰ Sartore, G. M., Pourliakas, A., & Lagioia, V. (2021). Peer support interventions for parents and carers of children with complex needs. *The Cochrane database of systematic reviews*, 12(12), CD010618 (<https://doi.org/10.1002/14651858.CD010618.pub2>).

schools did not have the skills and knowledge to respond in these situations, as shown by the schools expelling the young boy.

Despite the eldest child not being eligible for our program, our IFP and ECDP recognised the importance of addressing his issues alongside his siblings so that they could make progress as individuals and as a family. This would also increase Amy's capacity to support and care for her younger children. We referred Amy's eldest son to a child psychologist and arranged for the sessions to be held onsite because the family were at ease in our space. Our IFP supported him to engage with the therapy sessions in the early stages. He continues to attend the counselling sessions and our IFP educates Amy and the school's Student Support Officer about his intolerances so that the duration and incidences of any disruptive behaviour continue to decrease.

Our IFP supported Amy's younger son in kindergarten by arranging Expressive Therapy sessions. We continued to provide support post transition to school for six months by ensuring the continuation of Expressive Therapy and securing individual support from a Student Support Officer. Amy's younger son is settling in well to school with the support of the IFP, Amy and the Student Support Officer.

Prioritising young parents and carers

Vulnerable young families should have access to stronger supports at both the individual and the systemic level. Increased support for disadvantaged or vulnerable families is needed to ensure children growing up in these households have an equal opportunity to engage in education and realise their potential. Especially given that education is a crucial element in breaking the cycle of intergenerational poverty and disadvantage.²¹

Young parents/caregivers can face multiple personal, social, health and economic challenges linked to their circumstances, including limited financial resources, lack of affordable accommodation, social isolation, disrupted education, social stigma, the absence of family support, mental health issues, substance abuse, and family violence.

'Good' parenting can act as a protective factor for children growing up in disadvantaged settings²², and highlights the need for early interventions with high-risk or vulnerable families that support parenting attachment and responsive care.²³ Secure attachment helps children learn to manage their own feelings and behaviour, resulting in the confidence, resilience, and self-reliance from which they can thrive, engage in education, and break the cycle of disadvantage. By prioritising young parents/caregivers and connecting them with appropriate services, **yourtown's** Early Childhood Development Program effects positive change in the lives of young families and help break the intergenerational cycle of poverty and marginalisation

Recommendation 6:

That increased support is provided to parents/carers to improve parental/carer efficacy and family functioning through early intervention programs to further develop parental/carer capacity and skills (especially for younger parents and those in disadvantaged areas).

²¹ The Smith Family. (2010). Breaking the Cycle of Disadvantage (<https://www.thesmithfamily.com.au/-/media/files/research/policy-submissions/social-inclusion-board-july2010.pdf>).

²² Gutman, L. M. & Feinstein, L. (2010). Parenting behaviours and children's development from infancy to early childhood: changes, continuities and contributions, *Early Child Development and Care*, 180:4, 535-556, DOI: 10.1080/03004430802113042.

²³ Moulin, S., Waldfogel, J. & Washbrook, E. (2014). *Baby Bonds: Parenting, Attachment and A Secure Base for Children*. The Sutton Trust (<https://dera.ioe.ac.uk/30276/1/baby-bonds-final-1.pdf>).



We would welcome the opportunity to explore these ideas with you in further detail. Should you require further information about any issues raised in the submission, please do not hesitate to contact Kathryn Mandla, Head of Advocacy and Research at **yourtown** via email at kmandla@yourtown.com.au.