



Vision Australia Submission: Early Childhood Education and Care Draft Report

Submission to: Productivity Commission

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Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

Introduction

Vision Australia is pleased to have the opportunity to provide a submission to the Productivity Commission regarding its draft report on the early childhood education and care sector (the ECEC) (the draft Report). We previously made a submission in the initial phase of the Productivity Commission's Inquiry into the ECEC.

This is a short submission to address specific recommendations in the draft Report which are relevant to access to the ECEC by children who are blind or have low vision, as well as to note some other matters of importance.

Draft Recommendation 2.2 (Disability Standards for Education)

Vision Australia welcomes the draft recommendation to amend the Disability Standards for Education (**the Standards**) to include all services within the ECEC. This is an anomaly which has long needed rectification. It will give added certainty to families of children with disabilities in the ECEC of the access and participation expectations for those children.

For the Standards to be effective in the ECEC though, it would be necessary for parents to be fully aware of their rights under the Standards, and of the obligations of early childhood providers. In 2020, Vision Australia conducted a survey of parents and students to form the basis of a submission to the review of the Standards (**the Vision Australia survey**). The Vision Australia survey revealed that 40 percent of respondents were not aware of the Standards at all. This level of awareness is not sufficient to create the inclusive education environments that the Standards were designed to bring about. It is also not an issue unique to the blind and low vision community.

In its Final Report, the Disability Royal Commission has recently recommended that educational authorities currently covered by the Standards should update their policies and guidance for schools to support the implementation and continuous improvement of requirements for student and parental communication and relationships. This includes the provision of clear, accessible material for students with disability and their families on their rights and school obligations. We would urge that this recommendation also be implemented in the ECEC to ensure that any application of the Standards to the sector is effective.

Draft Recommendations 2.3 to 2.6 (Inclusion Support Program)

Vision Australia welcomes the draft recommendations related to the Inclusion Support Program (ISP) to: (a) amend eligibility requirements for inclusion funding; (b) review and amend additional educator subsidies; (c) reduce the administrative burden of ISP applications; and (d) improve coordination of inclusion funding.

In particular, we strongly support draft recommendation 2.4 which provides that the Australian Government should: (a) increase the currently hourly subsidy rate so that it

subsidises 100% of an additional educator's wage; (b) remove the limits on the weekly hours the subsidies can be approved for and ensuring they align with a child's enrolled hours; and (c) allow other qualified staff such as allied health professionals to be employed as an additional educator. We believe that this recommendation is important to ensure that proper and consistent integration and continuing supports can be provided for children with disability in ECEC settings. Allowing a qualified allied health professional to provide this support is also key, given the particular knowledge, skills and experience that these professionals can bring, especially around low incidence disability types such as blindness and low vision.

Draft Recommendation 3.6 (Contribute to professional development for the ECEC workforce)

Vision Australia strongly supports the government contributing to the professional development of the ECEC workforce to improve the quality and inclusivity of ECEC practices, particularly in the area of disability inclusion. It is vital for educators to be properly equipped with the knowledge needed to support children with disabilities and developmental delay in the ECEC. We would also urge the development of on-demand training programmes for ECEC staff with respect to lower incidence disability types such as blindness and low vision.

Other Comments

Service Providers

We note that the Productivity Commission intends to address findings from the recent review of the National Disability Insurance Scheme and any implications for the ECEC in its final report. For this purpose, we reiterate the importance of service providers such as Vision Australia being able to work with ECEC staff to assist them to build appropriate capacity within children, and to provide those children with the necessary accommodations to access and participate in the ECEC environment.

Complaint Mechanisms

Despite the recommendations in the draft Report aimed at improving inclusivity in the ECEC, it may take time for any revised practices to result in changed outcomes for children with disability, particularly regarding initial access to ECEC services, and gatekeeping type behaviours. Given the fundamental importance of ECEC services in building social, cognitive and emotional skills in children with a disability, it is vital that parents/carers of those children have a dedicated pathway which they can follow to assist in rectifying any barriers that may arise, particularly around initial enrolment. We reiterate our recommendation to provide parents of children with disability a streamlined mechanism or feedback process for this purpose. This pathway needs to ensure that issues can be actioned in a timely manner.

We note in this respect that, even though there are current complaint mechanisms under the *Disability Discrimination Act 1992* which are available to families, those mechanisms are time-consuming, and the positive obligations placed on complainants are often not compatible with the other pressures that may be being faced by the family unit. In addition, families may not have the resources needed to progress a complaint beyond conciliation to the Federal Court of Australia if a resolution is not reached. We note that, in its Final Report, the Disability Royal Commission has also recognised the importance of making complaint mechanisms in educational settings more effective. It has recommended, in this respect, that State and Territory government should create or expand existing complaint management offices at arm's length from schools to help resolve complaints about schools, especially those that concern the treatment of students with disability.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Felix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.