



*Early Childhood Intervention Australia*

*Productivity Commission  
Inquiry into Child Care and Early Learning  
Submission*

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# ECIA Productivity Commission Inquiry into Child Care and Early Learning Submission

Early Childhood Intervention Australia (ECIA) is the peak national organisation promoting the interests of young children with disabilities and developmental delays and their families. It has a national and State/Territory structure, with the majority of members being early childhood intervention (ECI) professionals working in Government-funded agencies. These include small community organisations, large disability and children's services agencies and various government departments, reflecting the diverse ways in which services to young children and their families are provided nationally. Our membership also includes family members of young children with disabilities and developmental delays. Members are based in urban, rural and regional centres throughout the country.

ECIA is dedicated to ensuring that young children of all abilities can fully participate in family and community life. Well-funded Early Childhood Education and Care (ECEC) based on best practice is vital to ensuring that children with disability or developmental delay receive the learning and development opportunities required to give them the best start in life.

ECIA welcomes the opportunity to contribute to the Productivity Commission Inquiry into Child Care and Early Learning and would like to highlight the particular needs of young children with disability and developmental delay and their families. The Issues Paper highlighted several areas of interest relevant to the concerns and expertise of ECIA which are:

- Inclusion;
- Inclusion Support Subsidy;
- Special Child Care Benefit;
- Specialist Equipment Program;
- Alternative ECEC funding models;
- Workforce Improvement;
- Transition to school; and,
- ECEC and the National Disability Insurance Scheme.

This submission will address these key concerns. We would also like to draw the Commission's attention to the submissions of Early Childhood Australia, Early Learning Association of Australia and National Disability Services.

## Inclusion

ECIA calls on the need for increased investment in inclusion support in mainstream early childhood education and care services. Universal services will require significant support to build a skilled workforce, evidence-based practices and better partnerships with families and local communities. Investment is required to ensure that all early childhood education and care services have adequate resources and support to promote inclusion. This investment needs to be at multiple levels – in professional development and training, the widespread implementation of innovative approaches, and through enhancing existing inclusion supports.

ECIA endorses practices that promote, encourage and support community inclusion for all children and their families. These lay the foundation for each individual's successful participation as a valued

member within our diverse community. This has been articulated in our Joint Position Statement with Early Childhood Australia on the Inclusion of children with disability in Early Childhood Education and Care. The principles contained in the Statement reflect our commitment to ensuring that children of all abilities participate in inclusive universal early childhood education and care services.<sup>1</sup> These principles are:

- All actions concerning children must be done with the best interests of the child in mind;
- Families are of vital importance;
- Every child deserves to be included in their community;
- Children's diversity is valuable and understood and respected;
- Every child is equal;
- High expectations should be held for every child; and,
- Evidence-based practice should be promoted.

We urge the Commission to look at the detail behind these principles and incorporate them into the findings of this Inquiry. The Statement can be found at <http://www.ecia.org.au/advocacy/position-statements/statement-on-the-inclusion-of-children-with-disability>.

Currently, many children with disability and/or developmental are denied access to ECEC environments. This was reinforced by the Commission's 2011 report into the Early Childhood Workforce that found that significant gaps exist between the early childhood education and care opportunities for children with additional needs and those of other children.<sup>2</sup>

While the *Disability Discrimination Act 1992* prevents ECEC services from discriminating against a child with disability, unless it will cause undue hardship, we know that in practice discrimination can and does occur. The current state of the system clearly reflects the predominantly poor inclusion practices in ECEC, in part due to an inadequacy of funding and supports. While some services refuse to accept enrolments of these children due to financial hardship, anecdotal evidence from ECIA members highlights that many services refuse enrolment due to negative attitudes to disability, inadequate training and support, and fear. This is active discrimination and cannot continue.

ECIA welcomes the introduction of the National Quality Framework (NQF) and Early Years Learning Framework (EYLF) and believes that its full implementation is vital for a quality inclusive ECEC as it promotes higher educator-to-child-ratios and a more qualified workforce.

ECIA shares the values of both of the frameworks and believes that inclusion should be measured by children's performance in relation to the EYLF and NQF's five primary desired outcomes for all children's learning and development:

- Children have a strong sense of identity (identity)
- Children are connected with and contribute to their world (community)
- Children have a strong sense of wellbeing (wellbeing)
- Children are confident and involved learners (learning)

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<sup>1</sup> Early Childhood Australia/Early Childhood Intervention Australia (2012) Early Childhood Australia and Early Childhood Intervention Australia Position Statement on the Inclusion of Children with disability in Early Childhood Education and Care.

<sup>2</sup> Productivity Commission 2011, Early Childhood Development Workforce, Research Report, Melbourne.

- Children are effective communicators (communication).

The implementation of the NQF is vital if Australia is committed to the provision high quality and inclusive ECEC. ECIA believes that the NQF cannot be diluted and needs to be carried forward as it is currently.

In order to support children of all abilities in achieving these outcomes a qualified and highly skilled workforce that is supported by adequate governmental funding is required. Research suggests that early action provides the best outcomes for children, resulting in healthier futures, happier families and advanced opportunities.<sup>3</sup> Countless international studies, such as the Perry Preschool Project, shows that high quality inclusive ECEC is vital for assisting children in achieving improved outcomes, even beyond their childhood, with substantial savings in the areas of education, health, welfare and justice following in their teenage and adult years. This can be attributed to their overall improved wellbeing, skills and sense of identity and community – the foundations of which were laid in early childhood.

## Inclusion Support Subsidy

ECIA recognises the importance of the families of children with additional needs. Families with children with disability and/or developmental delay provide vital support to their children. Properly funded and delivered ECEC not only benefits the child's learning and development but also provide parents the opportunity to participate in the workforce giving families more financial security and community participation. Adequate funding, support and confidence in services is required to encourage increased participation in the workforce for families of children with disability and developmental delay, particularly women who are often the primary caregivers.

ECIA recommends that Inclusion Support Subsidy (ISS) rates be increased to better accommodate the costs of additional support which their child needs whilst being cared for, giving the parent more time to participate in the workforce, and the child an opportunity to participate in an well supported early learning environment. Currently the ISS does not cover the full cost of additional support, often additional support is only funded through ISS for 3-5 hours, when in reality we know that working hours are well beyond this. While ECIA recognise that ECEC services also have to make a resourcing contribution to support inclusion, if they can continue to justify exclusion on the grounds of financial hardship then it is imperative that ISS increase, to not only increase participation but to also reduce the current active discrimination that is occurring in some services.

The Inclusion and Professional Support Program (IPSP) of which the ISS is a part of, has had no real increase in funding since its formation in 2006, despite the fact that between 2005 and 2009 alone there was an 8% increase in ECEC places.<sup>4</sup> This is clearly unsustainable in the long term if the government wishes to continue to make a high quality, inclusive ECEC service available to all children.

This increase of funding to ISS would further relieve financial pressure on families, as the current ISS rates are often insufficient to cover the full cost of inclusion support services. This means that children with disabilities and/or developmental delays often miss out on the vital support they both need and are entitled to, either by being flat out denied access to ECEC services or by being limited

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<sup>3</sup> McCain, M.N. & Mustard, F. (1999), Reversing the brain drain: Early study: Final report, Ontario Children's Secretariat, Toronto.

<sup>4</sup> DEEWR (2010) State of Child Care in Australia, April 2010

access to only the number of hours the ISS covers. This issue will only aggravate if unaddressed as the cost of ECEC services are expected to rise to reach the NQF standards.<sup>5</sup>

While recognising the importance of workforce participation, both for the families with children with additional needs but also for the broader economic benefits, ECIA believes that the current ISS model is too heavily focused on increasing workforce participation at the detriment of the learning and development needs of the child. ECIA therefore recommends that the purpose of the Inclusion Support Subsidy be redesigned so that its principle purpose is to assist children achieve the outcomes identified by the EYLF, not parental workforce participation.

Families of children with disability are being asked their purpose for attending ECEC in order to access ISS, as the Commonwealth do not want ECEC to be used as respite. No other family participating in ECEC is asked for the purpose of their enrolment. Why then should these families be further disadvantaged and denied the opportunity to access the learning and development opportunities that ECEC provides simply because their child has a disability? ECIA believes that these current restrictions need to be removed so that all children with disability and/or developmental delay can access ISS regardless of parental employment. Access to high quality and well supported ECEC is of vital importance, both for the family and the child, as parents need support in alleviating the pressures of being a carer and children need access to learning and development opportunities alongside their typically developing peers. Such a reform would better align the ISS to function with the best interest of the child in mind; giving children with disabilities or developmental delays the best start in life.

## Special Child Care Benefit

Currently children with disability or developmental delays have difficulty obtaining the Special Child Care Benefit (SCCB). This is despite the fact that their disability and/or developmental delay can often result in them being at serious risk of abuse or neglect (or their additional needs may have been caused by abuse or neglect) and the cost of child care is a serious barrier to participation in childcare. This obviously goes against the best interests of the child and can lead to serious harmful impacts on these at-risk children. ECIA would like to see that disability and developmental delays be considered as a factor in SCCB eligibility.

## Specialist Equipment Program

When supporting the inclusion of children into care environments (Long day care, ASC, BSC, Vacation Care, Family Day Care); the service, and the Commonwealth funded Inclusion and Professional Support Service rely on the child's regular early childhood intervention team being able to visit the centre and put in place the additional supports that are required. The Specialist Equipment Program requires an independent therapist who is not funded by the IPSP for their prescription, fitting and monitoring.

Examples of the work that early childhood intervention staff are undertaking in ECEC are considerations of the environment and making recommendations for specialized equipment; adding this care environment to the child and family's support plan with any changes needed; examining the transfers and lifts that a child may require in this environment and so on. A lot of this work usually takes place when a child first commences care or even prior to, during their transition visits,

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<sup>5</sup> COAG (Council of Australian Governments) 2009, Regulation Impact Statement for Early Childhood Education and Care Quality Reforms: COAG Decision RIS, December, Canberra.

so that everything is ready to go. Educators are trained by the therapists in safe lifting, transfer and feeding techniques, along with how to best support the child's health, wellbeing, learning and development needs in the particular setting. A therapist then comes back out to the care environment because the specialized equipment cannot be used in that setting until the therapist adjusts the equipment to fit the child and demonstrates how to use it and trains the educators in safe lifting techniques and transfers. Later they may re-visit to do re-adjustments or equipment recommendations, and they will also continue to visit the service provide early childhood educators with ongoing strategies to enhance the child's development.

While some states have an Early Childhood Intervention Program which covers this service, some do not and in these this cost remains unfunded. In addition, in the majority of States and Territories early childhood intervention services are in high demand and children are sometimes unable to access services due to long waiting lists or because the equipment service and/or eligibility criteria is not available through the public system. Parents are therefore asked to pay for the therapist visit, placing a costly and discriminatory barrier of entry into ECEC services. For those families unable to access early childhood intervention, a private therapist or the necessary equipment to meaningfully participate in the program, ECEC is unavailable. For what it publicly viewed as a universal services, this is clearly unacceptable and needs to be addressed.

## Alternative ECEC Funding Model

ECIA is aware that the government has particular interest in New Zealand's ECEC funding model which places emphasis on home based care. ECIA advises against this model as we believe it would result in a lower quality of care than is currently provided as the carers are typically not formally trained or qualified- but instead supervised by coordinators who are- which would be counter to best practice which relies on well trained and qualified carers. Furthermore ECIA believes that any funding model which shifts the current emphasis from long day care services (LDC) to family care/in-home care would provide a less inclusive service; further segregating children with disability and/or developmental delay from other children.

## Workforce Improvement

Many early childhood educators in ECEC services find it difficult to meaningfully include children with disability and/or development delay in their programs. To support inclusion staff in universal settings require expert advice, professional support, training and mentoring to learn more about the needs of individual children, promoting better outcomes for children and promoting greater confidence in services in regards to their ability to include children with disabilities. This training and development could be delivered in a partnership approach where early childhood intervention professionals and early childhood educators can collaborate and learn from each other.

Innovative responses will be required if we are to achieve true inclusion – this will require investing in current successful approaches but also funding the implementation of new models. The Centre for Community Child Health ECIS Literature Review recommended that secondary and tiered early intervention models need to be developed and implemented into mainstream services.<sup>6</sup> New models of inclusion need to be considered, including the Teaching Pyramid, a social learning and behavioural support framework that integrates supports for all children with graduated additional

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<sup>6</sup> Centre for Community Child Health. (2010) Early childhood intervention reform project: Revised literature Review, DEECD, Melbourne.

support for those in greatest need. The Teaching Pyramid, developed by Mary Louise Hemmeter and colleagues, is a social learning and behavioural support framework supporting all children's learning in early childhood education and care services and in family homes. It integrates support for all children with graduated additional support for those in greatest need.

Whilst most children are able to participate in all activities and learn when high quality environments and supportive relationships are provided (Tier 1), some children require more intentional teaching and support (Tier 2) and a small group require intensive support (Tier 3). Some children, such as those with a disability or development delay who are eligible for Early Childhood Intervention Services (ECIS), will require all three tiers of support and are more likely to need Tiers 2 and 3 supports than most of their peers.<sup>7</sup>

The Teaching Pyramid is just one of many models that align with the EYLF and all models should be investigated and field tested so that we can develop meaningful models of inclusion.

ECIA supports the increased qualification standards in ECEC and the improvement of educator-to-child-ratios which the NQS is implementing. In addition to these improvements, ECIA would also like to see an increase in the emphasis on inclusion training both in pre-service qualifications and in ongoing professional development.

ECIA urges Government to not only reform pre-service training requirements to ensure a greater component on inclusion, but also increase investment in the IPSP program to guarantee additional training on inclusion, particularly the inclusion of children with disability and/or developmental delay. In Victoria for example, only 1% of training offered by the PSC is related to inclusion. This is severely inadequate.

Without a strong conscious effort to increase training on inclusion, ECIA is concerned that, despite the aforementioned improvements arriving with the implementation of the NQS, educators in mainstream ECEC services will continue to find it difficult to meaningfully include children with disability and/or development delay in their programs. Without adequate support children with disability are left out and unable to meaningfully participate in their community and interact with their peers. Changing the current culture of how children with disability and/or developmental delay engage with, and are perceived by, all the other children in their programs is essential. The United Nations notes that children with disability and/or developmental delay face higher levels of bullying than others through their school life, severely limiting their capacity to contribute and the outcomes of their education.<sup>8</sup>

## Transition to School

While the transition to school is a crucial time for all young children, for children with disability and/or developmental delay it is even more important that they have a smooth transition that takes into account their needs. For transitions to be successful, the Centre for Community Child Health has

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<sup>7</sup> Fox, L., Dunlap, G., Hemmeter, M.L., Joseph, G.E., Strain, P.S. (2003) 'The teaching pyramid: A model for supporting social competence and preventing challenging behaviour in young children', *Young Children*, July 2003.

<sup>8</sup> Disability Rights Now, Australia's compliance with the convention on the rights of persons with disability Fact Sheet 13 - <http://www.disabilityrightsnow.org.au/node/88>.

notes that “it is important that discontinuities around learning, relationship building and support systems are minimised.”<sup>9</sup>

For children with disability or development delay and their families both early childhood intervention services and ECEC play a crucial partnership role in supporting the child’s learning, development and connections – therefore making the role of early childhood intervention and ECEC in the transition to school and the exiting of pre-school services even more important.

ECIA believes that although current early childhood intervention services provide significant support to children, families, early childhood educators and schools with the transition to school (for those who are able to access them), its resources are almost entirely spent prior to school starting with only minimal, if any, support during Term 1. Many ECI services are not funded to provide transitional support into Term 1 and inadequate funding in school-age services means that children are placed on a waiting list and may not access services or support during this crucial transitional period, nor will their families or teachers. ECIA would like to see this service extended, though not necessarily provided in such an intensive manner, to Term 2 as well- further facilitating a smoother transition for children. ECIA therefore recommends additional funding be allocated towards early childhood intervention services and ECEC to enable them to continue their collaborations to enable smoother transitions to school for children with a disability and developmental delay.

## ECEC and the National Disability Insurance Scheme (NDIS)

ECIA would like to draw the Commission’s attention to the possible impact and influence that the NDIS may have on ECEC.

While the intersection between ECEC and the NDIS is currently unknown, ECIA is concerned that an NDIS, with its focus on targeted and individualised services, could remove the inclusion mandate from universal services. It is vital both the Commission and the ECEC system do not just see children with disability and/or developmental delay as the NDIS’s ‘problem’. ECIA does not want to see a move back to a more segregated services system given the gains that have been made through the IPSP, the NQF and EYLF and also the fundamental right of all children to access ECEC.

While the NDIS is currently in trial phase, it is important that the impact on ECEC be tracked in those trial sites, so that there can be the development of a responsive system come full scheme roll-out.

## Conclusion

ECIA believes that this Inquiry provides a crucial opportunity to improve inclusion in ECEC for children with disability and developmental delay. ECEC services have the power to not only make the biggest impact on children’s lives and their future life trajectory, but to also change the next generation’s attitudes on community inclusion.

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<sup>9</sup> Centre for Community Child Health (2008), Policy Brief No 11: Rethinking the transition to school: Linking schools and early years services, [www.rch.org.au/ccch/policybriefs.cfm](http://www.rch.org.au/ccch/policybriefs.cfm)