

# Response to the Productivity Commission – Child Care Cairns & District Child Care Development Association, Inc.

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Thank you for allowing us the opportunity to respond to the Productivity Commission Draft Report into Child Care.

Our focus for comment is on Additional needs children and services – improving the accessibility, flexibility and affordability.

Funding does have an important role to play in improving accessibility to ECEC for children with additional needs. We agree that the Inclusion and Professional Support Program requires additional resourcing in order to better meet its policy objectives. The Inclusion Support Agencies work at the 'coal face' with educators to support quality inclusion and capacity building on a regular, ongoing basis.

We note the draft recommendations state that three capped programs to support access of children with additional needs to ECEC services should be established.

- Special Early Care and Learning Subsidy
- Disadvantaged Communities Program
- Inclusion Support Program

We agree with the Draft Finding 8.1 – including – The Inclusion and Professional Support Program requires additional resourcing in order to better meet its policy objectives.

*12.7 The Commissioner seeks views on the best way to allocate a fixed funding pool to support ECEC access of children with additional needs and deliver the greatest community benefit, including best options for allocating the SECLS payments for children with disabilities to ensure that the program enables as many children with disabilities as possible to access mainstream ECEC services.*

- Children with additional needs should be able to gain access to the ECEC of their parent's choice.
- Educators need continual support and capacity building over a lengthy period of time, not just in 'blocks' of support.
- In our experience the best results for children with additional needs are gained by supporting the Educators with information, resources, regular visits, fact sheets and encouraging them to work with other support agencies able to assist with the additional needs of the individual child.
- We agree that the present system needs to be overhauled to meet the needs of the Educators and Child Care Services.

- The cost effectiveness of having a child with additional needs in care can be prohibitive, especially to those small services (especially rural and remote) who are struggling to maintain their numbers and meet the staff/child ratio's.
- The financial assistance (ISS) needs to be increased, probably to a Cert III level of remuneration to make sure the additional costs for wages on the service are limited.
- In Queensland, the specialist equipment works quite well and meets the needs of the ECEC services.
- Increasing the rate of financial support will allow services to include all children into their care environment, with little or no additional costs to them.
- It will also allow the ISA's (or similar agencies) to maintain their relationships with the educators, to support them to include children with disabilities into their care environment, on an on-going basis. These relationships are already established and irrespective of what form of funding is decided upon, maintaining staff with the experience of the Inclusion Support Facilitators, to support and encourage Educators could only be a positive suggestion.
- Maintain the Flexible Support Funding arrangement, with an increase in the hourly rate, to allow ECEC services to apply for short-term funding that will allow services to be supported immediately the child commences care.
- Certainly the current process of accessing ISS is complex and could be made more efficient if the Portal Systems from other departments (Disability/CCB/Health) could be accessed.
- Why do we need to supply a health care card with applications when this information on the family is already on file, along with the child's disability? If a Health Care card is available, should this be enough to seek additional funding for children with a disability?
- Who will monitor these applications? An external agency, government department?
- What follow up on information will be carried out and by whom?
- If additional funding is approved, why can't it be approved for e.g. 20 hours per week – not 4 hours Mon/Tues/Wed/Thu./Fri – this would make it easier for the funding provider and for the child care service, who would claim for the funding used per week/fortnight and not have to then seek a 'review' of funding to change the days of care required?

*12.8 The Commission seeks views on what types of services (that are not funded by NDIS) should be provided for children with a diagnosed disability attending ECEC, and how best to prioritise available funding. It also seeks information on the range of needs and the costs of meeting these needs for children of different ages and by the nature and extent of their disability.*

- We agree that access to the mainstream ECEC funding on the same basis as children without a disability and up to 100% subsidy for the deemed cost of additional ECEC services, funded from the SEC&LS is feasible, although not sure this would be cost effective and would certainly limit the number of children able to receive support.
- 100 hours per fortnight is extremely generous and in our experience there are very few children with additional needs who would attend a care facility for that period of time each fortnight.

- If 'one off' funding is to be considered for ECEC services to build the capacity to provide services to additional needs children, such as modification to facilities, equipment, training staff etc., are to be made, consideration should be given to how this will assist both the educators and the child/family. Considering that the average turnover of staff in ECEC services is just over 15%, how this will assist the child and educators on an ongoing basis.
- If one- off grants are available twice per year (e.g. Jan/June) what happens if a child commences care in February and requires ongoing support, equipment and resources – does the service wait until June to apply?
- The Productivity commission states 'have two rounds of applications per year, allowing services to reapply in later rounds if unsuccessful – what happens if the child already has gained a place at an ECEC service and the funding application is not successful – is the child asked to leave until they have a successful funding application?
- In our experience, there would be no place in the service for a child with additional needs as the educators would not be able to access immediate support on an ongoing basis.
- Is the Quality Fund not available to support Professional Development and Training? Is this not 'double dipping' of funding for training?
- Services should not be encouraged to charge parents of children with disabilities more for care, irrespective of the costs. This is blatant discrimination and once again points out to parents and families that their child has a disability. This is a tremendous burden on families and takes us back to the draconian days of 'special schools' and 'institutions'. We have moved forward; please do not even think this is a positive move for anyone – families, educators or children.
- Encouraging services to have a 'cluster' of additional needs children and employing 'specialist' staff to support their inclusion, is again a backward step. For years we have fought and gained access for children with a disability to be included in mainstream ECEC services – now this report is seeking to undo the major positive steps that have been made over many years to include all children into the care environment. Specialist staff/therapists are involved with the child on a regular ongoing basis; surely the child and family have a right to experience quality inclusive practices, supported by Educators and other staff who understand the needs of a nurturing care environment in ECEC services.
- Surely financially it is far more efficient to have Educators who are supportive of all children, being mentored and encouraged by support agencies that understand the industry needs to meet the requirements of ACECQA when it comes to inclusion on an on-going basis, with support staff available at short notice.
- Thinking of changing more for child care for children with disabilities, suggesting 'clustering' for more efficient use of funding and employment of 'specialist staffing' does not meet the ACECQA or the services on Philosophy of quality inclusion in ECEC services. It is NOT INCLUSION!
- We understand the need for 'capping' program funding, as the IPSP program has been capped for some time, any similar program should not see access 'rationed' for children with disabilities – keeping a program that allows most children to access some form of ECEC service is far more cost effective for the community as a whole, rather than having additional payments go to certain ECEC services to reflect the high cost of inclusion – this will become a situation where

parents will be expected to travel long distances to access specific services or they will miss out all together on quality child care for their child, purely because the child has additional needs.

- NIDS approval should in no way affect a family's right to quality ECEC.
- Discussing a 'trade-off' between assisting high needs children to attend a mainstream ECEC service and the number of children who are able to be assisted may be required – once again discriminatory, especially for the non-metropolitan regions.
- Children with a diagnosed disability attending ECEC should be provided with quality care, with educators ably supported by staff who have the experience and understanding of quality inclusion.
- Unfortunately, not all ECEC services have staffs that are proficient in seeking grants to increase the capacity of their educators to meet the needs of children with disabilities.

*12.9 The commission seeks information on whether there are other groups of children that are developmentally vulnerable, how they can be identified and what the best way is to meet their additional needs*

- Children from disadvantaged families and communities
- Children with a disability
- Children whose parents may have a disability
- Children from CALD families and communities
- Refugee children, including children in detention
- Children from Aboriginal or Torres Strait Islander communities and families in a low socio-economic situation
- All children can be identified by the existing means ADSI etc.

*13.2 Commission seeks information on the efficiency and effectiveness of outsourcing the allocation of funding under capped programs that support children with additional needs. Views are sought on the model that should be used to allocate funding under the proposed new funding arrangements and the governance requirement to ensure outsourced allocation services are accountable and deliver value for money.*

- Outsourcing of funding of capped programs is more efficient, cost effective and targeted if it is carried out on a 'regional basis'
- Governance could be in a quality reporting system, feeding back to Government on the results of the program
- Service delivery model and agreements to be on a National Level, with outcomes being part of the funding model
- Feedback on a national level, to allow Government to allocate funding where required, on a regular basis (Every 3 - 5 years).
- Consideration to be given to 'factoring' in the additional costs of servicing the rural, remote and very remote regions of our nation

*8.1 The Commissioner seeks further information on the nature of the barriers faced by families with children with additional needs in accessing appropriate ECEC services and the prevalence of children with additional needs who have difficulty accessing and participating fully in ECEC. Information on the additional costs of including children with additional needs is also sought.*

- Lack of knowledge and understanding of what services are actually available to families and children
- Limited health services in rural and remote services. Lack of Doctors, Therapists, Child Health Nurses and auxiliary support services
- In ECEC services, limited staff experience with children with additional needs
- Lack of understanding of the needs of families who have children with additional needs
- Limited information in training packages for ECEC services, to support the understanding of additional needs children
- Lack of support services to assist families to access ECEC services
- Limited support for educators on an on-going, regular basis, to build their capacity to understand and accept children with additional needs into their care environment

**General Comments on the Draft Report**

- *We agree in principal with changes to CCB/CCR payments*
- *We agree that the IPSP requires additional funding to better meet its policy objectives, however are hesitant to agree with the Draft Recommendations 12.6 – as we feel that this will lead to a drop in the number of children with additional needs attending ECEC services. We are not supportive of the ‘once off’ grants to ECEC services to build capacity etc., as we feel that capacity building and support needs to be an ongoing services to all educators*
- *Agree with draft recommendations 12.7, however feel that 100 hours per fortnight of funding is extremely generous.*
- *Agree that children with diagnosed disability can access ECEC services on the same basis as other children, with up to 100% subsidy for deemed cost of additional ECEC services, however would suggest this is carefully monitored to maintain financial viability, without restriction to the number of children who are supported*
- *Block funding to support ECEC providers to build capacity should be ongoing – not just bi-annually.*
- *Agree that block funding for ECEC services for Indigenous children is continued*
- *Agree 5.2 – plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs*
- *Agree 8.6 – Remove the In-home Care category*
- *Agree in principal with Nannies being brought into the approved care system, so long as they are registered and monitored by a relevant Agency.*
- *7.2 – Do not agree that all educators working with children aged birth to 36 months are only required to hold at least a Cert III, or equivalent. This is certainly against the NQF and ACECQA*

*recommendations and does not reflect the results of studies into early childhood education and care.*

- *11.1- Agree that RTO should undertake regular audits by Australian Skills Quality Authority to maintain a high quality standard of their delivery of ECEC related training*