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Childcare and Early Childhood Learning

Productivity Commission.

Response to draft report

Prepared by
Network of Community Activities
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About Network

Network of Community Activities represents 1200 OSHC Services in NSW. Approximately 875 of these Out of School Hours Services (OSHC) in NSW services and ACT, are current financial members of the organisation. Network of Community Activities is the largest membership organisation in Australia dedicated to the advocacy, promotion, resourcing and development of play and leisure activities for children 5-14 years old

Established in 1974, Network provides resource, support, training, advocacy and advice to communities and OSHC services throughout NSW. Network is a Registered Training organisation (RTO) offering qualifications in school age care and community management. We also offer accredited child protection training for the OSHC Sector in NSW.

Network is the secretariat for the National Outside School Hours Services Association (NOSHSA) and represents the OSHC sector on variety of national and international forums and committees.

Introduction

In responding to this submission we also wish to also acknowledge and give our unequivocal support to the submissions tendered by:

National Out of School Hours Services Association (NOSHSA) and The NSW Children's Services Forum (NCSF).

As a member of both organisations, Network collaborated on the writing and production of both submissions. The sentiments and comments expressed in both of those tenders are shared by our organisation.

As a result of this collaboration we have not tried to address every area of the draft report but comment on the areas that we feel most passionately about that we believe have the capacity to enhance or detract from the quality of the children's services sector in Australia.

However we stand by the key principles, which we believe any Children's Services system, must be built on:

- **Children's rights** as defined under the United Nations Convention on the Rights of the Child (UNCRC) should be central to all decision-making.
- Workforce participation choices should be supported for parents of all children with equitable access to affordable, quality services that are **AGE APPROPRIATE**.
- Parents and children should not be squeezed into a "one size fits all model"
- **Social Inclusion** is a critical factor for the development of **resilience** in children 5-14 years. Any recommendations should not be limited in their application to early childhood so that we effectively **EXCLUDE** children 5-14 years.
- Community Management, with parent representation gives a **VOICE** to those who often can feel they do not have one when it comes to the formal care of their children as well as enhancing community involvement. No actions should be taken that undermine this important component of the OSHC sector.
- Social Inclusion applies not just to children but also to parents. Quality managed services where parents have the opportunity to participate in the

service management and are actively consulted with regarding the service operations **promote social inclusion and communities capacity building.**

Response to the Draft Report.

Network of Community Activities (Network) applauds the Productivity Commission on its proposal to increase overall investment in Early Childhood Education and Care and in saying this we believe that this recommendation is inclusive of Out of School Hours Care Service (OSHC) provision.

There is some concern that the focus is not on the direct interests of the child but on workforce participation and the economy. Children's rights are not evident in the report and there is an unreasonable expectation on services to meet all the demands of working parents.

In summary, Network found the draft response to have a number of significant and practical recommendations that we support and are long overdue for reform to the Children's Services sector.

However there were recommendations that we feel overall the report demonstrated a distinct lack of understanding of the Out of School Hours Sector and failed to adequately comprehend the significant issues associated with support for children with a disability. The PC report mentions Children with Additional needs however, this a clearer definition as the current system is going no where to meeting the growing demand and a broader definition could have serious implications for the children that need the most support.

We are appalled by the comments made on Page 275 of the report that refer to Outside School Hours Care as " short term, relatively informal and sometimes sporadic".

The flexibility of OSHC does allow for differing patterns of attendance however Children attending OSHC services do so for generally the majority of their primary education. For many children the time they spend in an OSHC service exceeds the time spent at school when calculating their attendance at vacation care, before school care and after school care. The OSHC service often becomes a conduit between home and school and is an integral part of a child's life.

There is a general impression created for the reader when looking at the report by the Productivity commission that the Commission has little understanding of the impact and benefits to the community of an OSHC service, nor its unique

nature of operation and has in reviewing submissions picked up on the points made by other organisations who also demonstrate this lack of understanding.

The OSHC service is fundamentally different in operation to the school classroom, although catering for the same age range. The school is not an OSHC service and comparisons to school environment in regards to staff ratios is unhelpful and ignorant in their application and does not support the play & recreation needs of children.

In addition there are case studies in the report that inaccurate. An example from Victoria (Box 7.11 on page 297) quotes 1:6 ratios. In Victoria, like NSW ratios are 1: 15. Therefore the NQF burden being described does not exist. This case study has serious flaws both in its facts and in the interpretation leading us to question the validity and reliability of other case studies and conclusion drawn by the Productivity Commission in this report.

Network has 40 years experience working with OSHC services and families and we did not see that experience reflected in this draft report. We request that the comments made regarding OSHC services are reviewed prior to preparation of the final report.

In addition we are concerned at the assumption that the Productivity Commission has made that there is no evidence that qualifications improve quality outcomes due to the absence of research. However we would like to note that a requirement for research should not be an indicator of no proof in improved outcomes when we have daily proof of best practice to refer to in the general community. In our day to day lives we know that a qualification does not guarantee improved outcomes but improves the chances of successful outcomes, otherwise why would we deem it necessary to train our pilots, our hairdressers and our drivers. Common sense should conclude for the ordinary person that a qualified person caring for children has a better chance of achieving successful outcomes for our children than an unqualified one. Do we wish to take such a risk with our children when we will not take one with our hair?

Shout of Approval. (subtitle “you got it right”)

Network believes that the following recommendations are sound and should not be changed. These recommendations we will request the Australian Government adopt.

- The creation of a singly child based subsidy to replace CCB/CCR/Jet paid directly to services. **(Recommendation 12.2)**
- Removal of food safety requirements that overlap with state regulations **(Recommendation 7.11)**

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- The abolishment of the Excellent rating in the National Quality Framework (**Recommendation 7.6**)
- The urgent redesign of the Assessment and rating system to increase pace of assessments (**Recommendation 7.6**)
- The development of a nationally consistent approach to jurisdiction based ‘working with children checks’ and a nationally recognised single ‘Working with Children Check’ (**Recommendation 7.10**)
- The removal of a requirement for a certified site plan for OSHC services on school property as a condition of approval (**Recommendation 7.7**)
- *Extension of the Scope of the National Quality Framework* (**Recommendation 7.8**)
- Abolishment of Supervisors certificates and more detailed and targeted advice to providers on Quality Improvement Plans (**Recommendation. 7.7**)
- Maintenance of high standards for Registered training Organisations (**Recommendation 11.1**)
- The exemption of non parent primary carers of children and jobless families where parents are receiving a Disability Pension or carer payment from the Activity test. (**Recommendation 12.3**)
- The maintenance of support for children with a diagnosed disability to access ECC services (**Recommendation 12.8**)
- Greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs and ensure necessary support services are available (**Recommendation 5.2**)
- The establishment of a program to link information from each child to the National ECEC collection, would be an excellent use of the information and improve outcomes for children (**Recommendation 13.2**)
- The Australian Government to review the operation of the new ECEC funding system (**Recommendation 13.3**)

Yeah But..... (subtitle “needs to be adjusted slightly”)

Network believes the following recommendations have some merit but there are elements that require further investigation and review based on the issues raised.

Draft recommendation 8.3

We support the Abolishment of minimum or maximum weeks of operation for CCB Eligibility. This recommendation would support service provision particularly in rural and remote areas where a service may not be able to be sustained 5 days per week but there is sufficient demand for a service 3 days per week due to the working patterns of families in the region. It would also support the development of Vacation Care and the continuation of existing vacation Care who sometimes struggle to meet the current minimum weeks requirements now.

BUT *we stress that the requirement must remain in place that it meets the needs of the community and not the provider. Providers must have to demonstrate that there is a genuine need for reduced or increased weeks of operation before approval is granted.*

Draft Recommendation 12.7

We support Australian Government Support for children assessed 'at risk' in this recommendation and the timeframes.

BUT *the requirement to alert child protection authorities of the child 'at risk' within one week of providing the service will work against the best interests of the child. Educators are skilled and trained in child protection under the National Quality Framework; they often have an excellent working knowledge of families in their community. The need to report "at risk" will detract from the important role services play in detection and support.*

If services become known in a policing/reporting role they are less likely to perform the important role of prevention. A child deemed "at risk" may not necessarily be at the stage that requires reporting to the authorities.

This expectation of reporting also places additional stress on the reporting authority thereby placing more children at risk as it detracts from the resources for authorities to be responding to cases where there is a risk of significant harm or abuse.

Draft Recommendation 12.4

The use of an Early Learning and care subsidy to service based and home based services directly to services is critical for ensuring funds are directed to the purpose intended. OSHC services report a high number of families taking the subsidy into their accounts and not making the child care payment to the service. This fraud will be eliminated under this model and ensure a higher level of accountability for the funds invested by the Australian Government. It would also help families see the full impact of the subsidy on affordability and gives services more flexibility.

But *We are concerned that "Deemed Cost" may not be fair or equitable across regions.*

The PC report lacks significant detail in this area and Network would need more information to carry out case studies on the impact to services. Network is a small organisation with limited resources however, we would be prepared to work with the commission on doing some case studies around the \$7.33 to see if this amount is realistic across a whole range of services. We are aware that other limited research suggests \$10.00 per hour.

Network is concerned of the impact of "deeming" as it fails to take into account rural and remote difference and the differences in rental properties. This can be

huge differences in what services have to reimburse schools for the use of their buildings & staff costs. This proposal needs further investigation as it may ultimately result differences in affordability between regions and result in disadvantage.

Draft Recommendation 12.5

A 'viability assistance' program to support providers in rural, regional and remote areas to continue is critical and important for ongoing support for families and children in those areas. The title of the program is simple and self explanatory and this is also important to ensure program intent is understood and supported.

BUT *the logic escapes us as to why a service may be assessed for a maximum of 3 in every 7 years. This does not contribute to service viability of sustainability and requires further explanation.*

It is reasonable to assume that some services in R and R areas will be long term recipients of viability assistance.

In addition some parameters around the process of determining eligibility will need to include the number of other providers in the region, the ability of the service to cross subsidise with other provision and provision of ongoing resource and support to assist the service to facilitate where possible potential growth

Draft recommendation 12.6

We support the establishment of programs to support access to children with additional needs into mainstream services and grants to support training and building modifications. However, as discussed previously this needs a clearer definition.

BUT *use of the terms "deemed", "means tested" and "transition" leaves area of doubt as to how this funding will be able to support inclusion where the establishment of financial parameters*

Draft Recommendation 8.1

The ability for OSHC services to accommodate in some circumstances preschool children is important, particularly in small rural, regional or isolated communities.

BUT *removing the requirements for a cap on number of preschool children leaves the system open to abuse and misuse. Children of preschool age should be required to have the same expectations of care that are set within other service based environments for this age group.*

There are already issues of supply versus demand in many areas and the inclusion of children of pre-school age into OSHC could have implications for school age children accessing the service.

School premises are often inadequate to cater for this age group and within the NQF these children have a different learning framework.

The removal of a cap would mean that the service may no longer be for school age children and the confused logic is that is it once again a service based services for under-fives but functioning without the legislative requirements.????

The recommendation without caps and a regulatory framework surrounding is not in the best interest of the child and leaves children vulnerable.

Draft recommendation 8.2.

We support that school should be integral partners in the establishment of OSHC services.

BUT *The requirements for a school to be solely responsible for establishment of a service is unrealistic and problematic.*

The establishment of OSHC within schools must involve close liaison with the school community including parents, and priority use should be given to the OSHC outside of school core hours – there is a current and growing problem around OSHC use of school facilities. The lack of a recommendation regarding the reintroduction of a planning model for service provision is of concern as it does not provide for future planned growth in service provision.

Draft Recommendation 7.1

We support the extension of the scope of the NQF and the need to ensure that interpretation of the NQF is through the lense of each service type.

We do support the case for reduced documentation for OHSC services in relation to QA1. The intention of the NQF and documentation for OHSC has been misunderstood by the Authorised Officers and is therefore placing an uncalled for amount of additional administration on services.

Network does strongly support OSHC service being included in the NQF and being a new system, there are obviously going to be some amendments a long the way.

BUT *the challenge is that services are suffering change fatigue. This is a new system and being evaluated before the majority of OSHC services have gone through the assessment and rating process. Recognition for service differences must come through the assessment process and this to date has not been consistent. Reduction in documentation is essential.*

Draft recommendation 7.4

We support the implementation of nationally consistent ratios and qualifications for OSHC services that are appropriate to the context of the service and based on research and consultation. The importance of national minimums for service quality in OSHC have been emphasised in the last few months by the Royal Commission into Child Abuse.

NSW is the only state in Australia that has no mandatory qualifications or ratios in the regulations. Currently the ratios for staff and children in Outside School Hours care in NSW are not mandatory, despite other states and territories having mandatory ratios of between 1:12 and 1:15. In NSW the majority of services have accepted a voluntary requirement of 1 adult staff member to 15 children and on excursions this is reduced to 1 to 8. To protect staff and children it is common practice that a minimum of 2 staff members are present at any one time. In some case services do not apply this and there is no legal requirement to do so.

In creating a child safe organisation the implementation of policies and procedures is just one strategy in place to support the organisation. The monitoring of this process is currently undertaken by the State Government through its regulatory compliance role. In this regard the system has a number of safeguards in it but remains based on the integrity of services implementing the policies and procedures.

BUT *we strongly reject suggestions that ratios acceptable during school hours are acceptable during OSHC session times. Such a suggestion shows a fundamental lack of understanding between the context of the service provision in OSHC and that of a school classroom including but not limited to:*

- *nature of activities being undertaken (indoors and outdoors)*
- *age range of children in attendance*
- *operation times for the service*
- *varied arrival and departure times of children and parents during the course of any session.*
- *requirement for staff to undertake face to face tasks and general administration with parents concurrently*

Screams of Horror. (subtitle. “you need to rethink”.)

Network does not support the following recommendations and in the absence of further information to support the recommendation we suggest it be removed or referred for further investigation.

Draft Recommendation 10.1

Network understands a number of organisations have addressed this in their submission. We support our colleagues in Community Child Care Victoria in their summary of the argument for retaining these payroll exemptions.

Special CCB

The withdrawal of Special CCB could be of concern as this is at the decision of the Co-ordinator/Director and often offers flexibility to vulnerable families in their ability to offer care.

For Your Information:

Information 8.1

Network has supplied in its initial response information on the barriers being experience by families and children with additional needs in accessing OSHC services

We attach a copy of more detailed information regarding these issues. See attachment A

We recommend a separate inquiry is undertaken o address the issues of supporting children with additional needs in children’s services. This is a long term issue and needs resolution

Information request 8.3

OSHC services could accommodate making paces for children on extended absence available to other children on a short- term basis and this is a common practice in OSHC services in NSW. We understand that there are issues for parents of pre-school age children accessing longer care, however this would need careful planning in terms of addressing the age, developmental needs of the child and the physical premises, along with staff child/ratios etc.

The use and availability of ”casual “places is a long standing practice and children of school age presents no difficulty for programming or support.(for Pre-school age ???) However, greater clarity by the Australian Government is required for ensuring that the CCB entitlements do not inadvertently have a service ‘double dip’ for the subsidy.

For Further Information.

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Attachment A

Supporting Children with Additional Needs

Network has been advocating for many years about the increasing concerns we have on support for OSHC services catering for children with additional needs and their impact on service sustainability, accessibility to services, workforce participation and recruitment of educators. We therefore believe it relevant to include information on our concerns taken from previous submissions to Government that have resulted in no improvement in this area.

There are three aspects of considerable concerns to us

1. The financial implication on service provision to cater for children with additional needs.
2. The availability of places for children with additional needs In OSHC.
3. The impact on availability of places for 5-12 years old is being impacted on by the lack of provision elsewhere for children in their teenage years.

Financial Implications

Provision of children with high and complex needs requires adequate funding. Services are suffering financially in order to assist families' access care.

This has been raised with the Federal Government consistently over many years and remains an unresolved issue for services. The examples speak for themselves. The current finding model is not sustainable, we are heading for a crisis in care provision for children with additional needs.

The following examples provided sum up the dire situation facing OSHC services in NSW.

“Attracting disability specific trained staff due to the hours and the wages. Funding is limited to the number of hours the children are attending and capped at \$16.49 per hour. This is below the award rate for the type of staff member that you would employ for their qualifications or skills and experience to work with some of the high needs we are encountering. This therefore becomes an ongoing loss for centres that can place a financial burden on it viability, particularly when they may be more than one ISS staff member per centre. The wage that we would be paying a staff member in this situation would be around the \$21 mark per hour. Using the example of J and L from the above list we would pay out a further \$40.59 per afternoon to cover staff direct cost (not taking into consideration insurances etc.). For the week the loss stands at \$121.77, for the term it equals \$1217.70 for the year it totals \$5114.34. That is a large financial loss considering that is only looking at the twins from the above list.”

“With the financial costs even for the 5 to 12 year olds we get about 16.00 an hour for the so called funding, yet we have to pay staff a minimum of 23.00 an hour so it costs the service a lot of money each week to support the special needs kids, and I know at the end of the day its not about the money its about the child but it certainly takes a lot out of the budget when you have 5 special needs carers every afternoon. “

“ In our Vacation Care program we extend shifts for permanent team members or employ casuals for the care to be shared. In 2008 the VC weekly wages deficit was from \$81.60 to a maximum of \$255/child, to now being from \$125 to \$320/child. We currently have 3 funded children in VC, if they all attend for the full day (8’ for a week (40’), this equates to a maximum weekly shortfall of \$375 to \$960.”

“I have three children and we must find an extra \$14160 a year to fund this, not that easy for a not for profit organization.”

Service Accessibility.

Network believes there is an urgent need to address the issue of provision of school age care services aimed at youth in particularly those with complex and additional needs.

Whilst Network supports the right of children 12-18 years to access a service we believe that the services providing this access are inadvertently complicit in shielding Government from the lack of adequate service provision for this age group. As a result we are seeing an increase in numbers of teenage children accessing services designed for primary age children. This access is placing unrealistic pressure on services, staff, children and families.

This issue is further compounded with frequent examples parents of children with additional needs threatening services and staff with legal action and discrimination. The bullying of services into taking children with high level o complex needs and retaining them at the service is not an isolated incident. In a number of situations Network has had services report to them incidents of bullying and harassment. Some of this harassment has come from disability advocates rather than the parent themselves adding a complicated dimension to collaborative work that meets the best interests of children. The only need being met in this instance is the needs of parents with an “instant fix” for affordable childcare.

As a result, fear of litigation often keeps services hostage to a system that is not meeting the needs of the child with high and complex needs, particularly in adolescence and to the detriment of the services and other service users. In addition there appears an incentive for some funded agencies to place children

with high and complex needs into OSHC services due to the ready access to some form of Government funding.

Whilst OSHC services are already struggling to meet the demands of primary age children with additional needs, the additional demands of an expectation that this care will then be extended into care for high school students with complex or additional needs is unreasonable. Services report there has been a steady increase over the last seven years in the number of families calling centres investigating and requesting care for their children with special needs.

With the changes in trends, staff find it most difficult to cater for the growing number of high school children and their specific needs.

- *EDITED for public dissemination due to privacy reasons.*

These trends are by no means limited to the metropolitan areas and one small rural service reported that provide care for 6 diagnosed children with high support needs and another 6 with challenging behaviour. This service caters for 31 children in total with a maximum daily participation of 26. Therefore, 46% of the children have additional support needs in this small centre. This level of service delivery is managed with 2 staff members and one additional disability worker. It could easily be said that the service staff have unrealistic demands placed on them to meet the standards of service delivery required by Government.

Provision of Age Appropriate Provision

“We currently have a boy who is now 16 years old enrolled in our service four days a week for after school care who has very high support needs. He is in a wheelchair and is both intellectually and physically disabled. He is tube (PEG) fed every afternoon by our staff, as he is unable to feed himself. He is also not independent with toileting and is normally changed using a hoist and change table but we don't have these facilities. His parents made the decision at the time of enrolment that they were happy for him to go unchanged while in our care (the hope is that school will do one last change before he leaves for the afternoon and then he is only with us for 2.5 hours or so). We were pressured by the local inclusion support service to take on the enrolment as the family were in desperate need of care and the support service's after school care service for children with high support needs was at capacity and could not take him. The staff have built a wonderful relationship with this child and his family and do not begrudge the extra work we have taken on but he is not in the appropriate setting for either his age or his disability.”

OSHC services designed for children 5-12 years of age are not appropriate settings for children in their teenage years. Despite the mental age of children

there are significant factors in regards to a child's development that makes provision unsuitable.

Due to the size of some teenagers services report that if they have challenging behaviour that is of a physical nature the degree of injuries inflicted on other younger and smaller children and the staff is more substantial. Staff also reported that adolescent children often start to display sexualised behaviour towards the other children and the staff as they move through puberty.

Access to appropriate equipment for use to meet individual needs of teenagers (i.e. hoist for toileting) is challenging in OSHC as often the children are much larger than primary age children with additional needs. The size of teenagers requires two staff for undertaking caring duties due to manual handling requirements. This results in compromised staff: child ratios in the centre. All children are placed at risk when ratios are compromised.

Due to ratios and the part time nature of OSHC service provision, specific staff rostering is not always possible in a traditional OSHC Service. This will often leave staff feeling uncomfortable particularly with toileting and assisting teenage girls who are menstruating.

The dignity of the children with additional and complex needs and their right to an age appropriate service should be respected. Currently, despite the best efforts of all parties involved, this is not the case in the provision available.

Absence of Options for Families

"We have a young man who participates in our programs, he has been coming to us since 2003 and is now 14. His Vacation Care participation is ISS approved but coping with his changing needs, as a teenager whilst continuing to deliver service to primary age children is increasingly difficult. We have discussed transitioning him out but to where????"

The major issues facing families and OSHC services is that there is no or limited provision of services for children with high and complex needs once they reach high school age. Many children currently using OSHC services have no access to another service to allow for transition to occur into a more age appropriate service.

The lack of age related care results in waiting lists for younger children in OSHC services designed to take the younger child. So the effect is twofold – it restricts access to a suitable service for younger children with additional needs and it places stress on services to provide care outside their scope.

A service in the St George area, estimated that they referred at least 4 families every term to other agencies and services in relation to Vacation Care, as they were unable to stretch their resources further. The referrals were to other mainstream services, which may have vacancies or are suitably resourced for inclusion. Once service stated “ we are currently reviewing our practices in relation to inclusion as being ‘too inclusive’ is creating issues and concerns. We are compromising the quality of care we provide to include more children than we should as there is very little choice for families”.

The lack of provision also provides families with issues in relation to transport. Children with high or complex needs are frequently not able to be accommodated in mainstream schooling however due to lack of provision are transported back to OSHC services located in schools. This places children at an additional risk and services have reported a lack of supervision on the transport can result in children being offloaded at the OSHC service location without a staff member present to take responsibility for them.

Staff Recruitment and Retention

“In the past we have had a number of older special needs children at our service for both ASC and VP, it has been very challenging for all involved as the majority of our special needs staff are uni casuals as we cannot afford to put on a fulltime disability worker as that child may only be with us for one year or six.”

“What do we do about staffing? all our good disability workers leave for fulltime work as we can only offer them a casual position of 3hrs a day as long as that child keeps coming or is not sick. This year I have had to turn away four families from the local ASPECT school due to not being able to accommodate the children with both staffing and funding with ISS.”

The rate of pay and the casual nature of disability support work makes staff retention and recruitment challenging in OSHC services. Services complained of being stretched to meet some of the support needs of the children attending with examples of tube feeding and changing nappies increasingly being required in services whilst concurrently providing play and leisure activities for 5-12 year olds on ratios of 1:15 in venues not designed for high level support needs.

Questions regarding legal implications, occupational health and safety and duty of care have been largely overlooked in the quest to meet the burgeoning demands of care provision. There is an absence of legal advice available to services and staff to assist them make informed decisions about their ability to provide care and their liability if an issue arises.

Services cited examples of finding it difficult to recruit and roster staff in OSHC services that are able to take on the additional requirements of a child with

additional needs. Lack of training and the nature of OSHC service provision make it difficult to support staff with these tasks. This is particularly common when staff are required to assist teenage girls who are menstruating which requires last minutes rostering changes that may not always be possible.

Current finding arrangements do not support services being able to fund adequate staff and child ratios nor do the service environments allow for modifications to make them more appropriate as they are not purposely built and lack in most cases many of the features required for the provision of high support care.

Network would like to see the following consideration made in regards to supporting children with additional needs in their access to child care provision:

- **Development and funding of services for 12-18 year olds to meet child care needs of families.**
- **Incentive grants / financial support for establishment of OSHC services in schools for children 5-12 years with additional and complex needs.**
- **Increase in funding levels to services providing care for children with additional needs where additional staff are required.**
- **Simplification of reporting process for funding requests.**
- **Disability workers appointed scheme to support a child and family on a long term basis across the different transitions to guide families in choices of service delivery and negotiate issues of access to services and funding.**

