**National Inclusion Support Agency Alliance Submission to the Productivity Commission Review on Childcare and Early Childhood Learning**

**January 2014**

**Who are the ISAA?**

The National Inclusion Support Agency Alliance was established in 2009 as part of the Inclusion and Professional Support Program (IPSP) funded by the Department of Education.

There are 67 Inclusion Support Agencies (ISAs) throughout Australia, providing inclusion support to commonwealth funded ECEC services to include children with additional needs:

* children with disability, including children with ongoing high support needs;
* children from culturally and linguistically diverse backgrounds;
* children from a refugee or humanitarian intervention background; and
* Indigenous children

 All ISAs are represented in the ISA Alliance by 18 elected members from all States and Territories.

The ISA Alliance was established to develop a cohesive vision for inclusion support, recognise current and future professional development opportunities, identify opportunities for innovation in the sector and facilitate the sharing of good practice.

**Background**

Research has widely demonstrated that the early years are a critical time in children’s lives and all children, including those children with additional needs, benefit from high quality early childhood education.

Children with additional needs benefit in many ways such as learning from their typically developing peers, learning social norms and social development, developing a sense of self identity and participation. The other children learn about diversity and equality, difference and sameness within the ECEC environment and then are able to transfer that information and respect to the wider community.

Parents of a child with a disability can network and socialise with other parents and not be made to feel excluded. Other parents can befriend families with children with additional needs and engage in social experiences outside of the ECEC service. Educators can broaden their skills and knowledge through understanding and experience.

ISAs receive, all too often, phone calls from parents explaining situations where they have tried to enrol their child with an additional need into an ECEC service and were discriminated against either overtly or covertly. The reasons for this discrimination include ‘we are unable to meet your child’s needs’, ‘another service or segregated environment may be a better option for your child’, ‘the service has no places’ when in fact they do, ‘your child is not able to transition without a support person ‘or ‘your child can only attend the hours when there is additional staffing provided (through the Inclusion Support Subsidy which has capped hours per day). Parents may not pursue this option at other ECEC services in fear of further rejection.

Educators who respond in this way often have a level of fear regarding the unknown about an individual child and their specific needs. We would regard highly, quality ECEC services with educators who have an attitude of support and are solution focused. Other ECEC services we support, believe they are unable to include the child and therefore do not want the child at their service. These attitudes are often reflected through the director or owner/operator.

Many families from an Aboriginal or Torres Strait Islander culture do not access mainstream ECEC services. From discussions with the community, families are fearful of what they perceive as institutions and environments of regulations and paperwork. The cost of ongoing access to ECEC services, especially for vulnerable groups such as ‘new arrivals’ and families on a low income who cannot afford to access mainstream ECEC services, is a concern. Children from these groups would benefit greatly from a high quality care environment.

Too many ECEC services believe they are including children with additional needs and do not realise what they do not know or understand. They often have a presumption that if the child is accessing the service then they are included. This lack of knowledge can affect the child’s quality of care and education in the environment. Other factors which can interfere with high quality care and education for children with additional needs include; transient educators, financial mismanagement, no allocation for professional development, young and inexperienced staff team, burn out and lack of information sharing internally and externally.

**Recommendations**

Quality care is imperative to quality inclusion.  The National Quality Framework has assisted services and educators to improve their capacity to include all children into the care environment, however the National ISA Alliance proposes the following changes be made to the ECEC sector to achieve better outcomes for children and families:

1. **Retain the National Quality Framework**
* The NQF needs to be retained as this will increase the capacity of educators in the ECE and school aged care sector to include a range of children as the number of qualified educators increases and the quality of each ECE service increases.
* Current proposals for changes to child/educator ratios should be implemented as planned and not put on hold as has been suggested by the Government. Educator/child ratios have a direct correlation to quality and the amount of time that can be spent supporting small groups of children. The “Under the roof “ staff to child ratio needs to be reviewed to ensure it is implemented as intended, not to lower ratios.
1. **Simplify the process of accessing the Inclusion Support Subsidy (ISS) for services**

The current process for accessing ISS is complex and is often a disincentive for services to include children. Information required is sometimes difficult to obtain and the need for parents to provide documentation to prove that their child has a disability is challenging as wait lists for assessments may be over 12-18 months in some locations.

* Improvements to the process for applying for ISS, the IS Portal (the online ISS application system) and the IPSP Guidelines need to be made to make the process of applying for ISS simpler and more streamlined for services. This would lessen the administration burden on the Inclusion Support Facilitator to enable them to spend more time in the coaching and mentoring role that has proven effectiveness for ongoing capacity building with educators.
1. **Increase the level of funding for Inclusion Support Subsidy (ISS) /Flexible Support Funding (FSF)**

ISS/FSF is a contribution to the cost of employing an additional educator or, in Family Day Care and In Home Care, the ISS can also be used as a payment in recognition of the impact on the carer of the additional care and attention required by children with ongoing high support needs.

The service who employs the educator must fund the “gap” between the actual cost of employing the educator and the ISS subsidy which can be financially unviable for some services and is a large financial disincentive to enrol children with additional needs for all services.(E.g. an owner of several early childhood services in QLD who includes a number of children with additional needs has suggested that it costs $30,000 per year over and above the ISS/FSF subsidy, to employ the additional educators required to support the inclusion of children with disabilities.)

Some services will only allow the child with additional needs to attend for the amount of time the additional educator is employed and not the full day.  Some services have also been instructed by their management to cap the number of children with additional needs they enrol to maintain the viability of their service.

The “gap” has been growing larger over the 6 years the program has been operating as the wage cost indexation of 1-1.5%pa is well below average annual award wage increases of 3-4%, thus increasing the financial hardship for services who include all children.

* The level of subsidy and the hours per day that the subsidy is provided for need to be increased to more closely match the cost of employing an additional educator for the hours needed.
1. **Increase the level of expert support provided to ECE and school aged services to enable them to include children with additional needs**

ISAs effectively provide on-the-ground expert consultancy support to assist services to build their capacity to include children with additional needs. This support is critical to the inclusion of children as, on its own, funding to assist services to employ an additional educator will not result in quality inclusion if ECEC services do not reflect on their environment, policies, program and practice and commit to achieving improvements in the quality of inclusion in their service.

The facilitation model of ISA service delivery which builds staff capacity through support visits, coaching and mentoring has resulted in services having the confidence to enrol children with additional needs, who may have previously excluded these children and improve the quality of inclusion within the care environment across all services.

ISAs have experienced significant growth in the numbers of eligible services in their regions since 2006 with no corresponding increase in funding, therefore the ISA’s resources are being stretched across more services.

The cpi increases in ISA funding since 2006 have also not kept pace with the increase in staff and travel costs in particular. Award wage increases average 4% per year compared with the significantly lower cpi increase in the ISA program funding (1.5% 2013-14). This means that there has been a consequent decrease in the amount of inclusion support provided by ISAs to services over time.

* Funding linked to average award wage increases and the demand for support from eligible services would prevent a decline in the amount of support provided to each service.
1. **Provide inclusion support to vulnerable children**

ISAs are observing a significant, and increasing trend of high needs children with social and emotional issues that are a barrier to their inclusion but not related to a diagnosed disability. Mental health issues in families, attachment issues and children in the Child Safety system pose significant challenges for ECE settings. Often this can result in families being asked to seek ongoing investigation for possible diagnoses where more appropriate support for children at risk of developing mental health issues would be beneficial. ISAs observe children with challenging behaviours move from service to service as their behaviours are a barrier to inclusion, however they do not fit within the current IPSP priority groups so are not eligible for ISS/FSF.

* Include vulnerable children as an eligible priority group within the IPSP
1. **Improve access to specialist equipment**

A therapist is required to order and sign off on any equipment required to support inclusion.  In some states, there is a charge for the therapist to complete the application and visit the service to demonstrate the use of the equipment. Services will not pay this cost and some parents find it difficult to access the cost of this service.

* PSC to allocate funds to supply a local Therapist through its equipment pool if required.
1. **Improve the transition to school for children with additional needs**

Improve the provision of supports to assist families and services to facilitate the transition to school for children with additional needs.

1. **Improve the provision of OSHC/Vacation care services for older children with additional needs**

Families struggle to find appropriate care options for children with additional needs once they access high school as the number of programs which cater to teens is limited. There is little choice for parents to enrol their older child into an after school facility which is appropriate to their age. Only limited places and locations are available which may not suit parents or children who would experience longer days at the care environment. Some families continue to utilise 5-12yrs OSHC services which is not a good outcome for the child/ren with additional needs or the other children in the OSHC service.

1. **Retain funding for different service types**

Service types need to be varied to meet the needs of the community especially in remote and rural locations. These ECEC services are currently working well and it would benefit the community to be funded to continue budget based funded services Indigenous and non-Indigenous, MAC services, mobile services and in home care.

1. **Improve access to staff training on inclusion (quals and access to PD)**

There is very little inclusion-specific training available to ECEC services to assist them to build their capacity. Educators report very little understanding of including children with additional needs and overarching inclusive practices through their TAFE/Teaching qualifications and are under prepared for diversity in their settings .

* Tertiary education institutions need to incorporate a competency based inclusive practices module in all relevant ECE qualifications
* PSCs to be funded to provide more inclusion-specific training to ECEC services, especially in rural/remote regions
1. **Improved wages for ECEC staff**

ECEC services continue to have high staff turnover which is in part,  due to poor wages and conditions. Increased wages would see a significant change in the number of educators who would continue to work in the sector thus leading to better quality care for all children.

Feedback from the ECEC sector through the ISAs has indicated ECEC educators are in favour of the National Quality Framework (NQF) and believe it has better outcomes for children and families. It is important to support this move by Government to increase qualifications and wages for educators and teachers working within the ECEC sector. The impetus has been started and it is imperative that it maintains a momentum to ensure high quality education and care is provided for all children accessing an ECEC service. The ECEC needs to be seen as a profession that is highly regarded within society with the appropriate remuneration for qualifications and experience.