

SUBMISSION TO THE PRODUCTIVITY COMMISSION INQUIRY INTO THE ECEC SECTOR 2023-24

Professionals and Researchers in Early Childhood Intervention (PRECI) is pleased to submit this response to the Draft Report of the Productivity Commission's Inquiry into the ECEC sector in Australia (November 2023)

About Professionals and Researchers in Early Childhood Intervention

Professionals and Researchers in Early Childhood Intervention (PRECI) is an Australian research-to-practice network focussed on outcomes for young children with developmental disabilities.¹ PRECI was established as a not-for-profit public company limited by guarantee in June 2022.

Our vision is excellence and equity in services for young children with developmental disabilities and at risk of developmental delay in Australia.

Our purpose is to lead Australian early childhood intervention² (ECI) research, knowledge translation, quality practice, and policy for young children with developmental disabilities.

PRECI has been formed to:

- provide a national network connecting ECI practitioners³ and researchers with a focus on supporting collaborative research, knowledge sharing and peer support.
- provide ECI professionals, community organisations, researchers, higher education institutions and policymakers with an authoritative source of information about best practice in ECI.
- identify, develop, promote, and raise awareness of advances in effective models of service delivery to ensure consistent implementation of best practice for young children and families.
- promote a national approach to coordinated and comprehensive pre-service, in-service, and post-graduate training opportunities for professionals working with children with developmental delay and disability, and their families and related mainstream services, on contemporary and evidence-informed practices.
- develop a national research framework and conduct research projects to advance and inform ECI within Australia.

¹ The term 'developmental disabilities' in this document encompasses children with disability, developmental delays, and developmental concerns.

² Early Childhood Intervention (ECI) is described as "the process of providing specialised support and services for infants and young children with disability and/or developmental delay, and their families in order to promote development, well-being and community participation". (ECIA Vic/Tas, 2023)

³ ECI practitioners are minimum bachelor qualified members of a collaborative team (e.g., speech pathologists, occupational therapists, psychologists, physiotherapists, specialist teachers, social workers...)

- promote interdisciplinary collaborations to ensure advances in research and translation of research into practice.
- provide nationally coordinated and timely responses to federal policy, funding, and service delivery guidelines to support consistent contemporary practice in ECI.

PRECI board members⁴ hold leadership positions across various professional and research organisations across Australia. Their views are based on Australian and international research and practice and have been continuously sought by Federal and State governments for the last 30 years.

The main focus of our submission is the ability of the ECEC sector to meet the needs of young children with developmental delays and disabilities.

The rights of children with developmental delays and disabilities

Australia is a signatory to the UN *Convention on the Rights of the Child* (1989)⁵, the *Convention on the Rights of Persons with Disabilities* (UNCRPD) (2006)⁶, and the United Nations' *Sustainable Development Goals* (SDGs) (2015). Among other things, these guarantee that all children, including children with developmental delays and disabilities, have the right to access universal early education and care services, and will be provided with appropriate support to enable them to participate meaningfully in those services.

Australia also has its own disability regulations. As the Productivity Commission's draft report notes, preschools are covered by the Disability Standards for Education 2005, which clarify the obligations of providers to ensure that students with disability can access and participate in education on the same basis as students without disability. (The report also notes that ECEC services other than preschools are not covered by the Disability Standards for Education 2005.)

The national ECEC curriculum framework, the Early Years Learning Framework (EYLF), is meant to provide for all children.

Despite these conventions, regulations and frameworks, Australia does not provide universal access to ECEC services. In the case of children with developmental delays and disabilities, the number of children attending universal ECEC services is a fraction of the total number of such children. Moreover, some jurisdictions continue to provide segregated ECEC services for children with developmental disabilities. Clearly, Australia is not living up to its international commitments or its own national standards.

⁴ See below for current PRECI Board members.

⁵ United Nations (1989). *Convention on the Rights of the Child* (UN General Assembly).

⁶ United Nations (2007). *Convention on the Rights of People with Disabilities* (UNPRCD) (Articles 7 and 12) (UN General Assembly).

Other reviews

The Productivity Commission's report needs to be seen in the context of other initiatives and inquiries. Over the last few years, the ECEC and disability services sectors have been subject to a range of overlapping reviews. These include:

- ***National Early Years Strategy***

This is the Australian Government's ongoing effort to develop an overarching 10-year framework to shape how the Government prioritises young children's wellbeing and delivers the best possible outcomes for Australia's young children.

- ***Australian Consumer and Competition Commission report (2023)***

This report focused on the market for the supply of childcare services. The review found that childcare markets under current market settings are not delivering on accessibility and affordability for all children and households across Australia. The report also notes that childcare services and government support and regulation (across different levels of government) are highly interconnected. A change to one aspect of the system can have wide-ranging impacts across the sector. Issues and policy responses cannot be considered in isolation and must be assessed across the whole childcare sector.

- ***Independent Review of the NDIS report (2023)***

One of the major findings of this review was that the high demand for NDIS services was exacerbated by the lack of alternative services for children with milder developmental problems. The review recommended the establishment of what it calls 'foundation services' for all children. This would involve strengthening the provision of universal early childhood system to cater for a wider range of children. In December, the States and Territories agreed to provide 'foundational services' to provide additional supports to the NDIS.

- ***Review of Inclusion Support Program (Department of Education, 2023)***

This review by Deloitte Access Economics found that the Inclusion Support Program (ISP) was aligned with the broader government focus on inclusion and ECEC was not adequately connected or integrated with other Commonwealth and state inclusion and early intervention services or programs. It also found that although the ISP is intended to develop workforce capability, it is not optimised to do so. Instead, the supports provided tend to be interpreted and applied as relief or capacity measures. While ISP is intended to focus on a broad measure of inclusion, the program has a strong focus on disability and prioritises funding based on diagnosis. Further, it does not effectively allocate resources to proactively invest in capability building, reflective practice and service improvement. Program monitoring has a strong focus on payment acquittal and short-term KPIs; it is not presently focused on outcomes or practice improvement.

The very existence of these various reviews illustrates a problem: as noted in the PC report (p. 53), 'Meaningful coordination and collaboration between jurisdictions and levels of

government is missing from the current ECEC policy landscape.’ All of these reviews, including the current PC review, need to be considered together and a new integrated vision for a truly inclusive ECEC sector developed, along with a new national agreement and mechanism to improve policy coordination and implementation.

Discussion

There is a wealth of evidence that children with developmental disabilities benefit from attending (and participating meaningfully) in mainstream ECEC and school settings. There is very little evidence that attendance at segregated special educational facilities offers comparable long-term benefits.

For children with developmental disabilities and delays, participating in mainstream ECEC services with other children is not merely an optional extra, seen as desirable but not essential. Like all children, those with developmental delays and disabilities learn in every environment in which they spend time. ECEC settings are essential learning environments, and therefore involvement in such environments constitutes an important arm of early childhood intervention, complementing direct early childhood intervention support services for families. Participation is a major driver of development, and ensuring that all children, including those with developmental delays and disabilities, are able to participate meaningfully in ECEC settings should be a central goal of ECEC services.

The goal of making early childhood services truly inclusive has been endorsed by peak early childhood and early childhood intervention organisations nationally and internationally. In Australia, Early Childhood Australia and Early Childhood Intervention Australia (2012)⁷ published a joint position statement on the inclusion of children with a disability in early childhood education and care. Similarly, the US Department of Health and Human Services and the US Department of Education (2023)⁸ have issued a joint policy statement of the inclusion of children with disabilities in early childhood programs.

Despite the evidence and these endorsements, Australian children with developmental disabilities do not have the same access to ECEC services as other children. As the PC report has noted, the Inclusion Support Program only reaches 1% of children in ECEC services, whereas at least 4% of children need it. This shortfall is partly due to the fact that parents of children with developmental delays and disabilities face a number of barriers to accessing ECEC services for their children. Some of these are referred to in the PC report as well as in the NDIS Review. The NDIS Review noted that across early childhood and educational settings children with developmental disabilities experienced barriers and

⁷ Early Childhood Australia and Early Childhood Intervention Australia (2012). *Position statement on the inclusion of children with a disability in early childhood education and care.*

http://www.earlychildhoodaustralia.org.au/wp-content/uploads/ECA_Position_statement_Disability_Inclusion_web.pdf

⁸ U.S. Department of Health and Human Services and the U.S. Department of Education (2023). *Policy Statement: Inclusion of Children with Disabilities in Early Childhood Programs.* Washington, DC.

<https://sites.ed.gov/idea/idea-files/policy-statement-inclusion-of-children-with-disabilities-in-early-childhood-programs>

challenges including lack of adjustments, high levels of exclusion and the use of restrictive practices.

One of the barriers is that many ECEC services are not adequately prepared or resourced to be able to provide truly inclusive programs. As a result, ECEC services may feel that they are unable to cater for children and may therefore discourage parents from enrolling their children. Parents themselves may be reluctant to send children to a service that does not cater well for children with diverse needs. Some parents also believe (or are encouraged to believe) that their children need a segregated ECEC service with other children with similar disabilities.

In addition, there are major workforce issues to be addressed. One concerns the number of additional staff that would be required by an expanded Inclusion Support program capable of meeting need. The ECEC sector is already struggling to fill all the positions needed to fill the expansion in ECEC programs, so finding additional ISP staff will be a challenge.

Another major issue is the extent to which current ECEC programs are prepared and resourced to support the needs of all children. There are no absolute cut-off points for any disability, and all (dis)abilities form continua. This means that ECEC settings will always have children with a range of abilities and additional needs; the more effectively they cater for that diversity, the easier they will find it to cater for children with exceptional needs.

To meet the needs of all children and to achieve true inclusivity, ECEC programs need to use tiered systems of support that provide can progressively support children with additional needs more intensely, as needed. There are well-established tiered systems that should be widely disseminated and resources, and both ISP and mainstream providers should be trained in their use. Inclusion support provided through the ISP should be reframed as a support for the inclusivity of the whole program, not just as providing support for a designated child. The widespread adoption of these strategies would do much to reassure parents of children with developmental disabilities that their children will be appropriately catered for in mainstream services.

ECEC quality standards need to be expanded and strengthened to monitor inclusion. At present, ECEC services are not monitored or held accountable for ensuring that their programs are truly inclusive. The Australian Children's Education and Care Quality Authority (ACECQA) and other state regulatory bodies need to develop ways of monitoring the extent to which ECEC programs are providing truly inclusive programs and ensuring access and support for children with developmental disabilities and delays.

Recommendations

PRECI endorses the following draft recommendations in the PC report:

- ***ECEC services should be inclusive of all children, including those with disability and those from diverse cultural backgrounds. But current government supports fail to reach many children who require them. The Australian Government should***

significantly increase funding for the Inclusion Support Program and streamline the requirements of the program to expand its reach.

- ***The Australian Government should amend the Disability Standards for Education 2005 to include all services within the early childhood education and care sector.***
- ***Australian, state and territory governments should better coordinate inclusion funding to reduce complexity for services and families. In the short-term, the Australian Government Department of Education and relevant state and territory departments of education should work together to streamline application requirements, to reduce the need for services to apply for funding multiple times. In the long-term, governments should clarify responsibilities for inclusion funding as part of a National Partnership Agreement on ECEC***
- ***The Australian, state and territory governments should form a new National Partnership Agreement (NPA) for Early Childhood Education and Care (ECEC) by 2026. The NPA should articulate the national vision for ECEC and clarify roles and responsibilities between all governments.***

PRECI also recommends that the federal government should develop a single overarching ECEC strategy that incorporates all the findings from the various reviews and includes a strong commitment to inclusive programs.

- ***The Early Childhood Education and Care Commission should implement a comprehensive research agenda to address some of the significant knowledge gaps around the factors that affect ECEC quality and their implications for children.***

PRECI endorses this recommendation but urges that it be broadened to include children with developmental disabilities, and how their needs can best be met within inclusive universal services. Research should also focus on curriculum and other strategies to ensure that the diverse needs of all children are being met.

In addition, PRECI makes the following recommendations:

- ***Inclusion support provided through the ISP should be reframed as a support for the inclusivity of the whole program, not just as providing support for a designated child.***
- ***New resources and training need to be provided to build the capacity of ECEC programs and ISP staff to cater for the needs of all children and increase the inclusivity of programs.***
- ***ACECQA and other state regulatory bodies should develop ways of monitoring the extent to which ECEC programs are providing truly inclusive programs and ensuring access and support for children with developmental disabilities and***

delays. This could including using existing measures of inclusion or developing new ones.

PRECI board members would welcome the opportunity to meet and discuss our recommendations with the Productivity Commission.

We would also like to point out that we can see various ways in which PRECI could play a role in implementing some of the recommendations made in our submission, both in the short and long terms. PRECI board members would be happy to explore these with the Productivity Commission.

Kind regards,

Kerry Bull (Secretary)

e. preci.secretary@gmail.com

w. <https://www.preci.org.au/>

PRECI Board Members (in alphabetical order)

- Dr Anoo Bhojti: Senior Lecturer, Monash University, Dept of Occupational Therapy (Vic)
- Dr Kerry Bull: ECI consultant (Vic)
- Paula Buttigieg: Executive Director Wize Therapy (WA)
- Kerry Dominish: CEO EarlyEd (NSW)
- John Forster: CEO Noah's Ark Inc. (Vic)
- Megan Fox: National Early Childhood Specialist (Tas)
- Dr Susana Gavidia-Payne: Adjunct Associate Professor, Educational and Developmental Psychology, RMIT University (Vic)
- Susan Gibson: Director Play, Move & Grow Assoc (SA)
- Prof Christine Johnston: School of Education Western Sydney University (NSW)
- Denise Luscombe: ECI Consultant, Director Postural Care Australia (WA)
- Dr Tim Moore: Senior Research Fellow, Centre for Community Child Health, The Royal Children's Hospital (Vic)
- Trish Wachtel: Area Manager, Early Childhood Approach, Early Childhood Australia, Developmental Educator (NT)