

RESPONSE TO PRODUCTIVITY COMMISSION DRAFT REPORT – CHILD CARE AND EARLY CHILDHOOD

FROM QUEENSLAND INCLUSION NETWORK (STATE WIDE MANAGERS/TEAM LEADERS OF INCLUSION SUPPORT AGENCIES IN QUEENSLAND)

Thank you for the opportunity to respond to the Productivity Commission Draft Report into Child Care and Early Childhood. The comments below have been collated for a state wide response.

Our focus for comment is predominately around the inclusion of additional needs children and relative services – improving the accessibility, flexibility and affordability.

GENERAL COMMENTS

As already mentioned by ISA's, services needs and staffing are constantly changing. A 'once off grant' is unlikely to provide sustainable resources to address changing needs of the service, its Educators and community.

It is a concern that children undergoing diagnosis could be excluded from the priority group, undergoing diagnosis has not been mentioned unless it comes under "at risk" ?? Children with mental health conditions should be considered for inclusion into priority groups.

We strongly disagree with the reduction of qualifications for educators working with children under the age of three. The key to a quality learning environments is the ability to put into practice strong knowledge of child development, current social and learning theories and use constant self-reflection and improvement. When considering children with additional needs and the importance of early diagnosis, if staff are not qualified in the 0-3 years age bracket, children may go undetected who require additional support, creating a more significant delay in accessing additional resources to support the holistic inclusion of the child into ECEC services and the community. Lowering Educational standards will not achieve this.

There is a lack of focus in this document on Educators skills and knowledge as the essential tool for inclusion of children with additional needs and quality care for all children. Limited funding options such as building modifications and training through one-off grants will not create sustained change in an industry with high turn-over of Educators. In this document ISA's and parent have identified ingrained prejudices and bias towards disability in some ECEC's. There needs to be some reflection on what is being taught to Educators before they are employed in services. As the inclusion unit is not taught until the Diploma qualification, it would be reasonable to assume limited knowledge around inclusion for educators who hold the current minimum qualification which is a Certificate III level, a requirement for ongoing funding for ISAs to be involved with all educators to actively explore and support inclusion in care environments is an component of any programme to support inclusion, otherwise, quite simply it will not happen.

Ongoing regular and continued support, training and mentoring to embed inclusive practice of ECEC Educators in services i.e.: the current ISF role

In terms of capacity building and support for educators, one of the roles of Inclusion Support Facilitators (ISFs) has been the provision of prompt and, on site and ongoing consultation, mentoring and facilitation of reflective conversations to identify needs and develop a plan for improvement. It is not clear how this support would still be available for services.

ISFs are the human resource whose supporting role is to facilitate the multiple interwoven of diverse components such as guidelines, Frameworks and their concepts, principles and practices, Quality Standards and linkages with community agencies when supporting Services on their endeavours for ongoing improvement and learning to ensure inclusion and growth.

There is a need to look at the grass roots and evaluate the quality of the inclusion and reflective practice units in ECEC qualifications being delivered by RTO's. Once Educators are employed in services there must be regular and continued support, training and mentoring to embed inclusive practice of ECEC Educators in services i.e. : the current ISF role

The focus of the Productivity Commission report means we are not supporting 'inclusion' rather further marginalising, segregating them, removing them from the peer groups, removing choice and equity and labelling children.

The work of the ISA to date has been able to demonstrate positive outcomes for educators and children, through face to face contact, skill development and ongoing support. There is an inference that this hasn't been successful, however this is not reflected in the ongoing demand for support from the services we support. The ISF is one of the few people who walk through the door of a service with a non-judgemental perspective, focussed on the strengths of that service and not looking for their shortfalls. This is a unique and positive influence that should not be undervalued and is used as strength based, capacity building model on an ongoing basis.

In regards to the second new proposed 'Block funded Program' under the 'Inclusion Support Program' which will provide once-off grant to ECEC providers, first of all we need to state that is not clear to us how this will be delivered and secondly terminology used when referring to children should be the correct one. For instances, referring to children as 'additional needs' children is labelling children. The correct terminology is children with additional needs.

The main concern in regard to once off grants for capacity building, including modifications to facilities and equipment and training for staff to meet the needs of children, is that it may be not appropriate due to the nature of ECEC services, where there are constant changes of staff, families and children. Services may not be able to forecast what their needs would be for the future and may require further funding for facilities or equipment depending on the needs of the children.

We also question the effectiveness of this sort of funding in terms of building the capacity of educators on an ongoing basis and in relation to their changing needs, community needs and staff turnover. For instances, training, professional development, reflective sessions should be ongoing.

There is a clear need for the focus on administration on the part of the ISF role is reduced to allow for the focus of their work on the capacity building of educators. The development of a national consistency of the skills of an ISF, the opportunity to network to share knowledge as well as standardised 'qualification' for this role required attention and focus.

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The Service Support Plan/now the Inclusion Improvement Plan should be used to reflect the needs of the service and educators when including children from the IPSP client groups. Any new model will need to be cost effective and efficient to allow access for all children into ECEC services. The SSP/IIP is used to identify and reflect on the needs of the service and educators. This document should link in with the Services Quality Improvement Plan and support universal access to quality educational services.

We are further concerned about the comment in page 23 –*“However, if funding is constrained then there will need to be a way of prioritising its allocation amongst additional needs groups”*. We found the prioritising funding allocation will not be equitable and it will be perpetuating disadvantage, instead of providing support to ensure inclusion for all and that all needs are met.

The emphasis of the Productivity Commission should be, recognising the importance of early childhood in Australia as other developed countries in the world have done, such as the Scandinavian and New Zealand educational models. These models are integral and inclusive, ensuring there are sufficient funds to prepare Educators with the best qualifications and capacities

If ECEC services are well equipped with Educators with the necessary qualifications and equivalent wages, then services would be able to create positive learning environment for all children and families. Then maybe this approach will close the gap of vulnerabilities with the so called branding of disadvantages communities that are negative and perpetuates vulnerability. For instance in this report a child who speaks a language other than English at home is seen as developmentally vulnerable or at risk. Shouldn't this been seen as a strength or an asset instead? Maybe what is needed is to build the capacity of educators for them to be able to support both the first and second language acquisition and maintenance. If educators are qualified, knowledgeable and experienced in all areas of inclusion they would be able to break the circle of vulnerabilities.

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ADDITIONAL VIEWS SOUGHT BY THE COMMISSION:

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?
- The model of 'one off' Subsidy Grants has failed miserably when used the C&K services and the Queensland Kindergarten Program.

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. In some regions, staff turnover is very much higher than the national average, especially in the remote regions and the lower socioeconomic areas thus adding to the difficulties of quality care and inclusion.

- 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.
- NDIS 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 who are undergoing diagnosis – this may take several years due to the long waiting lists and limited access to medical intervention in some regions.
- Children whose parents may have a disability
- Children from CALD families and communities
- Children with mental health issues OR at risk of developing mhi.
- Refugee children, including children in detention
- Children from Aboriginal or Torres Strait Islander communities
- Families in low socioeconomic situations and disadvantaged families and communities
- families in a low socio-economic situation
- All children can be identified by the existing means ADSI etc.
- Children who may have suffered torture and trauma
- Children in Foster Care or Child Safety

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
- Long waiting lists in Metropolitan regions
- 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 and inclusion 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
- High cost of Private Health Services

We trust that the Productivity Commission will take onboard our comments and suggestions before decisions are made as to the future of inclusion of children with additional needs. We feel that the recommendations are fraught with negative outcomes for children with a disability, children for Culturally and Linguistically Diverse backgrounds, Refugee Children, children from Aboriginal and Torres Strait Islander backgrounds, children with mental illness and children undergoing diagnosis. We are happy to speak with the Commission at any time, concerning our responses.

We would encourage the Productivity Commission to support the continual move to quality inclusive ECEC services thru allocating funding so that ALL SERVICES can be inclusive of ALL CHILDREN.

Thank You

The Queensland Inclusion Network