



Early Childhood Intervention Australia

ECIA Response to the Productivity Commission

Inquiry into Child Care and Early Learning

Draft Report

4 September 2014

Submission prepared by ECIA VC on behalf of:

ECIA NATIONAL; ECIA ACT; ECIA NSW; ECIA QLD; ECIA SA; ECIA TAS; and, ECIA WA

Should you require any further information regarding this submission please contact Anna McCracken, Policy Officer ECIA (VC)

## ECIA Response to the Productivity Commissions Inquiry into Child Care and Early Learning Draft Report

Early Childhood Intervention Australia (ECIA) is the peak national organisation promoting the interests of young children with disability and/or developmental delay and their families. It has a National and State/Territory structure, with the majority of members being early childhood intervention (ECI) professionals working in Government-funded agencies. These include small community organisations, large disability and children's services agencies and various government departments, reflecting the diverse ways in which services to young children and their families are provided nationally. Our membership also includes family members of young children with disability and/or developmental delay. Members are based in urban, rural and regional centres throughout the country.

ECIA endorses practices that promote, encourage and support community inclusion for all children and their families. These lay the foundation for each individual's successful participation as a valued member within our diverse community. This has been articulated in our Joint Position Statement with Early Childhood Australia on the Inclusion of children with disability and/or developmental delay in Early Childhood Education and Care. The principles contained in the Statement reflect our commitment to ensuring that children of all abilities participate in inclusive universal early childhood education and care services.<sup>1</sup> These principles are:

- All actions concerning children must be done with the best interests of the child in mind;
- Families are of vital importance;
- Every child deserves to be included in their community;
- Children's diversity is valuable and understood and respected;
- Every child is equal;
- High expectations should be held for every child; and,
- Evidence-based practice should be promoted.

The ECIA response to the Productivity Commission Draft Report on Childcare and Early Childhood Learning is driven by our commitment to ensuring that children of all abilities can fully participate in community and family life. ECIA urge the Commission to consider the impact of the

---

<sup>1</sup>Early Childhood Australia/Early Childhood Intervention Australia (2012) Early Childhood Australia and Early Childhood Intervention Australia Position Statement on the Inclusion of Children with disability in Early Childhood Education and Care. This statement can be found at [The Statement can be found at http://www.ecia.org.au/advocacy/position-statements/statement-on-the-inclusion-of-children-with-disability](http://www.ecia.org.au/advocacy/position-statements/statement-on-the-inclusion-of-children-with-disability).

recommendations on children with disability and/or developmental delay. We also urge the Commission to consider the impact of the recommendations on family. The successful inclusion of children in high quality Early Childhood Education and Care (ECEC) is critical to their participation in family and community life. This requires a highly skilled and well supported workforce that is able to provide the learning and developmental opportunities necessary to provide all children with the best start in life. Inclusion for young children is not merely about accessing services today, it is about meaningful participation throughout their life course. The return on the investment in human capital in the first five years of life for all children has been well evidenced and documented.<sup>2</sup>

### **ECIA welcomes the following recommendations:**

ECIA would like to acknowledge the intent of the Commission in relation to creating a simpler, more affordable and accessible systems for families, and one which recognises the importance of early learning within high quality ECEC settings.

- The commitment to continuing to “provide support for children who have diagnosed disability to access ECEC services”.<sup>3</sup>
- The increased investment in subsidies for low income families.
- The funding in integrated services for the coordination of activities.
- Ongoing funding for universal access to 15 hours preschool.
- Extending the scope of the NQF to include all centre and home based services that receive Australian Government assistance.<sup>4</sup>

### **ECIA would like to raise the following concerns:**

#### **Draft Recommendation 7.2**

---

- ECIA does not support the amendment that the centre based services only require a Certificate III for children 0-36 months. This is a contradiction to current evidence that demonstrates the importance of these first years of life and the developmental needs of

<sup>2</sup>PricewaterhouseCoopers is currently conducting economic modelling which examines long-term economic benefits of early learning services < [http://www.pc.gov.au/\\_data/assets/pdf\\_file/0003/133626/sub193-childcare.pdf](http://www.pc.gov.au/_data/assets/pdf_file/0003/133626/sub193-childcare.pdf)>; ECIA supports the research conducted by Murdoch Children’s Research Institute relating to this area also. [http://www.rch.org.au/uploadedFiles/Main/Content/ccch/PCI\\_CCCH-Submission.pdf](http://www.rch.org.au/uploadedFiles/Main/Content/ccch/PCI_CCCH-Submission.pdf)

<sup>3</sup> ECIA will refer to this recommendation in this submission as children with a developmental delay need to be included in this continuous support.

<sup>4</sup> ECIA will refer to this recommendation at 7.9 as ECIA believes the NQF should include preschools.

very young children.<sup>5</sup> ECIA would welcome an emphasis in the final report in high quality early childhood educators in these early years of development.

### **Draft Recommendation 7.9**

---

- ECIA does not support the removal of dedicated pre-schools from the scope of the National Quality Framework (NQF). The NQF has made significant impact on the development of common and consistent quality standards for all children, including those with disability and/or developmental delay. Removal of preschools from the NQF would impact on consistency, quality and the monitoring of preschools. As the Draft Report has emphasised the importance of consistency and quality education for children, ECIA views this as a contradiction that could significantly impact on children's long term learning and development outcomes.

### **Draft Recommendation 12.3**

---

- The activity test for eligibility for the new early learning benefit should include health care holders.<sup>6</sup>

### **Draft Recommendation 12.4**

---

- The Draft Report does not account for the current and necessary additional support ECEC settings can offer to parents of children with a disability and/or developmental delay. Parenting a child with a disability contributes to a higher incidence of parental stress and can have adverse effect on family functioning. To impose narrow eligibility criteria for parents accessing ECEC services imposed by the activity test could impact access to these services. Access to ECEC is critical in providing parents with the opportunity to develop supports for themselves and their families which may not directly be related to returning to work or training. Accessing critical supports could also influence the capacity of parents returning to the workforce in the future.
- ECIA recommends that further research needs to be commissioned into the role of childcare and the impact this has on children with disability and/or developmental delay and their

---

<sup>5</sup> Centre for Community Child Health, 'Childcare and Early Childhood Learning: Response to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning'. 2014  
<[http://www.rch.org.au/uploadedFiles/Main/Content/ccch/CCCH%20Submission%20\(Feb%2014\)%20\(revised\)%20CCCH%20website%20version.pdf](http://www.rch.org.au/uploadedFiles/Main/Content/ccch/CCCH%20Submission%20(Feb%2014)%20(revised)%20CCCH%20website%20version.pdf)>.

<sup>6</sup> Ibid.

families (e.g. the long term social and economic gain which comes as a direct result from children being engaged in high quality, early education settings).<sup>7</sup>

- The Draft Report indicates that there is a mandated requirement for parents to be studying, looking for work or in training. The inclusion and participation for children in early year's environments should not be based on the circumstances of families but rather on the needs of the child.<sup>8</sup> As highlighted earlier, focusing on training, education and returning to work, leaves out a significant proportion of families who currently do not have capacity to participate in either of these. ECIA is concerned that the situations of parents may impact on a child's participation and inclusion. ECIA recommends that the focus is on all children's right to learning and education rather than parent's capacity to engage.

## Draft Recommendation 12.6

---

### The Special Early Care and Learning Subsidy

- The Draft Report indicates that there is a diagnosis mandate relating to the eligibility criteria of *The Special Early Care and Learning Subsidy* (SECLS). ECIA recommends children with a developmental delay are included in the eligibility criteria to be consistent with the National Disability Insurance Scheme (NDIS). The *NDIS Act* outlines children with a developmental delay are eligible for support.<sup>9</sup> Diagnosis of disability in early childhood is complex. Due to developmental factors, a diagnosis for a child may take a number of years. ECIA is concerned a narrow criteria would exclude a considerable amount of children from accessing vital support. ECIA recommends eligibility for additional support be based on an assessment of the individual needs of a child, this would see children with a developmental delay included.<sup>10</sup>
- ECIA recommends *The Special Early Care and Learning Subsidy* should not be costed against a diagnosis or on the nature of a developmental delay. Costings should be assessed on individualised need. The NDIS has moved to assessment based on individual need rather than linked to deemed cost under grouping by diagnosis. ECIA supports individualised approaches to considering a child's needs.
- ECIA recommends that "top ups" will increase the likelihood of inequity, particularly for families who cannot afford to pay, or are located in rural or remote areas that already have

---

<sup>7</sup> PricewaterhouseCoopers submission to PC

<[http://www.pc.gov.au/\\_\\_data/assets/pdf\\_file/0003/133626/sub193-childcare.pdf](http://www.pc.gov.au/__data/assets/pdf_file/0003/133626/sub193-childcare.pdf)>.

<sup>8</sup> Also relates to **Draft recommendation 12.3** (family health care card holders)

<sup>9</sup> National Disability Insurance Scheme Act 2013, No, 20, 2013., Chapter 2, S25, 1(iii). <[www.comlaw.gov.au](http://www.comlaw.gov.au)>.

<sup>10</sup> ECIA supports the response from Noah's Ark in relation to this recommendation.

limited places available. The stated rationale for rationing the available funds by limiting the number of places, capping hours and asking parents to pay additional costs are discriminatory as they all limit accessibility based on disability.

### The Disadvantaged Communities Program

- ECIA acknowledges that there is evidence linking disability and/or developmental delay with socio-economic circumstances of families and communities. However, ECIA would like to emphasise that disability and/or developmental delay does not discriminate and neither should funding models.

### The Inclusion Support Program

- ECIA supports the continuation of a specialist advisor role such as the existing *Inclusion and Professional Support Program*. This should provide the framework for the proposed one off grants under the Inclusion Support Program. ECEC providers require ongoing specialist training and support to meet the needs of children with varying disability/and or developmental delay.<sup>11</sup>

### Draft Recommendation 12.7

---

- ECIA does not support the basic premise that *Special Early Care and Learning Subsidy* (SECLS) ensure that the “program enables as many children with disabilities as possible to access mainstream ECEC services.” Inclusion requires that all children have equal access to all services. ECIA is concerned that the Commission acknowledges that the potential result of SECLS will limit choice for families, with the potential effect of clustering children into specific services. This is a retrograde step and contrary to the gains over the last four decades which sees children with disability and/or developmental delay meaningfully participating and contributing to community life.

### Draft Recommendation 12.8

---

- ECIA believes the Australian Government should make a legislative commitment relating specifically to the Inclusion of children into ECEC services. ECIA would like to stress that

---

<sup>11</sup> ECIA would like to endorse the recommendations put forward by Noahs Ark in relation to this point.

inclusion of children extends beyond the parameters of merely accessing a service, it involves full participation, in all areas of a child's learning environment.

- ECIA would like to draw the Commission's attention to the possible impact and influence that the NDIS may have on ECEC. ECIA recommends an integrated planning process between the NDIS and ECEC systems. This process should incorporate the development of a specialised support service and clear guidelines relating to the roles and responsibilities of both service systems. While the NDIS is currently in trial phase, it is important that the impact on ECEC be tracked in those trial sites, so that there can be the development of a responsive system come full scheme roll-out

## Conclusion

ECIA believes that the feedback process for the Draft Report provides a crucial opportunity to improve inclusion in ECEC for children with disability and/or developmental delay. ECEC services have the power to not only make the biggest impact on children's lives and their future life trajectory, but to also change the next generation's attitudes on community inclusion.