



Response to the Productivity Commission's Draft Report on Child Care and Early Childhood Learning



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Noah's Ark welcomes the opportunity to provide comment in relation to the Productivity Commission's Draft Report. This submission is provided further to our letter of 12 August 2014 outlining our concerns about the Draft Report and our verbal submission to the Commissioners at the Public Hearing in Melbourne on 19 August 2014.

Noah's Ark is a non-government organisation providing early childhood intervention (ECI) and inclusion support (IS) services to children with disabilities and other additional needs and their families and carers. We are the largest early childhood intervention and inclusion support service in Victoria operating from 19 centres in Melbourne and regional Victoria. Last year our programs reached 1,800 families and 2,600 Early Childhood Education and Care (ECEC) services. Noah's Ark receives funding from the Victorian Government (Department of Education and Early Childhood Development) for the delivery of ECI services, Kindergarten Inclusion Support¹, Pre-School Field Officer² and Parent to Parent Programs³. Noah's Ark is also funded by the Australian Government (Department of Education) as an Inclusion Support Agency⁴ (ISA) as part of their Inclusion Professional Support Program (IPSP⁵).

Noah's Ark welcomes aspects of the report, particularly the extension of funding for children with disabilities to up to 100 hours per fortnight; giving them the same access entitlements as other children. However, as indicated in our letter and verbal submission we have several major concerns about the implications of some of the Commission's recommendations for children with disabilities and developmental delays and their families. These are outlined further below.

1. Inclusion of Children with Disabilities in ECEC Services

1.1 Historic Foundations for Segregation

As outlined in our verbal submission, the core challenge for ECEC services in working with children with disabilities stems from the fact that early childhood settings were not originally thought of, or designed, with the needs of children with disabilities in mind. The routine institutionalisation of children with disabilities during the first half of the twentieth century meant they were excluded from the community during the period in which many community based services for children were developed⁶. In the 1970s, when institutionalisation ceased and new services were set up for children with disabilities they were established as segregated services. As a consequence, the ECEC and the early childhood intervention (ECI) professions and sectors developed independently. This is apparent in the approaches to the inclusion of children with disabilities in children's services which remain deeply embedded in a belief that children with disabilities are fundamentally different from other

¹ In the North West Region only

² In the North West Region – Swan Hill only

³ In Gippsland only

⁴ Noah's Ark is the Inclusion Support Agency in 9 of the 17 Dept. of Education Victorian Regions

⁵ The objective of the IPSP is to promote and maintain high quality, inclusive education and care, for all children, including those with ongoing high support needs, in eligible ECEC settings. This is achieved by increasing the knowledge and skills of educators, and the capacity of education and care services, through providing professional development, advice and access to additional resources as well as inclusion support.

⁶ Mellor, E. (1990). *Stepping Stones: The development of Early Childhood Services in Australia*. NSW: HBJ Publishers.

children; and the lack of knowledge about the needs of children with disabilities in mainstream services. This is regardless of four decades in the growth of our knowledge about child development and learning, and the evidence that children with disabilities are far more similar to, than different from, their peers.

1.2 What is Inclusion?

Inclusion is not just about 'having access to' or 'being present in' an ECEC setting. Rather, inclusion means that the child with a disability or developmental delay is participating in the full ECEC program alongside their peers and their learning and development are receiving the same priority and high expectations as other children. For some children this may mean that their educators and carers require additional skills to be able to support their learning. For others it may mean that staff need more time and/or the support of experts to be able to attend to more complex behaviours and needs or specialist equipment to allow them to participate. Some children with disabilities may need no additional assistance at all, rather just the understanding and support of their educators and carers.

1.3 Importance of inclusion in ECEC settings

For children with disabilities, as for all children, the early years are critical to their development, learning and wellbeing. Like all children, children with disabilities learn from adults with whom they have strong, positive relationships, and from each other, through play and social interaction. Like all children, children with disabilities need time to explore, play alongside others and practise new skills until they achieve mastery. Children with disabilities particularly benefit from the opportunity to develop skills in supportive ECEC environments and in the company of their typically developing peers. When this happens they are more likely to use these skills in all aspects of their lives and to develop friendships and connections within their broader community^{7 8}.

1.4 Inclusive practice benefits everyone

Inclusive practice benefits all children⁹. Children with disabilities increase their communication and social skills through interaction with typically developing children; while typically developing children learn about similarities and differences and to be accepting of difference. Inclusive practice also benefits carers and educators who learn new skills which they are able to apply more generally in their work. Families also benefit through being less socially isolated and feeling more positive about their child and towards themselves as parents¹⁰.

2. Concerns about the inclusion of children with disabilities in the current ECEC System

Noah's Ark believes that the inclusion of children with disabilities in ECEC services needs to be understood as a complex social enterprise, needing multiple strategies to address it and ongoing monitoring and attention at policy and practice levels.

The benefits of children with disabilities accessing ECEC can be understood in terms of both the benefits to parents through better opportunities for workforce participation and benefits to

⁷ Buyse, V and Hollingsworth, H.L. (2009) Research Synthesis points on Early Childhood Inclusion. DEC journal, Young Exceptional Children, Monograph series 11.

⁸ Odom, S. L. (Ed.). (2002) Widening the circle: Including children with disabilities in preschool programs. New York: Teachers College Press.

⁹ Odom, Schwartz and ECRII Investigators 2002. Research Synthesis Points on Early Childhood Inclusion. National Professional Development Center on Inclusion, FPG Child Development Institute, Chapel Hill, North Carolina

¹⁰ Hardin, B., Wesley, P., & Lohr, L. (1998). Inclusive preschool environments: Strategies for planning. Lewisville, NC: Kaplan Press.

the child which set the foundations for their learning and development which will ultimately contribute to the child's workforce opportunities. The focus of the following discussion is on the benefits to the child.

As the Productivity Commission has noted:

Governments intervene in ECD because they consider that while ECD services have direct benefits for children and families; services also provide wider economic and social benefits, including productivity, enhancing human capital improvements and assistance in overcoming disadvantage. There is also recognition that market pressures alone are unlikely to provide quality services, and that an appropriate regulatory system aimed at quality improvement and assurance is required¹¹.

In a different context the Productivity Commission has also commented on the broader inadequacies of service responses to people with a disability:

Most people know little about Australia's current disability system and do not know how poorly they would be served were they to need it — this is a system marked by invisible deprivation and lost opportunities¹².

This critique also applies to young children with a disability. Our concerns stem from both the history of segregation and the consequent lack of skills and confidence and a clear policy framework in the ECEC sector as well as the way in which families behave when faced with discrimination and exclusion.

2.1 Families need support to utilise ECEC services

When families receive advice that their child has a disability or developmental delay they experience a form of grief¹³. Gone is the child they wished for and expected and all of their future expectations for that child and in its place is the child they have - a child with a set of needs and issues that they may not understand or accept at this early stage. For many families the temptation is to hide away, particularly if their child has unusual or attention-grabbing looks or behaviour. Families may isolate themselves from extended family, friends and the community. They may feel and be extremely isolated and excluded from mainstream life.

Specific care is needed to make these families feel welcome and accepted and able to take their place in their community. This care needs to embrace the whole family, not just the individual child.

The first place where children and families require acceptance is in the ECEC sector. Participation in ECEC services not only facilitates the learning and development of the child but also facilitates the social inclusion of their parents (particularly the mother) who are able to connect with other parents through the ECEC service and to work and/or participate in community activities while their child is being cared for.

2.2 Impact of poor practice

When children and families experience poor inclusion practice, such as being made to feel unwelcome or that they are creating problems for others, they are more likely to hide away and not seek to participate than they are to fight the discrimination they are experiencing. These experiences in the early years can impact on the children and family's expectations and activities for many years to come

¹¹ Productivity Commission 2011, Early Childhood Development Workforce, Research Report, Melbourne.

¹² Productivity Commission 2011, Disability Care and Support, Report no. 54, Canberra

¹³ Bruce, E. J. (2000). Grief, trauma and parenting children with disability: cycles of disenfranchisement. *Grief Matters: The Australian Journal of Grief and Bereavement*, 13(2), 27-31.

Poor inclusion practice at this early stage in a child's life may set the child and family back many years in terms of their acceptance of their child's disability and their capacity to take their place in the community. In particular, poor ECEC inclusion practice may mean that one parent is unable to return to work and the family feels unable to place their child within a mainstream school setting. This sets up a life-long expectation of segregation and the need for support rather than inclusion and independence. What happens in the ECEC sector is crucial for the achievement of significant social policy goals and, ultimately, reduced costs for government.

2.3 Integration is not inclusion

Following the segregation of the past, the first models of inclusion, or "integration", were based on a perception that children with a disability had limited capabilities and just needed to be present rather than participating in order to meet the requirements of the antidiscrimination laws. Integration usually involved employing an unskilled adult ("Integration Aide") to care for and support the child. This approach is still the default position of many ECEC services, and schools, however, it is now known that this isolates the child from his or her peers and from the fully qualified educator and diminishes the possibility that the child will reach their optimum learning and development outcomes. While some children may need additional assistance to participate this should not have the effect of isolating them from their peers or the most qualified educator.

2.4 Access to information about individual children's learning needs

With the more recent introduction of the Early Years Learning Framework (EYLF), children with disabilities are expected to achieve outcomes in the same domains as all other children. However there is a policy and structural vacuum in regards to who provides advice to educators about an individual child's learning needs. The Australian Government's IPSP programs focuses on the whole ECEC program, not the individual child. The mandate of the State Government funded early childhood intervention programs are not specific in regards to the support to be provided in ECEC settings. However the educator in the ECEC service does need specific advice about a child's learning ability if the best outcomes towards the EYLF are to be achieved for all children

2.5 Lack of data and accountability

The historic lack of data or accountability for children with disabilities in ECEC settings means that there has been no evaluation framework and no detailed knowledge about the presence or otherwise of children with disabilities in services. This has started to change with the introduction of the EYLF but still requires considerable attention.

2.6 Importance of the National Quality Framework

In the light of all of these concerns, the ECI sector welcomed the development of the Australian Government's National Quality Framework (NQF). The NQF has placed an expectation on ECEC services to meet the needs of every child. In particular, the development of the common outcomes for all children has been significant in raising aspirations about the access and participation of children with disabilities.

The creation of the common outcomes has also led to improved opportunities for collaboration between the early childhood and early childhood intervention sectors as evidenced by the development of the joint position statement between Early Childhood Australia, the peak body for ECEC service providers, and Early Childhood Intervention Australia¹⁴:

¹⁴ ECA and ECIA, 2012, *Position Statement on the Inclusion of Children with a Disability in Early Childhood Education and Care.*, <http://www.ecia.org.au/advocacy/position-statements/statement-on-the-inclusion-of-children-with-disability>

3. Concerns about the Draft Report

Noah's Ark has a number of concerns about the Productivity Commission's Draft Report, some of which we addressed in our verbal submission to the Commissioners in August.

3.1 Lack of recognition of the impact of discrimination against children with a disability and their families

Children with disabilities and their families face discrimination every day in ECEC services across Australia. Children are redirected to "more suitable" services where other children with disabilities may be present and services may "scare" parents away by questioning their own capacity to cope, or by overdramatising the amount they will need to do for the child to participate.

The Productivity Commission's report starts with an understanding that ECEC services are able to support the inclusion of children with disabilities, albeit with some need for additional funding and twice yearly access to one-off grants. The report fails to recognise the current uneven playing field for children with disabilities and their families and the need for ECEC services to have targeted individualised support to be able to deal with complex needs in a way that supports the achievement of the EYLF for all children.

3.2 Lack of an individualised approach

The Productivity Commission's Draft Report has endeavoured to deal with the complexity of issues surrounding the inclusion of children with disabilities through the establishment of the Special Early Care and Learning Subsidy (SECLS). The SECLS will offer ECEC services an unspecified amount of additional funding for each child with a disability. The idea is that the ECEC services will use the additional funding to purchase the support they need to include the child.

Noah's Ark has strong reservations about the potential impact of the proposed SECLS. We believe that this approach risks:

- Resulting in children with disabilities being clustered into specific services (see below)
- Reducing access to inclusive services in regional and remote communities
- Reinforcing stereotypes that every child with a disability is the same and must have additional funding in order to be included, leading to even further costs and inequalities in the ECEC system and as the child grows older
- Creating an artificial divide between the needs and entitlements of those with a "diagnosed" disability and those who remain undiagnosed but may be experiencing significant developmental delay and the need for additional support
- Failing to address the underlying issues related to the capacity of ECEC services to support the inclusion of all children, including children with a disability.

Noah's Ark is also concerned about any approach that is focused on "disability type" as opposed to individual needs. The fundamental reorientation in support provided to people with disabilities through the National Disability Insurance Scheme is breaking a historic pattern of providing funding and support based on 'type' and shifting to individualised funding. It is essential to move on from generic responses to disability as if the person is defined by the diagnosis as opposed to the person being impacted individually by disability. This is the fundamental principal underpinning the planning process in the NDIS trial sites.

As we advised in our verbal submission, the learning and care support needs of one child with a particular diagnosis may be significantly different to that of another child of the same age with the same type of disability. This need for an individualised approach, while similar to adults with a disability, is even more pronounced for children where normal variations and rapidly changing developmental factors impact on the skills and capacities of each child.

Funding by disability-type would reinforce the sense that all children with disabilities are “special” and in need of specific funding in order for them to participate in ECEC settings. While children with a disability may need additional support, this approach undermines progress towards ensuring that the needs and capacities of the child are considered first, prior to determining what support is needed, and the expectation that ECEC services should be building their capacity to fully include all children, including many, or even most, children with disabilities.

3.3 Risk of Social Exclusion

The Productivity Commission notes that the SECLS is likely to lead to the “clustering” of children with disabilities into specific services (page 547). Contrary to the Commission’s view that this will enhance choice for parents of children with a disability, Noah’s Ark’s belief is that this will inevitably lead to there being “special” ECEC services – particularly in metropolitan areas where there are sufficient numbers of children with disabilities – and to the effective denial of access to affordable ECEC services for children with disabilities in non-metropolitan areas.

The financial incentive to create “special” ECEC services contradicts thirty years of progress towards reducing the segregation of children with a disability. The broader policy goals of successive governments have been to achieve the social inclusion of people with a disability. There is a clear choice to be made. Recent UK legislation¹⁵ for children with a disability has recognised that to achieve the best outcomes for young adults with a disability, including workforce participation and social inclusion, then the range of early childhood, education, health and care services need to be mobilised in this direction. To continue to apply short term slice of life approaches that reinforce segregation for short term cost benefits fails to recognise that this simply defers the much higher costs of dependent adults. The long-term implications of segregation in the early years include additional costs within the school system (with an increasing demand for special school settings and integration aides) and, ultimately, within the social security system (as adults with disabilities remain segregated from effective workforce participation).

Additional costs will also accrue if the parents of children with disabilities cannot find the type of ECEC setting they are seeking as this will delay their long-term productive contribution to society. Noah’s Ark believes that there would be merit in the Productivity Commission being asked to undertake an economic analysis of the value of the inclusion of children with a disability in ECEC and education.

3.4 Lack of integration with the National Disability Insurance Scheme

Noah’s Ark is also concerned about the lack of integration between the Commission’s recommendations in relation to child care with the expectations and aims of the National Disability Insurance Scheme (NDIS). While there is some continuity in the central concept for both schemes, to give choice and control to consumers, it is not clear that the process of individualised funding that underpins the NDIS equates with the selection of service provider that is characteristic of the current report. There is also the risk that the program boundaries are being drawn by exclusion, rather than inclusion, and the boundaries are bureaucratic rather than functional.

The fundamental premise of the NDIS is that the person is an individual who needs to be supported with his or her care and support needs. This same principle must be applied to children with a disability in ECEC. The starting point must be that each child is an individual with specific development and learning needs. The EYLF provides a context in which a child’s progress towards agreed outcomes can be considered.

The process that will enable this to occur is for the educators involved with the child to understand the developmental needs of the child. This knowledge is unlikely to pre-exist

¹⁵ *Children and Families Act 2014* <http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

within the educators unless they have prior experience with a child with similar needs. Accessing knowledge about the development and learning needs of a child with a disability is difficult because of the fragmented nature of services. One of the key opportunities provided by the NDIS is to link those working with the family and child through the NDIS, with educators and others who can draw on this knowledge. However, the bureaucratic boundary being drawn between the NDIS and education needs to be explicitly addressed to ensure a significant gap does not emerge.

The Commission's proposals for children with a disability fail to understand the level of individualised planning necessary to ensure decisions are specific to the individual child. It cannot be expected that the ECEC staff will already have sufficient knowledge to be making accurate decisions and drawing on general information about children with a disability is unlikely to assist. As the Victorian Equal Opportunities and Human Rights Commission recently noted about children with a disability in education:

Discrimination against students with disabilities takes different forms. However, in many cases, discrimination is grounded in negative attitudes to disabilities and the failure to set high expectations for these students. This can significantly limit the potential of these young people both now and in the future¹⁶.

3.5 Risk for children without formal diagnosis

While Noah's Ark believes that ECEC services should have the capacity to deal with children of different abilities without always needing to access specific funding, we are also critical of the Commission's decision to exclude any such support to children with a developmental delay (except in nominated communities). The diagnosis of disability in children is a complex process that may take several years as the developmental factors play out. It is arbitrary and potentially counterproductive to exclude some children in need of additional support on the basis of the lack of 'a diagnosis' rather than any assessment of their need. It is notable that the NDIS has also come to this conclusion and now recognises the need for some children without a clear diagnosis to receive early support in order to achieve better outcomes in the longer term.

3.6 Lack of capacity building for ECEC services

Building the capacity of ECEC services to include children with disabilities has been achieved through multiple strategies over many years, including, most recently, the *Inclusion and Professional Support Program* which offers mentoring, training, funding for physical modifications, equipment and increased staffing to accommodate the needs of specific children.

The IPSP has been focused on the twin goals of encouraging inclusion (funding is not available to specialist settings) and building the capacity of mainstream services. The IPSP has a proactive role in terms supporting services to understand how they can adapt to include children with different needs. The degree to which staff feel supported will impact on the attitudes they have towards the child they are working with.

It is not clear how the translation of this type of support into a market will continue to achieve the development of positive attitudes or how such an approach will service regional and remote areas.

The proposed abolition of this program (page 23) will leave a major hole in the availability of specialist support to ECEC programs and may lead to deterioration in their capacity to provide inclusive care.

¹⁶ VHREOC 2012, Held Back: The experiences of students with disabilities in Victorian schools. Carlton, September 2012 file:///C:/Users/debbie%20King/Downloads/1404-VEOHRC_HeldBack_-_StudentwithDisabilityReportW3.pdf

4. Policy Recommendations

4.1 Commitment to the NQF and Children's Outcomes

Noah's Ark believes that the most important outcome from the Productivity Commission's review should be the re-commitment to the *National Quality Framework*. If ECEC services are supported to achieve the NQF the inclusion of children with disabilities has the best chance of success. High quality ECEC services offer a highly individualised approach, which is also the foundation for the successful inclusion of a child with a disability. We strongly recommend the maintenance of the NQF and the expectation that all ECEC services will be supported to achieve the required quality standards and outcomes for all children.

We are also of the view that the qualification levels of staff in ECEC services are important and strongly related to the quality of ECEC services. The level of understanding ECEC staff have about child development makes a difference for all children, and particularly for children with a disability. In dealing with a child with a disability educators must address complex developmental needs, along with issues in areas such as communication and behaviour. If staff have a high level of understanding of child development then they have a strong foundation for making the necessary adaptations. Educators' understanding of child development is linked to the amount of study they have undertaken and to their qualifications. We would advocate for educators with high level qualifications across the early years. The earlier issues for children are identified and addressed the better for the child, family and community in general. ECEC services are often the first place in which children spend time with adults experienced in child development who are able to identify issues for the child.

4.2 Government policy and legislative commitment to inclusion

We believe that the Government's commitment to inclusion needs to be maintained and reinforced. Equity of access to society's institutions and organisational structures cannot be assumed for people with disabilities. It is wrong to think that children with disabilities do not currently experience a high level of direct and indirect discrimination in ECEC services.

Any move away from the requirements of the *Disability Discrimination Act 1992* (DDA) must be rejected. All children must have an enforceable right of access to all mainstream ECEC settings with those settings able to obtain specialist support, funding and advice if needed. In addition there should be specific provisions which discourage the placement of children with disabilities into segregated settings (such as one-to-one care or specialist childcare services). This is the case currently with the IPSP where support is not available to settings which are not inclusive.

This will require a clear government policy commitment to inclusion and maintenance of the DDA.

4.3 Integrated planning between ECEC and NDIS sectors

As mentioned above there is a gulf between the ECEC sector and the NDIS and the risk that the history of parallel service provision will be replicated. Both are suggesting that each other is responsible for key aspects of the care and development of children with disabilities. There is a need for integrated planning between those responsible for the NDIS and those who are seeking to include a child with a disability. It is unlikely that National Disability Insurance Agency (NDIA) Planners will have the skills to know what support is required to achieve the inclusion and full participation of a child in ECEC settings. Both Government agencies have an incentive to minimise costs to themselves and transfer costs to the other. Integrated planning and joint responsibility for the best possible outcomes for the child and family are necessary to overcome vested interests. This needs to be supported by authorising personnel being close enough to the planning process to approve decisions

which are responsive to the actual situation of the child, as opposed to remote decision making dictated by inflexible program guidelines.

As mentioned in our verbal submission, the same conclusion has been reached in the UK¹⁷. The UK Government is introducing education, health and care (EHC) plans for children and young people with complex needs bringing together all three sectors to develop one plan for children and young people aged from 0 to 25 years. These provisions are contained within the *Children and Families Act 2014*¹⁸.

4.4 National Centre of Excellence

The current report is framed as if the responses to the inclusion are already known and that the main challenge is funding support to these known solutions. Instead the inclusion of children with disabilities in mainstream settings needs to be understood as an evolving field that has a brief history of about thirty years, during which there has been significant movement from a highly prejudiced starting point. While there is a growing evidence base, primarily from research in the USA, which could be used to develop broad program strategies as well as strategies for individual learning¹⁹, there are a lack of models for how to successfully include children with a disability in an Australian context. A specific focus need to be given to continuing to develop and train educators in programmatic strategies that will assist the development of all children. Considerations include the development of pedagogy, curriculum, assistive and adaptive technology and the implementation of universal design. We strongly recommend the establish a body such as an *Australian Centre of Excellence in Inclusive Practice* which could undertake, and commission, Australian research and provide information, training and resources to multiple sectors (ECEC, schools, ECI).

4.5 Individual and multi-level response

Noah's Ark strongly recommends that the Productivity Commission rethink the concept of the SECLS and attach the provision of additional funding to individual children based on need. This will require a mechanism for determining and allocating individual funds, preferably based on broader plans developed in conjunction with the NDIS.

In addition, any response to supporting children with a disability to achieve outcomes must be both multi-tiered and flexible. The type of support an ECEC program requires will vary according to the experience of the staff and the complexity of the child's learning and development needs. The type of support also needs to recognise that young children's needs change very quickly, both in terms of their own abilities and their interactions with the environment, and so must be flexible.

Noah's Ark accepts that direct assistance through additional staff will still be needed for some children, but can be more carefully utilised. Currently the attachment of support to a particular child means that programs can be over-resourced when there are a number of children with a disability present.

¹⁷ <https://www.gov.uk/government/policies/increasing-options-and-improving-provision-for-children-with-special-educational-needs-sen>

¹⁸ <http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

¹⁹ For example, embedded interventions
<http://community.fpg.unc.edu/sites/community.fpg.unc.edu/files/resources/Handout/CONNECT-Handout-1-3.pdf>

5. Structural Recommendations

5.1 Individualised Programs

The principle of choice and control for consumers is based on the notion of individuals having the capacity to seek out responses that suit their individual circumstances, rather than services dictating the model of support. The inclusion of children with a disability has been dominated by a one size fits all model of support ('integration aides'). The reliance on 'aides' to support the inclusion of children is an outmoded and retrograde approach which potentially isolates the child from his or her peers and the educator. However, without direct intervention and the provision of additional support, many ECEC services will return to this model of care as their default position when faced with the need to care for a child with a disability.

Noah's Ark believes that the focus of inclusion must start with the individual child and then plan around how to mobilise the support and resources to achieve success in the EYLF outcomes.

5.2 Capacity Building

The second step in including a child with a disability should focus on the capacity of the ECEC program to support all children to make progress towards their outcomes. The more this is developed the more all children will benefit.

Some ECEC programs may need additional assistance to think through how to create an individualised approach for a child with more complex developmental needs. There are some structural ways in which a program can increase its capacity, for example through adaptations to the environment, adaptations to the resources for play, learning and development, increasing the social support given to the children and reconsidering the suitability of the general activities.

Noah's Ark believes that abolition of the IPSP program will leave a void in the capacity for ECEC services to obtain specialist advice and build their capacity to achieve the inclusion of children with disabilities. It currently provides a systematic response to the support needs of services which is broadly available and easy for services to access. It is not at all clear in the Commission's proposal how this level of support is to be continued either through SECLS or a twice yearly funding program.

5.3 Individualised developmental programs

For some children it will be necessary to have an individualised developmental plan because the child will need to have the opportunity to develop or practice specific skills and those opportunities will not occur without deliberate strategies being put in place. The most effective developmental plans will combine the knowledge available about the child and his or her learning needs with a detailed understanding of the routines in an ECEC and the opportunities these present for learning or embedded interventions. This approach will be most effective if it is undertaken collaboratively between professionals with specialist knowledge about the child and his or her abilities, the early intervention program staff, and the lead educator working with the child. The need to join up the NDIS and ECEC systems has been discussed previously.

Just-In-Time support also needs to be available to educators when they work with a child with a disability on an ongoing basis as the child, the group of children or other aspect of the program, changes. The early years are a highly dynamic period in which all children's needs and capabilities rapidly evolve.

5.4 Additional staffing

The level of the care and support needs or the learning and developmental needs of some children with disabilities will require a higher staff: child ratio. The provision of additional staff

into ECEC settings needs to be reframed in terms of increasing the staff to child ratio so that all children in a program meet the EYLF outcomes. An additional staff member should not have an exclusive focus on a child with a disability, but allow the whole team to be able to manage the additional demands or risks as the consequence of a child having complex needs.

5.5 Preparation of staff

In the longer term ECEC programs would be better served by staff who have a stronger introduction to working with a child with disability as part of their higher education. Educator preparation currently has a very limited focus on children with a disability. While it is not necessary for educators to be introduced to all types of disabilities, their response to the presence of a child with a disability would be more effective if they had an overall understanding of disability and were prepared for how they might be able to respond.

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