



National Inclusion Support Agency Alliance Response to the Productivity Commission Draft Report into Childcare and Early Childhood Learning

September 2014

Who are the ISAA?

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

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

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

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

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

The ISA Alliance works in partnership with the PSC Alliance and the IPSU Alliance and we support their responses to the PC Commission.

National ISA Alliance Response

The ISA Alliance supports the following elements of the Commission's report in relation to children with additional needs:

- The right of children with additional needs to access childcare and early childhood learning services in the same way as all other children
- The need for an increase in resources allocated to the Inclusion and Professional Support Program and that funding support for including children with additional needs ideally needs to meet the actual costs incurred by the ECEC service in including the child/ren.
- Providing support to include vulnerable and at risk children in ECEC services
- Support for integrated "hub" service provision.



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The ISA Alliance (ISAA) would like to see further consideration of the following elements in the Commission's final report:

1. Inclusion is important

The proposals in the draft report do not sufficiently support the **inclusion** of children with additional needs in ECEC.

The Early Childhood Intervention Australia and Early Childhood Australia joint *Position statement on the inclusion of children with a disability in early childhood education and care* is based on evidence and extensive consultation with the sector¹.

Our position is that children with a disability have the same rights as all children and additional rights because of their disability. They share with all children the right to be valued as individuals and as contributing members of families, communities and society.

Every child is entitled to access and participate in ECEC programs which recognise them as active agents in their own lives and learning, respond to them as individuals, respect their families as partners and engage with their diverse backgrounds and cultures. This means that ECEC services and support professionals must be resourced and supported to the level required to fully include children with a disability and to achieve high quality outcomes for all children.

The commission has noted that the SECLS would be used most effectively by ECEC services which cater to multiple children with additional needs at the same time. This move to "specialist" services contradicts current evidence based best practice in early childhood education and early intervention where including children with additional needs into mainstream services to actively participate in the educational program together with their typically developing peers has been demonstrated as beneficial for children with additional needs².

Ideally children with additional needs would be represented in each ECEC program in proportion to their representation in the broader population, rather than clustered in fewer services. In this way typically developing children will have the opportunity to understand the diversity in our community and all children with additional needs would have the opportunity to mix with their typically developing peers.

The proposed SECLS funding structure must be amended to promote quality inclusive practice in all services. This means that all children can attend the service of their choice and all services are adequately supported to meet the needs of those children attending. Disadvantage is not clustered and "special" facilities catering largely for disadvantaged children are not created.

¹ http://www.earlychildhoodaustralia.org.au/wp-content/uploads/2014/06/ECA_Position_statement_Disability_Inclusion_web.pdf

² *Children with Disability in Early Childhood Education and Care*, Centre for Education Statistics and Evaluation (2014) www.cese.nsw.gov.au



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Families need to access the service of their choice to maximise their participation in the workforce. The proposed recommendations would reduce choices for families with children with additional needs.

Under the National Disability Agreement, specialist disability services are the responsibility of State and Territory governments to cater for specific needs. The SECLS funding structure should support inclusion in mainstream services.

2. Inclusion funding needs to support the actual needs of the service

The need for an additional educator to support the inclusion of children with additional needs differs from service to service and does not just depend on the diagnosed disability or developmental delay of the child. Other factors such as the environment, the experience and attitude of the educators, the number of other children with additional needs (whether diagnosed or not) will all significantly impact on the service's ability to include children

Children with challenging behaviours (including vulnerable children) may not have a diagnosed disability, would not access NDIS but still have a significant impact on the service and risk being excluded from services.

Not all children with the same diagnosis have the same needs and funding by diagnosis would ignore the individual needs of these children and the educators providing the program. If funding is provided purely on a child-based structure, we estimate that the need for funding will be 2- 3 times the current ISS expenditure as SECLS would be provided for all children with a diagnosis, regardless of need. Many children with a diagnosis do not require additional support and some may need it only on a temporary basis, as they and their educators become accustomed to their routines. Funding based on the assessed needs of the entire care environment at a point in time is considered far more efficient and effective.

The funding structure also needs to be flexible enough to support short term funding needs, children undergoing diagnosis, changes in attendance of children, attendance at Vacation care programs with very short notice etc to be able to support families in their choice of ECE service.

The funding structure also needs to meet the full costs of including children with additional needs so that including children does not impact a service's financial viability.

3. Inclusion is not just about funding

In many areas, there may be a lack of qualified educators and therefore a service cannot employ an additional educator even if they receive funding to do so e.g. NT, ACT.

Where services can employ an additional educator, this does not in itself guarantee that there will be quality inclusion taking place. Recently qualified Cert III and Diploma educators have a lack of knowledge about inclusion as there is not enough focus within their courses on inclusion topics. This means that with high staff turnover in the sector, services often have staff teams who are inexperienced and fearful of including children with additional needs. This often



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translates into the service not enrolling the child or limiting their attendance. If the capacity of these services to include children with additional needs was built, our experience is that this leads to less demand for additional funding.

Capacity building is not just about grants for equipment or alterations to buildings and capacity building needs cannot be anticipated six months in advance. If incorporated into ECEC in a timely manner, on an as needs basis, it is likely to be far more effective. For example, a service needs support to discuss a child's needs and necessary environmental or program modifications immediately upon entering a program. If the service was expected to wait for the next funding round, it is likely that the child could be excluded until such capacity building takes place. Capacity building funds need to be available as needed, throughout the year, as does access to staff with the expertise to assist ECEC services to include all children.

ISAs provide expert, on the ground, practical support to services to help them include children in their particular environment with their particular challenges. ISAs also transfer knowledge to build the capacity of services via coaching, mentoring, small group training etc which often reduces the need for services to access additional funding.

Table 1 provides data on the number of services supported by Inclusion Support Agencies over three periods, and the number of children with additional needs included by services as a result of the support provided. The support provided by ISAs through on site visits or by phone, email or IP Services includes coaching, mentoring and advising on practical inclusion activities; supporting services to work in partnerships with families and link to relevant community groups or organisations such as early intervention services, accessing appropriate resources; developing an Inclusion Improvement Plan, and applying for other support where it is required, such as Inclusion Support Subsidy (ISS) funding.

It also provides data on the number of services accessing ISS funding and the number of children with ongoing high support needs included by services as a result.

The services counted and children included in the ISS data are also counted in the ISA data. This is because all services receive inclusion support from ISAs before they apply for or receive ISS funding.



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Table 1 – Inclusion Support provided to ECEC Services by Inclusion Support Agencies under the IPSP

	Jan-Jun 2014 ⁽¹⁾	2012-2013	2013-2014
	ISA	ISS ⁽²⁾	ISS ⁽²⁾
Children supported	19,070 (6 mths)	12,550	12,750
Services supported	10,075	5,180	5,230

(1) ISAs report on a six monthly basis using manual processes and therefore data can only be provided for each six month period. That said, the data for each six month period and across a full financial year is comparable because services are supported on an ongoing basis, until they no longer require support (ie they have built sufficient capacity to include children) or until children leave the service.

(2) Note: the data is taken from the IS Portal and reflects online applications only.

The above data demonstrates that:

- Only 50 per cent of services supported by ISAs require ISS funding to include children with ongoing high support needs
- 50 per cent of services do not require additional funding to include children with additional needs, and are able to successfully include children through working with ISAs to build their inclusive capacity
- Services are able to include 35 per cent of children with additional needs with support from ISAs and without additional funding.

4. Once off grants are not an effective way of assisting services to include children

Once off inclusion support grants do not support the flexibility that families need to access ECEC and services need to include children. If funding for January-June is allocated in January, a child with additional needs may enter the service in February and the service needs to wait until July to access support. This may result in the service not including the child until July. A service may have already enrolled the child and been unsuccessful in their application for a grant, this may mean that the service ceases the child's enrolment.

In some regions there is very high staff turnover and the grant system does not provide flexibility to cater for upskilling new staff in a timely way e.g. a service may need to access professional development for educators but has to wait until the next funding round

If services need to apply for the grant without any assistance (e.g. from an ISA) they may decide not to apply. Equally it could lead to funding being received by those able to write the best submission, rather than those in most need. In the recent LDC PDP applications some LDC centres (primarily stand alone centres and often in regional/remote locations) did not apply as they were discouraged by the thought of the application process even though it was



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actually a very simple process. Therefore services often most in need of grant funding may miss out.

The Commission notes that families are likely to be able to access services if the availability of grants encourages services to include more children. In our experience, the grant based model is more likely to discourage services from including children if they are not assisted to apply by an agency as services are time poor and additional red tape adds to their administrative burden.

In addition this funding is likely to be poorly targeted as services may not know what supports they should apply for which means that some services who need support may not apply whilst others will overestimate their real need for funding.

5. There is a need for block funding to provide inclusion support to services. This is currently provided through Inclusion Support Agencies

- ISAs provide cost effective, individualised support meeting the specific needs of the particular children and environment within the ECEC service. The benefits of the ongoing coaching/mentoring support that ISAs provide to services is reflected in the positive feedback from surveyed services. ISAs support services over time to build their capacity and break down the attitudinal barriers that can exist for educators as well as the common situation where educators are too fearful of “doing the wrong thing” to include children with higher support needs. Over time we find that services can include more children with additional needs whilst still maintaining the same level of funding or decreased levels of funding as they have implemented program changes, built their expertise to implement inclusive strategies etc.
- ISAs provide “on the ground” consultancy support to services as a cost effective measure to ensure that all ECEC services can access appropriate, targeted support for their particular circumstances.
- ISAs provide expert support but also transfer knowledge to build the capacity of services via coaching, mentoring, small group training etc which often reduces the need for services to access additional funding. For example, in the Northern Territory ISAs spend 80% of their time helping to build the capacity of staff rather than services accessing funding. ISAs also have a role in assisting the targeting of funds (e.g SECLS) to services and increasing services’ accountability for Government funds.
- ISAs assist the implementation of the Government’s quality agenda as they have a unique situation whereby they are often the only agency who visit to support services rather than have a compliance role such as Assessment and Ratings visits so services are open to discussing their challenges and areas for improvement without fear of a poor rating.



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- If the provision of Inclusion Support is not block funded and moves to a user-pays model, there are likely to be services who will not be able to access support as it will not be viable for ISAs to operate in that area, particularly if the tax benefits for not for profit providers are removed.



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Response to Productivity Information Requests

• 12.7 The Commission seeks views on the best way to allocate a fixed funding pool to support the ECEC access of children with additional needs and deliver the greatest community benefit. This includes views on the best option for allocating the Special Early Care and Learning Subsidy payments for children with disabilities to ensure that the program enables as many children with disabilities as possible to access mainstream ECEC services.

The SECLS needs to be targeted to meet needs rather than simply child based funding and needs to take into consideration:

- The need for a simpler system for services to apply for additional funding which also targets funding to meet need as the current IS portal is very time consuming for ISAs and services to use.
- Reduced red tape for families who need to provide documentation to services to assist them to apply for funding. A child based funding model as proposed by the Commission seems to require more red tape to access funding from a family's perspective. Any funding application system needs to link with data held by other Government systems to streamline these requirements.
- Different funding needs of different service types
- The combined needs of the children and staff in each service not solely individual child needs – this will mean that actual needs and costs are different in different services
- Costs of providing additional needs support can be different in different service locations
- Flexibility for differing attendance patterns of children across each week
- Flexibility to support services with short term inclusion funding needs only
- Prioritising funding for high needs children
- How vulnerable children can also be included
- Funding must not encourage practices which are not quality inclusion



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<ul style="list-style-type: none"> • 12.8 The Commission seeks views on what types of services (that are not the funding responsibility of the National Disability Insurance Scheme) 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. 	<p>Funding may needed for the following supports</p> <ul style="list-style-type: none"> • Mentoring and coaching of educators • Specialist equipment • Professional development • Behaviour support • Reduced child:educator ratio <p>These supports need to be provided on the basis of assessed need, rather than as a standard payment.</p> <ul style="list-style-type: none"> • Educators report that their greatest support needs come from children with challenging behaviours • The greatest needs for specialist equipment is for children with high physical support needs • Children with intellectual disabilities and few physical limitations generally require less additional support, apart from professional development when the educator first meets such a child³
<ul style="list-style-type: none"> • 8.1 The Commission seeks further information on the nature of the barriers faced by families with children with additional needs in accessing appropriate ECEC services 	<p>Access</p> <ul style="list-style-type: none"> • Some families with children with additional needs may require advocacy support – particularly when families are still at the early stages of understanding their child’s additional needs/diagnosis or if the family are unaware of their priority of access rights, similarly if services are unaware of priority of access they may not offer spots to families with children with additional needs • Services may be reluctant to provide access possibly due to limited confidence/understanding about children with additional needs, possibly

³ Internal communication, Noah’s Ark Inc



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	<p>if the service already has a high number of children with additional needs within the service and they may be worried about their capacity to include more children</p> <ul style="list-style-type: none">• Long waitlists• Location/transport• Isolation• Physical access for children <p>Cost</p> <ul style="list-style-type: none">• Financial factors may be a barrier depending on the cost of the service and access to government funding for child care fees <p>Educators/service</p> <ul style="list-style-type: none">• Communication difficulties between educators and families where English is a second language• Lack of experience, qualifications, and knowledge about inclusion• Attitudes towards and values about inclusion <p>Other</p> <ul style="list-style-type: none">• Fear of rejection• Grief, embarrassment• Lack of knowledge about the ECEC system and what quality looks like
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<p>8.1 What is the prevalence of children with additional needs who have difficulty accessing and participating fully in ECEC.</p>	<ul style="list-style-type: none">• Most families are accessing ECEC but once they have accessed the service it is common to see conditions such as limited hours, reduced days or families being asked to pick up the child if the educators are not managing• Depends on the area and the capacity of the service and educators.• The most significant impact would be for children who experience mild to moderate needs or disabilities. These are children who very often will not receive direct intervention or might be delayed in diagnosis because their disability or need is not as apparent or impactful on the environment. Specifically, children with behaviour problems related to language delays or processing, sensory issues, attention or self-regulation, deficits in coping skills, and mental health concerns are affected the most in inclusive practices.
<p>8.1. Information on the additional costs of including children with additional needs is also sought</p>	<ul style="list-style-type: none">• Cost of additional educators to maintain lower ratios• Time and cost-for educators/services<ul style="list-style-type: none">○ Off the floor to develop IIP○ To attend training○ To implement training strategies○ To participate in case meetings○ To complete questionnaires and feedback as part of the assessment process• Environmental costs – if physical changes need to be made (ramps etc.)• Purchasing of resources (sensory supplies etc.)• Gap fee from funding (ISS contribution)



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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. •

As ISAs we receive a high volume of requests for support that are classified by educators as issues relating to children displaying challenging behaviour. In our professional practice we engage with services to analyse the environment and other external factors that maybe impacting on the child's wellbeing. From our support experiences 'challenging behaviour' presents as a symptom of deeper more wide reaching factors such as educator experience, environment, family dynamics as well as undiagnosed disabilities. We identify that the following groups of children are also developmentally vulnerable;

- Children at risk, including those in the child protection system
- Children who are/have experienced trauma
- Children with developmental delays not diagnosed as eligible disabilities (sensory processing disorder)
- Children of families not recognising the need to seek medical advice (eg. Children displaying traits of FASD)

These groups of developmentally vulnerable children fall outside the IPSP priority groups. In order to respond to services request for support ISFs are responsible for undertaking activities that provide eligible services with practical advice and assistance in accessing resources that will support them to build capacity and the ability to provide a quality environment inclusive of all children regardless of priority grouping. Examples of core activities of the ISFs include;

- Development of ongoing professional relationships with services and their ISA
- Assisting to link services to other support agencies, community groups services and organisations;
- Providing on-site support with the development and review of planning to support the establishment, and/or improvement and maintenance, of quality inclusive environments



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Educators come from varied educational backgrounds often with little knowledge or experience of the additional needs of children from vulnerable groups. The ongoing relationship between ISFs and educators provides the vehicle for sustainable growth in providing inclusive practices for all children.

With continued support from their ISFs educators are better placed to support a child's engagement in all aspects of the program. In developing a shared approach of capacity building through the IIP tool, educators are engaged in invaluable professional discussion providing them with opportunities to;

- Reflect and make changes to policy, pedagogy, planning activities and the physical environment,
- Identify how educators will engage with families and relevant organisations,
- Seek Internal and External capacity building opportunities, including other IPSP Supports such as Bicultural Support, and family and professional learning experiences.

It is through these working relationships with ISAs that educators are in turn able to use strategies which support the early identification of the children with additional needs and those with developmental vulnerabilities within their service and implement effective inclusive programs and practice.