



4 September 2014

Childcare and Early Childhood Learning  
Productivity Commission  
GPO Box 1428  
Canberra ACT 2601

[childcare@pc.gov.au](mailto:childcare@pc.gov.au)

**RE: Productivity Commission draft report 'Child Care and Early Childhood Learning'**

Dear Sir/Madam,

Carers NSW welcomes the recognition of the barriers faced by families of children with a disability in accessing Early Childhood Education and Care (ECEC) services in the draft report for the Productivity Commission's Inquiry into Child Care and Early Childhood Learning.

Carers NSW is an association for family members and friends supporting people with a disability, mental illness, drug or alcohol dependency, chronic condition, terminal illness or who are frail aged. Carers NSW supports and advocates for carers in NSW, and is also part of the national Network of Carers Associations, which works collaboratively to lead change and action for carers. In terms of this Inquiry, our response will focus on access to childcare for carers of younger children with a disability or additional needs, in most cases parents.

The draft report recognises that families of children with a disability or additional needs face barriers to accessing childcare because of lack of funding, discrimination and lack of experience with providing inclusive services. In many cases this discrimination is difficult to prove, and can extend to siblings without a disability. This means that many children with a disability are missing out on the benefits of ECEC, and their primary carer may be unable to maintain employment or return to the workforce.

The draft report notes that workforce participation for mothers who are primary carers of children aged 0-14 years with a disability is only 38%, compared to 64% for other mothers (AIHW 2009). Difficulty accessing appropriate formal care, including ECEC, is part of the reason for this gap. However, supporting carers to engage in the paid workforce would have many benefits for carers and the broader community, including increased financial independence, improved health and wellbeing for the carer and reduced reliance on income support.

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Carers NSW supports the following recommendations in the draft report:

- 12.3 – Jobless families where parents are receiving the Disability Support Pension or Carer Payment be exempt from the activity test.
- 12.6 – The provision of the Special Early Care and Learning Subsidy, the Disadvantaged Communities Program and the Inclusion Support Program to support access of children with additional needs to ECEC services.
- 12.8 – The Government should continue to provide support for children who have a diagnosed disability to access ECEC services.

However, Carers NSW also recommends that approaches supporting carers and families of children with a disability be flexible and person-centred, and that guidelines not be unnecessarily restrictive. This includes consideration of families that may not strictly fit the eligibility criteria but need additional support, for instance, not all children with additional needs will have a diagnosed disability when entering ECEC. Carers NSW also notes that many carers are ineligible for Carer Payment (often due to their partner's income) and instead only receive Carer Allowance, and recommends these carers also be exempt from the activity test.

Carers NSW thanks the Productivity Commission for its consideration of the needs of carers and children with a disability in this draft report. For further information, please contact Yve Gritschneider, Policy and Development Officer

Yours sincerely,

Elena Katrakis  
CEO  
Carers NSW