



**Productivity
Commission Inquiry
into Child Care and
Early Childhood
Learning**

**SUBMISSION
REGARDING INCLUSION**



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Introduction

Noah's Ark Incorporated (Noah's Ark) is a non-government organisation providing early childhood intervention and inclusion support 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 20 centres in Melbourne and regional Victoria. Our Early Childhood Intervention (ECI) and Inclusion Support (IS) programs last year reached 1,800 families and 2,600 Early Childhood Education and Care (ECEC) services.

Noah's Ark is making this submission to the Productivity Commission's Inquiry into Childcare and Early Childhood Learning in order to ensure that the needs of children with disabilities and other additional needs are adequately recognised and considered as part of the Productivity Commission's Inquiry.

Early Childhood Education and Care (ECEC) services are vitally important in supporting the learning and development of all children. Equitable, appropriate and inclusive care and learning support in these settings will create better outcomes for children with disabilities and other additional needs and set the course for their learning and development over the lifespan.

Demand

National planning for ECEC services needs to anticipate the level of demand from families with children with disabilities and other additional needs.

A 2009 ABS survey found that 7% of children aged 0-14 have a disability. Of these, approximately 85% have specific limitations or restrictions and 67% require assistance with day to day activities (ABS, 2009). Around half (48%) of all children with a disability require assistance with cognitive or emotional activities such as decision making or thinking through problems; coping with feelings or emotions, and making friendships; maintaining relationships or interacting with others. Other activities that children with a disability require assistance with include communication (39%), mobility (32%), self-care (28%) and health care (25%) (ABS 2009).

It follows therefore that if children with a disability are included in ECEC to the same extent as other children (and this should be the aim), 7% of the ECEC population will have a disability and up to 85% of this group will require additional assistance to fully participate.

In addition to children with disabilities, the Australian Government's current *Inclusion and Professional Support Program* (IPSP) recognises a number of other priority groups who may also require additional assistance to access and participate in ECEC. This includes; Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds and children from refugee or humanitarian intervention backgrounds. Actual proportions of these groups requiring

inclusion support are less clear but will take the expected demand for inclusion support well above 7% of the ECEC population.

Importance of Inclusion

Participation in ECEC is an important factor in each child's social and emotional development. Children with disabilities require interaction with their typically developing peers to learn social and emotional skills and to support their physical and cognitive development. Children with disabilities enrolled in mainstream ECEC settings make at least as much developmental progress as they do in non-inclusive settings while at the same time achieving greater progress in the areas of social competence and communication through their interaction with typically developing peers. (Buysse and Hollingsworth 2009, Odom 2002).

In 2012 Early Childhood Australia (ECA) and Early Childhood Intervention Australia (ECIA) endorsed a joint position statement on the inclusion of children with a disability in ECEC (ECA/ECIA, 2012). Rather than repeat its contents here, the Productivity Commission is referred to this publication (<http://www.ecia.org.au/advocacy/position-statements/statement-on-the-inclusion-of-children-with-disability>).

The principles outlined in the Statement include:

- Best Interests of the Child
- Importance of Families
- Social Inclusion
- Diversity
- Equity
- High Expectations for Every Child
- Evidence Based Practice

A number of suggested actions for Governments, organisations and institutions are outlined in the joint statement.

The Importance of Quality for Children with a Disability

The National Quality Framework (NQF) has been welcomed by the early childhood intervention and inclusion support sectors and its full implementation is considered imperative to the achievement of inclusion. It is acknowledged internationally (Irwin et al 2004) that a high quality ECEC setting is inclusive by definition (i.e. it is not possible to be 'high quality' without also being inclusive). In this regard it is anticipated that with a high staff:child ratio and a qualified workforce, many issues currently faced in inclusion could be overcome. By way of example one of Noah's Ark's inclusion support facilitators found that:

After a previous coordinator had applied and been approved for Inclusion Support Subsidy (ISS) for a child with a disability, a new coordinator of a vacation care program in Western Metropolitan Melbourne, who was more qualified and experienced, cancelled the subsidy. She said she was experienced in including children with additional needs and found that she was able to introduce practices and strategies to include this child without the need to access to additional resources. She felt that she was capable of including the child within her own staffing profile.

Although many children with disabilities do require additional resources to obtain the greatest benefit from ECEC, it is our experience that many challenges to inclusion are caused by a lack of knowledge or confidence on the part of educators.

Any actions that reduce impact of the NQF, for example by not recognising the importance of the early years, not raising the staff:child ratio or not seeing the urgency of having four-year trained Early Childhood teachers in all ECEC settings, will disadvantage all children and children with disabilities and others with additional needs in particular. Failure to invest adequately at this important stage of life will increase costs further along the life course and will not be cost effective when considered in a broader context.

How well is Inclusion of Children with a Disability in ECEC Working?

Funding levels

The Australian Government's IPSP program has had no real increase in funding since its inception in 2006, despite an 8% increase in the number of ECEC places in the 4 year period from 2005 to 2009 (DEEWR, 2010) and a likely increase of between 15–20% from 2006 to 2014 (based on an extrapolation of DEEWR's figures). In addition, the proportion of children with a disability accessing ECEC has increased, as the importance of inclusion is realised and the ECEC sector builds its capacity through the support of the ISA and other components of the IPSP. IPSP program providers are therefore being asked to assist educators to include 15-20% more children in ECEC, with no increase in resources. This is not sustainable in the longer term.

Continued Discrimination

In the experience of Noah's Ark, it is evident that children with a disability are still being discriminated against in relation to their access to and participation in quality early childhood education and care services.

For example Noah's Ark staff became aware of the following situation in an area of Melbourne:

A private provider of Vacation Care (VAC) and Out of School Hours Care (OSHC) programs was informing families of children with disabilities that they can attend their programs but that they would not be accessing ISS to employ additional staff. The reason given was because of the difference between the ISS payment and the actual cost of employing additional staff.

The impact of this decision was widespread:

- *There were no additional staff to meet children at the bus when it arrived from the Special School in the afternoon. Two families had to immediately withdraw their children from After Care. As one parent explained – "My daughter has Autism. She cannot walk into the program by herself; she will wander away or may try to cross the road. She has been at this program for six years and was very upset when she had to change to another program. Her behaviour regressed and she started to wet her pants".*
- *Other families also withdrew their children over a period of time because of concerns for their safety and wellbeing.*

- *A parent of a child with a disability did decide to enrol her child in the program because she didn't have any other options. She was informed that if her child attends then she will be responsible for taking the staff person away from fifteen other children.*
- *One parent had to leave her job because she was unable to find alternate care.*
- *Other Vacation Care programs in the area had to pick up the slack with one program including twenty three children with disabilities during their holiday program.*

Fortunately, with support from the Association for Children with a Disability and Noah's Ark the provider has now reconsidered their policy and, after 18 months, is once again including children with disabilities.

A number of factors discriminate against children with disabilities gaining access to ECEC. These include:

- ECEC services are able to refuse to accept enrolments of children with a disability on the grounds of financial hardship. Although services can access the ISS, the subsidy does not include the full costs of employing an additional worker and it is time limited: to 5 hours per day (Long Day Care); 2 hours per day (Before School Care); 3 hours per day (Out of School Hours Care); 8 hours per day (Vacation Care) and up to 50 hours per week for Family Day Care. Services need to not only bear the cost gap between the subsidy and their real costs but must also self-fund the total cost of any hours in addition to those covered by ISS. In our experience many children have been denied enrolment for this reason.
- Parents of children with a disability are being asked to provide evidence to the National Inclusion Support Subsidy Provider (NISSP) that the ISS is not being used for respite purposes. No other parent is asked the purpose of attendance at ECEC and the Child Care Benefit and Child Care Rebate are paid to families regardless of the reason for ECEC enrolment. This policy ignores the educational benefits to the child of attendance at ECEC, and prioritises the parent's workforce participation over the child's development.

In addition to discrimination in gaining access to ECEC, children with disabilities can also face discrimination in relation to their participation in ECEC programs. Children may need specialist equipment, an additional educator in the room, environmental or activity modifications in order to be able to participate. They may also need staff that have the attitudes, confidence and skills to be able to educate and care for them effectively. Just offering the same access as other children may not be adequate. Some children require additional support in order to participate at an equitable level and gain the same or similar outcomes as other children.

Resourcing

A range of resources, based upon individual need, are required to support children with disabilities. Insufficient, inappropriate or inadequate resources may prevent a child's access and participation in ECEC.

Some examples of where resources may not be adequately provided are detailed below:

- Some ECEC services will only allow a child to attend for the number of hours for which they receive the ISS. This not only limits the child's educational experience but

also limits the parent's employment opportunities, as a full work day plus commuting may involve 10 or more hours per day.

- The Specialist Equipment Program relies on an external therapist who is not funded by the IPSP for its prescription, fitting and monitoring. In some states the State funded Early Childhood Intervention (ECI) program will provide this service, but in other States there is no equivalent State funded program and sometimes a child is unable to access an ECI program due to waiting lists or eligibility criteria. Noah's Ark is aware of situations where parents are being asked to pay for a therapist to visit the ECEC service to perform these functions and that this can cost families \$500 or more. In addition, private therapists may not be familiar with the ECEC environment or the specific considerations in providing equipment in this environment.
- Bicultural support is not always available or easy to access. Bicultural support provides eligible ECEC services with access to an interpreter or other bilingual/bicultural people to support the service to enrol and settle a child/children from culturally and linguistically diverse, or refugee or humanitarian intervention backgrounds. Access to this support can assist a child and family to make a quick transition into the ECEC environment.
- Staff training in inclusion is limited, both in pre-service education and in ongoing professional development. Many undergraduate courses no longer include content on disability awareness or inclusion. In addition, although the Professional Support Coordinators (PSCs) are funded to provide professional development as part of the IPSP, very little to none of the training they provide is on inclusion. Where training is available, it is often delivered with a considerable time lag between the need being identified and support offered. In Victoria Noah's Ark is aware that less than 1% of training provided by the PSC is inclusion related.

Vulnerable Children

While all young children could be considered to be vulnerable in some way, there are also a significant number of children attending ECEC services who are potentially at risk who are not currently eligible for any additional support. Although Inclusion Support Facilitators (ISF) under the IPSP can provide support to educators in government approved services to include these children, they are not eligible for the Inclusion Support Subsidy (ISS) or any other subsidies in the Early Childhood Education and Care (ECEC) setting. This group may include:

- children at risk, including those in the child protection system
- children with severe behavioural concerns
- traumatised children
- children with developmental delays not diagnosed as specific disabilities.

Anecdotal evidence indicates that a significant proportion of an ISF's time is spent assisting educators in supporting these children.

The following case study illustrates this point:

A large long day care centre in Inner Melbourne operates a 3-5 year old room. The care environment is large both indoors and outdoors and requires the two educators to actively supervise the 29 children attending per day. The service contacted the Inclusion Support Agency (ISA) for support for a child who had joined the room mid-year. He had recently been put into foster care and was displaying very challenging

behaviour including rough and violent interactions with staff and peers, offensive language and absconding from the room. The child did not qualify for ISS as he is not undergoing any type of assessment. Educators struggled to spend quality time with this child and they started to express concerns that he was being labelled by other children and families as the “bad kid”.

Without the support of an additional worker his behaviour impacted hugely on the program as the indoor/outdoor program was disrupted and other children’s needs could not be met. Routines and transitions were stressful and other children’s behaviour changed due to the resulting stress in the room. Educators wanted him to feel safe and secure within an environment which would become his stability but without the support of an additional worker this proved to be extremely difficult and frustrating for the educators.

Staff documented his behaviour through a series of observation techniques but were unsure what to do next as they were unable to find triggers for his behaviour. The educators felt unable to support the child in the care environment as they couldn’t offer consistency in behaviour guidance or the ability to support his play and choices as there were other children who also required support. Without ISS in place, the educators are unable to implement strategies consistently meaning there was no change in his behaviour and the child became even more isolated from the group.

Other Challenges

National Disability Insurance Scheme (NDIS)

In considering ECEC services, the Productivity Commission will need to take into account the possible role of the NDIS within ECEC. Although the National Disability Insurance Agency (NDIA) will not fund services related to education, it is believed it will fund personal care related to accessing education. How the two systems will interface needs consideration. In addition, the NDIA may provide equipment for personal care. It is unknown yet how the NDIS will impact ECEC, but a close watching brief is required.

Support for Secondary School Aged Children

It is known that there are a number of children with disabilities who are older than primary school age who are accessing OSHC and vacation care. This is primarily due to a lack of alternatives.

By way of example:

In the city of Yarra there is a vacation care program that caters for up to 60 children per day. The program is run for primary aged children (5-12 years) but is open for older children to access due to the lack of programs in the area for children attending Specialist Schools. Amongst the children attending there are 8 with diagnosed disabilities. Four of these children are aged between 13-15 years old and have high support needs and diagnosed disabilities.

These children are older and visibly bigger than the other children. Whilst they are included in all aspects of the program it is difficult for the educators to facilitate age appropriate interactions and ensure they are socially included. Educators also find programming challenging as they have such a variety of ages attending the program and making sure that all abilities are accommodated and challenged. This is also impacting on the choice of excursions. Two of the children require assistance with toileting including nappy changes and one child requires full support at meal times.

Although support is in place, true social inclusion is difficult as most children are much younger.

While this is working well in some regions and in some cases, it should not be the only choice that parents of older children are given. There are no community supports available for secondary school aged children, as typically developing children are generally assumed to be able to care for themselves between the hours when they finish school and their parents return home from work. Older children with a disability who require supervision or care after school or during the vacation period are in need of a service that is appropriate to their age and needs. Additionally, children with a disability in some remote regions of Australia, particularly in the Northern Territory, only have the option of support from the Aged and Disability Clinics in their communities.

Conclusion

Effective inclusion of vulnerable children and children with disabilities in ECEC demands support from government to ensure that these children have equal access to and participation in the ECEC system. The NQF must continue to be rolled out in the way in which it was initially intended in order to meet the needs of all children, noting that this is especially important for children with disabilities and other additional needs. The IPSP program must be expanded and funded at a level to allow it to keep pace with the growth and changes in ECEC and in the number of children with additional needs accessing ECEC.

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