

Goodstart submission to the 2020 Review of the *Disability Standards for Education 2005*

September 2020

1. Introduction

At Goodstart Early Learning, we are pleased to provide input to the Review of the Disability Standards for Education (the Standards). We thank you for the opportunity to provide input on how we can ensure all children with disability can access and participate in early childhood education and care on the same basis as children without disability.

As Australia's largest provider of early childhood education and care, we are committed to playing a pivotal role in identifying and supporting children's needs earlier and in a safe and inclusive environment. With 80 per cent of a child's brain development occurring in their first five years, high quality early learning can be invaluable in early identification, prevention and referral, as well as being an intervention in its own right.

Our vision for early childhood intervention in 2030 is consistent with our vision as an organisation: that every child has the best start to school and life, regardless of where they live, what early learning setting they attend or their family's circumstance. By providing consistently high quality early learning – with access to tailored and responsive funding and support for children with additional needs – we will see more Australian children ready for school and life, as evidenced by a reduction in developmental vulnerability when they start school (AEDC). We will help achieve this by:

- 1) Continuing to provide high quality, inclusive early learning and programs and practice to support social inclusion;
- 2) Advocating to government for policy change so that every child can access funding and support at the level they need, when they need it, recognising some children may need more than others; and
- 3) Influencing the broader early childhood sector (early learning and early childhood intervention) by sharing and promoting evidence of best practice.

2. Position statement

We support the extension of the Disability Standards for Education to the early childhood education and care sector, so that all Australian children can have the best start in life, including those with developmental delay and/or disability. It is, however, imperative that the existing funding and support system complements the Standards by removing any barriers to access and participation. It is also imperative that there is alignment and clarity on expectations of ECEC service providers in relation to supporting access and participation of children with disability in ECEC.

There is clear alignment between the objectives of the Disability Standards for Education and the National Quality Framework for early childhood education and care (ECEC). It is our view that an ECEC service that is Meeting or Exceeding the National Quality Standard would also be complying with the Disability Standards for Education, given the analogous focus on inclusion, education and relationships with children and families.

Associated legislative, policy and funding frameworks should support the attainment of the objectives in the Standards and a clear assurance framework would need to be implemented to hold services accountable for meeting them. Each of these fundamental components to implementing the Standards – i.e. awareness, assurance and support funding – incurs a necessary level of investment from Government, which must be considered when deciding whether to extend the Standards to the broader ECEC sector.

Our responses to the questions in the ACECQA discussion paper are provided in [Section 4](#) of this submission.

3. About Goodstart Early Learning

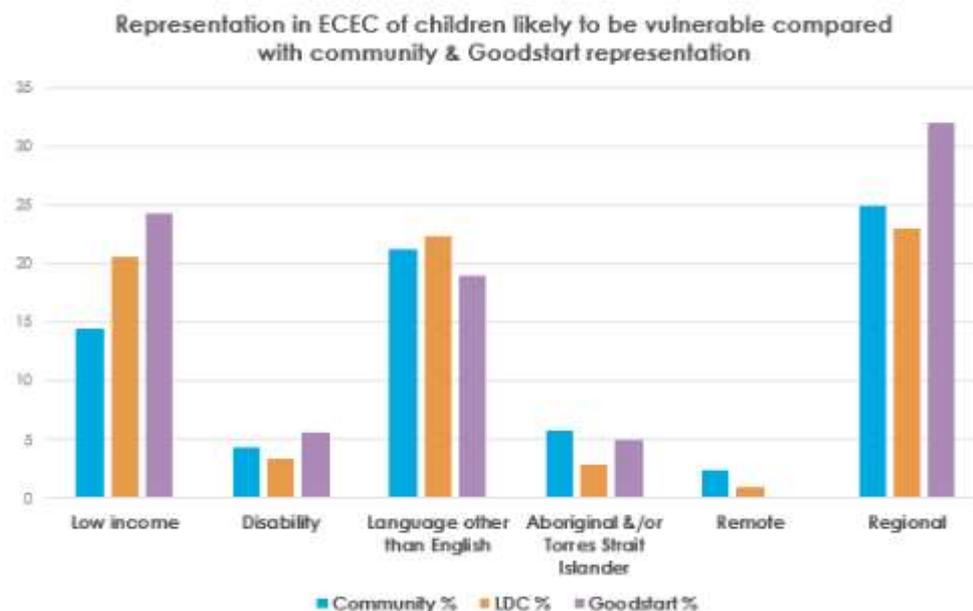
3.1 We are for children, not profit

Goodstart is Australia’s largest not-for-profit social enterprise and Australia’s largest ECEC provider, with 670+ centres located in all states and territories, caring for more than 71,000 children from 60,000 families with a team of 16,000 employees. Our purpose is to ensure all Australia’s children have the learning, development and wellbeing outcomes they need for school and life.

It is our view that all children should be supported to participate in quality early learning and care, regardless of where they live in Australia, their family circumstances, their inclusion support needs, or their early learning setting. We believe the best way to do this is to ensure all children have access to at least two days access to high quality early learning in the two years before full-time school. There is a wealth of international evidence that shows that two years of kindergarten has more impact than the one year that Australian currently provides, and this was confirmed in the *Lifting our Game Report*¹.

Across Australia, 39% of children attending our services have at least one indicator of vulnerability and we have proportionally more low-income families and children with disability than the community and sector. We also have more Aboriginal and Torres Strait Islander children than the rest of the sector but not yet at community levels across the country.

TABLE 1: Representation of vulnerable children in ECEC sector, Goodstart and community – by cohort



3.2 Social inclusion at Goodstart

Inclusive practice is fundamental to our way of working. As an inclusive organisation, all children, families and educators are welcomed at Goodstart. Quality early learning begins with secure, nurturing relationships between educators and children². Each and every day, our centres and teams of educators work in partnership with thousands of families across Australia to deliver high quality, inclusive and community connected early learning programs to benefit all children and their learning, development and wellbeing.

¹ Lifting our Game 2017 - <https://earlychildhood.qld.gov.au/aboutUs/Documents/lifting-our-game-report.pdf>

² Sims, Margaret (2015), 'The role of staff in quality improvement in early childhood', available [here](#).

We actively support all children to participate in our services, irrespective of their abilities, developmental capabilities or life circumstances. We provide a national support structure that assists with accessing funding support, additional staff training and enrolling children needing additional support. We try to maximise all available funding and support, so a child can fully participate in early learning but, sometimes, there are administrative delays that risk the child not having the support they need. As a not for profit and in line with our social purpose, we often fund inclusion support until government funding is approved. However, red tape and funding delays often mean that, in other services, children are being excluded.

To truly support social inclusion, we fund additional educators (outside ratio) to support children with additional needs, we work hard to ensure our early learning environments are suitable for children of all abilities and we continuously develop and invest in our educators to enable them to offer the best possible care and education for all children. Our key initiatives to support vulnerable children across the country are outlined in [Appendix A](#).

3.3 Beyond Goodstart

Our social purpose is to support all Australia's children, not just all children in Goodstart centres. We are committed to advocating on behalf of children and explaining the importance of quality early learning and other policy issues that benefit children and families, including early childhood education, workforce participation, welfare, disability support, mental health and wellbeing as well as social inclusion and equality.

We work closely with the Early Learning and Care Council of Australia (ELACCA), Early Childhood Australia, the Australian Council of Social Services, United Voice, the Australian Childcare Alliance, the Australian Research Alliance for Children and Youth, and our Founding Members on early learning and care policy issues.

4. ACECQA survey feedback

1. How would you rate your level of awareness of the Disability Discrimination Act (DDA)?

Since its inception in 2010, Goodstart has had a high level of awareness of and adherence to the Disability Discrimination Act (DDA). As a not for profit organisation dedicated to ensuring all children are included in early learning, regardless of background or ability, the DDA is of great importance to us and helps guide the underpinning philosophy of our organisation.

2. How would you rate your understanding about the DDA and your obligations under it?

As an organisation, our understanding of the DDA and our obligations under it are well understood. However, as Australia's largest not for profit provider with more than 670 centres in every state and territory, the extent of awareness of the DDA would and does vary in both state support offices and within our centres. Early learning is a highly regulated sector and, as such, early childhood teachers and educators generally rely on information provided through organisational policies and procedures that clarify their obligations under a number of legislative and policy frameworks over and above the National Quality Framework, including but not limited to disability, workplace health and safety, industrial relations, child safety, and so on.

3. How did you become familiar with the DDA?

As a not-for-profit organisation with social inclusion at the heart of our purpose, we continuously monitor, understand and comply with all relevant legislative, regulatory, policy and funding frameworks, including those relating to disability. As such, we have long been familiar with the DDA and its objectives.

4. Is further work required to improve ECEC/school age education and care providers' awareness and understanding about the DDA? If yes, what might that be?

Further work will always be required in a mixed market sector with thousands of providers across different provider types, such as ECEC, to ensure all providers are aware of their obligations under the DDA. Some of the systemic ways to build and improve understanding may be as follows:

Make the DDA explicit in the *Education and Care Services National Law* and the National Quality Standard (NQS). The NQS refers to all children and does not explicitly identify children with a disability. In building understanding of the DDA in the sector via the NQS, we suggest being clear about:

- Acknowledging specific needs for children with disabilities
- Understanding that children with disabilities might need support at different levels of intensity at different times.
- Ensuring that all new service approvals comply with a minimum set of criteria to ensure access and participation of children with a disability or a family member with a disability.
- Better clarity on how services are to comply with the DDA with an associated compliance framework noting that this may require additional investment by Government to enact and monitor.

5. Do you understand your obligations for making reasonable adjustments to ensure a child with disability can participate in ECEC/school age education and care? Would you know how to consult with the parent/carer?

As an organisation committed to inclusion, our obligations for making reasonable adjustments to ensure a child with disability can participate in ECEC are well understood and implemented. However, there may be different levels of knowledge and understanding at the centre or state-level across our vast national organisation. We work hard to build and maintain a high level of knowledge and understanding through our national Inclusion Support Helpdesk, our national network of Social Inclusion Coordinators, our professional development programs and through accessing the Commonwealth Inclusion Support Programme. We have specific professional development programs aimed at improving communication skills that support our teams, especially our centre leaders, to be able to talk to parents to discuss their goals and aspirations for their child, including where a child may require reasonable adjustments to be able to participate (See [Appendix A](#) for a summary of Goodstart's social inclusion programs and initiatives).

6. Do you feel confident negotiating and implementing a reasonable adjustment? Do you know how to determine if this would result in unjustifiable hardship?

Everyday across our 670 centres, it is very common for children with a disability to access and participate in our services. Whilst there is variation in knowledge and skills across our network of 670 centres, our teams are aware of and utilise supports such as the Inclusion Professional funded by the Commonwealth Inclusion Support Programme, our own Inclusion Helpdesk, our own network of Social Inclusion Coordinators and resources made available on our intranet and learning hub. Drawing on these resources enables our centre teams to negotiate and implement reasonable adjustments. In the event that a reasonable adjustment may result in unjustifiable hardship, we have access to our Legal Team as well as our Quality and Compliance team and Social Inclusion Team who assist our centres to make a determination. With a network of 670 centres, there is usually a solution to support access and participation of all children and families seeking to enrol.

7. Have you ever made a reasonable adjustment?

Everyday across our network of 670+ centres, reasonable adjustments are being made at the time of enrolment and ongoing to support the inclusion and meaningful participation of children with disabilities. Reasonable adjustments may include changes to facilities, e.g building a ramp, accessing specialised equipment (e.g mobility aids, change tables, visual stimulation aids), adjusting the curriculum (planning and programming) to support a child's learning and development, using effective visual systems, introducing augmentative communication aids and so on. This is considered to be a vital element of our role in ECEC, to ensure children and families have the support they need to fully participate in early learning.

8. Have any parents/carers said that you were not meeting your obligations? How did you address this?

At times, parents have provided us with feedback about their expectations for their child, which, on occasion, indicates we are not meeting our obligations. We usually receive notification that this is the case via our Family Services Team. In response to a parent complaint, our Performance Leads (line managers for our Centre

Leaders) investigate and coordinate a response with the parent/caregiver who had made the complaint, including rectifying the issues that are the substance of the complaint. For any complaint related to a child with a disability, our Inclusion Support Helpdesk reviews the complaint and considers options for additional support to be provided to the child or centre team. The Performance Lead communicates and agrees improvements with the family and the centre team and monitors implementation at a local level.

9. Do you have any other comments about the extent to which children with disability are currently accessing and participating in ECEC/school age education and care services?

At Goodstart, we are very proud of our representation of children with disability accessing our services as compared to their prevalence in the community and in other ECEC services (see Table 1, above). We strive to ensure every child who comes to Goodstart accesses and continues to participate in our high quality, inclusive early learning and care. We evaluate our initiatives and programs to ensure we bring a continuous improvement mindset to our work with many of the most vulnerable children in the country.

We understand that a child's participation in early learning may be disrupted as a result of their disability, particularly if they have underlying health issues. Consequently, we have introduced monitoring of children's attendances to ensure that we are aware and can act if a child or family needs more support to stay engaged and continue progressing. This includes access to Goodstart@Home, staying connected to children and families when they can't attend, and identifying and addressing barriers to access and participation in consultation with families.

10. To what extent do you agree or disagree with the following statements?

1. *There are barriers currently preventing children with disability from accessing ECEC/school age education and care services. If you 'agree' or 'strongly agree', what are those barriers?*

We strongly agree there are still barriers to children with disability accessing ECEC services. Some of those barriers relate to cost as families with children with disabilities often have additional cost burdens. Other barriers include:

Service barriers:

- The attitudes, beliefs and values of some service providers that may lead to families having to 'shop' for a service that will enrol their child
- Variations in the application of high quality and inclusive practices
- Facilities not being fit for purpose
- Onerous enrolment processes including documentation, provision of evidence, medical information, etc

Families:

- Feeling they have to hide their child's disability to be able to enrol in an ECEC service
- Fearing their child won't be accepted or won't be well cared for
- Concerned their child's additional support – if approved – will not match the parent's workforce needs (i.e. due to Inclusion Support Program funding hours and wage limitations)

Waiting times:

- Waiting for support, i.e. waiting for approval for additional support through the Commonwealth Inclusion Support Program, waiting times for reasonable adjustments to be made, e.g. in the case of facilities changes, sourcing specialised equipment and so on.

2. There are barriers currently preventing children with disability from participating in the educational program within ECEC/school age education and care services. If you 'agree' or 'strongly agree', what are those barriers?

We strongly agree that there are still barriers to children with disability participating in ECEC services, including:

Service barriers:

- The attitudes, beliefs and values of some service providers that may lead to a child accessing but not truly *participating* in their ECEC setting
- Variations in the application of high quality and inclusive practices that support a child's inclusion and sense of belonging
- Facilities not being fit for purpose with limitations placed on a child's ability to fully access resources and equipment

Families:

- Feeling that they have to hide or not acknowledge their child's disability to be able to maintain participation
- Fearing their child won't be accepted or won't be well cared for
- Facing onerous processes for providing evidence, e.g. documentary evidence of a child's disability or assessment, etc
- Having to tell their story multiple times

Waiting times:

- For support, e.g. waiting for approval for additional support through the Commonwealth Inclusion Support Program
- For reasonable adjustments to be made, e.g. in the case of facilities changes, sourcing specialised equipment and so on

3. There are specific barriers currently preventing Aboriginal and Torres Strait Islander children with disability from accessing and/or participating in ECEC/school age education and care services? If you 'agree' or 'strongly agree', what are those barriers?

We strongly agree that the barriers outlined in 1 and 2 above are also preventing Aboriginal and Torres Strait Islander children with disability from accessing and/or participating in ECEC. In addition to those barriers, there remain cultural barriers and the extent of their existence differs across a continuum. They include lack of:

- understanding of historical impacts and contemporary cultural barriers on the lived experience of children and their families
- connection to local Aboriginal and Torres Strait Islander communities, e.g. Elders, community leaders
- knowledge of cultural expectations and how to incorporate these into service delivery
- cultural knowledge and ways of knowing being evident in program and planning for Indigenous and non-Indigenous children
- evidence within a community that a service is culturally safe and culturally competent and therefore safe for families and children to approach

At Goodstart, we are highly cognisant of these barriers and their impact on access and participation and we seek to address them in every centre, every day. A comprehensive list of initiatives and programs to support inclusion for all children, including First Nations children, are provided at [Appendix A](#).

11. How has your service/s supported children with disability to access and participate in ECEC/ school age education and care settings, including any effective support to transition to school?

For a full description of Goodstart's initiatives to support children with disability to access ECEC, please refer to [Appendix A](#). The various initiatives covered in the Appendix include:

Commonwealth:

- Leverage support of Commonwealth Inclusion Support Programs (ISP) such as: Inclusion Development Fund - additional educators; Special Equipment Library; and Inclusion Innovative Solutions Funding.
- ECEI and NDIS pathways in each state with links to resources that support transition to school

Please see [Appendix B](#) for a summary of changes to the ISP we welcomed earlier this year along with our assessment of areas to strengthen in respect of the ongoing implementation of the ISP.

Goodstart:

- Inclusion Support Helpdesk – available 5 days per week to all Goodstart Centres across Australia
- Family Connections – foundational 12 month Social Inclusion Professional Development Program available to all Goodstart centres and some non-Goodstart centres
- Inclusive Practices Program – online, virtual PD for educators working with children with additional needs
- Intensive Individual Support Plans – available for children with complex support needs to provide intensive support for twelve weeks to ensure their ongoing participation. Links back to Commonwealth ISP.
- Links to local services including local referral pathways
- In some locations training for schools to best support transitioning children and/or specific arrangements with feeder schools to provide longer transitions or more intensive transitions as needed for children and families.

12. To what extent do you agree or disagree that the following types of ECEC/school age education and care face specific challenges in implementing inclusive practices for children with disability?

We agree that challenges remain in implementing inclusive practices for all children with disability. We are a national organisation highly committed to social inclusion for all children and yet we are cognisant that our 670 early learning and care services sit along a spectrum of inclusive practice. Given our dedicated commitment to social inclusion, we expect there will be even greater variation across the ECEC sector, with some services practicing very high quality, inclusive services and others being at a much more foundational level of practice. It should also be noted that, as a large, not-for-profit provider, we are able to invest in professional development and ongoing continuous improvement in ways that smaller providers or for-profit providers may not be able to.

Please find our responses to questions on pre-school/kindergarten (non-school) and long day care below.

Specific challenges in Long Day Care and Preschool/Kindergarten (non-school operated). If you 'agree' or 'strongly agree', what are those challenges?

Across our organisation, our services are predominantly long day care services, however, we also operate a small number of preschool/kindergarten services (non-school operated). Extending the Standards to all ECEC services would provide greater clarity and consistency for children and families as well as services providers.

We strongly agree that there are specific challenges in implementing inclusive practices for children with a disability. These include the following:

Qualifications and skills

The national ECEC quality reforms have led to a significant uplift in quality and inclusive practice. However, there is still variation in the quality, training, skills and access to professional development across the sector, particularly in relation to specialised disability capability. Goodstart has addressed this through improvements to our in-house Registered Training Organisation (RTO), implementation of professional

development, access to just-in-time support via our Inclusion Helpdesk, along with universal access to resources and learning materials.

Curriculum

ECEC services operating effectively under the NQS are required to make the necessary adjustments to the curriculum to ensure all children are able to access and participate in ECEC. In an extension of the above, Goodstart provides support to our educators and teachers through our Inclusion Support Helpdesk, professional development programs, learning hub and intranet as well as our Practice Improvement and Social Inclusion Teams to ensure that programming and planning takes into account adjustments for children with disability. All Goodstart centres are encouraged to make full use of the Commonwealth Inclusion Support Program to ensure the curriculum is accessible for all children.

Facilities and facility design

Many ECEC facilities, especially those that are older, were not designed to meet standards for access for children and families who may have a disability. While adjustments can be made to such facilities, these adjustments may not be possible on some buildings and may therefore lead to challenges in implementing inclusive practices. Further, the design and floor space of some facilities may also prohibit services in providing equipment necessary to support a child's inclusion, e.g. hydraulic nappy change table.

Families

Services may face challenges implementing inclusive practices if families are not yet ready to acknowledge their child's inclusion support needs. This can sometimes prevent services from being able to access the support they need to practice inclusively, e.g. having an additional out-of-ratio educator to better support all the children in the room.

There are also occasions where a child's access to hours of additional support do not match their parents' working hours, which is concerning given the evidence tells us that parents – particularly mothers – caring for children with a disability show lower workforce participation than other parents³. Not matching ISP funding to a parent's workforce participation can impact equitable access and can lead to inadequate support for children with disability for the hours they are in a long day care or preschool setting.

13. How does the NQF support you to deliver inclusive education practices?

The NQF does not specifically reference children with a disability. Instead it takes an inclusive approach, with all standards and elements relating to every child and is underpinned by the principles of:

- Rights and best interests of the child
- Principles of equity, inclusion and diversity. These are set out in the National Law.

Furthermore, the Standards and elements provided under the NQS give more specific detail about expectations for all children and by its definition children with disabilities. We believe that in implementing the standards ECEC settings would broadly be complying with the outcomes of the Act. The quality areas and elements of the NQS that we believe particularly apply are listed below.

QA1 – Educational Program and Practice

1.1.1 - Curriculum decision making contributes to each child's learning and development outcomes in relation to their identity, connection with community, wellbeing, confidence as learners and effectiveness as communicators.

1.1.2 - Each child's current knowledge, strengths, ideas, culture, abilities and interests are the foundation of the program.

³ <https://aifs.gov.au/sites/default/files/fm95c.pdf>

1.3.1 - Each child's learning and development is assessed or evaluated as part of an ongoing cycle of observation, analysis, learning, documentation, planning, implementation and reflection.

1.3.2 - Critical reflection on children's learning and development both as individuals and in groups drives program planning and implementation.

1.3.3 - Families are informed about the program and their child's progress

QA3 – Physical Environment

3.1.1 - Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child.

3.2.1 - Outdoor and indoor spaces are organised and adapted to support every child's participation and to engage every child in quality experiences in both built and natural environments.

QA5 – Relationships with children

5.1.1 - Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included.

5.1.2 - The dignity and rights of every child are maintained.

QA6 – Collaborative partnerships with families and communities

6.1.1 - Families are supported from enrolment to be involved in the service and contribute to service decisions.

6.1.2 - The expertise, culture, values and beliefs of families are respected and families share in decision making about their child's learning and wellbeing.

6.1.3 - Current information is available to families about the service and relevant community services and respires to support parenting and family wellbeing.

6.2.1 - Continuity of learning and transitions for each child are supported by sharing information and clarifying responsibilities.

6.2.2 - Effective partnerships support children's access, inclusion and participation in the program.

14. In complying with your obligations under the NQF, to what extent are children with disability supported to do the following on the same basis as a child without a disability?

a. Seek admission or apply for enrolment at an education and care service

As an inclusive organisation, children with a disability are enrolled and admitted to our services to the same extent as children without disability. However, their enrolment or admission may require a slightly longer lead-in time, taking into consideration any adjustments that need to be made. This includes training, procuring equipment, service changes, access to external supports including translating an interpreting and Aboriginal and adjustments to facilities. This is consistent with Part 4 of the Disability Standards for Education, which deals with enrolment.

b. Access the education and care service environment and its facilities

To the same extent taking into consideration any adjustments that need to be made. This includes training, procuring equipment, service changes and adjustments to facilities and how resources and equipment are organised. This is supported by the expectations outlined in QA3, specifically:

QA3 - Physical environment

3.1.1 Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child.

3.2.1 Outdoor and indoor spaces are organised and adapted to support every child's participation and to engage every child in quality experiences in both built and natural environments.

c. Participate in an educational program that has been designed to develop their skills, knowledge and understanding

To the same extent and supported by the Commonwealth Inclusion Support Program. This could be further strengthened by investing in; training and development and recognition of the higher qualifications needed to better support children with disability; ongoing support for educators working with children with disability and; matching hours of subsidy for time limited support and additional educators under the Inclusion Development Fund to children's booking patterns. This is supported by QA1, specifically:

QA1 - Educational program and practice

1.1.1 Curriculum decision making contributes to each child's learning and development outcomes in relation to their identity, connection with community, wellbeing, confidence as learners and effectiveness as communicators.

1.1.2 Each child's current knowledge, strengths, ideas, culture, abilities and interests are the foundation of the program.

1.3.1 Each child's learning and development is assessed or evaluated as part of an ongoing cycle of observation, analysing learning, documentation, planning, implementation and reflection.

1.3.2 Critical reflection on children's learning and development both as individuals and in groups drives program planning and implementation.

1.3.3 Families are informed about the program and their child's progress

This QA is consistent with Part 5 of the Disability Standards for Education which deals with Standards for Participation.

d. Access any specialised support services needed to participate in the educational program

At Goodstart this is critical element of the work that we do to maximise the access and participation of all children, every day. It is recognised in the DDA and in Part 7 of the Disability Standards for Education that children with disabilities are likely to need more support to access educational programs on the same basis as other children. This underpins Goodstart's approach to inclusion and is described in detail in [Appendix A](#).

e. Access an education and care environment that is free from discrimination caused by harassment or victimisation on the basis of their disability.

The Disability Discrimination Act, along with the National Law, the National Quality Framework, Early Years Learning Framework and our own policies and procedures (e.g. NQS 5 - Relationships with Children, NQS 6 - Partnerships with Families, No Exclusion Policy, Code of Conduct, Family Support Team) make every attempt to ensure that children with a disability can access and participate in ECEC on the same basis as a child without a disability. Whilst we believe there is good intent in the intersection of the legal framework and national and organisational policies, these could be strengthened through a compliance/assurance framework. This must be considered in the context of increased Government resources to not only implement the framework but to also resource the monitoring and compliance required to maintain continuous improvement.

15. What government mechanisms or initiatives could further promote inclusive access and participation by children with disability in education and care services?

For children with additional needs to have a positive and engaging early learning experience, it is essential that the right supports are in place. Getting this right up front will also have flow-on benefits for the other children in the centre, the educators and the child's family.

It is critical that disability and other inclusion support funding and support is timely, responsive, flexible and accessible. Timeliness is particularly important so that children with disability and their families are not waiting for weeks or even months for support funding to be approved before they can commence early learning. As a not-for-profit organisation with social inclusion at our heart, we allocate social purpose funding to provide additional support while waiting for government funding to be approved but we are very conscious that smaller providers may not have this capacity, particularly with long funding lead-in times. In the absence of timely funding, children may not be receiving appropriate levels of support to fully participate and/or be unable to commence participation until funding is approved.

Inclusion Support Program funding

As noted throughout this submission, the primary government mechanism for supporting inclusive access and participation by children with disability in ECEC services is the Inclusion Support Program (ISP). While recent revisions to the ISP Guidelines are positive in that they extend funding to a broader cohort of children, there are still aspects of the funding that are not working in the best interests of children and their families, resulting in some children having a negative outcome or simply missing out altogether. It is essential that funding is matched to need and that the policy settings are creating opportunities for children, not more barriers. A summary of our recommendations around improvements to ISP are provided in Appendix B.

Better system connectedness

We are also committed to better connection between the NDIS, early childhood early intervention (ECEI) services and ECEC services. It is particularly important that the system supports both the child and family, particularly where education and support services can minimise the need for a family to navigate complex support pathways or tell their story multiple times.

For children and families, there is no 'one size fits all' system that will be everything to everyone, especially for children with additional needs. While every effort should be made to support families to seamlessly navigate support services, the level of coordination and integration will usually depend on the complexity of the child's support needs. For example, on a continuum of integration, a fully integrated, co-located service model may only meet the needs of a child with significant clinical and non-clinical support needs.

Early childhood education and care services can play a pivotal role in supporting earlier identification of developmental delays and disabilities. However, in many settings there is a lack of awareness by ECEC providers and families about the pathways to assessment and diagnosis. More could be achieved by raising awareness amongst families, ECEC services and NDIS/ECEI services about bi-directional eligibility, referral pathways and service offerings to ensure better access for children and families. Better connectedness may also enable children and families to receive services flexibly in the places they choose and lead to more seamless services for families.

If you would like to discuss any aspect of this submission further, please contact:

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OR

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APPENDIX A

Goodstart – social inclusion programs and practice

Understanding a child's strengths and skills, authentically partnering with families and collaborating with other early childhood professionals, such as allied health practitioners, is critical to the successful inclusion and participation for children with a diagnosed disability, developmental delay and/or additional needs within an early childhood education and care setting. Listed below are a few of the programs we have implemented to make sure all children and families feel a sense of belonging and feel safe, nurtured and valued.

At Goodstart, inclusive practice is supported by a network of social inclusion coordinators and access to an Inclusion Support Helpdesk and support continuum, which highlights the elements and considerations of inclusive practice.

1) Enhancing Children's Outcomes (EChO) centres

EChO centres offer enhanced services over and above the universal base of education and care. We invest in proportionately disadvantaged communities using our unique EChO model to enhance learning, development and wellbeing outcomes for very vulnerable children, along with supporting their families and building their communities.

Services include additional teachers, child and family practitioners, speech pathologists, occupational therapists and social inclusion coordinators. We also offer playgroups, visiting service providers, food rescue and re-distribution, referral and support in the local community and scholarships for eligible children. Importantly, educators and allied health professionals work together in the centre creating a practice uplift.

2) Family Connections program

At the heart of our inclusion strategy is our foundational social inclusion Professional Development program, Family Connections. Goodstart has partnered with allied health professionals and other support agencies to develop and deliver Family Connections – a unique program delivered over 12 months to centre directors and educators, created to enhance outcomes for children and their families in vulnerable circumstances. The program includes a monthly face-to-face professional learning session, additional on-the floor coaching in centres, facilitated centre team meetings and mentoring for centre leaders.

Family Connections aims to strengthen practice and relationships between educators, children and families by focusing on their strengths, resources and aspirations to generate improved child outcomes. Importantly, the program supports centres in building connections with community services. Family Connections is delivered in Learning Circles over the duration of a year and covers topics such as leading change for children, attachment-based practices, communication, social, emotional, sensory development and play, partnerships with families and community links.

3) Intensive Individual Support Plans (IISP)

The IISP provides an additional educator over a 12-week period to support the inclusion of a child with ongoing high support needs. The additional educator provides relationship-based intensive support. Training and mentoring support is provided to the centre and additional educator by either a Goodstart Child and Family Practitioner, Occupational Therapist or Speech Pathologist, depending on the presenting needs.

Goodstart invests approximately \$440,000 per year to support these very vulnerable children. One of the criteria for being eligible for an IISP is ineligibility for the Inclusion Development Fund (IDF) or providing evidence that ISP support is not sufficient to meet the full support needs to overcome the inclusion barrier. This means that there is a direct correlation to children being supported through this approach, children who require significant levels of support to overcome their inclusion barrier, and lack of appropriate access to the Inclusion Support Program (ISP).

4) Redlands Integrated Early Years Place

The Redlands Integrated Early Years Place (RIEYP) is an integrated service, which is delivered through a partnership between Goodstart Early Learning and The Benevolent Society and receives funding from the Queensland Department of Education. The REIYP is an innovative model working in partnership with local community agencies in the Redlands to deliver programs and services which improve child and parental wellbeing, strengthen family resilience, promote children's development and build community connection for families. The positive engagement with community partners through the Community Advisory Committee has enabled the local community agencies, parents and prescribed entities to work together to co-design opportunities, programs and services which promote the safety, welfare and wellbeing of children in the Redlands.

The day to day direct service delivery is largely achieved through universal and targeted playgroups which aim to build resilient families, are preventive in nature and create child safe educational environments. Local services such as Qld Health, Family and Child Connect, Early Childhood Early Intervention, Domestic and Family Violence services and local Aboriginal Family Wellbeing services rotate their participation at the playgroups.

5) Increasing Access and Participation Project (Victoria)

The research tells us that the children who would benefit most from early learning are also the ones most likely to miss out. We also know that children who start behind, stay behind. To support some of our most vulnerable children, Goodstart Early Learning partnered with the Department of Education and Training (DET) and the Department of Health and Human Services (DHHS) in Victoria to support children known to child protection to access and participate in early childhood education and care. We employed a Family Community Engagement Worker to provide outreach for families, connect with external services, support social inclusion and upskill existing centre teams around the support needs of the child and family.

Through this program, 91 vulnerable children are now engaged in early learning and participating regularly. Centre teams are working with families around their child's needs, through the development of Emotional Support Plans, and have engaged medical and allied health professionals to support development and wellbeing, were required. Families are also supported to access Additional Child Care Subsidies and other support funding.

6) Early Learning Fund (ELF)

Goodstart and The Benevolent Society have partnered together to establish the ELF to help improve access to quality early childhood education and care by removing cost as a barrier and supporting children's participation early learning.

The ELF offers scholarships to Indigenous children, refugee and humanitarian entrants, families in hardship and children at risk of abuse and neglect. In 2019, the ELF supported 390 children at a cost of approximately \$330,000.

7) Early Childhood, Early Intervention (ECEI) Pathways

Goodstart has partnered with The Benevolent Society and Brotherhood of St Laurence to articulate the role of ECEC settings and educators alongside appropriate ECEI pathways. The project seeks to provide resources and support to educators in their role including identification of support need, referral, ongoing support and support coordination. The project also outlines the practice expectations for educators as they are supporting children and families that are eligible for services within the ECEI pathway.

8) Supporting Aboriginal and Torres Strait Islander children at Goodstart

A key part of our inclusive practice is creating culturally safe and welcoming environments. We have implemented an Engaging Aboriginal and Torres Strait Islander Educators Community of Practice program at Goodstart. The Community of Practice aims to increase workforce participation by Aboriginal and Torres Strait



Islander people and overcome barriers to Indigenous children participating in early learning. The model enables solutions to be created and addressed locally, aiming to create culturally safe and competent early learning centres, strengthening local community connections and relationships.

Since the model was introduced in February 2018, more than 41 participating centres have welcomed over 100 additional Indigenous children and 23 Indigenous educators and employees. Workforce pathways, partnerships and diversity manager, Simone Miller, together with cultural liaison, Melody Ingra, presented on the Community of Practice model at the Aboriginal Early Childhood Conference in June 2019. We also support cultural safety in our services by training educators, centre support staff and central office staff in cultural competency, using the Arrilla platform.

APPENDIX B

Inclusion Support Program (ISP)

The Inclusion Support Programme (ISP) assists early childhood education and care services to include children with additional needs alongside their peers, through provision of tailored inclusion advice and support from Inclusion Agencies (IA) and access to funded support and specialist equipment, where required. Currently, ISP funding is targeted to children with a diagnosed disability.

The Australian Government Department of Education and Training has recently revised the ISP Guidelines, following consultation with the sector and families. Goodstart welcomed the following changes:

- a) Expanded eligibility to include undiagnosed conditions, such as trauma related behaviours;
- b) Ensuring ISP funding and support for children participating in a preschool program in a centre-based care setting;
- c) Clarifying that the definition of typically developing peers is not limited to same-age peers; and
- d) Including a guiding principle around child-centric program delivery.

However, for the ISP to truly meet the needs of children, families and educators, we make the following important recommendations:

- 1) Index funding for educator wages: Index the wage subsidy annually, in line with increases in the award, so it does not continue to lose value in real terms and apply a one-off 'catch up' increase to the wage subsidy to align with current award wages (\$25.00/hour).

Since changes to the ISP were implemented in 2016, the hourly rate for the wages subsidy has not increased at all – it has not even been indexed by CPI, let alone award wage increases. In the same period, award wages for early childhood educators have increased 3.25% per annum, on average.

For most providers, this compounding impact of the growth in wages is 10.1%. At Goodstart, we have seen the average hourly wage for funded ISP staff increase by 12% in the same period, which reflects our above average wages.

- 2) Match funding to attendance: Remove the 25-hour individual cap and 40 hour shared funding cap for an additional educator and match funding to a child's enrolled hours, to support a child's participation in early learning and their parent's workforce participation.

A child's inclusion support needs do not end at their capped hours and there is a risk that children will be left without the adequate level of support if ISP does not cover the hours they attend early learning. Where ISP funding does not cover a child's enrolled hours, this can result in children being withdrawn from care, children not being adequately supported for additional hours, and/or reduced access and participation by vulnerable children.

- 3) Provide timely and seamless funding for support: Implement an Access and Continuity Guarantee to provide funding continuity when a child changes rooms or adjusts their enrolled hours within the same service.

Children and centres are currently experiencing lengthy gaps in funding and support during periods of transition (known as a change to a child's environment). To prevent these ongoing delays, we recommend the implementation of an *Access and Continuity Guarantee*, which includes:

- Provider-initiated funding periods (up to 12 weeks) when a funding and support application has been initiated or while funding is being reassessed.
- Funding and support provided for up to 50 hours per week, in line with Child Care Subsidy entitlements, to support parents' workforce participation.