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**Vision Australia Submission: Early Childhood Education and Care**

Submission to: Productivity Commission

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Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

# Introduction

Vision Australia welcomes the opportunity to provide a submission to the Productivity Commission regarding its inquiry into the early childhood education and care sector (the ECEC). Our focus will be on issues within the ECEC for children and families experiencing disability, with a particular emphasis on children who are blind or have low vision.

# Background

It is widely accepted that early childhood education and care is fundamental to building social, cognitive and emotional skills which are beneficial to children in their ongoing formal schooling. The ability for children with a disability to develop skills and learnings and increase their capacity through early childhood education is of particular importance. For Australians who are blind or have low vision, education is vital in enabling participation in the civil, political, economic, social, and cultural spheres of society on the same basis as other members of the community. This encompasses all levels of education, including early childhood education. In addition, there are considerable benefits to the broader community in having interaction between children from diverse backgrounds, including children who are blind or have low vision. An inclusive early childhood service builds knowledge of diversity among young children and creates the opportunity for friendships between children with and without disabilities. Valuing diversity and inclusion from an early age is advantageous to strengthening community attitudes and ideals.

There are various issues within the ECEC which are impacting outcomes for children who are blind or have low vision, including:

1. Difficultly accessing early education and care centres
2. Regulatory enforcement framework
3. Service provider access to early education and care centres

# Access to Early Education and Care

We recognise the Government’s Inclusion Support Program (the ISP) which is in place to provide support for eligible mainstream ECEC services to build capacity and capability to include children who have additional needs within those services. We also note the further support available to ECEC services through application to the Inclusion Development Fund (the IDF). This fund, amongst other things, subsidises the employment of additional educators to assist the inclusion of a child with a disability or additional needs.

Despite the availability of the ISP and the IDF, however, we are still receiving reports from family members of Vision Australia clients about difficulties in accessing ECEC services. We note a case study below.

Case Study

Last year, a client of Vision Australia, ‘M’ was declined enrolment at two childcare centres because of his vision impairment. M is blind and was 3 years old at the time of application. Both childcare centres had indicated to M’s mother that there was capacity to take on new enrolments during the year. M’s mother advised both centres that M was blind and would require inclusion support.

*Childcare Centre One*

The Director of Childcare Centre One (a QLD based centre) requested that M’s mother obtain a letter from a Vision Australia Occupational Therapist (the OT), which she could then consider further with the team. The Director mentioned to M’s mother that she was wary of accepting M because of the risk that he may hurt himself while at childcare. During a follow-up phone call between the OT and the Director:

* The OT explained that supports were available from Vision Australia and that M could engage in Vision Australia sessions at childcare.
* The Director queried whether Vision Australia could provide one-on-one support to M during the day. The OT noted that therapy supports for M could be increased to weekly 1-hour sessions to assist with childcare transition, but that one-on-one support was not necessary.
* The Director advised that she was not willing to enrol M based on his “needs”, except if Vision Australia provided one-on-one support for him, as inclusion support would not be sufficient.

*Childcare Centre Two*

The Director of Childcare Centre Two (an Australian wide centre) requested that documents be provided in relation to M’s disability, for the purpose of the inclusion support process. M’s mother later received an email from the Director which advised, amongst other things, that:

* The childcare centre would not be able to accommodate M because there were several new staff who were still going through a training cycle, and it would not be possible to source inclusion support due to the already high level of demand of additional needs children.
* Even if the childcare centre was able to source inclusion support this was not one-on-one support, and due to the varying degrees of children needing attention in the room, it was not felt that M would benefit and get the support he needed.
* An alternative type of care called ECDP (Early Childhood Development Program) may be available. [The ECDP is a program which provides early intervention to children with significant disability who require intensive, multidisciplinary programs to develop skills and behaviours to maximise their participation in schooling.]

M’s mother ultimately discontinued the application process for each of the above childcare centres, and enrolled M in a centre that had previously collaborated with Vision Australia to support children with vision impairment. This centre is a 20-minute bus trip for M and his mother to access. The above childcare centres were within walking distance of the family home.

# Regulatory Enforcement Framework

There appears to be limited options available to families of children with a disability to make a complaint should a child be limited or refused a place at an early childhood education or care service based on matters arising from their disability. Whilst it is open to families to make a complaint under the Disability Discrimination Act, this is a time-consuming process, which places positive obligations on complainants, and is often not compatible with the other pressures that may be being faced by the family unit. In this context, it is also worth noting that the Disability Standards for Education 2005 still do not apply to child care providers, and therefore cannot be relied on by families seeking services within the ECEC. This is an anomaly in need of rectification.

We note the case study below which show the unsatisfactory nature of the regulatory enforcement framework in its application to children with disability.

Case Study

A 2-year-old client of Vision Australia with a diagnosis of oculocutaneous albinism and autism spectrum disorder was expelled from his childcare centre. His disabilities impact on his functioning, making it challenging for him to regulate his emotions, communicate with his peers and teachers and interact appropriately with his peers. Vision Australia provided a significant amount of professional development to the ECEC staff and visited regularly to demonstrate strategies that could be used to support the child’s inclusion in the ECEC program. However, the childcare centre decided to expel the child following some incidents that involved aggressive behavior towards another child at the centre. There was no opportunity for the family to discuss and involve Vision Australia staff to understand how best to curb this behavior and prevent the expulsion. This was very stressful for the family who felt that they had limited options available to them. It also impacted the child who didn’t understand why he couldn’t go back to the childcare centre.

# Service Provider Access

Service providers such as Vision Australia are expertly placed to provide knowledge and strategies to early education staff regarding blindness and low vision, to assist a child to access all aspects of a service, and build capacity within their early years. As the below example shows, however, it is sometimes difficult to provide supports to children within these environments, or to implement reasonable accommodations. This impacts outcomes for children with blindness and low vision, and limits their potential learnings.

Case Study

A 3-year-old client of Vision Australia who is blind attends a preschool. Vision Australia staff have visited the preschool regularly (fortnightly or monthly). However, there are often different staff at each visit, or there is no specific person that information can be relayed to at the time of the Vision Australia visit. There is also no evidence of follow through with strategies and accommodations suggested. As a result, the child spends his day separate from his other peers on a mat with his own toys. This significantly limits his ability to develop and learn new skills and gives no opportunity for him to interact socially with his peers. With no encouragement from staff to other children within the preschool to interact with this child, it also reinforces the natural wariness that these children may have to difference, rather than developing tolerance and awareness of disability.

# Conclusion

Based on the above, we submit the following as focus areas for improvement:

1. Embedding disability inclusion in the education and ongoing training of all ECEC staff.
2. Improving access to on-demand training programmes for ECEC staff with respect to lower incidence disability types such as blindness and low vision.
3. Allowing the funding model to provide up-front integration supports for a child with disability, so that a more intensive level of support can be provided during the childcare transition phase to build strategies for inclusion,
4. Providing a streamlined complaint mechanism or feedback process for parents of children with a disability.

**About Vision Australia**

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.