



Feedback form

Inclusion Support Programme Guidelines 2016–17 to 2018–19—Draft for consultation

The Australian Government Department of Education and Training is seeking feedback from stakeholders on the Inclusion Support Programme Guidelines 2016–17 to 2018–19—Draft for consultation.

Stakeholder comments about the practical implementation and ongoing administration of the Inclusion Support Programme, as reflected in the Programme Guidelines—Draft for consultation, would be particularly welcome.

Please complete this form and return it by 5.00 pm AEST on 17 December 2015 via email to inclusionsupportprogramme@education.gov.au.

For more information on the Inclusion Support Programme and updates about its implementation, please visit the [Department of Education and Training](http://www.education.gov.au).

About you

Stakeholder category	Peak body
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State	National
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Feedback

Section	Key points/issues
	<p>Guidelines</p> <ul style="list-style-type: none">• Early Childhood Australia (ECA) welcomes the release and consultation for the Draft Inclusion Support Programme Guidelines.• The Government has been very responsive to feedback in the Draft Regulation Impact Statement on the Child Care Assistance Package in relation to this programme. We think that a number of constructive recommendations from the sector have been taken up and addressed which will improve the overall operation of the programme and support the inclusion and wellbeing of young children in early childhood education and care settings. <p>Funding</p> <ul style="list-style-type: none">• ECA also welcomes the government's increased investment in the Inclusion Development Fund (IDF).• However, there is still a risk that the Fund may be expended with strong demand, and that services will need to wait for the next year's allocation.



	<ul style="list-style-type: none">• We seek clarity on the quantum of funding to be allocated to the IDF per annum, particularly funding that is associated with the IDF subsidies and that provided for the Inclusion Agencies (IAs) and the Inclusion Development Fund Manager.• It is important that Inclusion Agencies are funded sustainably, with adequate funding for capacity building and face-to-face support. It is difficult to provide comment on funding adequacy without further information regarding the programme investment allocation.
7.1, C1.1, D1.1, F1.1	<ul style="list-style-type: none">• We suggest aligning definitions here to Family Assistance Legislation Amendment (Jobs for Families Child Care Package) Bill 2015 (i.e. long day care and occasional care are 'a centre-based day care service').
A1.1	<ul style="list-style-type: none">• We are concerned about potentially losing the benefits of a regional approach by moving to a state level area for Inclusion Agencies. We suggest that IAs should demonstrate how they will deliver responsive services to the regions in the tender specification. This should also be a focus of the evaluation and performance management during the contract delivery.
A2.2	<ul style="list-style-type: none">• We suggest that it would be efficient and effective for the Department of Education to partner with the Queensland Government to enable all approved services nationally to access the <i>Early Years Connect</i> suite of online learning modules (under development) focused on inclusion. With some minor alterations, the modules could help promote the use of Strategic Inclusion Plans (SIPS) and the Inclusion Support Programme.
C2.2	<ul style="list-style-type: none">• We recommend the addition of other cohorts of children:<ul style="list-style-type: none">○ children with behavioural needs or children that cause risk to other children○ children from a refugee or humanitarian background.
C2.3	<ul style="list-style-type: none">• We welcome the new provision removing the need for ongoing evidence for children with a permanent disability. This reflects feedback from services and Inclusion Support Agencies in the Draft RIS consultations and is consistent with the NDIS implementation.
C4.3	<ul style="list-style-type: none">• ECA welcomes the subsidy rates which have increased from the current rate of around \$17 per hour to \$23 per hour. While this is closer to covering the actual cost of an additional educator, it will not cover the cost of a higher qualified educator (above a Certificate III level).• We also welcome the flexibility provided in applying the subsidy across the week (25 hours for one child) rather than the previous daily limit of five hours. This will mean that an additional educator can be funded by the government to stay for longer on a given day.
D4	<ul style="list-style-type: none">• We suggest clarification is provided in the phrasing of staff-to-child ratio requirements as this has caused some confusion amongst providers during the transition to new ratios from 1 January 2016. Current wording may suggest that by meeting the <i>National Quality Framework</i> (NQF) (which includes ratios applying across the service), this is meeting across the care environment. We suggest expressly noting that the ratios must apply in the care environment under these guidelines as well as the overall service (consistent with the NQF), which is the intention of the guidelines.
E2.2	<ul style="list-style-type: none">• We welcome the broader statement of a diagnosed disability or diagnosed medical condition which does not prescribe an explicit list of disabilities for which children are and are not eligible to access the subsidy. This responds directly to concerns raised about the current guidelines in the Draft RIS consultation on the



	<p>Child Care Assistance Package.</p> <ul style="list-style-type: none">• We welcome the broader range of professionals that can provide documentary evidence including psychologists consistent with the NDIS.
F1.1	<ul style="list-style-type: none">• ECA welcomes the broad and more inclusive eligibility of children that is not limited only to the listed cohorts. This reflects modern approaches to inclusion which support each individual child.• On that basis we recommend removing the reference in the guidelines for the prioritisation of the 'first five cohorts'.
F3	<ul style="list-style-type: none">• Whilst we welcome the increase in subsidy levels, the removal of funding for Professional and Inclusion Support Coordinators will mean that a significant amount of red tape and administration will have to be taken up by individual services to access funding and support.• The steps to submit an IDF Innovative Solutions support application pose a risk to the timeliness/responsiveness of support and may prevent support upon enrolment.• The requirement for services to submit a funding proposal will be beyond the capacity of many services, particularly those that do not have the support infrastructure of large providers. Note: 83 per cent of approved providers have one service only (ACECQA Snapshot, November 2015).• For some services, it is likely that the additional burden placed on services to receive IDF Innovative Solutions funding will be an impediment, resulting in children and families from a Culturally and Linguistically Diverse background being excluded from services.• The Inclusion Agencies will be required to provide services with substantial support around submitting funding proposals for the IDF Innovative Solutions Support Model.
G2	<ul style="list-style-type: none">• 'Non-urgent' applications can take up to 20 days to be processed for approval. We suggest clarifying what is considered 'urgent'.
F3.4	<ul style="list-style-type: none">• Whilst there is no limit on the number of applications a service can submit, priority will be given to services that have not already received previous support.• In application, we are concerned that this may not support a service including families from a range of different language/cultural groups or indeed from different circumstances, e.g. refugee families.
F1.3	<ul style="list-style-type: none">• Without the support of Professional and Inclusion Support Coordinators, the model of purchasing 'cultural experts e.g. bicultural support' will require significant support by services both administratively as well as with regard to effectively working within an education and care environment. It may be difficult to find cultural experts in some regional areas for individual services without assistance.• Whilst there is a benefit in local community organisations providing this service to the local area, the cost of managing, administrating and supporting a small group of workers may either:<ul style="list-style-type: none">○ increase the cost of bicultural worker support○ reduce the quality of support○ increase burden on the service regarding inducting the worker to the environment, supporting the worker to engage effectively, ensuring administrative requirements such as Working with Children Checks etc. are



	<p>completed.</p> <ul style="list-style-type: none">• We think the role of the Inclusion Agency requires consultants with expertise in inclusion with regard to both bicultural inclusion as well as disability inclusion, underpinned by strong early childhood pedagogy. We suggest that this is considered in the tender specifications.
G2	<ul style="list-style-type: none">• We welcome the requirement of the role of the IDF manager to respond to all inquiries within five business days as a Key Performance Indicator.• However, we note that when this is applied to the IDF Subsidy for Immediate/Time Limited Support, five days should be seen as a maximum amount of time for approvals, not a standard time. The current approvals for flexible support funding may be immediate and it is important that there is still a focus on providing immediate approvals where appropriate under the new support system.