Submission: Inclusion Support Program Guidelines Review

Ethnic Community Services Co-operative (ECSC) thanks the Department of Education for the opportunity to provide feedback on the proposed changes to the Inclusion Support Program (ISP) Guidelines. ECSC is a not-for-profit organisation in NSW that provides multilingual/ multicultural services and support to meet the needs of culturally and linguistically diverse (CALD) people, particularly those from disadvantaged backgrounds. We play a lead role in enabling the inclusion of CALD children and families in the Early Childhood Education and Care (ECEC) sector in NSW through our **Bicultural Support** program, which is currently accessed by eligible services via the Innovative Solutions Support stream of the Inclusion Development Fund. Prior to 2016, Bicultural Support was able to be accessed directly as a standalone program under the Inclusion and Professional Support Program (IPSP).

For 38 years, ECSC, through Bicultural Support, has been successfully supporting the inclusion of children from Culturally and Linguistically Diverse backgrounds (CALD), Refugee and Indigenous Children and their families, through the provision of culturally and linguistically appropriate childcare, education and information. This is achieved through the provision of relevant language assistance to facilitate communication between children, families and educators; introducing the child's culture to the children and staff at the service, thereby increasing cultural knowledge and ensuring that the child and family know that their culture is valued; in educating staff about relevant cultural and child-rearing practices; and, in encouraging and supporting the maintenance or development of children's home languages.

Given ECSC's experience in Bicultural Support, this submission will focus on the impact of the proposed changes on the inclusion of CALD children and families in early childhood services.

Summary of changes we support

1. Broadening the ISP policy focus to children with "additional needs"
2. Broadening of eligibility for Immediate/Time Limited Support
3. Streamlined application process for support to develop a Strategic Inclusion Plan
4. The clarification that the IDF Innovative Solutions Support stream provides *flexible funding* for services to build their capacity for inclusion
5. The expansion of the eligibility criteria to allow "relevant organisations" to apply for funding for collaborative and strategic projects

Key recommendations

1. Establish dedicated funding and frameworks within the ISP to facilitate the inclusion of CALD children and families in ECEC services
2. Fund Bicultural Support directly as a stand-alone program that is accessible to all eligible children's services in timely manner
3. Amend the "Barriers and Strategies" document to enable identification barriers at the service level to inclusion of CALD children and families; and to reflect the strengths of Educators who speak more than one language
4. Implement improved monitoring and accountability of third-party organisations providing services to ECECs under ISP funding

1. Inclusion of all children

The Commonwealth and State and Territory Governments set their vision a decade ago that "**all children** have the best start in life to create a better future for themselves and for the nation"[1]. A key aspect of achieving this vision is for all children to have access to quality childhood education and care. ECSC fully supports the acknowledgement in the ISP Guidelines that inclusion is every child's right and benefits all.

ECSC welcomes the broadening of the ISP policy focus to children with "additional needs", and the acknowledgement that children from a range of backgrounds (including Aboriginal and Torres Strait Islander children, children from CALD backgrounds, children from refugee or humanitarian backgrounds and those who have experienced trauma) may "require specific considerations or adaptations to participate fully in ECEC services"[2]. As well as potentially increasing the number of children who may be eligible for support, the use of the term "additional needs" rather than "disability" may facilitate conversations with families who are uncomfortable with terms such as "disability", "refugee" or "trauma" and who are therefore reluctant to seek support. Further, we welcome the introduction of a simple application process for up to $3,000 to support services to develop their first Strategic Inclusion Plan. We believe that the process of developing a Strategic Inclusion Plan is helpful for services to look at the 'big picture' of inclusion in their context and to consider a range of barriers that children may experience to participation in their service.

However, we are concerned that despite this broader focus, in practice, the ISP does not provide dedicated funding or frameworks to support the inclusion of children from diverse backgrounds, who may or may not have additional needs other than disability. Three of the four types of support provided under the ISP, namely, the IDF Subsidy for Time Limited Support, the IDF Subsidy for an Additional Educator and the IDF FDC Top Up, are still (in practical terms) focused solely on supporting the inclusion of children with disability. For example, in order to access the IDF Subsidy for an Additional Educator, the service must still provide documentary evidence from a "relevant professional that confirms the child has ongoing high support needs"[3]. Furthermore, ECEC services are not required to specifically consider the inclusion of CALD children when developing their Strategic Inclusion Plans.

As we have indicated in previous submissions, we strongly believe that funding in the ISP should be quarantined for specific purposes, including for facilitating the inclusion of CALD children and families in ECEC services. The literature shows that CALD children, and particularly those experiencing additional forms of disadvantage, are underrepresented in ECEC services[4], and that CALD families may require additional support to participate in ECEC,

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[1] Commonwealth of Australia (2009) Investing in the Early Years—A National Early Childhood Development Strategy. Canberra, ACT, p. 4
[2] ISP Guidelines Version 2.0 Consultation Draft, p. 6
[3] ISP Guidelines Version 2.0 Consultation Draft, p. 21
[4]Australian Institute of Health and Welfare 2015. *Literature review of the impact of early childhood education and care on learning and development: working paper*. Cat. no. CWS 53. Canberra: AIHW, p. 21; Productivity Commission 2014, *Childcare and Early Childhood Learning*, Inquiry Report No. 73, Canberra, p. 521-523

such as language support or cultural training for staff[5]. It is our experience that children from CALD backgrounds remain underrepresented in ECEC services due to language barriers, parental worries about cultural appropriateness of services, complexity of the system and limited support available in community languages. These barriers to accessing ECEC warrant a specific focus in the ISP on facilitating inclusion of CALD children and families.

> ""A" HAS BEEN AT THE SERVICE FOR 6 MONTHS AND HAS NEVER JOINED THE GROUP TO EAT HER LUNCH. SINCE THE BICULTURAL SUPPORT WORKER HAS COME, "A" NOW JOINS IN AND EATS HER FOOD"
>
> -An educator

The practical focus on disability in the implementation of the ISP also obscures the fact that children experience multiple identities and therefore may encounter a range of barriers to inclusion which require expertise and resources to address. For example, a CALD child with a disability may experience barriers to participation relating to their disability but also to their language and culture. The importance of culturally responsive practice in supporting CALD children with disability and their families is acknowledged by Early Childhood Intervention Australia in their National Guidelines for Best Practice: "Understanding the practices, values, beliefs and cultures of families, and the immediate and extended communities in which they interact are fundamental to the best practice of ECI"[6]. In our experience, CALD children with disability may be supported based on their disability, but their cultural and linguistic inclusion tends to be ignored. There are also important cultural differences in how disability is regarded and explained around the world, and this can impact significantly on children's inclusion. CALD families may not be aware that their child with disability has the right to participate in early childhood education and care in Australia. They may not be aware of the support services that exist to facilitate their child's inclusion in society. Particularly given the research around improved self-esteem and health outcomes attached to positive cultural identity, we believe that it is vitally important that ECEC services are equipped to respond to the cultural and linguistic challenges which may arise in facilitating the inclusion of CALD children with disability.

2. Barriers to accessing Bicultural Support

Currently, ECEC services face significant practical barriers to accessing Bicultural Support. We believe that the proposed changes do not adequately address these barriers. In order to access Bicultural Support, ECEC services must apply via the IDF Innovative Solutions Support stream. This requires a number of steps, each of which may be a barrier to the service and child receiving the required support:

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[5] Productivity Commission 2014, p. 523
[6] Early Childhood Intervention Australia (2016). *National Guidelines- Best Practice in Early Childhood Intervention*. Sydney: ECIA, p. 11.

i. The service must identify that there is a need for Bicultural Support, either due to language or cultural needs of a particular child/ren who has enrolled in the service, or due to underrepresentation of CALD children at the service;

ii. The service must become aware of the availability of Bicultural Support and how to contact the provider;

iii. The service must liaise with the Inclusion Agency to complete a Strategic Inclusion Plan (SIP);

iv. The service must liaise with the Inclusion Agency as well as with the Bicultural Support providers (in order to obtain quotes) to develop an application for funding under the IDF Innovation Solutions Support stream;

v. The service must submit the SIP and funding application to the Inclusion Development Fund Manager via the Portal;

vi. The service must wait for the SIP and funding application to be approved;

vii. The service must then liaise with the Bicultural Support providers to arrange provision of the support and payment of fees.

This contrasts with the streamlined process which was available prior to 2016, when ECEC services could access Bicultural Support directly by submitting a single form to the Bicultural Support provider, and have a Bicultural Support worker or consultant on site within a week.

The complex and time-consuming nature of the current application process has dramatically reduced the uptake of Bicultural Support in NSW from around 100 allocations of a Bicultural Support Worker per month (prior to 2016) to just one 1 allocation per month (2019). The direct impact of this is that more than 1000 CALD children are missing out on vital inclusion support every year in NSW alone. Furthermore, there are many situations in which timely access to Bicultural Support during a child's early days at an ECEC service is critical to successfully settling a child into a centre, and/or identifying whether there are additional needs to be addressed. For example, in their 2014 Inquiry into Childcare and Early Childhood Learning, the Productivity Commission highlighted the significant impact of Bicultural Support in facilitating the inclusion of six Burmese (Karen State) children in an ECEC service while their parents attended English classes at TAFE – the service was given less than a day's notice that the children would be enrolling[7]. Under the current funding arrangements, these children and the relevant service would have missed out on the support during this critical settling period. Furthermore, in numerous examples from our own service provision, Bicultural Support workers have assisted ECEC services and families to identify when a child has developmental or behavioural concerns that require additional

> "THE BICULTURAL SUPPORT WORKER WAS ABLE TO GIVE US A BETTER UNDERSTANDING OF "N'S" DEVELOPMENT. WE PROGRESSED WITH A DISCUSSION WITH HER PARENTS AND A SUCCESSFUL APPLICATION FOR FUNDING TO SUPPORT "N" NEXT TERM"
> - An Educator

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[7] Productivity Commission 2014, *Childcare and Early Childhood Learning*, Inquiry Report No. 73, Canberra, p. 524

support, but which may have been overlooked due to language or cultural barriers. The timely identification of these concerns in turn enables timely access to early intervention.

The proposed changes recognise that ECEC services often need to be able to access immediate support to facilitate the inclusion of children with additional needs, through the expanded eligibility for Immediate/Time Limited Support. However, it is unclear whether or how this support could be accessed to facilitate the inclusion of children from CALD backgrounds. We strongly believe that CALD children have a right to access inclusion support in a timely manner, and that ECEC services, families and communities all benefit from inclusion Bicultural Support being readily available at critical phases in a child's contact with an ECEC service. Furthermore, under the previous funding arrangements, Bicultural Support was funded in terms of the number of hours of support which could be provided to services. Under the current arrangements, funding is approved as a dollar amount under the IDF Innovative Solutions Support stream, which may lead to inequity in the amount of support ECEC services may be able to access from different providers, depending on their fees. In order to address the barriers to timely access to Bicultural Support, as well as to ensure equity of access to Bicultural Support, we urge the Department of Education to fund Bicultural Support directly as a stand-alone program that is freely accessible to all eligible children's services seeking to support the inclusion of culturally and linguistically diverse (CALD) children, families and communities into their program and practice.

3. Holistic, rights-based, access & equity approach

ECSC welcomes the continued focus of the ISP on access and equity, through supporting ECEC services to address barriers to inclusion which may arise from the interactions between children, families, educators and care environments [8]. We strongly support the holistic approaches to inclusion reflected in the ISP and other policy documents which recognise and affirm the connections between children, families, communities and the natural world[9]. We also welcome the continued focus on the rights, capacities and strengths of children (rather than perceived "deficits") reflected in the introduction to the ISP Guidelines[10]. We note that these approaches are also consistent with the bio-psycho-social model of disability advocated by the World Health Organisation and others[11].

In light of this, we recommend two changes to the list of "barriers" from which ECEC services are able to select when preparing their Strategic Inclusion Plans:

1. The addition of a barrier (or cluster of barriers) in the service environment of the service not speaking the child's home language, having limited understanding of aspects of the child's culture, having limited cultural competence, limited knowledge of working with

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[8] ISP Guidelines Version 2.0 Consultation Draft, pp. 5 and 19; Department of Education (2017) *Inclusion Support Programme: Barriers and Strategies.*

[9] Department of Education, Employment and Workplace Relations (2009). *Belonging, Being and Becoming: The Early Years Learning Framework for Australia.* Canberra, ACT: DEEWR, p. 16

[10] ISP Guidelines Version 2.0 Consultation Draft, p. 5

[11] See, for example, World Health Organisation (2011) World Report on Disability. Malta: World Health Organisation and The World Bank, p. 4

children from refugee backgrounds, etc. This acknowledges that there are limitations within the service environment, and not just "additional needs" of the child, in supporting the inclusion of children from CALD and refugee backgrounds.

2. The removal of the barrier listed as "Educator – English as a second language". This could be changed to "Educator – Communication barrier" to reflect any conditions which may create a barrier to effective communication between educators, children, families and services. **We note that being able to speak English in addition to another language is actually a significant strength and employable quality and should not be viewed as a "barrier"!**

4. Collaborative and Strategic projects

ECSC welcomes the proposed changes to the IDF Innovative Solutions Support stream. We believe the streamlined application process for support to develop a Strategic Inclusion Plan will enable more ECEC services to engage with the ISP and begin planning for inclusion. We also welcome the clarification that this funding stream provides flexible funding for services to build their capacity for inclusion and note that the list of example "approved purposes"[12] may assist services to understand how the funding may be used. However, we note that there is little information provided about how the impact and outcomes of funding accessed by ECEC services under the IDF Innovative Solutions Support stream will be evaluated. Under previous funding arrangements, our Bicultural Support program provided regular reports to the funding body on the support provided, and ECEC services completed evaluations of the Bicultural Support provided after each allocation. These evaluations helped to improve our service delivery, maintained transparency of the program and often indicated emerging languages or communities. We are concerned that the current funding arrangements do not allow for sufficient monitoring, evaluation and accountability of third party service providers (including Bicultural Support) who may be engaged by ECEC services under this funding stream.

Further, we welcome the expansion of the eligibility criteria to allow "relevant organisations" to apply for funding for collaborative and strategic projects[13]. We strongly believe that in order to develop inclusive practices, ECEC services need the support of a range of organisations with expertise in engaging particular communities; working cross-culturally; supporting children with additional needs; and in developing reflective, culturally responsive practice. Research has shown that for Indigenous communities, service delivery fragmentation can be a significant barrier to accessing early childhood development services[14] and that components of successful service delivery included working holistically with families in the community context while building community networks[15]. In our own experience, ECEC services have the potential to act

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[12] ISP Guidelines Version 2.0 Consultation Draft, p. 31

[13] Ibid, p. 34

[14] Wise S (2013) *Improving the early life outcomes of Indigenous children: implementing early childhood development at the local level*. Issues paper no. 6. Produced for the Closing the Gap Clearinghouse. Canberra: Australian Institute of Health and Welfare & Melbourne: Australian Institute of Family Studies.

[15] Sims M (2011) *Early childhood and education services for Indigenous children prior to starting school.* Produced for the Closing the Gap Clearinghouse. Canberra: Australian Institute of Health and Welfare and Melbourne: Australian Institute of Family Studies, p. 7

as a source of knowledge, as well as a bridge between, CALD communities and other community services. The Collaborative and Strategic Projects component of the ISP presents a significant opportunity for relevant community organisations to support the ECEC sector in developing inclusive practice and in supporting children and families to access other services in the community.

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