



Australian Federation of
Disability Organisations

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22 February 2024

Early Years Engagement Team
Department of Social Services
GPO Box 9820
Canberra ACT 2601
Via email to: earlyyearsengagement@dss.gov.au

To the Engagement Team,

Re: Submission to the Consultation on the Draft Early Years Strategy

By way of introduction, AFDO has been the recognised national peak organisation representing people with lived experience of disability since 2003. Our mission is to champion the rights of people with disability in Australia and support them to participate fully in all aspects of Australian life.

We have read the draft Early Years Strategy with interest and thank you for providing AFDO with an opportunity to provide feedback on this important document. While disability is mentioned several times throughout the strategy, there doesn't seem to be any tangible, concrete actions aimed at driving better outcomes for children with disability and their families. '

We note that the guiding Principles referenced underneath the strategy are intended to help shape activities under the Priority Focus areas. Guiding principle 4 states that services and opportunities must be *"equitable, inclusive and respectful of diversity"*.

While we have not had sufficient time to prepare a more comprehensive submission, we wanted to highlight a few key aspects of public policy we believe must be considered as the Department is finalising the Strategy to ensure it is inclusive of the needs of children with disability and their families.

The rights of people with disability, including children with disability, are set out under the Convention on the Rights of Persons with Disabilities (CRPD). This document has been signed and ratified by the Australian Government. As such, Australia is required to periodically report to a Committee of independent experts known as the United Nations Committee on the Rights of Persons with Disabilities (CRPD Committee).

This involves the Australian Government outlining the steps it has taken to implement the CRPD during that reporting period. The CRPD Committee will then issue a set of concluding observations instructing the Government on what it needs to do next. The CRPD's last set of concluding observations relating to Australia was handed down in 2019. At paragraph 14, parts (b to d) the Committee recommends Australia:

- (b) *Ensure access for children with disabilities to quality and human rights-based early intervention mechanisms;*
- (c) *Amend all legislation to guarantee that children with disabilities are provided with age-appropriate support and accommodations to express their views in all matters that affect their rights or interests;*
- (d) *Fund and resource culturally suitable support for Aboriginal and Torres Strait Islander children with disabilities and their families, in the local community.*

Australia's Disability Strategy 2021-31, which is referenced in the Early Years Strategy, is Australia's blueprint for the domestic implementation of the CRPD. One of the policy priorities listed under this strategy is as follows:

"Children with disability can access and participate in high-quality early childhood education and care"

In order for this aspiration to be realised, early childhood educators and other specialists working with children and families need to be adequately trained and disability confident.

We need people to undertake disability awareness training that is tailored to their industries while they are still in education and before they move into the workforce.

That's why we recommend the Minister for Employment must work with the Australian Curriculum, Assessment and Reporting Authority, the Tertiary Education Quality and Standards Agency and the independent Training Package Assurance function within the Department of Employment and Workplace Relations to ensure modules on disability awareness, accessibility and inclusive design are built into:

- The Australian school curriculum.
- Relevant VET accredited courses.
- Relevant university courses.

Government must also consult with people with disability and their representative organisations to better understand the industries that must be prioritised as part of this work.

While the draft Early Years Strategy makes several references to the National Disability Insurance Scheme (NDIS), the scheme is about to be completely overhauled subject to the findings and recommendations that came out of the [recent Review](#).

Right now, the NDIS is still failing many children with disability and their families with,

- The interfacing arrangements between the NDIS and the education system are far too complex.
- Children and families who do not qualify for the scheme are often worse off as the necessary supports simply don't exist elsewhere.

We believe a number of the Review Panel's recommendations have the potential to significantly improve outcomes for children with disability under the age of 5. While Government is yet to respond to these recommendations, we wanted to bring them to the Department's attention as we believe they need to underpin the content of the final Early Years Strategy:

- Supporting Action 1.8 refers to National Cabinet agreeing to jointly invest in a capacity building program for families and caregivers of children with development concerns and disability.
- Supporting Action 6.2 refers to the NDIA reforming the pathway for all children under the age of 9 to enter the NDIS under early intervention requirements.

AFDO is supportive of both of the above recommendations and sees them as being absolutely critical to the wellbeing of children with disability.

The NDIS Review Panel has also recommended the establishment of a new role within the NDIS ecosystem which AFDO would like to see come to fruition. They have recommended a Lead Practitioner for Children and Families be available to all NDIS participants, as well as some children who are not eligible for the scheme but who could benefit from this support.

The following has been extracted from the FAQ page on the NDIS Review website:

“A Lead Practitioner could be an allied health, developmental or early childhood educator, who is the main professional working with the family. Lead Practitioners would act as a key worker to help families find best practice supports to support their child and/or children. The Lead Practitioner would coordinate a supportive team and provide early intervention to support children and families in their homes, early childhood settings and schools. This would help children to learn and practice skills in their everyday environment, built into daily routines.”

The NDIS Review Panel also recommended there be;

- better screening checks to pick up issues early and provide early intervention when it is most effective.

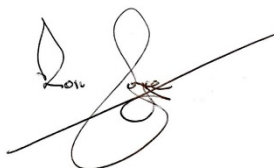
Finally, we would like to draw the Department's attention to the following recommendations that came out of the [Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#) as they are also applicable to the Early Years Strategy:

- Recommendation 9.2 refers to state and territory governments ensuring all First Nations children up to the age of five entering out-of-home care are screened using the culturally adapted developmental screening Ages and Stages Questionnaire-Talking about Raising Aboriginal Kids (ASQ-TRAK) tool. The Royal Commission recommended that children who are vulnerable in two or more of the five domains included in the screening tool be supported by an application for an Early Childhood Early Intervention plan.
- Recommendation 9.10 refers to the Australian Government and state and territory governments supporting the establishment of a First Nations Disability Forum to lead further development and implementation of the Disability Sector Strengthening Plan (DSSP) by the end of March 2024. The Royal Commission recommended this forum be tasked with undertaking a range of different activities, one of which involves supporting First Nations community-based organisations across the early childhood sector to improve workforce disability competency.
- Recommendation 9.12 refers to the development of disability-inclusive cultural safety standards for the provision of services for First Nations people with disability. These standards would be imbedded across a range of different settings, including the early childhood sector.

We regret that we did not have time to make a more detailed submission to this consultation process but hope the information we have provided is useful and trust that the Department will take our feedback on board.

Should you require further information in relation to any of the matters raised in this letter, please do not hesitate to get in touch.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Ross Joyce', with a long horizontal flourish extending to the right.

Ross Joyce
Chief Executive Officer
Australian Federation of Disability Organisations

"As CEO, I am living and working remotely at times on Wadawurrung and Dja Dja Wurrung Country, as well as Wathaurong Country and Wurundjeri Country and pay my deep respects"

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