

# **ECEI Implementation Reset Consultation:** *Supporting young children and their families early, to reach their full potential*

**Goodstart Early Learning submission  
February 2021**

## Executive Summary

### We are for children, not profit

Goodstart is Australia's largest not-for-profit social enterprise and Australia's largest ECEC provider, with 671 centres located in all states and territories, providing early learning and care for more than 70,700 children from 59,200 families with a team of 14,900 employees. Across Australia, 4,403 children attending Goodstart have a disability or developmental delay. This is 6% of all children at Goodstart and is proportionately higher than other ECEC providers.

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 high quality, inclusive early learning and care no matter their location or life circumstances.

### Supporting an ECEI implementation reset

We support the Early Childhood Early Intervention (ECEI) Implementation Reset to continue to improve the ECEI Approach, so children and families can access funding and support in a simple and timely way. In particular, we support the proposed changes that will improve access to and grow the capacity of mainstream and community services, such as early childhood education and care (ECEC). ECEC plays a pivotal role for children as both a pathway to early childhood intervention and as a prevention and early intervention strategy in and of itself. Access to quality ECEC is also important, so parents of children with disability can participate in the workforce.

We are committed to supporting children with a disability, developmental delay or other inclusion support needs, so we want to work with NDIA to support the continuous improvement of the ECEI approach and of the early childhood development system, as a whole.

### What our families told us

One unique way we can add value to this review process is by capturing feedback directly from families. To support this consultation, we surveyed over 1,600 families who are (or should be) eligible for ECEI based on their child's diagnosis or needs<sup>1</sup>, with 87% of respondents indicating they had accessed ECEI services for their child.

Full findings are throughout the body of this submission but key findings include:

- **While many families (59%) feel confident accessing ECEI services, the services aren't always easy to access.** Interestingly around one-third (34%) of families reported they found it easy to access services, whereas another one-third (32%) said they found it difficult.
- **Educators at Goodstart play a key role in providing families with information about ECEI.** Around a quarter of families (26%) found out about ECEI from their educator, second only to their doctor (47%).
- **A child's ECEC centre is a key part of the support structure that families value and rely on:**
  - Around half the families (54%) said their ECEI provider had set goals with their child's Goodstart centre.
  - Most families (81%) said their ECEC service provider or therapist was working with their Goodstart centre to some extent to support their child. When this occurs, families noted there are significant benefits:

---

<sup>1</sup> Goodstart ECEI Family Survey (February 2021) – 1,642 families surveyed with a response rate of 14.7% (margin of error <6%).

- Families reported the greatest benefits of coordinated goal setting was feeling confident that everyone who cares for their child has the same information (71%) and is working towards the same goals for their child (69%).
  - Almost half of families (46%) also reported that their child's educators benefitted from the expert knowledge of the ECEI service.
- **There's more work to do to ensure families awareness and access to the support options available to them.** Around two-thirds of families (65%) who said the ECEI provider did not set goals with their Goodstart centre said it was because they were not aware of this option or it wasn't presented to them. Unfortunately, 11% said they asked for support but did not receive it.

## Recommendations

We support the intent of the ECEI reset and make the following specific recommendations:

1. **Embed ECEC participation in all ECEI planning in recognition of the role that ECEC settings play in early identification and support**, noting that many services are already delivering early intervention services in their own right.
2. **Ensure Early Childhood partners to maximise the universal early childhood system by ensuring all children supported by ECEI and participating in ECEC benefit from:**
  - a. Collaborative planning, goal setting and assessment, with more support provided in the natural settings where children typically spend their time.
  - b. Capacity building for ECEC educators by ensuring they are more systematically engaged in assessment, support and case coordination.
  - c. Leveraging Inclusion Agencies to improve coordination of information, referrals and funding for children with a disability or developmental delay.
3. **Support families to access universal services and support in natural settings** by addressing unintended funding incentives and administrative barriers that steer families towards specialised, individual support over universal services or group funding in mainstream services.
4. **We respectfully request that Goodstart Early Learning be formally included in the next round of consultations to support the ECEI Implementation Reset.** Other ECEC organisations that could also add value to this process include the Early Learning and Care Council of Australia (ELACCA) and Early Childhood Australia (ECA).

This submission includes our responses to the 23 recommendations in the ECEI Implementation Reset Project Consultation Report. Goodstart also supports the broader systemic recommendations made by Reimagine Australia in their submission, *Getting back to the future: Supporting young children and families early, to reach their full potential*.

---

**IF YOU WOULD LIKE TO DISCUSS ANY PART OF THIS SUBMISSION IN FURTHER DETAIL, PLEASE CONTACT:**

**Penny Markham**

**National Lead, Social Inclusion**

Goodstart Early Learning

Mobile: 0414 401 469

Email: [pmarkham@goodstart.org.au](mailto:pmarkham@goodstart.org.au)

---

## Abbreviations dictionary

EC	Early childhood
ECEC	Early childhood education and care
ECEI	Early Childhood Early Intervention
IA	Inclusion Agency
IDF	Inclusion Development Fund
ISP	Inclusion Support Program
LAC	Local Area Coordinator
NDIA	National Disability Insurance Agency
NDIS	National Disability Insurance Scheme

## About Goodstart Early Learning

### Our commitment to including all children 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 children. Each and every day, our centre teams work in partnership with thousands of families across Australia to deliver high quality, inclusive and community connected early learning to achieve learning, development and wellbeing outcomes for all children, especially children who experience vulnerability or disadvantage. 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 enrolling children needing additional support, accessing funding, providing additional staffing and delivering professional development to upskill teams in their work with children with disability or developmental delays. We also endeavour to maximise all available funding and support, so a child can fully participate in early learning however sometimes administrative delays risk the child not receiving the support they require.

To truly support social inclusion, we have invested in developing and implementing different service models for children experiencing vulnerability to contribute to the early childhood evidence base about what works and for whom (see response to Recommendation 12). 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.

## Goodstart's Response to Recommendations

### Recommendations we support

**Recommendation 1:** Explain, rename and promote the new NDIS Early Childhood approach

**We support this recommendation** as the new terminology suggests a range of support mechanisms and options as opposed to a gateway to a lifelong scheme (which is appropriate for some but not all recipients of EC services). This language may assist in broadening families' and providers understanding and reducing barriers to act early to support children's inclusion and prevent the need for intensive supports further down the track.

Consideration should also be given to language used in promotional material and eligibility criteria e.g. 'functional impairment', which is unfamiliar to families and can create barriers and build on fears, particularly in the early years when families may just be starting to identify and/or understand their child's needs. A principle of plain English should apply to all family-facing information and resources.

### Family feedback

Many families indicated they were confused about the supports their child was receiving. Around 13% of survey respondents told us their child was not receiving ECEI support but half of those respondents said their child was receiving support via the NDIS.

Some comments from families included:

- "I have no idea how the NDIS and ECEI are connected? Do they work together somehow?"
- "I have applied for extra support in the room which the government ECIS I think."
- "I'm really sorry if I have filled out this survey [survey] incorrectly but I have never heard of the ECEI provider... is this the same as the inclusion support worker at daycare?"
- "ECEI as I understand it is = Goodstart accessing this through the Victorian Inclusion Agency is that correct?"

**Recommendation 4:** Create a distinct delegate/planner workforce that is exclusively focused on young children and their families

**We support this recommendation** as children and families need access to planners who understand the critical importance of the early years and the opportunities that exist within a child's community to maximise their participation in everyday activities. Planning services and support should not only focus on access to specialist support, as it currently does, but also knowing about and supporting a child's inclusion in community and mainstream services where children and families typically spend their time. Planners also need to understand and be sensitive to the unique needs of families whose young children are experiencing delays or additional needs and who may be engaging with developmental services for the first time.

### Family feedback

- Around half the families (54%) said their ECEI provider had set goals with their child's Goodstart centre.
- Some of the reported reasons for not ECEI provider not setting the goals with Goodstart centre were:
  - Child goal setting options were not presented to families (34%)
  - The parent(s) were not aware if they could avail the service (31%)
  - The parents asked for support, but they did not receive it (11%)

**Recommendation 5:** Continue to work with federal, state and territory governments to identify gaps and strengthen the role of mainstream services

**We strongly support this recommendation** and highlight the role that ECEC services can play in helping families to navigate pathways to ECEI partners as well as ensuring children accessing ECEC

and ECEI have partners who understand and can work collaboratively towards their goals. Australian children spend significant time in ECEC settings. There is opportunity for educators in these settings to engage in assessment and case coordination to ensure that children have services that work together to support them to achieve their goals.

#### **Family feedback**

- Most families (81%) said their ECEC service provider or therapist was working with their Goodstart centre to some extent to support their child. When this occurs, families noted there are significant benefits:
  - Families reported the greatest benefits of coordinated goal setting was feeling confident that everyone who cares for their child has the same information (71%) and is working towards the same goals for their child (69%).
  - Almost half of families (46%) also reported that their child's educators benefitted from the expert knowledge of the ECEI service.

We also recommend that the role of the Commonwealth funded Inclusion Agencies (IAs) and state-based Child Protection agencies be considered in this recommendation. The Australian Government funds the Inclusion Support Program (ISP), which provides funding for additional support to approved ECEC providers. Inclusion Professionals support all centres to include children with additional needs through consultation services and funding for higher level supports, where required. IAs could play an instrumental role in joining up ECEI providers and ECEC settings in local communities. Inclusion Professionals providing services under the ISP should have specialised knowledge of the EC approach that could be shared with ECEC providers to ensure all ECEC settings have information and support so they can help families access information, resources and make referrals for support when they need it.

Similarly, state and territory Child Protection agencies have contact with some of the most vulnerable children in our society, some of whom have disability or developmental delay. Ensuring they also have access to information about services for young children may assist a family to access supports and help to reduce significant family stressors.

#### **Family feedback**

- *Inclusion support is a different topic. I find the support (from the impression I've been given) from ISS isn't great. My great Goodstart director had to fight for ISS as they always deemed my son as not needing it! He has Down syndrome - I know he is doing great but seriously he's definitely not at the same level as his peers and I'm sure my centre could've used more support (even if it's just to help reach goals like toilet training and school readiness)*
- *"It took 12 months to get the plan in place for my daughter (which I will describe as a year of trauma to be perfectly honest), I believe the paperwork required was lengthy & not sure why else it took this long since I was asking from the time I enrolled my daughter"*
- *"I have assumed ECEI is the body that assigns a helper to my son's room. He has ASD 3 and I found it extremely slow to get a helper for his room. This is absolutely not a criticism of Goodstart as they were proactive - but rather the delays were at the government end. We send therapists into childcare and we pay for those by NDIS"*

Consideration should also be given to streamlining and integrating these services to reduce the time and administrative burden of engaging with multiple services and federal programs to meet a child's needs. Often, families and ECEC services may be engaging with an ECEI planner, multiple ECEI service providers, Inclusion Professionals, which requires families to repeat their case multiple times and causes duplication of effort and paperwork (e.g. consents, planning/goal-setting and administrative requirements). In some cases, goals for the child may be different across services and these should be integrated for best outcomes. In addition, a case coordination/ case management function should be considered for children and/or families with multiple or complex needs to ensure they are supported through the system.

**Recommendation 14:** Increase the age limit for children supported under the Early Childhood approach from 'under 7' to 'under 9' years of age

**Goodstart supports the recommendation** to increase the age range for the Early Childhood Approach from 7 years to 9 years. Currently, children with developmental delay or disability may not receive the support they need early enough to make a difference prior to starting school. For some children entry into school may be the first time a family acts on recommendations for assessment and intervention. Whilst discussions frequently occur earlier, some families are not ready to act until later. An increased age range would enable assessment and intervention to be in place for longer, whilst still in an early life stage when they are likely to benefit more.

#### **Family feedback**

- *"Children who are delayed after 7 but don't fit the category of intellectual disability or autism ect [sic] but have severe learning difficulties should still be able to receive support. Currently my son will not receive funding after seven even though every educator and therapist he has work with argues he will still need ongoing support due to his delays and learning difficulties. Because there is no label he will get no more support."*
- *"Early intervention was harder to access the older my child got. She had a lot of funding that didn't get used due to lack of availability from early intervention..."*

**Recommendation 17:** Introduce a 'capacity building support in natural settings' item in the NDIS Price Guide

**We support this recommendation in principle, however we wish to emphasise** that the current pricing guide privileges individual therapy over other forms of support, for example by educators in early childhood settings (see also examples of service provision developed and being evaluated by Goodstart), The result of this focus is driving families to make decisions about services that are narrow in their scope and delivery within a medical model of intervention. Whilst the addition of an item on capacity building in natural settings is welcomed, it is unlikely to result in change unless there is also a requirement for EC partners to incorporate the natural settings item into each child's plan. In addition, we also recommend the price guide or pricing structure move beyond the individual and allow for group funding to enable mainstream services to provide group services such as playgroups, small groups within ECEC and parent support groups which have diminished in the face of individual focused items.

#### **Recommendations we support in-principle / with changes**

**Recommendation 9:** Implement a tailored Independent Assessments (IAs) approach for young children to support consistent access and planning decisions

**Goodstart supports this recommendation, in-principle, but recommends the approach to assessment take into consideration the settings in which children typically spend time.** Specifically, collaborative assessments with other early childhood providers, such as ECEC services should be a requirement. These are likely to yield more information about a child's strengths and areas of support than standardised assessments alone. Currently, the time-consuming nature of gathering information and the extra costs involved to the participant is a disincentive for collaboration in the assessment process.

However, to truly understand and plan for a child's inclusion, their family, key educators and others who know them well should be part of the process. A collaborative assessment process is also more likely to identify and enable planning and goal setting across all of the settings in which children spend time, increasing the likelihood that children will be able to achieve their goals and continue to make progress.

Furthermore, checking in with families should be something that happens at critical points of intervention i.e. written communication provided to families and educators on each occasion of service, and if required plan monthly or six weekly case conferences (dependent on complexity of need). Currently, even when ECEI providers work within ECEC settings there is frequently a lack of clarity around goals and accountability to the value they are bringing to the child within the context of their early learning program. There is also a frequently a lack of a partnership approach such that recommended strategies are not always relevant to an ECEC environment.

**Recommendation 10:** Increase Early Childhood partner capacity to identify and help young children and families from hard-to-reach communities or those experiencing disadvantage or vulnerability

### Case Study 1

Himla attended a Goodstart kindergarten in Queensland. Her mother expressed concern about her social interaction skills but described Himla as delayed in almost every area of development (in a parent questionnaire).

Observations by a Goodstart Speech Pathologist in the kindy indicated that Himla was experiencing a significant delay in speech sound development and potentially delayed language skills. Without immediate, individualised support to address these delays, there was an increased risk of social exclusion and educational impacts at school.

The Goodstart Speech Pathologist suggested accessing ECEI services through NDIS. The family knew nothing about ECEI or NDIS and were not confident completing the ECEI form, which the Speech Pathologist prepared with them. Himla is now accessing ECEI Speech Pathology intervention. Her mother is greatly relieved to have an allied health professional working with Himla and supporting the family in navigating her transition into school.

**Goodstart supports this recommendation in principle.** However, EC partners should leverage community and mainstream services, such as ECEC settings who already have ongoing relationships with children and families to better identify and help young children and families experiencing disadvantage. It is the established trust in the relationships that ECEC providers hold with families that can assist in guiding families to the right services early or alternatively build their understanding and confidence over time to take the step to access ECEI services for their child.

Goodstart agrees that children and families who are experiencing vulnerability or disadvantage are likely to need more support at different times to navigate what can often be a very complex system. Families who are disadvantaged in any way – be it socially, culturally or financially – or who struggle to navigate NDIA are at higher risk of experiencing funding and service gaps, delays, frustration and distress. EC partner capacity to support families and work in *partnership* with services familiar to the family will be a necessary investment.

**Recommendation 11:** Increase Early Childhood partner capacity to connect families and young children to local support networks and services in their community.

**Goodstart supports this recommendation and believes it to be critical to achieving greater inclusion for children, consistent with the objective of the ECEI reset.** If local support networks and services are developed and supported to welcome and include all children and families, these children are more likely to benefit from true inclusion.

One opportunity to better support families to connect with services available in the community is to strengthen the links between local area coordinators (LACs) or ECEI partners and the ECEC sector. ECEI partners could be mandated to have links to ECEC settings within their local communities with specific pathways of referral that ECEC settings can discuss with families. ECEC settings build relationships with families and children and have opportunity to have ongoing conversations about services that might be beneficial to them often over a crucial period in a child's early life. Educators are well placed to identify when children may need additional support or assessment. If better connections existed between these crucial parts of the early childhood system families and children may have better and more timely access to services. This would also meet the goal of acting earlier to ensure children benefit from the early childhood approach well before school and is also likely to lead to a more successful transition to school with less likelihood of school exclusion, particularly if ECEC, ECI, school and families partnered on this goal.

Goodstart worked with the Brotherhood of St Laurence and the Benevolent Society to develop a pathway document to increase knowledge in ECEC settings about how and when to refer children and families to ECEI. The aim was to build a better interface between the sectors so that children and families can access services in their local communities earlier. The pathway document is provided at [Attachment A](#).

Further to the above, the Commonwealth Government funds the Inclusion Support Program which provides additional support to all approved ECEC providers in Australia. Inclusion Professionals support all centres to include children with additional needs through consultation services and funding for higher level supports should these be required. The role of the Inclusion Agency could be expanded to assist in joining up ECEI providers and ECEC settings in local communities. Inclusion Professionals providing services under the ISP could have specialised knowledge of the EC approach that could be shared with ECEC providers to ensure all ECEC settings have access to information and support so they can better support families access information, resources and support when they need it and to ensure families and those involved in the child's day-to-day care are all receiving the same information/advice and working toward the same goals.

**Recommendation 12:** Increase Early Childhood partner capacity to provide Short Term Early Intervention (STEI) support to eligible young children and families for longer

**Goodstart is concerned that this recommendation creates an expectation that it is only Early Childhood partners contracted under the NDIS that would be able to offer short term early intervention.** There should also be the possibility of early childhood packages that could be provided by mainstream services in collaboration with EC providers. For example, Goodstart has made significant investments in developing a number of different service models for short term intensive support for children to enhance developmental outcomes and maximise their inclusion in ECEC. Our aim is to not only support children attending Goodstart but also to share what works beyond Goodstart to benefit other services.

Three models are described below:

1. Short term intensive support to maximise children's inclusion in their early learning program. This approach is implemented over twelve weeks for children with very high support needs with the aim of maximising their inclusion. The model is implemented under the supervision of an allied health practitioner who supports educators to understand a child's presenting needs and coaches a child's key educator to implement strategies within the early learning setting that will best support the child's inclusion. Over the twelve weeks, as children meet their goals the support is scaled back. Children may move into receiving support through the Commonwealth Inclusion Support Program following a short-term intensive period.
2. In targeted centres across all states and territories, Goodstart has developed a model in which allied health practitioners work directly with educators and children in their early learning program. The practitioners are members of a centre team and work with educators in twelve-week cycles to implement strategies to support children with developmental delay or disability to meet goals established with their family and key educator. This approach is in place in 40 centres across the country. Children may continue to receive services following a review each twelve weeks to ensure they continue to make progress.
3. Goodstart has also developed an approach to upskilling educators to take on the role of allied health assistant in selected services. The current focus is on the inclusion of children with disability and/or vulnerability in ECEC and embedding practices to enhance educators' understanding of any impacts on programming, planning and the ECEC environment. The current focus is on environmental and task modifications that can be made to ensure each child's meaningful participation. Educators receive training in the approach over 24 months and are then coached and mentored by an occupational therapist. The educator embeds this work through time allocated to support their colleagues in the implementation of the approach across all rooms within a centre. This model has been demonstrated to contribute to the delivery of consistent, high quality, inclusive practices in centres with very high proportions of vulnerable children.

# 5 Steps to Early Intervention at Goodstart

## 1 Early Indicators

### Initial signs of potential delays

- Start an active relationship with your ECEI Partner and get to know the referral pathway.
- Complete NQSS Procedures including documenting observations and planning support arrangements.
- Complete the NQSS Inclusion Support Procedure, including access to the Commonwealth Inclusion Support Programme.
- Ensure a current Strategic Inclusion Plan is in place.
- Engage families to discuss early indicators for potential additional supports.

## 2 Referral

### There's significant impairment in one or more functional domains

- Have an ECEI referral form, meet with parents to discuss concerns and referral options.
- Support parents to self-refer to ECEI Partner, or complete referral with parental consent.
- Encourage parallel referrals to both ECEI Partners and allied health support pathways through family GP.
- Gain parental consent to provide additional information to referral points based on your observations.
- Keep monitoring child, educator and family wellbeing.

## 3 Ongoing Education and Care

### Waiting for engagement from ECEI, no active ECEI intervention (variable timeframe)

- The internal Goodstart support pathways have been engaged and the Inclusion Support Programme, including specialised equipment, is in place.
- Inclusion Professional is engaged to support inclusion strategies within the centre.
- Regular communication with professionals supporting the child, including regular meetings that include parents.
- Support parents, including managing parallel referral pathways, gaining extra information and escalating concerns to agencies.
- Continue monitoring the wellbeing of child, family and educator.

## 4 ECEI Engagement

### Coordinated approach with ECEI Partners

- Work closely with ECEI Partners and family, plan to meet agreed goals.
- Assistance through the ECEI Partner may include referrals to community supports, short term ECEI intervention or support to access and develop an NDIS funded plan.
- Continue to monitor and review the plan alongside parents and other supporting professionals.
- Ensure continued monitoring of child, educator and family wellbeing.

## 5 Transition to School

### Monitor the move with additional supports in place

- Encourage the family to enrol early and engage them in making transition decisions.
- Start early transition planning with supporting professionals and invite school involvement.
- Assist the parent with navigating support processes, referrals and funding opportunities.
- Ensure family has copies of relevant materials relating to their child.

Visit our Social Inclusion intranet site for more information on disabilities, developmental delays and additional need supports

goodstart.org.au  
> inside goodstart  
> centre support teams  
> social inclusion