

17 December 2015

Department of Education and Training

By email: inclusionsupportprogramme@education.gov.au

Inclusion Support Programme Guidelines 2016-17 to 2018-19: Draft for consultation

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind.

FECCA welcomes the opportunity to provide feedback on the draft Inclusion Support Programme guidelines. However, we are disappointed in how the Department has conducted this consultation. Meaningful consultation cannot be achieved when the draft is only available for four to five working days for comment.

FECCA has prepared this submission with input from members of the National Association of Multicultural and Ethnic Children's Services (NAMECS).

The importance of early childhood education

FECCA highlights the importance of child care and early childhood education for CALD children. The quality of life of migrant and refugee children is directly affected by their access to appropriate early childhood education and care services.

Child care and early childhood education hold a key place in the wellbeing of families and their local communities. They provide key opportunities for children's development and social engagement, and for enabling families to engage fully in the labour market, each of which is important in contributing to stronger families.¹

¹ Australian Institute of Family Studies, 'Child care and early childhood education in Australia', Facts Sheet 2015, 2.

Child care and preschool attendance have been consistently found to affect early child development.² Children of migrants and refugees may not have much or any exposure to English language at home, so early childhood education is particularly important for the development of their language skills. Child care also provides an important opportunity for migrant children to be exposed to Australian social culture, assisting with their later transition to formal schooling.

FECCA believes that the right resources must be invested into early childhood development and education to ensure that children from CALD backgrounds develop a sense of belonging, have access to adequate support and are empowered to preserve and develop their cultural identity. The Inclusion Support Programme Draft Guidelines include minimal references to children from CALD and refugee backgrounds, which is concerning given the size of this cohort within the Australian population.

IDF Innovative Solutions Support

Under the draft guidelines, support for children from CALD, refugee and humanitarian backgrounds is included as the IDF Innovative Solutions Support. Level of innovation is a factor to be considered by the IDF Manager when assessing a proposal. FECCA does not consider inclusion as innovative, but rather as a basic principle of equity. Inclusion of children from CALD and refugee backgrounds is a minimum standard. Inclusion and cultural competence should be included in the Programme Guidelines as a necessary element of child care and early childhood education, rather than as an 'innovative solution' to be considered by service providers.

The National Quality Framework for quality early childhood education and care embraces cultural diversity and encourages service providers to build cultural competence for educators and children. The Programme Guidelines should reflect the Framework's focus on inclusion and cultural competence.

Applications for IDF Innovative Solutions Support

FECCA is concerned that given the model outlined in the Draft Programme Guidelines relies on a service applying for funding, rather than receiving block funding, it will be up to advocacy skills of families as to whether their children's needs are met. Families may not be aware that this funding is available, thus effective communication strategies with families as a clear target group will be crucial. Even with an effective communication strategy, it is likely that children will fall through the gaps given the challenges that families from CALD and refugee backgrounds face, including language barriers and lack of knowledge about Australian systems.

The application process may discourage or prevent services from applying for funding. It will be difficult for smaller providers who may not have the time or expertise to write funding submissions. Application processes should be simple and easy for all to use, to take into account the varying capacity and expertise of different providers. Prompt response time for applications should also be an essential feature of the new service provision to ensure that the needs of children are met in a timely manner.

While there is no explicit limit to the number of applications that a service can make to the IDF Innovative Solutions Support, the IDF Manager may prioritise support to services that have not yet accessed IDF Innovative Solutions Support over a service that has received previous support. Funding must be child and family focused, and demand driven. Some

² Australian Institute of Family Studies, 'Financial disadvantage and children's school readiness', *Family Matters* No. 83 (October 2009), 24.

areas have greater numbers of children from CALD and/or refugee backgrounds, and therefore a greater need for funds to ensure inclusion of these children. The quality of care and support for individual children should not depend on whether or not the service that they access has been granted IDF funds previously.

Inclusion Agencies

CALD families are found across all regions of Australia and in all service types. The current ISF structure has provided more localised support by agencies who have built strong community connections. Dilution of the previous commitment to localised service provision and the potential loss of local knowledge is of concern with the creation of state-wide Inclusion Agencies.

Any tender process should require strong professional and local connections to be retained. With the change of providers, it is important to ensure minimal loss of the knowledge and expertise in the sector. The capacity to provide translated information, both written and auditory, and support the maintenance of first languages are also importance.

The Draft Guidelines could be improved by providing further detail on the modalities of the Inclusion Agencies and role of bicultural support workers. The Department should consult further with the sector on these issues.

Conclusion

FECCA would be happy to provide further input into the development of this programme.