

**MISSION
AUSTRALIA**

**Supporting young
children and their
families early, to reach
their full potential 2021**



Supporting young children and their families early, to reach their full potential: Mission Australia's response

Mission Australia

Mission Australia has been serving Australia for more than 160 years. Our vision is an Australia where all of us have a safe home and can thrive. In the 2019-20 financial year, we supported close to 170,000 individuals through almost 500 programs and services across Australia¹.

We have been an NDIS partner delivering Local Area Coordination and Early Childhood Early Intervention services since 2016 and a partner in the preceding launch programs in Tasmania. Our ECEI services are located in regional areas: North Queensland, Western and far Western NSW, and North West and South East Tasmania.

We welcome the opportunity to respond to the recommendations outlined in the consultation paper regarding the ECEI Implementation Reset.

This response includes:

- A response to the general consultation questions
- A table summarising our position on several key recommendations
- A detailed response to several key recommendations

¹ Mission Australia, Annual Report, 2020, accessible at:
<https://www.missionaustralia.com.au/publications/annual-reports/annual-report-2020>

Consultation questions

Overall, we strongly support an increased focus on short-term early intervention (STEI) outside of access to the Scheme. STEI is at the heart of equity and access – engaging vulnerable and hard-to-reach groups so that they have access to best-practice early intervention support. Better STEI will also reduce the need for children to transition into the Scheme.

Early childhood intervention (ECI) is a dynamic space where families try to work out how to help their child at the same time as trying to navigate relationships with numerous new services; an ECEI Partner is just one of those relationships. We need to keep families at the centre of our work – processes, assessments, tools, reports, and frameworks need to share a common goal: to help children and families. The language we use needs to be simple, understandable and useful so that families are empowered to exercise choice and control. In placing the needs of children and families at the centre of all that we do, we will ultimately achieve the goals of the NDIS.

We believe that this increased focus on STEI needs to be paired with a stronger whole-of-government commitment to linking children and families with mainstream and community supports and, conversely, using those mainstream and natural supports in the community to link with vulnerable and hard-to-reach children and families.

This STEI-partnership approach in community will then allow Early Childhood Coordinators to establish trusting relationships, help community groups and partners increase their capacity to support children and families, and identify children who will benefit from STEI. In doing so, families with children who may require access to the Scheme will have a clearer and more efficient pathway.

Table 1. Summary of views on key recommendations

Recommendation	Summary
<p>Recommendation 1: Explain, rename and promote the NDIS Early Childhood Approach – and stop using the term “gateway” – so families understand and follow a clear pathway with a mix of early childhood support options available.</p> <p>(also relates to Recommendations 2, 3, 7, 18, 19, 21)</p>	<p>We support the removal of ‘intervention’ from the Early Childhood Approach, and we suggest this recommendation is taken further.</p> <p>If children and families are at the centre of our work, we need to communicate in simple English and remove program- and industry- specific jargon and medical terminology from our interactions with families. A move towards family-centred strengths-based language is consistent with the reorientation of the Early Childhood Approach; the language will also support greater transparency for families.</p> <p>Further, simple English and straightforward language and communication style is critical if we are to remove barriers to access and inclusion for vulnerable children and families (many of whom have poor literacy and numeracy) as well as culturally and linguistically diverse groups.</p> <p>The Early Childhood Approach name needs to be clearly differentiated from established entities (such as Early Childhood Australia) and meaningful to families, rather than to providers.</p>
<p>Recommendation 4: Create a distinct delegate/planner workforce that is exclusively focused on young children and their families, to improve the way families are supported</p>	<p>Mission Australia supports this recommendation, but we believe that implementation will require mitigation of the potential risk that this action would pull experienced early childhood professionals from an already stretched early childhood support sector.</p> <p>A clearer focus and priority on upskilling the existing workforce using the Agency’s internal expertise (ECS branch) would help regional areas to preserve the local markets.</p>
<p>Recommendation 5: Work with federal, State and territory governments to identify gaps and strengthen the role of mainstream services, so all young children receive support from the appropriate service</p>	<p>Access to Community and Mainstream services for early intervention varies greatly across States and territories. Mission Australia supports analysis of these gaps and efforts to provide appropriate services for children consistently across the Country.</p>

Recommendation	Summary
	<p>Strengthening collaboration in the early childhood sector and broader community is common sense and best practice. By truly integrating an Early Childhood Approach into (and alongside) mainstream services the Agency will be promoting capacity building and further upskilling of the sector.</p> <p>Building on the achievements of the early childhood sector in working with families in their natural environments has a natural flow-on effect on Scheme sustainability as fewer children require the ECEI pathway.</p>
<p>Recommendation 6: Consider a range of mechanisms that will enhance compliance of providers with the <i>NDIS Practice Standards on Early Childhood Supports</i> and increase awareness by families of providers that adopt that best practice framework.</p>	<p>Mission Australia supports this recommendation in principle, but we believe that any mechanism needs to be accessible, affordable and equitable for regional providers and smaller entities. In doing so, we believe that it will promote family-centred evidence-based best practice support, without eroding the thin regional labour market.</p>
<p>Recommendation 8: Implement tailored methods of delivering supports for young children and their families living in remote and very remote areas to strengthen access to services.</p>	<p>Mission Australia supports this recommendation as we see place-based approaches as key to driving Scheme sustainability.</p> <p>We would welcome the opportunity to engage in place-based approaches alongside the Agency. This approach is consistent with our organisational goal of strengthening communities.</p>
<p>Recommendation 9: Implement a tailored Independent Assessments (IAs) approach for young children to support consistent access and planning decisions.</p>	<p>While we support this recommendation, we believe the outcomes would be strengthened if Independent Assessments are incorporated into existing functional assessments and administered by staff who have a relationship with the family; retesting should reflect functional outcomes that matter to children and families rather than arbitrarily replicating testing.</p>
<p>Recommendation 10: Increase Early Childhood partner capacity to identify and help young children and families from hard-to-reach communities or those experiencing</p>	<p>Mission Australia believes that this recommendation is best achieved by an increased focus on STEI paired with stronger linkages between children and families, and the mainstream settings and supports in their community.</p>

Recommendation	Summary
<p>disadvantage or vulnerability, so they can connect to – and benefit from – early intervention supports.</p> <p>Recommendation 11: Increase Early Childhood partner capacity to connect families and young children to local support networks and services in their community.</p>	<p>This greater focus on linkage and early supports will allow Early Childhood Partners to develop the relationships and skills in community partners to identify and help young children that they work with. This approach is especially successful where services establish relationships with families via the relationships they already have with other services and trusted supports.</p>
<p>Recommendation 12: Increase Early Childhood partner capacity to provide Short Term Early Intervention (STEI) support to eligible young children and families for longer.</p>	<p>We agree with this recommendation, but we need to address the ‘how’ and ensure that realistic scope for innovation and flexibility is built into future Early Childhood Partner service opportunities.</p>
<p>Recommendation 13: Clarify the interpretation of the developmental delay criteria under Section 25 of the NDIS Act (2013) to improve the consistency and equity of Agency decision-making. Establish thresholds for key criteria using Independent Assessments.</p>	<p>Mission Australia’s position is that the criteria to determine developmental delay needs to represent and reflect the day-to-day functioning of children and families.</p>
<p>Recommendation 15. Use the early intervention criteria, under section 25 of the NDIS Act (2013) to make decisions around access to the NDIS for all young children</p>	<p>Mission Australia supports this recommendation because it will allow families to meet the functional needs of their child without the pressures of seeking a diagnosis in order to receive funded plan supports. This will also promote a tailored and family-centred approach to decisions relating to access.</p>
<p>Recommendation 16: Increase Early Childhood partner capacity and flexibility to tailor the level of support provided to families to implement a child’s plan and more quickly connect to the right supports and services.</p>	<p>This recommendation is strongly aligned with Mission Australia’s approach and our commitment to true partnership with families and communities. We anticipate that families will require scaling up and down of support, and families will differ in the amount and type of support they need.</p> <p>While we support this recommendation, there is a need to be clear about whether the limitations to providing this support relate to the capacity of Early Childhood Partners, or to broader system and legislative flexibility that require a focus on the systemic factors in order to better support the role of Early Childhood Partners.</p>

Recommendation	Summary
Recommendation 17: Introduce a ‘capacity building support in natural settings’ item in the NDIS Price Guide to encourage families and early childhood providers to prioritise supports delivered at home or other natural settings.	While we strongly support this recommendation, we need to clearly define ‘capacity building support in natural settings’ – it is support to develop the skills and knowledge of parents, carers, and educators so that they can better support their child in natural settings. It is not simply removing a child from an activity so that support can be delivered in a natural setting.
Recommendation 20: Undertake further ongoing research and study on the outcomes of young children after receiving early intervention support, to inform future policy and operational changes.	While Mission Australia agrees that a stronger evidence base to guide decisions and service delivery is essential, the data needs to be contextualised by (and with) the input of children and families, Early Childhood Partners and providers.
Recommendation 21: Improve the existing annual progress review process for young children, to support families to celebrate the achievement of reaching their goals and outcomes, and transition out of NDIS supports to the next stage of their lives.	We support the development of an evidenced strengths-based approach that supports families and services to identify and recognise all the supports required to achieve goals and outcomes. In many cases, the achievement of goals is an outcome of an increased focus on STEI, paired with stronger linkages between children and families and their mainstream settings and supports in their community.
Recommendation 22: Ensure providers are using the recently introduced ‘provider outcomes report’, as a mandatory measure to evaluate the effectiveness of their supports and services.	We believe that consistency of reporting is a positive step, however the focus of the report needs to be on the achievement of improved outcomes for the family and child, rather than on Agency or provider outcomes. Reports need to be relevant and understandable to families, and help inform their decisions around future supports and directions for their child’s development.
Recommendation 23: Offer families of young children a ‘transition out’ plan for up to 3 months’ duration, to support them to transition to the next stage of their lives, if they are no longer eligible for the NDIS.	While we support the focus on ‘transition out’ planning, Mission Australia believes that ‘transition out’ needs to be discussed throughout the family’s support journey. A transition out plan is a critical element of any support in empowering families and addressing their reliance on funded or specialist supports. However, as we identified in recommendation 16, tailored approaches are needed to ensure the right supports are removed at the right time. This would differ for every family.

Detailed response to selected recommendations

We recognise that the implementation of many of the recommendations are already underway to some extent, and we continue to advocate for ongoing consultation and collaboration between the Agency and the community, along with its partners.

Overarching recommendations and enablers

We support the reorientation of the ECEI away from the 'intervention' approach towards an NDIS Early Childhood Approach. Families see 'intervention' as a medical term that carries negative connotations, and the term is inconsistent with a collaborative approach to partnering with, and working alongside, families and communities.

Furthering this shift away from 'intervention' and medical styles of language and approaches, while we support the need for providers to align with practice standards and embed a culture of best-practice and continuous improvement, we see an excessive focus on compliance as running counter to the intention of local community approaches and support.

Recommendation 6: *Consider a range of mechanisms that will enhance compliance of providers with the NDIS Practice Standards on Early Childhood Supports and increase awareness by families of providers that adopt that best practice framework.*

We agree that providers should follow best practice as defined by the *NDIS Practice Standards on Early Childhood Supports*; we do not believe that implementing mandatory registration will benefit families.

The registration process is costly and time consuming, especially for smaller locally owned private support services, and in many cases, the providers are already subject to legislation or accreditation requirements. This requirement would further weaken the already thin market in regional areas, as we would expect to see attrition of smaller providers from the Scheme, resulting in an increase in waitlist times for registered Providers. Children and families in regional communities would see a reduction in the level of choice and control available in their community.

We support the establishment of an accreditation system that promotes family-centred evidence-based best practice support. However, to ensure the thin regional support market is not further eroded, the system needs to be accessible, affordable and equitable to all providers. The Agency would also need to establish and ensure adequate resourcing for compliance and accountability functions.

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

While we see that IAs are beneficial in Scheme access, children and families will benefit from incorporating these elements into the existing functional assessment. A functional assessment already captures elements of the proposed IA process, and incorporating standardised assessments within the current process would capture the required data without adding another step. This would not only drive efficiencies for the Agency, Partner, and providers in the community, it would also benefit children and families. Families would avoid having to tell their story multiple times, they would no longer need to learn new terminology, and the standardised data would sit alongside

information gathering and observation. This would provide critical context for the data, and place consideration for child and family functioning alongside the IA information.

Incorporating the IA into the existing functional assessment will also provide consistency in the information available to the Agency to inform decisions, which will result in a more transparent and equitable access process. However, while IAs are initially useful, readministering IAs at multiple points along a child's journey introduces an onerous requirement, and it does not reflect the functional outcomes that matter to children and families.

After initial Scheme Access, the specialist service providers who are working with the family should lead ongoing planning and reviews. Specialist providers have requirements around measuring progress, and tracking goals and outcomes. Rather than adding an additional assessment step, these professionals – with clear guidance from the Agency – are best placed to help inform where significant changes to a child and family's circumstances warrant action.

Recommendations for Early Support (Including NDIS access)

Mission Australia has been supporting vulnerable and disadvantaged Australians for more than 160 years, and we are committed to working in hard-to-reach locations, and with people experiencing disadvantage and vulnerability. We currently deliver 459 services across Australia, supporting people through aged care; alcohol and other drug support; mental health support; housing and homelessness; youth services; justice and corrections; family and domestic violence support; community development; and support for children and families. Of our 559 service locations across Australia, one third are located in outer regional, remote and very remote Australia.

Our ECEI Partner services operate exclusively in regional and remote areas. While there are many challenges associated with working in such areas (e.g. thin markets, lack of mainstream supports, geographical distance), we also recognise the cohesion, resilience, and flexibility within these communities are strengths that allow us to better identify and support disadvantaged and vulnerable children and families.

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, so they can connect to – and benefit from – early intervention supports.

Working with children and families from hard-to-reach communities and those experiencing disadvantage and vulnerability is core to Mission Australia's approach. Our experience highlights a need for better connection with community.

Children and families need the NDIS to build their connections to specialist supports, but in regional and remote areas, there is an even greater need to families with mainstream supports. We need to embed ECI in mainstream community settings, establishing trust and relationships and developing the capacity of the early childhood sector to identify and address the developmental needs of children, and refer when necessary.

While linkage to mainstream and natural supports is at the heart of the NDIS approach, its value and the time that this linkage takes needs to be reflected in the modelling of Early Childhood Partner services so that it becomes a resourced priority. If we are to overcome the culture that prioritises individual NDIS funded plans and specialist supports as the only, or the best, option for families, we

need to measure this work in more meaningful and tangible ways. This may include holding partners accountable for engaging and mapping their involvement within early childhood settings (and community playgroups) across their Service Areas, with a focus on hard-to-reach communities or people experiencing disadvantage or vulnerability.

Recommendation 12: Increase Early Childhood Partner capacity to provide STEI support to eligible young child and families for longer.

While we agree with this recommendation, we need to address the ‘how’ and ensure that scope for innovation and flexibility is built into future Early Childhood Partner modelling. The capacity to innovate and be flexible and responsive to changing conditions in thin labour markets is essential and while we have always found the Agency to be extremely supportive of pilot initiatives, we believe that including scope for innovation in future modelling will encourage (and further normalise) a culture of innovation, best-practice and flexibility.

Mission Australia has created a framework for short-term early intervention (STEI) in the ECEI pathway. Mission Australia’s Building Better Outcomes Package (BBOP) provides individual and timely support to families, embedding supports into their everyday routine and, in doing so, recognising and highlighting parents and carers as the experts in their child’s development. The BBOP framework sees Coordinators work alongside families to draw on specialised supports and evidence-based programs in an individual or group-based capacity, leveraging both online and face-to-face options for flexible delivery. This ensures all families have the same access and opportunity to evidence based supports regardless of isolation or geographical location. The framework is governed by the ECEI approach and the National Early Intervention Principles.

BBOP was a name chosen deliberately to reflect a strengths-based, proactive and collaborative approach we take to working with parents and the community. We have implemented BBOP in regional areas by engaging providers in short-term subcontracting arrangements to meet particular needs, and the approach has been highly successful (see *Cowra Guardian*: <https://www.cowraguardian.com.au/story/7093082/ndis-early-childhood-early-intervention-has-georgie-on-track/>)

Recommendations for planning and implementation

Recommendation 20: Undertake further ongoing research and study on the outcomes of young children after receiving early intervention support, to inform future policy and operational changes.

The NDIA has one of the largest and fastest growing data sets relating to the needs, successes and challenges of Australians who live with disability and those who support them. We remain supportive of using these data sets to inform future policy and operational changes, and to undertake ongoing research and study. It would be extremely useful for the Agency to provide specific reports about the effectiveness of approaches and supports for children and families this would further support informed and evidence based decision making for families.

However, we also recognise that data needs context before it can translate into meaningful reports: we believe that the insights of families and children who have experienced the System need to remain at the core of building a more accessible and inclusive society

Recommendations for transitions

Recommendation 21: *Improve the existing annual progress review process for young children, to support families to celebrate the achievement of reaching their goals and outcomes, and transition out of NDIS supports to the next stage of their lives.*

We support the development of an evidenced strengths-based approach that supports families and services to identify and recognise all the supports required to achieve goals and outcomes. In many cases, the achievement of goals is an outcome of an increased focus on STEI, paired with stronger linkages between children and families and their mainstream settings and supports in their community.

Drawing on Mission Australia's case management expertise, planning for a transition out (or graduation) should weave through the child's journey, and strengths-based language (e.g. graduation, rather than transition; use of family-friendly Simple English over jargon and medical terminology) will further empower families so that they are more prepared for exit. This process and language is also more aligned with non-clinical language and is thematically consistent with reorienting ECEI away from the 'intervention' approach.