

Submission to changes in the Disability Standards for Education 2005

To include early childhood education and care
services and outside school hours care services

February 2025

Early Childhood Intervention Australia Victoria/Tasmania (ECIA VIC/TAS) is the peak body representing Early Childhood Intervention Services in Victoria and Tasmania. ECIA VIC/TAS members are drawn from a diverse range of sectors including Early Childhood Intervention, Early Childhood Education and Care, Pre-School Field Officers, students, and parents/carers/kin. We are the leading voice in Victoria and Tasmania for professionals, children and families accessing Early Childhood Intervention supports. We advocate for all children and families to thrive, be included and participate fully in family and community life.



ECIA VIC/TAS acknowledges the traditional custodians of the lands and pays respect to elders past and present. We pay respects to Aboriginal and Torres Strait Islander children, their families, and we commit to creating a future where every child is valued, safe and an empowered member of their community.

Introduction

ECIA VIC/TAS welcomes the opportunity to contribute to the consultation on proposed changes to the *Disability Standards for Education 2005*. We acknowledge the Australian Government's ongoing commitment to ensuring high-quality services for all children, including those with disabilities and/or developmental delays, and their families.

As a membership-based organization, ECIA VIC/TAS regularly hears firsthand from our members about the successes and challenges children face in accessing early childhood education and care (ECEC) services. Our unique position allows us to engage with multiple perspectives—children, families, and the ECEC sector—through our members' work. We actively promote best practice approaches, emphasizing collaboration with the ECEC sector to support children across all learning environments.

Our members work alongside ECEC professionals to implement high-quality programs that prioritize inclusive practices and uphold the rights of the child. We endorse the proposed changes and offer additional recommendations for their implementation to ensure all stakeholders are informed, understand the implications, and can effectively put them into practice.

Sally Moore
Chief Executive Officer



Response

In recognition of the importance of quality-of-service provision for young children and families ECIA VIC/TAS endorses the proposed changes to bring early childhood settings as described in the paper to be in line with the Disability Standards for Education. We see that this will create a consistent approach for all children in education settings and work to uphold the rights of children with disabilities in Victoria.

We agree with the description below as provided in the consultation paper where the changes will apply to

- education providers, and students enrolled in or applying to enrol in an education service (as currently covered by the Standards) and also to
- educational early childhood service providers, and children enrolled in or applying to enrol in early childhood education services.

We are comfortable with the descriptions of who an educational early childhood service provider is, as described:

An 'educational early childhood service provider' is a person (such as a company or an individual) or a group of people (such as a partnership or unincorporated association) that provides an educational early childhood service.

This includes:

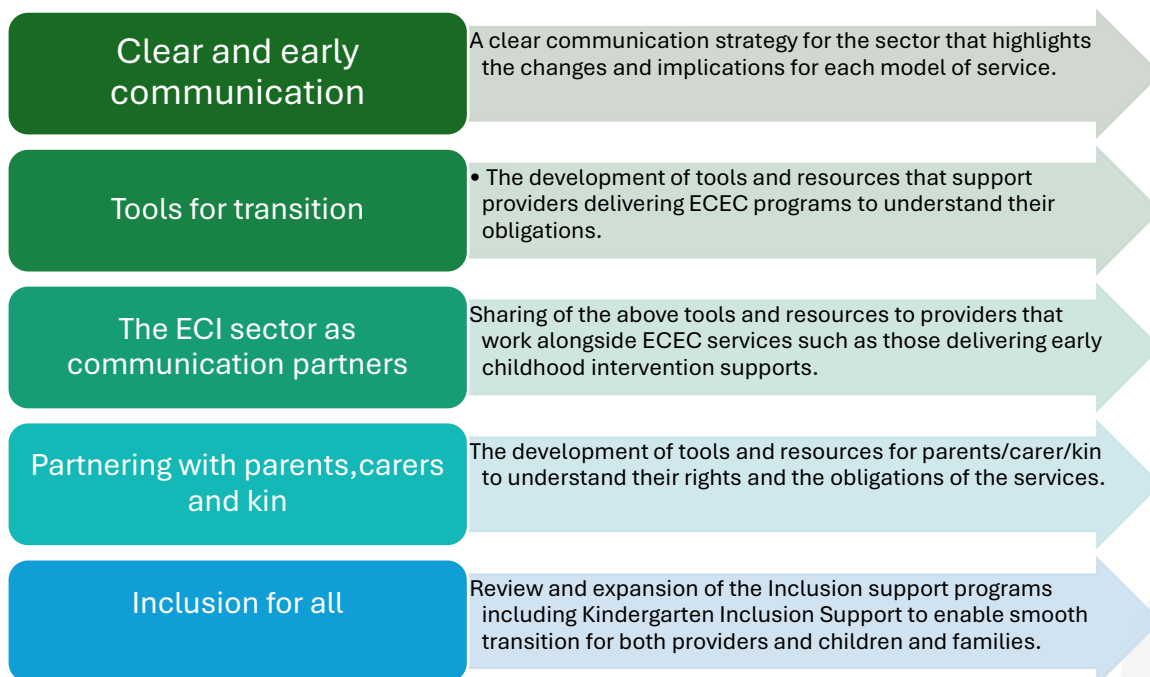
- A service approved under A New Tax System (Family Assistance) (Administration) Act 1999 – this is a service that attracts child care subsidy (CCS) or additional child care subsidy (ACCS)
- A service that is approved under a law of a state or territory to provide child care or a preschool program that is legally required to provide children with an education program that is based on an approved learning framework. This would include: – all services approved under the National Quality Framework (NQF) – some other non-NQF service types approved under state or territory law. 5 January 2025
- Providers of services that develop or accredit curriculums, education programs based on an approved learning framework, or training services used by any of the above services.

We agree with the listings of approved learning frameworks including:

- the two nationally approved learning frameworks– these are the Early Years Learning Framework and My Time, Our Place – Framework for School Age Care in Australia
- a state or territory approved framework – for example, the Victorian Early Years Learning and Development Framework.

Recommendations for implementation

In endorsing these changes to bring early childhood education and care (ECEC) under the *Disability Standards for Education, 2005* ECIA VIC/TAS proposes the following recommendations to support effective implementation:



1. Clear and early communication

Effective communication is essential to ensure all stakeholders understand the changes and their implications. Early and clear messaging will enable ECEC providers to review their processes and operating models, ensuring compliance with the updated standards. Sufficient time must be allocated for services to absorb these changes, train staff, and integrate them into daily practice.

2. Tools for transition

To facilitate a smooth and efficient transition, tailored resources and tools should be developed to guide ECEC services through the necessary adjustments. Providing clear, practical guidance on “*what this means for us*” will help services navigate the changes effectively. Given the diversity of ECEC service providers, resources should be adaptable to different operating models.

3. The sector as communication partners

ECIA VIC/TAS members work closely with the ECEC sector, supporting children, families, and services. Aligned with best practice guidelines, early childhood intervention (ECI) services are well-positioned to act as communication partners, ensuring that both families and services receive accurate information. Disseminating details of the changes, along with supporting resources, through ECIA VIC/TAS and the broader ECIS sector will strengthen sector-wide understanding and implementation.

4. Partnering with Parents, carers and kin

Families play a critical role in the success of these changes and must be provided with clear, accessible information about the updates and their practical implications. To foster strong partnerships between families and ECEC services during this transition, resources should be developed in multiple languages, Easy English formats, and with access to interpreters where needed. These resources should also outline the pathways available for families to raise concerns if they believe the standards are not being met.

5. Inclusion for all

The Productivity Commission has emphasized the need to review and strengthen inclusion support in ECEC, highlighting the importance of reforms that enhance accessibility for children with disabilities and complex medical needs. Programs such as Kindergarten Inclusion Support (KIS) have been identified as needing review. Aligning these inclusion support programs with the *Disability Standards for Education 2005*, presents an opportunity to ensure they are comprehensive, effective, and consistently applied across all settings.



ECIA VIC/TAS would like to thank all members for their contributions to this submission and their ongoing commitment to supporting children with developmental delay or disability and their families, thrive and participate in their communities.

This submission is available on the ECIA VIC/TAS website.

Please visit www.eciavic.org.au