

Noah's Ark, Victoria

Response to the Proposal for a National Disability Insurance Scheme Quality and Safeguarding framework

Noah's Ark is a non-government organisation providing early childhood intervention (ECI) and inclusion support (IS) services to children with disabilities and other additional needs and their families and carers. We are the largest early childhood intervention and inclusion support service in Victoria operating from 19 centres in Melbourne and regional Victoria and from one office in the Australian Capital Territory. Last year our programs reached 1,900 families and 2,600 Early Childhood Education and Care (ECEC) services. Noah's Ark receives funding from the Victorian Government (Department of Education and Training) for the delivery of ECI, Kindergarten Inclusion Support¹, Pre-School Field Officer² and Parent to Parent Programs³. Noah's Ark is also funded by the Australian Government (Department of Social Security) as an Inclusion Support Agency⁴ (ISA) as part of their Inclusion Professional Support Program (IPSP⁵). We are also participating in two launch sites for the National Disability Insurance Scheme (NDIS) – Barwon and the ACT.

Noah's Ark welcomes the opportunity to provide comment in relation to the proposed NDIS Quality and Safeguarding Framework.

Response

Noah's Ark believes that the discussion paper sets out a balanced approach to the issue of service quality in the provision of supports to adults with disability and appropriate safeguards to protect the rights of adults with disabilities.

However, we note that the Discussion Paper makes no specific reference to the need for specific quality requirements and safeguards for children with disabilities and their families. This is a serious omission.

The NDIS legislation sets out both general outcomes for persons with a disability and specific actions that are in the best interests of children. We believe that any quality system should also seek to monitor and safeguard the best interests of children. In particular, the quality framework should explicitly reflect the legislation's reference to:

- protecting children from harm

¹ In the North West Region only

² In the North West Region – Swan Hill only

³ In Gippsland only

⁴ Noah's Ark is the Inclusion Support Agency in 9 of the 17 Dept. of Education Victorian Regions

⁵ The objective of the IPSP is to promote and maintain high quality, inclusive education and care, for all children, including those with ongoing high support needs, in eligible ECEC settings. This is achieved by increasing the knowledge and skills of educators, and the capacity of education and care services, through providing professional development, advice and access to additional resources as well as inclusion support.

- promoting children’s development; and
- strengthening, preserving and promoting positive relationships between children and their parents, family members and other people who are significant in their lives.

The legislation also aims to facilitate greater community inclusion of people with disabilities and support their full participation. For children and families this includes their access to the full range of community services and resources available to other families and children; including their full and equitable participation in early childhood education and care. Any quality framework which addresses the needs of children should identify how children’s participation in early childhood education and care settings and their achievement of the learning outcomes for all children will be supported.

It is also important for the NDIS quality and safeguarding system to recognise and address the vulnerability of families who are still coming to terms with their child’s disability. When families receive advice that their child has a disability or developmental delay they experience a form of grief⁶. Gone is the child they wished for and expected and all of their future expectations for that child and in its place is the child they have - a child with a set of needs and issues that they may not understand or accept at this early stage. Families are vulnerable to being sold “cures” or other miraculous outcomes for their child at this time, and while it is important that they have choice and control of their NDIS funding, it is also important that the scheme protects them from being exploited and guides them towards services that are effective.

In this regard, Noah’s Ark believes that it is important for there to be two levels of protection for families with young children with disabilities:

- Ensuring families can only obtain services for their child from ‘registered providers’, including those families who chose to self-manage their funding
- Providing registration to providers who are not only ‘safe’ in terms of their staffing, governance and complaints processes but who also offer services which are legitimate, proven and/or evidence based.

To achieve this, Noah’s Ark recommends that, at a minimum, the NDIS apply the third highest level requirement (*Mandated independent quality evaluation requirements*) to the registration of service providers seeking to provide services to young children and families and extends the expectation of “quality evaluation” to include participation in “outcome evaluation” from time to time. This should ensure that registered services not only have good processes but also deliver good outcomes for children and families.

Please note that we have not recommended the fourth and highest option (*Mandated participation in an external quality assurance system*) because currently in our sector, no such accreditation or quality assurance system exists. If this were to be the choice of the NDIS it would add to the costs for providers in this sector and there would be a need to establish a new quality assurance system that reflected the quality factors within this sector, including those alluded to above.

Additionally, while Noah’s Ark is aware that the NDIS is keen to maintain freedom of choice, particularly for families who chose to self-manage, we are concerned that if there is no regulation of services who provide early childhood services to self-managing families then this will be the back-door way for the ‘snake-oil salesmen’ to enter the early childhood intervention and disability services market. As detailed above, families are still coming to terms with their child’s disability at this early stage and can easily be convinced that their child can be ‘cured’ or given a major (and impossible) boost if only they invest in a particular program.

⁶ Bruce, E. J. (2000). Grief, trauma and parenting children with disability: cycles of disenfranchisement. *Grief Matters: The Australian Journal of Grief and Bereavement*, 13(2), 27-31.

Summary

Noah's Ark supports the development of the Quality and Safeguarding Framework by the NDIS.

Noah's Ark recommends that:

- The framework be amended to reflect the NDIS legislation and seek to protect children from harm; promote their development and relationships and support their inclusion and full participation
- All early childhood providers are required to be registered
- Registration of early childhood providers be at the level outlined in Option 3 of the discussion paper (*Mandated independent quality evaluation requirements*)

Noah's Ark is happy to provide any additional information as required by the NDIS.