

5 January 2023

PO Box K35  
Haymarket Post Shop  
NSW 1240  
[ipart@ipart.nsw.gov.au](mailto:ipart@ipart.nsw.gov.au)

Carers NSW thanks the Independent Review and Regulatory Tribunal (IPART) for the opportunity to provide a response to the review of early childhood education and care affordability, accessibility and consumer choice. Carers NSW commends the NSW Government for recognising the need for policy changes and increased resourcing to meet diverse and growing needs in the early childhood education and care (ECEC) sector. Carers NSW believes this review provides a timely opportunity to investigate the adequacy, availability and appropriateness of ECEC services for children with disability in NSW. It also provides an opportunity to identify ways to improve and expand on inclusive ECEC services in NSW, promoting optimal outcomes for children with disability and their carers.

Carers NSW is the peak non-government organisation for carers in New South Wales (NSW). A carer is any individual who provides care and support to a family member or friend who has a disability, mental illness, drug and/or alcohol dependency, chronic condition, terminal illness or who is frail. Carers NSW is part of the National Carer Network and a member of Carers Australia. Our vision is an Australia that values and supports all carers, and our goals are to:

- Be a leading carer organisation in which carers have confidence
- Actively promote carer recognition and support
- Actively support carers to navigate a changing service landscape that will be characterised by ongoing policy reform
- Promote connected community experiences and opportunities for carers that are inclusive of diverse carer groups
- Lead and advocate for carer-specific and carer-inclusive policy making, research and service delivery
- Continue to be a quality-driven, responsive and carer-focused organisation.

Thank you for accepting our submission. For further information, please contact [REDACTED]

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Yours sincerely,

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Carers NSW

## Introduction

Carers NSW thanks the NSW Government for the opportunity to provide feedback on the review of early childhood education and care (ECEC) affordability, accessibility and consumer choice. While Carers NSW supports initiatives that aim to improve the affordability and availability of ECEC more broadly, this submission focuses on the specific issues faced by carers of children living with disability with the aim of ensuring that changes to childcare are carer-inclusive. There are an estimated almost 18,000 primary carers in NSW who care for a child with disability aged between 0-8 years.<sup>1</sup>

It is important to note in relation to this matter that parents do not automatically meet the definition of carer outlined in the *NSW Carers (Recognition) Act 2010*, however, they may be considered a carer if the child they care for requires additional support due to a disability, mental illness, chronic illness or life limiting illness. It is important to distinguish between carers and parents to recognise the unique experiences and needs of both groups.

While it is important to acknowledge the parental care provided to children by parents and guardians and the impacts of this, carers often provide a more intense or more complex level of care that exceeds that of other parents, which can have greater impacts on their long-term outcomes. Many carers of children who provide additional care or support to a child experience reduced ability to engage in the paid workforce, maintain social connections, and attend to their own self-care, including managing their own health needs. These challenges particularly impact women, who represent the majority of primary carers in NSW. Economic modelling has shown, for example, that if a woman leaves the workforce to care for a child with disability when she is 30 years old, her retirement income will be inadequate during her old age.<sup>2</sup>

*"I want parents caring for their child(ren) to be better recognised as carers, not just parents. I know I do significantly more than average parents."*

- Respondent to the Carers NSW  
2022 National Carer Survey

ECEC is important in supporting developmental outcomes for children. It also provides parents, guardians and carers with replacement care, enabling them to participate in activities such as education or employment while their children are cared for. The inability to access inclusive ECEC that is suitable, appropriate, affordable, and meets the developmental and care needs of children living with disability or chronic health conditions exacerbates these impacts and further disadvantages carers, reducing their time and energy to tend to their own needs. Carers NSW therefore urges the NSW Government to ensure that improvements to childcare are inclusive, accessible, and adequately resourced to meet the developmental and care needs of all children. This will enable optimal outcomes for carers and the children they care for.

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<sup>1</sup> Australian Bureau of Statistics (2019) *Survey of Disability, Ageing and Carers*. Table builder dataset.

<sup>2</sup> Nepal, B., Brown, L., Ranmuthugala, G., Percival, R. (2008), Lifetime health and economic consequences of caring: modelling health and economic prospects of female carers in Australia, National Centre for Social and Economic Modelling.

## Ensuring inclusive ECEC services

ECEC services are widely available across NSW, however carers have reported to Carers NSW that they are unable to access suitable childcare options for children with disability, particularly in cases where children have complex care needs. This is concerning given that more than 7% of 3–5-year-old children currently attending preschool in NSW are children with disability.<sup>3</sup>

The intersections between disability and early childhood service systems continue to create barriers to childcare for carers. Carers of children living with disability report that they are unable to access direct care, including childcare like support through the National Disability Insurance Scheme (NDIS) as this care is often deemed ‘parental responsibility’, despite this care extending beyond that provided by other parents. Furthermore, with education considered a mainstream service which should be accessible and inclusive of children living with disability under the NSW *Disability Inclusion Act 2014*, disability support funded through the NDIS is limited in this context. However, carers report to Carers NSW that mainstream early childhood services and supports are not adequately inclusive and often cannot meet the care or support needs of the child they care for, creating significant gaps between these systems and challenges accessing the necessary supports.

The inability to access adequate support through early childhood, education and disability service systems can have wide reaching impacts for carers. This includes limiting a carer’s ability to participate in employment due to a lack of replacement care, as well as limiting their time to participate in health and wellbeing and social activities. Furthermore, the inability to access adequate and inclusive early childhood education can also impact on long-term developmental and social outcomes for children with disability.

*“It is very hard to find suitable employment options, and the inflexibility of changing days etc with day care really limits my options for employment...”*

- Respondent to the Carers NSW  
2022 National Carer Survey

While Carers NSW commends the NSW Government for their commitment to improving childcare quality and availability, we are concerned by the current state of preparedness of the broader education sector, including the early childhood education and childcare sectors, to meet the needs of children with disability, as well as other children who may require additional support. There is significant under-staffing and workforce shortages in all areas of education, but particularly in early education and childcare.

In a recent review of before and after school care (BASC) programs in NSW, disability inclusion was not a stated priority, despite the difficulty many parents of children with disability report in accessing these services, and the subsequent implications for children’s outcomes and their parents’ capacity to remain in paid employment.<sup>4</sup> Further, in NSW, despite an

<sup>3</sup> NSW Department of Education (2022) *Incentives boost to get more support in preschools for children with disability* [Media Release, 07 October 2022]/

<sup>4</sup> Carers NSW (2019) *Carers NSW submission to the NSW Department of Education on before and after school care programs*.

anticipated 50% increase in students with disability accessing public schools, planning for inclusion remains inadequate even for current school populations.<sup>5</sup>

Carers NSW commends the NSW Government on recent initiatives such as the Early Childhood Inclusive Education Scholarships program which aim to increase inclusivity of education services for younger children. Increasing the capacity of Early Childhood Educators (ECEs) to identify and support children who may have additional needs will likely improve outcomes for these children and their carers. However, Carers NSW has concerns this initiative places the onus for upskilling and professional development on the individual, rather than recognising the need for sector-wide, systematic approach to increasing accessibility and inclusion within the early childhood education sector.

Carers NSW believes that there is a key role for the NSW Government in the development of childcare policies and programs to ensure that these services are inclusive of all children and do not discriminate against or disadvantage children living with disability, chronic illness, mental illness or life-limiting illness. This can be achieved through the development of policies and legislation that enforce inclusion and access requirements or standards for childcare services, and the setting of clear targets for services, with reporting mechanisms that create accountability. Additionally, adequate funding to cover the costs of disability training for staff, specialist staff or consultants and additional support staff to enable an adequate level of care or support for children with disability are needed to ensure ECEC providers can effectively meet the developmental needs of children with disability.

Furthermore, Carers NSW believes that childcare services should also be carer-aware and carer-inclusive in line with the NSW Carers Charter<sup>6</sup>. Ensuring that childcare services and their staff can effectively identify and support carers, including young carers who may be providing care to a sibling and enrolled in these services, will support the effectiveness of these services as well as the sustainability of caring arrangements.

## Conclusion

Carers NSW thanks the NSW Government for the opportunity to provide feedback on the review of early childhood education and care affordability, accessibility and consumer choice, and commends the work being undertaken to improve outcomes for children in NSW. Improving childcare affordability and accessibility provides an important opportunity to ensure that all children in NSW can access inclusive and appropriate early childhood education services, and that children with additional needs and their carers are supported to achieve optimal outcomes.

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<sup>5</sup> Baker, J. (2020) 'Schools must prepare for 50 per cent rise in students with disabilities: report', *Sydney Morning Herald*, 2 September 2020, available online at: <https://www.smh.com.au/national/nsw/schools-must-prepare-for-50-per-cent-rise-in-students-with-disabilities-report-20200902-p55rrm.html>, viewed 28 February 2022.

<sup>6</sup> NSW *Carers (Recognition) Act 2010*, Schedule 1.