



YWCA CANBERRA

**Submission to the 2025 Review of the Disability Standards  
for Education (2005)**

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## **Acknowledgement of Country**

YWCA Canberra proudly recognises the rights of Aboriginal and Torres Strait Islander peoples to own and control their cultures and pays our respect to these rights. YWCA Canberra acknowledges the need to respect and encourage the diversity of Indigenous cultures and to respect Indigenous worldviews, lifestyles and customary laws. We extend our respect to the Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and will continue to always be Aboriginal land.

## **About YWCA Canberra**

YWCA Canberra is a feminist not-for-profit organisation that has provided community services and represented women's issues in Canberra since 1929.

Our mission is 'We strengthen communities by supporting girls and women through our services and advocacy' and our vision is 'Girls and women thriving'.

We provide essential, quality services for women, girls and families in the ACT and surrounding regions. We work in the areas of children's services, community development, homelessness and affordable housing, youth services, personal and professional training, women's leadership and advocacy.

We are externally accredited against the [Quality Improvement Council \(QIC\) Health and Community Service Standards \(7th Edition\)](#). Accreditation against the QIC standards support us to improve client and community engagement, diversity and cultural appropriateness, management systems, governance and service delivery, while committing to a cycle of continuous quality improvement. In addition to the QIC standards, we are accredited against the following external client related service standards for our key areas of work:

- [Australian Charities and Not for Profit Commission](#)
- [National Quality Standard for Early Childhood Education and Care and School Aged Care](#)
- [National Regulatory System for Community Housing](#)
- [Registered Training Organisations Standards](#)

Through our national Affiliate Association with YWCA Australia, we are part of the World YWCA network, which connects 120 countries across the globe.

## **Overarching considerations**

YWCA Canberra welcomes the opportunity to provide feedback into the *2025 Review of the Disability Standards for Education (2005)* (hereafter referred to as 'the standards'). We are committed to improving the experiences of children with disabilities and their parents and carers who access our services. As local providers of Early Childhood Education and Care (ECEC), School Aged Care (SAC) and vacation care we provide services to more than 2000 children each week. Our early learning services for children 0-5, are contained within six ACT Property Group owned facilities and one which is located in a private commercial operation. These leasing arrangements are relevant in considering the upgrade obligations under the proposed new standards.

YWCA Canberra currently provides services to several dozen children who have been assessed as having additional or high needs as well as others who do not meet assessment eligibility, but who have unique needs related to complex trauma or whose wellbeing issues remain undiagnosed. Our staff work closely with parents and carer to provide high quality care and education services for their children, however while we operate from a premise of inclusivity some children require dedicated one-on-one support that can be unique to their needs. While the standards go some way towards lifting the inclusion of children with disabilities in education, conceptually there is a greater need for the framework to operate from the view of the individual child. In this regard, we note the Inclusion Support Program, delivered by the Department of Education. While not within scope of the review, we share concerns regarding the accessibility of the program and its misalignment with the unique needs of children and their carers. Rather than acknowledging that each child is an individual with unique and possibly complex needs, the Inclusion Support Program encourages inclusivity which, while supported in principle, may negate a child's need for curated one-on-one support.

We welcome the reforms of the 2025 draft Amendment Standards which clarifies that early education providers must comply with the standards. In our 2020 contribution to the consultation, we noted the arbitrary exclusion of early education services from the standards created a "*distinction that meant children with disabilities, and their parents or carers, were often excluded from broader social participation at their earliest years*" and how this was evident in the disproportionately low rates of children with disabilities in early education settings.

Data captured between 2016 and 2021 indicates that the proportion of children with disabilities attending early learning in Australia has increased. In the ACT, 4.6% of children enrolled in a

CCS approved early learning service in 2021 had a disability.<sup>1</sup> In 2016, this proportion was 2.7%. This increase is replicated nationally. Similarly, our early learning staff are reporting an increase in the presentation of complex needs of children to our services including obsessive compulsive disorders and global developmental delay.

We use this submission to call for:

**Recommendation:** Amend the national quality standards so educator to student ratios, for children of school age, reflect the number of students with disabilities enrolled in an educational environment.

**Recommendation:** For both early learning services and school aged care, note the limitations of the lease holders within the Standards and the responsibility of state and territory education departments or other school authorities, who own or manage early learning spaces.

**Recommendation:** Provide funding to support early learning providers upskill their School Aged Care workforce in identifying and responding to the needs of children with disabilities.

### **Considerations for extension of Standards to ECEC**

YWCA Canberra's early learning services operate from a lens of inclusivity and access. Many of our services have the capacity and resources to provide adjustments and support for children with disabilities and their families. However, this is largely dependent on the age and structure of the buildings that host our services. As noted, the majority of our early learning services operate from buildings owned by the ACT Government. While we proudly maintain these buildings to a high standard, structural adjustments to the older buildings are not likely to be possible without substantial investment from the lessor, typically the ACT Government.

A similar relationship exists in School Aged Care where the service is delivered within an existing school which significantly curtails the provider's capacity to make 'reasonable adjustments' to accommodate the needs of a child with disability, in line with the standards.

In our case, the practical implementation of the standards on services will largely fall to the ACT Government as the lessor. In our experience, negotiating on requisite upgrades can be cumbersome and onerous subject to contractual obligations as well as the lessor's operational objective to be profitable. These practical realities must be considered and fully engage state and territory authorities in extending the standards to early learning providers.

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<sup>1</sup> Productivity Commission (2025) *Report on Government Services 2025*, 3 Early Childhood Education and Care. Table 3A.15 <https://www.pc.gov.au/ongoing/report-on-government-services/2025/child-care-education-and-training/early-childhood-education-and-care>

Beyond these practical implications, there is also a need for the standards to consider the impact on staff ratios. Children with unique needs often need one-on-one care whilst attending an early learning service. Changes to staffing ratio for children in our services is also adopted by our services for children on emergency placements and for those with unique needs. The standards however do not refer to the likelihood of ratio amendments where children with disabilities are accommodated.

### **School Aged Care**

School Aged Care (SAC) sites are located within a specific part of a school setting (typically a hall) which the provider has been given permission to use. As noted, this arrangement curtails the provider's capacity to make 'reasonable adjustments' to accommodate the needs of a child with disability, in line with the standards. These adjustments relate not only to the physical environment but also to how the child's needs are met between the school and the SAC service, hosted by the school. There is a distinction whereby a child with a disability is afforded a Learning Support Assistant, during the school day, to help manage their needs and adjust to the learning environment

each day. For those children who attend SAC programs however, this curated support is not available. This is challenging for parents, the child and the service.

Further to this, where an LSA is typically qualified and trained in managing the needs of children with disabilities, this is unlikely to be the case for SAC staff. There is little support available to assist services in training staff to be competent in responding to the needs of children with disabilities. The discontinuity of this support between the school and the SAC is a significant consideration in the success of the standards and safely accommodating children in outside school care.

We noted the structural and ratio limitations in our *Submission to the 2020 Review of the Disability Standards for Education (2005)*. These concerns persist:

#### **Case Study**

*A child with Down's syndrome was enrolled in an outside school hours service. Due to their disability, the child had a strong tendency to try and abscond from the service. This created pressures on the child to staff ratio as the child needed to have one-on-one supervision throughout her attendance to prevent her efforts to abscond from the service. As we always have two staff rostered on even if the ratio is less than 11 children to safeguard the children and staff, our model of care was compromised. In this unique case, an inclusion support person would not be funded as we already have sufficient staff numbers employed under the ratio guidelines, however, the needs of the child and the need to respond to their behaviour, compromised our delivery model.*

*By way of example, the current situation is that a SAC provider is funded to supply only one special needs educator per environment. There is no requirement or incentive for providers to vary this ratio based on the number of children with disabilities who attend a given SAC setting. In SACs where more than one child has a disability this ratio has impacts on the provider's capacity to maintain ratio while also accommodating the needs of children with disabilities.<sup>2</sup>*

The discrepancy in ratio requirements between what the child experiences in the school setting and what can be accommodated in the SAC setting is challenging for providers to overcome. The *per environment* ratio setting for SAC compounds an already difficult situation that providers face in not being able to make reasonable adjustments to accommodate children with disability.

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<sup>2</sup> YWCA Canberra, Submission to the 2020 Review of the Disability Standards for Education (2005) <https://ywca-canberra.org.au/wp-content/uploads/Disability-Standards-for-Education-review-14-Sept-FINAL.pdf>