



**Response from the  
National Out of School Hours Services  
Association (NOSHSA)  
On  
DRAFT REPORT Productivity Commission  
Inquiry into childcare and early childhood  
learning.**

**Information About the Submission**

The National Out of School Hours Services Association provides this submission

PO Box 481 Paddington NSW 2021

[www.noshsa.org.au](http://www.noshsa.org.au)

mail [noshsa@noshsa.org.au](mailto:noshsa@noshsa.org.au)

## **Our Interest.**

The National Out of School Hours Services Association (NOSHSA) represents the combined Australian voice of the peak Out of School Hours Services (community based and private) in each State and Territory.

These peak bodies are:

ACT/ NSW - Network of Community Activities.  
NT – NTOSHC.  
Qld - QCAN.  
SA - OSHCSA.  
Vic - Community Child Care Victoria.  
WA – OSHC WA

NOSHSA acts as a federated model with representation by a single peak in each state and territory. We have an active membership through our State and Territory peaks of at least 1800 community based and private OSHC providers.

Each of our state and territory associations will provide their own response where possible addressing specific issues for their membership. In some cases individual state and territory associations may have a difference of opinion, this is largely due to the differences in structure and operation of OSHC services across Australia. Despite the introduction of a National Quality framework there remains significant differences in how regulation is applied in each state and territory and management structures.

## **1. Summary**

The National Out of School Hours Services Association as a federated model and supports the submissions of our members.

We ask that the Productivity Commission refer to the following three submissions to ensure they receive a broad and far reaching response to the issues relevant in the report for the OSHC sector. Each of the three submissions provides a perspective based on the experiences within that state.

**Community Child Care Victoria**  
**Network of Community Activities, NSW**  
**Queensland Children's Activities Network (QCAN)**

We have not in this submission attempted to collate all the information provided across submissions from or states and territories but instead summarise some key aspects of which we as a national peak feel most strongly about.

## **2. Our Guiding Principle**

***We believe it is critical for Australia to have a Government that is committed to best practice in the provision of services to Australian children including the important and valuable investment quality Outside School Hours Care (OSHC) services makes in the lives of children and their families.***

The Government can do this through continued support for the implementation of the National Quality Framework (NQF), which is a bipartisan commitment to quality children's services, based on research and sector consultation.

OSHC is the fastest growing sector and the largest enabler of workforce participation in children's services. To date in WA alone we have an estimated 30-40% increases in enrolment of kindergarten children into OSHC services.

Changes to school starting ages in some state and territories coupled with changes to Government policy requiring return to work provisions for parents in receipt of benefits have contributed to the increased demand in many locations coupled with an increase in school populations.

However this sector requires assistance with the development of a growth strategy to ensure effective governance and management of services is retained. This includes a commitment to work with NOSHSA on the development of approved national ratios and qualifications for OSHC as part of the National Quality framework.

Access to current and relevant research on best practice in OSHC service provision remains limited with little attention provided to the researching the impacts of service provision on children's development as well as effective models of management and governance that support quality service provision.

To date the current regimes and awards do not recognize the complexity and differences between OSHC provision and other service types. This has resulted in a history of resource distribution being inequitable and placing the future development of OSHC services at risk.

## **3. General Comments on Draft Report.**

There are some fundamentally inaccurate and concerning statements made in the report that we would like to see revised as a matter of urgency. The statements and inferences are damaging to the OSHC sector and demoralizing.

- **Outside schools hours care is not “short term, relatively informal, and sometimes sporadic” as described by the PC on page 275 of the report.**

Children attending 7 years, children attend on average 10 hours per week services staff are conduit between school and home and long terms support system for parents and children, attending an equivalent to 2 full days of school.

- **Reference in Box 7.6 ‘NQS Elements that should not apply to OSHC’ in relation to QA6.**

OSHC services are required to handle information received from families sensitively and are aware and responsive to family relationships such as management of fee collection, custody arrangements, extended family members who collect children,

Government has invested in the school and OSHC partnerships guide in recognition of the importance of community partnership and engagement for the wellbeing of children. An assumption of this nature undermines the role of the community in the lives of children and families. An integral component of quality service delivery is the ability of the service to connect with it’s local community.

- **Box 7.8 Support for national requirements for school age children.**

A second element that was referred to in the report is the misguided and ill informed comments relating to OSHC and classroom ratios on page 280. There are fundamental difference between the context of a classroom situation and that of the OSHC service.

The belief that the ratios required in a classroom teaching situation are the same as that in the OSHC service demonstrate a complete lack of understanding about the two forms of provision.

Submission from our members have captured the differences including;

- *Wide range of ages, abilities and activities in OSHC as compared to the classroom experience of one age group and one activity.*
- *The high number of transitions that take place during the OSHC sessions as compared to the classroom environment including children arriving and departing at different times, families entering and leaving the premises.*
- *The requirement for indoor and outdoors activities to be occurring and high level of physical activity increasing risk.*
- *Hours of operation – OSHC services can open and close in the dark due to morning and evening opening times and closing times.*

## **4. Response to Recommendations**

**Of the 41 recommendations NOSHSA proposes to comment on recommendations they fall within our area of expertise and advocacy.**

NOSHSA welcomes the following aspects of the Productivity Commission Report:

- The requirement for nationally consistent ratios and qualification in OSHC. (**Recommendation 7.4**)
- The creation of a singly subsidy to replace CCB/CCR/Jet paid directly to services. (**Recommendation 12.2**)
- Abolishment of minimum or maximum weeks of operation for CCB Eligibility. (**Recommendation 8.3**)
- Removal of food safety requirements that overlap with state regulations (**Recommendation 7.11**)
- 100% subsidy for children "at risk" for 13 weeks and then up to 26 weeks
- The abolishment of the Excellent rating in the National Quality Framework (**Recommendation 7.6**)
- The urgent redesign of the Assessment and rating system to increase pace of assessments (**Recommendation 7.6**)
- The development of a nationally consistent approach to jurisdiction based 'working with children checks' and a nationally recognised single 'Working with Children Check' (**Recommendation 7.10**)
- Maintenance of high standards for registered training organisations (**Recommendation 11.1**)
- The removal of a requirement for a certified site plan for OSHC services on school property as a condition of approval (**Recommendation 7.7**)
- More detailed and targeted advice to providers on Quality Improvement Plans (**Recommendation. 7.7**)

***In response to draft recommendation 7.4***

- NOSHSA agrees with progressing nationally consistent ratios and qualifications for OSHC. NOSHSA will support a ratio of 1:15 - being the maximum number of children per educator as the minimum standard. Where single staff models exist this ratio must be less and consistent with standards set for school age children in other parts of the children's services sector such as Family Day Care.
- A national standard for qualifications in OSHC is essential but should enable the sector to draw on the diversity and skills of the broader community which can enhance children's leisure time. NOSHSA believe that further research is required to support the implementation of an appropriate standard of qualification for the OSHC sector which may include the development of knowledge, skill and competence on the job. Until that research is completed the current standards for qualifications in each state and territory should be retained.
- NOSHSA would strongly encourage higher qualifications for staff in leadership roles such as managing the Education and Care Services on a daily basis. Again, this should be supported by research and evidence.

***In response to draft recommendation 7.1***

NOSHSA does not support a separate set of standards for OSHC. NOSHSA do support contextualising the NQS for OSHC by providing clear and specific guidance in regard to school age care pedagogy and practice to inform the assessment process.

NOSHSA would also support that the guide developed in partnership with APPA, My Time, Our Place – Promoting Collaborative Partnerships between School Age Care Services and Schools is used more purposefully in assessing Quality Area 6.

NOSHSA has had concerns with the consistency between assessors during assessment and rating visits across the various states and territories and across the country. NOSHSA believes that a review of the assessor training which is targeted at the understanding of operations of an OSHC service should be looked at and revised to provide assessors with a deep understanding of how OSHC services operate and clear guidance on the expectations on OSHC services. NOSHSA is happy to provide assistance in this area. It is important for assessors to understand the full context of OSHC prior to them going in to do an assessment and rating visit.

***In response to draft recommendation 8.2***

NOSHSA is encouraged by the promotion of relationships between schools and OSHC. The guide developed in partnership with APPA is, as mentioned, a useful resource. Consideration must also be given to the infrastructure and planning of OSHC so that suitable facilities are provided for this purpose and that facilities provided do not compromise the quality of care for school age children attending OSHC.

**END**