

# **Submission to the Productivity Commission Inquiry into Childcare and Early Childhood Learning from the Queensland Children’s Activities Network**

## ***Introduction***

The Queensland Children’s Activities Network (QCAN) is the peak body representing Outside School Hours Care (OSHC) services in Queensland. We have a long history of actively leading and promoting quality practices for OSHC services and were instrumental in the development and implementation of one of the first regulatory frameworks for OSHC in Australia. QCAN have also played a key role in advocating on a National level as a stakeholder in our federated body the National Out of School Hours Services Association (NOSHSA).

Our core business is to promote connectedness and professionalism within the School Age Care sector through membership. We achieve this through a diverse membership base comprising both private and community-based service providers. QCAN maintains a reputation for working collaboratively with many organisations and as such have contributed to other submissions made to the Productivity Commission for the purpose of this inquiry.

## ***Scope of submission***

While the Productivity Commission Inquiry seeks to obtain broader feedback from the Childcare and Early Childhood Learning sector, this submission is directed toward the School Age Care/Outside School Hours Care sector which is encompassed by this broader definition.

It is important to continue to differentiate School Age Care distinctly from Early Childhood Learning and Education. While many children who participate in OSHC are defined developmentally within the context of Early Childhood there are also equally as many children spanning the Middle Childhood years. The emphasis on school readiness and preparation (as an example) for Early Childhood services is not the same focus for School Age services. Therefore, it is necessary to ensure that leisure pedagogy underpins the practice of school age programs and that children’s learning and development in OSHC is positioned within a relevant and appropriate context.

## ***Ratios***

QCAN believe that it important to seek national consistency for ratios in OSHC. However, as there is little research to justify the adoption of one jurisdictions regime over another, it would be necessary to undertake some rigorous research alongside sector mapping to identify:

- Appropriate ratios to ensure quality OSHC experiences for all Australian children;
- The current circumstance of the sector for example, whether services work to ratios or if they plan at a level better than minimum ratio to allow for emergencies/contingencies;
- The number of children actually in care at any given time. Research may identify for example that in an after school care program the maximum ratios are only sustained for an hour as children are collected from 4pm thus lowering the number of children to educators;
- The cost impact of any ratio change to affected jurisdictions.

## **Qualifications**

Again, QCAN believe that it is important to seek national consistency for qualifications in OSHC. However, as there is little research to justify the adoption of one jurisdiction's regime over another, it would be necessary to undertake some rigorous research alongside sector mapping to identify:

- Appropriate qualifications to ensure quality OSHC experiences for all Australian children;
- The richness and diversity of leisure experiences which enable children to explore a variety of sporting, recreational, creative and artistic opportunities and the skills required by educators to facilitate these.

*The Queensland Government implemented a minimum standard for OSHC qualifications with the introduction of the Child Care Act (2002) and Regulation (2003). In 2006/2007, the Department of Communities undertook sector consultation and decided that it was in the best interest of children to broaden the scope of qualifications to include drama and arts related courses as children benefit significantly in a leisure program through exposure to such experiences.*

## **Flexible Care**

QCAN encourage government to take a thoughtful approach to flexible care for school age children as these children are already attending school Monday through Friday for 6 hours each day. Extending hours beyond the typical 7-9am or 3-6pm (give or take half an hour) may be very detrimental for children who already spend extended hours at school. A school age child attending full time care is likely to be already spending over half their waking hours away from home. Flexibility needs to be approached with children's health and wellbeing as the foremost consideration.

## **Workforce participation**

QCAN support that access to OSHC services enables families' greater opportunity for workforce participation. However, there is not equal access to care for all Australian families. Larger school populations are more likely to have financially viable and sustainable OSHC programs. Unfortunately, the same can't be said for smaller schools whose populations cannot sustain an OSHC service under the current model for a centre-based service.

There are limited opportunities to attract children for OSHC from other schools as the service has usually been established to support the school that it is hosted by. It would be unlikely that families would want their children to go to another service if their school already has an established OSHC. Services on site are typically the preference for children and families. Often the service acts as a conduit for communication between the school and the family and children do not have to be transported off site.

Services that are not sustainable need appropriate levels of funding to ensure that families and children have equal access to quality OSHC services.

## **Sector investment**

Many state governments are benefitting significantly financially from OSHC. Schools are able to charge commercial rate rents for the premises leased to OSHC providers which in turn increases cash flow into the school budget. In Queensland, there are many examples of large schools recouping close to \$100 000 per annum from their OSHC provider.

Federal government investment should be forthcoming to improve important aspects of quality for the sector, however funding models should be carefully planned so that the targeted outcomes are realised. As an example, funding directly for educator qualifications and development to improve the skills for this sector is vital as there will likely continue to be unqualified educators in OSHC into the future.

The current funding distribution vehicle via the PSC for OSHC isn't considered desirable for sector specific up-skilling and development. The responsibility of the PSC to provide professional development and support across all sector types is significant and specialist or expert development of the sector requires a more holistic and strategic national approach.

Funding is also needed for purpose built OSHC facilities. Many services operate from shared or sub-standard facilities as the priority for facilities on school sites is given to classrooms. Federal funding for quality facilities and agreements with schools that these facilities be retained for the purpose of providing OSHC under peppercorn arrangements would be welcome.

The previous commitment of \$450 million to the OSHC sector should be realised and invested to improve skills, facilities and support as a priority.

### ***Financial assistance for families***

A combined payment of CCB and CCR would be helpful to families in accessing affordable care. The 85% cap of the CCB rebatable hourly fee should be increased to ensure equity across all sectors. Families accessing OSHC are equally deserving of the 100% rebatable hourly fee.

Any proposed changes to funding models for the sector would need to be skilfully constructed and customised for OSHC. The cost of care has a significant impact on whether families will choose to use a service or leave their children in the care of older siblings (or perhaps even self-care arrangements).

### ***Support for providers***

OSHC services continue to have the largest number of stand-alone providers across all parts of the sector. The complexities of the NQF have resulted in a number of community based operators and parent management groups relinquishing their responsibilities for the service and outsourcing to larger providers. Social capital is developed through enabling community based services to continue with operating OSHC services and these providers require investment in terms of a resource, support and advisory service (similar to the hub model in Victoria for Kindergartens).

### ***Collaboration between OSHC and Schools***

For the most part, schools and OSHC services tend to work as silos. Strategies and resources to support stronger engagement and connectedness between schools and OSHC providers would be welcome.

### ***National Quality Framework***

QCAN would support streamlining of the National Quality Framework assessment and rating process. We have worked together with Family Day Care Queensland and Childcare Queensland to identify potential system improvements that would serve the purpose of streamlining the process as well as building the capacity of all parts of the sector. Collectively we agree that the QIP is a valuable, comprehensive and rich document but think it is unfortunate that this is assessed and monitored solely by compliance.

Our proposal would be to include the assessment and rating instrument (or a similar customised version of equal quality) in the process of self- assessment and have it form part of the Quality Improvement Plan (QIP) requirement under the National Law. The current QIP tool provides no scope for services to rate themselves against the NQS in terms of the 3 possible levels – working towards, meeting or exceeding.

Under our proposal, services would be asked to rate themselves and accordingly provide substantiation as to why they have assessed the service at a particular level. This then forms the basis for discussion between the assessor and the service. After this professional dialogue, reflection and the assessors visit, an interim overall rating is then assigned at the time.

This process would better engage services with the standards holistically, taking into account that there are different rating levels awarded to each standard as well as overall. The capacity of the service to fully engage with the standard would be improved as a result of this process.

The service's rating would reveal to Authorised Officers/Assessors how services have evaluated themselves including how they define and describe their own quality practice within the local context. Authorised Officers would be able to take a more informed approach to the process and this would in turn alleviate pressure on assessors to effectively gather all of the data required in order to make an appropriate decision.

This process empowers services to attain high standards in diverse ways. It creates a cycle of continuous reflection, collaboration and growth and empowers the ECEC services to take ownership to achieve self-actualisation. This proposal shifts the thinking from one of subjectivity and compliance to one of ownership, partnership and enables showcasing innovation of which services are capable within their context.

The process would help to build relationships and trust between services and assessors by being more transparent and collaborative.

Thank you for considering the contents of this submission.

For further details regarding this submission, please contact:

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