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Early Childhood Education and Care
Productivity Commission
Locked Bag 2, Collins St East
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18 May 2023

Dear Commissioners,

RE: Submission on the inquiry into Early Childhood Education and Care

Thank you for the opportunity to provide a submission as part of the public consultation on the Productivity Commission inquiry into Early Childhood Education and Care. In accordance with the National Outside School Hours Services Alliance (NOSHSA) goals and objectives, this submission focuses on the aspects of the terms of reference related to the provision of high quality programs, practices and operations in Outside School Hours Care services, including workforce considerations.

NOSHSA is the National Outside School Hours Services Alliance. Established in 1993 NOSHSA as an alliance of the peak Out of School Hours Services Associations in each State and Territory in Australia. NOSHSA is committed to Out of School Hours Services, their children and the families who use these services.

In responding to the enquiry, NOSHSA address the following:

- Affordability of, and access to, quality ECEC services that meet the needs of families and children
- Impacts on demand and supply
- Operation and adequacy of the market
- Developmental and educational outcomes for Australian children, including preparation for a school day that includes OSHC
- First Nations children
- Vulnerable and/or disadvantaged children and families
- Children and families experiencing disability
- Workforce participation

Affordability of, and access to, quality ECEC services that meet the needs of families and children

NOSHSA acknowledges the significant government investment to support families with the affordability of quality Outside School Hours Care. NOSHSA have long held concerns about the direction of profits made by OSHC services and in particular the significant fees paid to schools for rent/lease charges, facilities upgrades and other 'value adds' given to schools for purchases that have little, if anything, to do with the provision of quality OSHC. Schools regularly use OSHC (particularly in the Government



schools sector) to revenue raise and this is often at the expense of quality OSHC operations including investment in children's resources, professional development and non-contact time for OSHC educators and providing adequate staffing levels (beyond minimum standards) to promote children's wellbeing, learning and development.

There is a strong connection between the fees charged by providers and the minimum ratios prescribed by jurisdictions. For example, the June quarter 2022 ECEC report ([June quarter 2022 report - Department of Education, Australian Government](#)) indicates that the jurisdictions with the lower child to educator ratios operate with hourly fees which are more than \$2 higher per hour than the national average and over \$3 per hour higher than jurisdictions with the highest child to educator ratios. This demonstrates a direct connection between fees charged and staffing costs. It also demonstrates that the system is able to accommodate higher fees, without significant impact to families to cover higher wage costs (and lower ratios) as the hourly subsidy rate for OSHC enables this.

Whether or not different settings are required based on the location of services needs to be considered alongside the quality standards including ratios which contribute to improved outcomes for children and consequently improved working conditions for educators.

Impacts on demand and supply

One of the most significant impacts on demand and supply is the lack of facilities and infrastructure to meet the communities' needs for OSHC. NOSHSA are aware that it is complex for schools to make adequate provision for OSHC given the school's priority to deliver a formal education program within their school environment and that 'formal education' spaces such as classrooms and libraries do not necessarily become available for use immediately upon school finishing for the day. There is limited understanding about how long children actually spend in OSHC and what constitutes high quality OSHC spaces, facilities and environments.

The National Quality Standard (NQS) addresses the 'physical environment' in Quality Area 3. It is interesting to note that this standard and its underpinning laws and regulations are those most frequently not met by the OSHC sector.

High quality OSHC spaces are intentionally designed for meaningful leisure and play. Indoor spaces need to offer a choice of activities to meet the needs and interests of school age children. These choices may include areas for arts and crafts; drama and music; reading and relaxation; de-escalation and sensory spaces; areas suitable for games and construction and spaces where children can catch up on homework etc. Quality OSHC environments are thoughtful and purposeful spaces that create a sense of belonging for children and children transition from the school day into these spaces when they are 'reading and waiting' for them.

Unfortunately, when it comes to the expansion of OSHC, there is frequently little more than consideration of the minimum indoor and outdoor square meterage space requirements to expand a service. What needs to be considered is the enabling of a learning environment that will support



children’s wellbeing and development in the full two hours+ prior to school starting and the full three hours+ following the completion of the school day. (Including Vacation Care hours, OSHC services are open for more hours cumulatively than schools. Children’s time spent in OSHC increases annually with the average number of weekly hours in the June 2022 quarter being 12-14.)

Operation and adequacy of the market

NOSHSA recognize the role of both for-profit and not-for-profit providers in the market. In particular, the not-for-profit sector typically play a stronger role in less viable markets and rural and remote communities and these types of services are less attractive for providers who prioritize profits. NOSHSA consider it an appropriate role for government to support and invest in the not-for-profit sector given the significant role this part of the sector has contributed to its growth and advocacy for children and families. Not-for-profit providers continue to lead some of the highest quality OSHC services across the country and set a standard for care that all parts of the sector can aspire to. All of the OSHC services rated as excellent by the Australian Children’s Education and Care Quality Authority (ACECQA) are governed and operated by not-for-profit providers. ([Excellent rated services | ACECQA](#))

Developmental and educational outcomes for Australian children, including preparation for a school day that includes OSHC

The OSHC sector is an underutilized and underrecognized asset within a school. OSHC provides a unique opportunity to deliver programs to enhance primary-school age children’s social, emotional, physical and cognitive wellbeing through play. The update to the Approved Learning Framework for School Age Care has a strengthened emphasis on play and educator practice that contributes to meaningful play opportunities and affordances for play within the OSHC environment.

A stronger emphasis on the transitions between school and OSHC is vital to support children’s learning, wellbeing and development more holistically. Unfortunately, to a large extent, the OSHC sector and schools continue to operate as silos. This is problematic for both children and families. Continuity of learning is a contributing factor to children’s success in both school and more generally in life (as active and contributing citizens). Families also expect that schools and OSHC work in partnership within a child-centred practice framework which enables information sharing and communication to support children’s growth and development. Unfortunately sharing between OSHC and schools is often lacking and one-way. Improving collaboration and continuity create a holistic and nurturing environment where all children had the opportunity to thrive.

First Nations children

NOSHSA are aware that First Nations children are under-represented in OSHC. The update to the approved learning framework for school age care which includes a new principle on Aboriginal and Torres Strait Islander perspectives.

Providing opportunities for Aboriginal and Torres Strait Islander children and young people to see themselves, their identities and cultures reflected in their environment is important for growing a strong



identity. Embedding Aboriginal and Torres Strait Islander perspectives in all educators' philosophy and practice is a key tool to advance Reconciliation. This also contributes to the Closing the Gap commitments and fulfilling every Australian child's right to know about Australia's First Nations' histories, knowledge systems, cultures and languages. Embedding Aboriginal and Torres Strait Islander perspectives is a shared responsibility of approved providers, educators, and other professionals working in early childhood educational settings, regardless of whether Aboriginal and Torres Strait Islander children and families are enrolled in that setting. [MTOP-2022-V2.0.pdf \(acecqa.gov.au\)](#)

NOSHSA acknowledge that OSHC services experience challenges developing the professional practice required to do this well and would welcome investment from the Australian Government into a professional development program to support educators with this important work. (NOSHSA acknowledge the work for Reconciliation Australia and Narragunnawali in leading these initiatives for the ECEC sector.)

Vulnerable and/or disadvantaged children and families

Access to OSHC is prioritized for working families. Consequently, many vulnerable and disadvantaged children do not have equitable access to OSHC. Whilst many services may find it difficult to meet the demand for care due to the demand for OSHC exceeding their capacity and places available, a program setting within CCS to target access for vulnerable and disadvantaged children and families would be welcome due to the social and emotional benefits afforded through access to high quality OSHC for all children.

Children and families experiencing disability

NOSHSA have welcomed the review of the Inclusion Support Program. This program has not been well received or utilized by the OSHC sector. The complexity of application and approval has made it difficult for families and children experiencing disability to get the support they need. OSHC services have found the current program guidelines particularly challenging to navigate to get the right level of support to facilitate inclusion.

OSHC services require support to meet the needs of children with disabilities. This includes specialized resourcing and training. Ongoing funding to deliver meaningful and innovative projects that build capacity are welcome.

Workforce participation

In recent times, the OSHC sector have had to place caps on occupancy due to workforce shortages. In some cases, parents have been asked to collect their children directly from school as the OSHC have not had sufficient staff to meet minimum ratio requirement to provide suitable and safe care environments after school.

The vast majority of the OSHC educator workforce are employed on a casual basis and work short shifts often being required to work a before and after school split shift each day. This type of casual work



arrangement is often not suitable (or desirable) for qualified educators seeking permanent employment with regular hours. Even when offered permanent employment, many OSHC educators prefer the casual arrangement due to the significantly higher (25% casual loading) rate of pay in contrast to the benefits of personal or annual leave. The casual loading often compensates for the reduced hours of work available in OSHC.

Unfortunately, there remains misalignment in the sector between the perceived role of OSHC educators and what is actually expected of the role under the National Quality Framework. There is low work value attributed to OSHC work with high casualization cited as the main reason for this.

NOSHSA recognise that there are limited incentives to join or increase participation in the OSHC workforce. The most recent advocacy work of the United Workers Union preferences the Long Day Care sector for initial application of any government funded pay increase. This is hugely problematic for OSHC in a sector where we are already competing to attract and retain qualified personnel.

NOSHSA acknowledges that the qualification requirements for OSHC remain jurisdiction specific at present and we welcome the opportunity to consider a national approach to qualifications for OSHC that is supported by a relevant evidence base to working with school age children in play and leisure settings.

NOSHSA appreciate the opportunity to respond to this important review. We value the time taken by the commission to discuss these matters and review our submission.

Yours sincerely

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