

**SUBMISSION TO:**

**PRODUCTIVITY COMMISSION INQUIRY INTO CHILDCARE AND EARLY CHILDHOOD LEARNING**

**(DRAFT REPORT)**

**PREAMBLE**

The Australian Primary Principals Association (APPA) represents the 7,200 principals who lead the Government, Catholic and Independent primary schools in all Australian states and territories.

Primary school principals have a general interest in this Draft Report because the quality of early childcare and learning has an impact on the readiness of children for a more formal classroom environment and the activities in which children engage in the primary school classroom. In addition, childcare arrangements impact on student engagement with school in the primary years.

Primary school principals have a particular interest in the report in so far as it addresses issues of Outside School Hours Care (OSHC) services that are often provided by, or in partnership with, their schools.

This submission will respond to Recommendation 8.2 regarding Outside School Hours Care and then provide comments of a more general nature.

**SPECIFIC COMMENTS**

**Recommendation 8.2: *State and territory governments should direct all schools to take responsibility for organising the provision of an outside school hours care service for their students (including students in attached preschools), where demand is sufficiently large for a service to be viable.***

APPA and the primary principals associations affiliated with it value the partnership between OSHC and schools. APPA views OSHC programs as a necessary service for many families.

Those families that require childcare services in locations where OSHC centres do not operate often struggle to make satisfactory childcare arrangements and are sometimes forced to leave primary children unsupervised for a number of hours outside the school day.

OSHC programs should not be an extension of classroom acticities. However, APPA appreciates that well organised programs create enthusiasm for classroom learning and provide opportunities, through activity and play, to apply and practise the knowledge, skills and attitudes being taught at school.

Principals associations have worked with OSHC provider organisations to develop resources to facilitate productive partnerships between OSHC centre and school staff. (APPA also worked with NOSHSA to produce Promoting Collaborative Partnerships between Schools and School Age Care Services.)

Stakeholder submissions notwithstanding, APPA believes the majority of primary school principals work with parents to establish OSHC services for their schools wherever such services are viable. Primary principals are conscious of their responsibility to ensure the good running of their schools each day and their responsibility to ensure there is not unreasonable hardship placed on school staff to make this happen.

Where school facilities cannot be shared with OSHC services in a way that leaves them available for classes each day, principals are unable to enter into partnerships.

APPA is in agreement with the intent of the Recommendation. OSHC should be available to as many families as possible. In this regard, it may be that school parent organisations, depending on their structure and governance arrangements, are positioned to establish and manage OSHC services.

APPA strongly endorses the reference including preschool students in the recommendation.

However, if state and territory governments direct all schools to take responsibility for organising the provision of OSHC services without providing the necessary facilities, resources and support to accommodate the service or the administrative and childcare staff to run the service, it is impossible to envisage how schools will comply with the direction.

APPA believes a stronger recommendation would be:

“State and territory governments should work in partnership with schools and other agencies to establish single and cluster schools’ OSHC services to maximise the availability of OSHC services to Australian families.”

**GENERAL COMMENTS**

Many primary schools operate OSHC services or are active partners in OSHC service provision. In order to facilitate the work of those schools in this area, APPA suggests the following considerations.

1. A nationally consistent set of staff ratios and qualifications should be developed so that it takes account of the setting, pedagogy and practice specifically found in OSHC services.
2. The requirement to report against an individual learning plans for each child should be replaced with a report mechanism that covers learning activities undertaken on a centre, group and/or individual basis.
3. Food handling and preparation requirements that are appropriate for commercial activity should be replaced by a more practical set of OSHC guidelines for student ‘cooking’ activities.
4. All jurisdictions should implement a nationally consistent Working with Children Check process.
5. OSHC services operating from school facilities should not have to provide site plans as part of service approval.
6. The Excellent Rating should be abolished as it is primarily sought as a marketing tool.
7. The arrangements for identifying and ‘certifying’ supervisors should be reviewed to minimise duplication and administrative demands.
8. The National Disability Insurance Scheme should be instructed to investigate mechanisms to support the participation of students with disabilities in OSHC services.
9. Regulations in relation to excursions, particularly those that are low-risk or within grounds, should be reviewed to make compliance less onerous.
10. The complexity involved in the management and oversight of OSHC services should be recognised through any system promotional structures for principals.

**CONCLUSION**

High quality early childhood education and care services should be available to every Australian child regardless of their family circumstances. APPA recognised that this Draft Report directs the efforts of many public and private agencies towards this goal. APPA appreciates the opportunity to contribute this submission and trusts it will be considered.