

5 September 2014

Productivity Commission
Childcare and Early Childhood Learning
Childcare@pc.gov.au
Draft Report

Dear Commissioners

Response to *Productivity Commission 2014, Childcare and Early Childhood Learning, Draft Report* – From AlburyCity OOSH Services

We wish to respond to the Productivity Commission's draft report as a service provider of Out of School Hours Care (OOSH), both After-School Care and Vacation Care.


In particular, we would like to provide feedback for the information request 12.8 (p.51), 8.1 (p.51) and 13.2 (p.53).

We also wish to comment on draft recommendations 7.4 (p.55), 8.1 (p.55), 7.1 (p.58), 7.7 (p.60) and 7.6 (p.60).

Information request

12.8, 8.1 and 13.2

- Children with additional needs must be supported in a wide range of ways to access mainstream OOSH services.
- Currently services act as “gatekeepers” to service access, weighing up staff capacity, group dynamics, ratios and costs involved with providing care to an increasingly large cohort of children that span developmentally from toddlers to children who have passed puberty and are young adults.
- This “gatekeeper” mentality has been borne of the reality of day-to-day service delivery. Issues are very real and consist, in no particular order:
 - Cost of additional staff ISF leave services approximately \$6 - \$7 per hour short changed and frankly not worth the time spent making an application.
 - Onerous amount of ongoing paperwork to apply each year for ISF for children who have a diagnosed disability. These children are never going to wake up one morning with no disability. The never-ending cycle of paperwork is a time consuming disincentive for services and crushing for already overwhelmed families.

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- The nature of OOSH children in their pre and pubescent development. Services must ensure children who display sexually explicit behaviours are closely supported and protected as are the other children and staff. This requires staff with qualifications and reduced staff – child ratios.
 - The itinerant nature of OOSH staff where often ongoing capacity building of staff is impossible because of the part-time and casual nature of the sector.
 - Services can only accept children if and when staffing can be provided. This means families cannot commit to return to work/study. In many ways families need 100% support or 0% support, as anything in between leaves families vulnerable to the vagaries of the above, unable to commit to workforce requirements.

As part of the Childcare Flexibility Trials our service developed some action research to look at the issues of barriers and access to services for children with additional needs.


By developing a model that suits our particular area, community and service, we have reduced some of these barriers. The main changes have been:

- Wherever possible we avoid ISS funding
- Service does not apply for Inclusion support Funding but rather the Flexible Support Funding, less paper work but more realistic, however it is of a finite timeline.
- We partner with a local disability service that send children with a skilled and known worker with the child to the service to support the child.
- Share knowledge and skills between the OOSH and disability sector, enhancing staff capacity where possible.
- OOSH does not have to find suitably skilled staff or pay the staff.
- Children with profound disabilities are able to access our mainstream service.

There are downsides to this arrangement, however local solutions to local problems should be supported and not have additional paperwork to do. Centralisation to KU of ISF does not always work for those on the ground. Whilst appreciating the effort the organisation goes to, the loss of local perspectives and local time is disappointing.

Comment on Draft Recommendations

7.4 We note that there is “uncertainty surrounding” (p.55) the benefits of higher ratios and qualifications in the OOSH setting. Our service has just been handed its draft Assessment and Rating report and excitingly have been given “Exceeding” overall rating. We have four staff – two University trained (teaching and education), one with Certificate III OOSH and one ready to commence Certificate III OOSH. It is deeply understood that it is our capacity to reflect on our actions and the impact that they have on both the children in our care, and the community that allows us to provide exceeding quality care.

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- 8.1 The idea that OOSH services can cater for children under school age and children of school age with larger ratios and less qualified workers appears difficult to envisage. Our OOSH service runs from an old school hall with no capacity to provide an environment that has quiet places or places for socially developing groups of two or three children that children aged three or four need. We have one large noisy chaotic space that older children can cope with but younger children would be stressed by.
- 7.1 The tailoring of the National Quality Standards to suit OOSH services is most welcome in regard to the perceiving pressure to maintain child-based reporting. The huge number of children who use OOSH in a single year make individual children's records impossible. However, we are committed to retaining the guiding Educational Curriculum Frameworks for primary aged children "My Time Our Place". This document has highlighted for us the importance of our work with children and allowed us the opportunity to have deeper discussions with our OOSH community and each other.
- 7.6 We agree with the draft report to abolish the "Excellent" rating. As holders of a provisional Exceeding rating, it appear elitist that services who apply for an "Excellent" rating only do so if they can afford:
- a) The fee and
 - b) The administrative time (money) to complete the required paperwork. You should not have to pay for excellence.

If you wish to discuss this submission further please contact our OOSH Coordinator Cathy Northam

Yours faithfully

~~James~~ Jenkins
Director Community & Recreation