



## **Submission to the Productivity Commission inquiry on Childcare and Early Childhood Learning**

The Queensland Children's Activities Network (QCAN) Inc is the peak body for OSHC supporting and promoting quality OSHC opportunities for all Queensland children. QCAN maintain an extensive membership network and regularly connect with the sector through the various services the organisation provides. At their recent conference, QCAN had the opportunity to discuss with its members the draft recommendations made by the Productivity Commission and as such this response reflects valuable sector input accompanied by significant experience and research.

QCAN acknowledges the following recommendations made by the Productivity Commission to improve the system. Further guidance on many of these recommendations is offered from the perspective of QCAN, as the Queensland member organisation representing over 95% of the OSHC services in this state.

- Improving the context of the NQS for OSHC
- A single subsidy to replace CCB, CCR and JET
- Nationally consistent ratios and qualifications for OSHC
- National working with children check
- More detailed and targeted guidance to providers on requirements associated with Quality Improvement Plans
- Removal of the requirement for a certified site plan

### ***In response to DRAFT RECOMMENDATION 7.1***

*QCAN offer strong support for tailoring the National Quality Standard by improving the context without requiring a completely different set of standards. The National Quality Standard should continue to include (as it does now) OSHC, however, there would be benefit in customising and streamlining elements to suit OSHC. This is supported particularly by the removal of requirements to report/assess programs at the individual child level. For OSHC it would be relevant and appropriate to assess at the program level. It would be possible to streamline the standards and elements in Quality Area 1 to a single statement such as the following (or something with similar intent) as accompanied by the approved learning framework this would ensure all that is required to design and deliver a quality program.*

***“Educators are active, focused and reflective in the use of an approved learning framework (My Time, Our Place) to inform the development of a curriculum, and when designing and delivering the program.”***

*QCAN believe that the sustainability elements are not practical for OSHC and are not necessarily determinants of quality care. At an exceeding level, embedding sustainable practice could be an element for services to work towards. These elements should be reviewed and in the least take into account sustainability measures undertaken by schools that are also embedded in the day to day practice of the OSHC service.*

*QCAN believe that the most vulnerable families who access OSHC rely on the support provided to them in their role as parents. OSHC is a valuable connection/link between school and families and it should not be assumed that for these families the school is meeting all of their needs. OSHC services are often the main point of contact for working families and not only an important connection in the early school years, an ongoing connection during children's primary school life.*

*OSHC educators are keenly attuned to the social and emotional needs of children and families and are often the first to know when there has been a breakdown or crisis within a family. The nature of the environment enables educators to engage with children in conversations that support and nurture their wellbeing. Many children spend extended hours in OSHC and as such these relationships are critical to family wellbeing. Teachers aren't equipped to support families in the same way as they face the increasing demands of student performance and curriculum implementation.*

*OSHC services acknowledge positive change in the area of parent engagement as a result of the NQS and services have also reported that schools are developing a more comprehensive understanding of what the OSHC sector is about (not just babysitting!).*

*Any consideration to removing elements of Quality Area 6 has the potential to undermine the valuable work undertaken to produce the resource 'Promoting Collaborative Partnerships between Schools and School Age Care Services' which was developed by the Australian Primary Principals Association and the National Out Of School Hours Services Association to complement My Time, Our Place – Framework for School Age Care in recognition that 'It takes a village to raise a child'.*

#### ***In response to DRAFT RECOMMENDATION 7.6***

*QCAN strongly support draft recommendation 7.6 and offer the following suggestions:*

- redevelop the Quality Improvement Plan to be more reflective of a service's self-assessment processes and to enable a self-determined rating;*
- use the assessment process to authenticate the self-determined rating and to identify areas where self-assessment and actual practice are not aligned;*
- provide effective guidance to services (perhaps independent professional/expert guidance) where improvements may be possible to enhance performance in areas where the service is not meeting required standards;*
- consider improving/directing the investment of professional support funding to assist services with self-assessment processes thus building capacity to enhance critically reflective practice within the service and enabling services to seek and access targeted support in the areas where it is most needed;*
- consider other approaches to recognising exemplary practice as an alternative to the excellent rating so that innovative and outstanding practice can be acknowledged without the perception of exclusivity or elitism.*

#### ***In response to DRAFT RECOMMENDATION 7.7***

*QCAN particularly support more detailed and targeted guidance to providers on requirements associated with Quality Improvement Plans, educational programming, establishing compliant policies and procedures and applying for waivers. We suggest that this could be achieved by redirecting the current model of professional support funding to relevant non-government organisations with the sector-specific expertise to provide this support. A refreshed professional*

*support program should be explicitly connected to engaging the sector with the National Quality Framework and provide customised support tailored to the different types of care provided.*

***In response to DRAFT RECOMMENDATION 12.6***

*QCAN are concerned that subsidy programs do not always reflect the context of OSHC. Where services operate on special school sites, these are not currently eligible for funding as they are not considered 'inclusive'. It would be inappropriate and inequitable to transport these children with disabilities to another school setting for OSHC so that they could meet the requirements of inclusion. As a result, charity organisations have met the additional costs required to provide this type of service. There are some excellent examples in Queensland of quality OSHC provision for children with disabilities and these programs should be eligible to be included in funding programs. It is unfortunate that families of children with disabilities do not have equitable access to appropriate OSHC services to support their engagement in the workforce.*

***In response to DRAFT RECOMMENDATION 7.4***

*QCAN support this draft recommendation in principle, however, taking into consideration ratios that are currently acceptable for children during school hours is inappropriate given that:*

- teachers hold qualifications higher than those proposed or required of educators caring for school age children in outside school hours care services;*
- there are significant differences in the nature of activities. School is highly organised and structured with children spending the majority of their time indoors and seated at desks;*
- playground supervision during break times is a very different type of activity to the rich, leisure based learning environment of OSHC;*
- parent volunteers are frequently sought by schools when they undertake activities which require a lower ratio, this is not possible in OSHC due to the context in which the service is being provided (e.g. families are working or studying);*
- children work together in groupings of age and similar developmental characteristics in classrooms or school experiences and are not grouped vertically as in OSHC where children of quite diverse age, development and ability (e.g. 4 year olds through 12 year olds) play and participate together. The nature of this experience is not at all consistent with school and the mere notion that it would be considered to appropriate to align OSHC ratios to school ratios is a grave concern;*
- there has been strong evidence established over time to support a minimum ratio of 1:15 which was initially articulated in the National Standard for OSHC in 1995. This standard had already been adopted across many jurisdictions in their State or Territory regulation, though it is noted that some jurisdictions maintain a lower ratio;*
- the risk assessment/management approach to setting ratios for swimming, excursions and special events as articulated in the National Law and Regulation is an additional safeguard for children to ensure that ratios are safe and suitable while not prohibiting services from undertaking activities where the cost of additional staff could render the experience not viable;*
- the hours of operation for the service mean that there are fewer adults on site than there are during the school day and as such additional staff through reasonable ratios are a safeguard for children and educators;*
- the OSHC service will operate from multiple facilities/spaces on school sites and children are not all located together in one room or one area as they are during the school day.*

*QCAN believe that single staff models need to be reconsidered to ensure the safety and wellbeing of children in OSHC at all times. The viability assistance mentioned in draft recommendation 7.7 could extend to ensuring that a suitable number of educators are present at all times. However, the time limitations proposed for this subsidy would not be helpful to OSHC when the context and population accessing the services is typically restricted to a single school community. Transport arrangements are also expensive and time consuming adding another layer of burden on a service.*

*QCAN promote that any person responsible for the day to day management and operations of an OSHC service should have a minimum 2 year qualification and that this qualification should include some business/management related competencies.*

*QCAN encourage the productivity commission to look broadly at qualifications in the OSHC sector and agree that there are many students and experienced educators from other disciplines who may bring valuable skills to a leisure based setting. Innovative approaches to the OSHC workforce are essential as much of what educators need to know and be able to do is learnt on the job as opposed to a formal qualification. QCAN have developed a Core Knowledge and Competency (CKC) Framework for OSHC to support those educators who do not hold and are not working towards a specific OSHC qualification to be developed on the job. This approach also involves developing/strengthening leadership capacity within the sector as both are integral to improving workplace performance.*

#### *Case Study*

*Payne Road OSHC have employed two unqualified educators, one of whom is an engineering student. This is possible in Queensland as the regime for qualifications is very broad and requires only one educator to hold or be working towards a 2 year qualification (in a relevant discipline) to be present while children are being educated and cared for, and, of the remaining educators (maintaining a 1:15 ratio) only half are required to hold or be working towards a minimum Certificate III in a relevant discipline. This regime enables educators who are studying other disciplines or are experienced workers to be employed.*

*However, Payne Road OSHC recognised that these educators required some specific on the job training in areas that were relevant to working with school age children in the OSHC setting including: children's growth and development; interactions and relationships with children; program development and implementation; the Framework for School Age Care; cultural competency; safety and wellness; family and community relationships and leadership. Through implementing the CKC Framework, the Coordinator took on the role of the workplace mentor and supported these educators to develop their knowledge and competence on the job. This resulted in more confident and capable educators. The Coordinator was impressed with how the engineering student engaged with children and was able to lead them in some advanced construction experiences where the children built their own bikes. These are the types of valuable opportunities afforded to school age children in the OSHC setting.*

*In addition to this case study, there are many examples of how the qualifications regime in Queensland has upskilled the workforce which prior to 2004 had no qualification requirements. There is much that can be learned from Queensland's decade of experience in implementing qualifications for OSHC. QCAN recommend that there is no change to the existing requirement for qualifications in Queensland OSHC services until a valid and reliable research base is available to present a reasonable case for change. Again, we would encourage innovative approaches for the OSHC workforce.*

*Please note: QCAN are very concerned about the examples (e.g. Page 297) that the productivity commission has chosen for OSHC and believe that these are somewhat sensationalised and inaccurate. It would be helpful for the PC to research the case studies before putting them forward as examples. It would appear that those who have provided/supplied the case studies misunderstand or have misinterpreted what is required of the NQS and the relevant laws.*

***In response to DRAFT RECOMMENDATION 8.1***

*QCAN are concerned about the removal of the requirement for the majority of children attending school age care to be school age. We believe that this may compromise the context of OSHC in having a leisure time focus for school age children as opposed to an early childhood learning environment. QCAN support that children younger than school age require educators with specialised early childhood skill sets as well as lower ratios and specialised facilities. The health and wellbeing of very young children who are placed into care in a setting with much older children is of utmost concern and services that cater to younger and older children together must be very thoughtful in meeting the needs of all children.*

***In response to DRAFT RECOMMENDATION 8.2***

*QCAN believe that this draft recommendation is encouraging and further to this schools should have the opportunity to:*

- choose an appropriate provider for their community based on clearly established criteria to enable that selection (such as the Queensland Government Panel of Providers and procurement process for OSHC);*
- receive independent support in the process of establishing/organising the provision of an outside school hours care service to provide advice and recommendation on the appropriateness of facilities and relevant requirements/minimum standards;*
- access financial support to improve the infrastructure and to provide an OSHC service that is suitable and appropriate for this purpose.*

*In addition to this, schools should be accountable for:*

- ensuring facilities for OSHC are maintained at an acceptable standard;*
- minimising the financial burden on services to pay commercial rents and instead consider opportunities for surplus to be accumulated in making provision for future growth and facilities maintenance/improvement in line with the increasing demand for care.*

***In response to DRAFT RECOMMENDATION 12.2***

*QCAN support a single subsidy to replace CCB, CCR and JET and recommend that sufficient financial modelling is undertaken to ascertain the true deemed cost of care and that this cost reflects the differing wage rates and operational expenses currently in existence for OSHC.*

For further information, please contact  
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