

## OSHC ACT

### Response to Productivity Commission Draft Report

This response to the Productivity Commission's Draft Report on Childcare and Early Learning has been prepared by members of OSHC ACT. OSHC ACT is a group of educators and managers who represent a number of OSHC organisations in Australian Capital Territory. We request this response is considered by the productivity commission in preparing final recommendations to the Australian Government.

PC Reference	Recommendation	OSHCACT Position	Comment
Recommendation 7.1	<p>To simplify the National Quality Standard, governments and ACECQA should:</p> <ul style="list-style-type: none"><li>• Identify elements and standards of the National Quality Standard that can be removed or altered while maintaining quality outcomes for children</li><li>• Tailor the National Quality Standard to suit different service types — for example, by removing educational and child-based reporting requirements for outside school hours care services.</li></ul>	<p>We conditionally support this recommendation.</p>	<p>We have concerns that the 'tailoring' towards each care type will dilute the intention of National Quality for children; however a review of elements and standards under each Quality Area would be valuable.</p>

<p>Recommendation 7.4</p>	<p>Governments should develop and incorporate into the National Quality Framework a nationally consistent set of staff ratios and qualifications for those caring for school age children in outside school hours and vacation care services. These requirements should take into consideration ratios that are currently acceptable for children during school hours, the uncertainty surrounding the additional benefits of more staff and higher qualifications, and the valuable contribution that can be made to outside school hours care services by less qualified older workers and university/TAFE students.</p>	<ul style="list-style-type: none"> <li>• We support and agree that there needs to be a national ratio, however the determination of the ratio needs further research and discussion.</li> <li>• <b>We are unable to find what the ratio is during school hours.</b></li> <li>• In regards to qualification standards we support there should be National Guidelines.</li> </ul> <p>We believe there needs to be a National Forum to review qualifications and ratios for OSHC.</p>	<p>Concerns</p> <ul style="list-style-type: none"> <li>• Child Protection – larger ratios mean reduced supervision and opportunities for disclosure/relationship building.</li> <li>• Injuries – for both educators and children, and first aid management.</li> <li>• Excursions – limits the opportunities and activities</li> <li>• Relationships – inability to form and maintain relationships with children and families without compromising supervision.</li> <li>• Environments – limits the use of both indoor and outdoor simultaneously as recommended in the NQF.</li> </ul>
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Recommendation 7.5	<p>To provide services with greater flexibility to meet staffing requirements, ACECQA should:</p> <ul style="list-style-type: none"><li>• Remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months</li><li>• Explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.</li><li>• All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.</li><li>• The New South Wales and South Australian Governments should allow a three month probationary hiring period in which unqualified staff may be included in staff ratios before beginning a qualification, as was recently adopted in all other jurisdictions.</li></ul>	We do not support these recommendations.	
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<p>Recommendation 7.7</p>	<p>Governments, ACECQA and regulatory authorities, as applicable, should:</p> <ul style="list-style-type: none"> <li>• abolish the requirement for certified supervisor certificates</li> <li>• provide 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</li> <li>• explore potential overlaps between the National Quality Framework and state and local government requirements as part of the ongoing review of the Framework, and ensure any identified overlaps are eliminated</li> <li>• review ways that services with higher ratings ('Exceeding National Quality Standard') could be relieved of some paperwork requirements, where these are less important to ensuring quality given the service's compliance history</li> <li>• removing the requirement for outside school hours care services operating on school facilities to provide site plans as a condition of service approval</li> </ul>	<ul style="list-style-type: none"> <li>• Questioning this point as the change has been made to a service supervisor</li> <li>• We do not support this recommendation.</li> <li>• We support this recommendation</li> <li>• We do not support this recommendation.</li> </ul>	
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Recommendation 7.8	Governments should extend the scope of the National Quality Framework to include all centre and home based services that receive Australian Government assistance. National Quality Framework requirements should be tailored towards each care type, as far as is feasible, and minimise the burden imposed on services.	We agree that that the scope should be extended to include all children’s care and education services/individuals.	
Recommendation 8.1	The Australian Government should ensure that the requirement (currently contained within the Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Determination 2000) for most children attending an outside school hours care service to be of school age, is removed and not carried over into any new legislation.	We do not support this recommendation.	Concerns about developmentally appropriate environments and facilities, impact on ratios and qualifications.
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.	We do not support this recommendation.	<ul style="list-style-type: none"> <li>• Concerns – what award would educators fall under this, i.e. Teachers award, classification etc?</li> <li>• Would it be extension of school day? Will the principles of play and leisure (as described in My Time Our Place) be overshadowed by the Australian National Curriculum</li> <li>• Are teachers going to be made responsible for writing and running OHSC services?</li> <li>• Would National Guidelines for schools be developed and enforced</li> </ul> <p>What is sufficiently large? Who decides this? Is this dictated by State and Territory Governments?</p>