



19th February 2023

Attn: Productivity Commission

RE: Early Childhood Education and Care Inquiry

Thank you for the opportunity to participate in this public hearing and represent the views of the National Outside School Hours Services Alliance (NOSHSA) members including the service providers, educators, children and families that together have contributed to building our unique and diverse sector. This submission focuses on the aspects of the inquiry related to the Outside School Hours Care Sector.

In providing this submission, NOSHSA address the following:

- Overview and current state
- OSHC and the NQF
- Schools and OSHC
- OSHC workforce
- Pathways and qualifications
- Inclusion Support
- Future opportunities and other insights

Overview and current state

The Australian OSHC sector is the most rapidly expanding service type within Early Childhood Education and Care (ECEC). Though the sector is captured within the 'ECEC' sector for the purpose of funding and regulation, OSHC are also an important part of the Australian school system, particularly servicing primary schools. Unfortunately, our partners in formal schooling do not often see it that way and consequently the OSHC sector is regularly treated as a burden on the school, its resources, its staff and its routines. This is exacerbated by the fact that many schools are in receipt of significant financial returns from OSHC and in return are often disrespected and undervalued.

NOSHSA would prefer to see the OSHC sector embraced by schools and work together actively as partners in the education system. National and international evidence supports that better outcomes are achieved when practice across schools and OSHC is child-centered, however at present we remain segregated or at best integrated, but unfortunately we are yet to be 'included'.

The Australian OSHC workforce is unique and diverse. Approximately 80% of educators are employed on a casual basis and work short shifts with average weekly hours totaling less than half a typical full-time workload. Consequently, OSHC educators are likely to receive a gross weekly wage that is significantly lower than the national minimum wage.

There are two main reasons that casual educators who work in OSHC are able to survive on this wage. This is because they either supplement their income with a second job or they are students. Other reasons that OSHC educators may be attracted to casual positions include, for example, semi-retirement or access to supplementary income support.



Approximately 20% of the workforce are permanent employees and this group are more likely to be in senior positions such as Coordinators, Service Managers, Nominated Supervisors and Educational Leaders. The wages for this cohort are typically aligned to similar positions within the long day care sector, however, educators in OSHC are less likely than their LDC counterparts to be paid above the award.

The demand for educators in OSHC exceeds the talent pool available, particularly in the areas of middle and upper management. The role is complex and often misunderstood by the broader community. For example, it is not uncommon for schools and families to assume that the job has little to no administrative requirements. This is a mistaken belief, as all educators working in the OSHC sector are required to meet the same regulatory arrangements and quality standards under the National Quality Framework (NQF) as other service types. Schools in particular find it difficult to understand why the OSHC sector is regulated far more rigidly than formal education, and we see this, for example, in playgrounds that are suitable for use by primary school children during break times may not be deemed suitable to meet the standards in OSHC. As mentioned, improving the alignment between school and OSHC practices which are child centered would be a helpful start to improving school and OSHC partnerships and collaboration efforts.

There is limited growth in the not for profit part of the sector which is interesting given the sector initially established as not for profit community services under an Australian Government operational funding initiative of the late 80's and early 90's. This model was particularly useful in growing the sector because it ensured that resources were directed to service's operational costs and limited financial returns to schools. It is also a model where under-serviced areas such as rural and remote services or schools with smaller populations can establish. However, the challenge with this model is that there are no centralized governance arrangements to support local communities (such as parent managed services) to sustain viable business models and operations. Generally, improving the central governance available to support individual communities to manage their own OSHC services would be welcome.

OSHC and the NQF

The NQF is not a perfect fit for the OSHC sector and there are aspects that are far better suited to regulation and quality assessment of Long Day Care. The over-emphasis on quality improvement is burdensome for the sector and the ratings system is confusing for OSHC parents who find it difficult to see the difference between a service that 'meets' national quality standard and a service that is meeting the bare minimum of regulatory obligations. Meeting as a rating sounds 'average', like a service is meeting the foundation regulatory requirements, however we know that many services assessed and rated as meeting, have compliance issues from time to time. The event-based rating outcome that continues to stand while services work through compliance has some complex contradictions that are unhelpful when schools and families try to interpret how good an OSHC service actually is. Ultimately, the quality of a service depends on the educators that work there and the experiences of children and their families.

On a day to day basis, quality is determined by the educators who work with children, the programs and experiences they design and deliver and their promotion of safety and wellbeing while at the same time building strong and supportive relationships with and between children. When the composition and capacity of the staff team changes, so does children's and families' experience of quality. There are too few measures built into the NQF to ensure that the frequent changes of staffing arrangements consistently deliver high quality outcomes. This provides an opportunity to rethink the relationship between educator practice and service quality in a more dynamic and integrated regulatory approach.

There are too many components and layers to the NQF for the OSHC sector. There are many opportunities to simplify the system without compromising quality and the timing for this is opportune as the evidence clearly demonstrates how the NQF has raised the bar on quality since its implementation. In 2024 we have seen the release of versions 2.0 of the Approved Learning Frameworks. What we need now is an NQF 2.0 which not only refreshes the NQS but makes it more accessible, practical and useful for the sector, the regulators and for families. One refresh example could be adjusting the minimum standard to the 'meeting' level of the NQS monitored through regulatory and compliance activities. In this way a refreshed approach to assessment and rating could genuinely promote continuous improvement rather than validating what services already know about their practice. In fact, an assessment and rating outcome of 'meeting' is the most uninspiring event and often results in teams feeling disappointed and disheartened and wondering why they worked so hard just to feel average. It isn't a system that is currently inspiring educators to stay. The sector desperately needs an inspired workforce that is valued, appreciated and recognized by the system.

Schools and OSHC

Commissioners have called upon state and territory governments to consider the role that they play in OSHC. This is important because the reality is that state and territory government's schools with an OSHC are offsetting investment in education with very significant rents, lease fees and 'co-investments' paid by OSHC providers. While the OSHC sector should not be a burden to schools, there should be increased investment in facilities and infrastructure. If premium commercial rents are to be charged for facilities, then they should be fit for purpose and well maintained. Given the significant profits made by OSHC providers in some communities, there is a potential for investment in infrastructure to be funded by government loans scheme which can be repaid through rent and lease fees. This is one way that the cost of investment could be recovered.

If the broader Australian vision of expanding OSHC provision to a greater majority of schools, existing resources need to be redistributed. While the ACCC has offered some guidance on how best to serve different areas of the market in the sector, OSHC will require a bespoke approach that is contextually relevant to the way services are provided.

OSHC is a place where children's wellbeing is a priority. There are rich opportunities for learning and development in a social and citizenship context. The OSHC sector has not yet been embraced or acknowledged by schools for the significance of these contributions to children's learning and development. It is time to look at the school day from a child's perspective and work towards seamless and collaborative delivery. There are international models where schools together with



OSHC take a multi-disciplinary approach to designing and delivering learning opportunities. Australian OSHC needs more investment in research, identification and promotion of best practice models that genuinely improve outcomes for children and strengthen alignment and partnerships between schools and OSHC. Children thrive when stakeholders across their lives work together.

OSHC workforce

There has been limited planning and nationally consistent or integrated coordination for the OSHC workforce. There has been chronic underinvestment by governments in the OSHC workforce with limited opportunities for career growth and development. This is a problem, because the OSHC sector is the fastest growing part of the ECEC sector in Australia. The demand for places continues to climb across the country.

The OSHC sector typically grows in two ways. The first is the establishment of new services, typically within schools that don't currently have an OSHC even though there is community demand for a service. The second and most unique growth opportunity for the sector is in the service's size. Unlike the LDC sector, which operates from purpose-built facilities, OSHC infrastructure is not typically well planned for or invested in. The usual way of establishing an OSHC is to find a suitable space to operate a program within a school and go through the process of obtaining a service approval. This is a problem as services, particularly in inner city areas, quickly outgrow their capacity and without the infrastructure investment, they find themselves operating from sub-standard and often inappropriate venues that are not fit for purpose. More often than not, large services have to occupy multiple spaces across a school site to accommodate all the children, which increases supervision and safety risks because OSHC is not like a classroom and children are encouraged to have choice and control over their time through being able to self-select and move between the different offerings of the service. Infrastructure planning is important because the environments that programs operate in/from have an impact on the health and wellbeing of both children and educators. Poor quality environments are not good for children and can be psychologically unsafe for educators. As mentioned, educators often leave the OSHC sector because they feel undervalued and the impact that work environments have on wellbeing should not be underestimated. It is not uncommon for OSHC educators to have limited or no access to suitable spaces for administrative tasks, to have no where to eat or take a break away from their direct care role and no where to professionally collaborate or even store their belongings. Staff rooms and storage spaces are considered a luxury for the OSHC sector when these basic entitlements should be available as a minimum standard.

Pathways and qualifications

There are no nationally mandated qualification entry requirements for educators to work in OSHC. This is helpful for the sector in attracting the diverse population of staff required for the role. OSHC is different to LDC because it is an interest-based program and the emphasis is on meaningful leisure. This means that educators can share different interests and skills with children. A rich and high quality OSHC program would typically cater to school age children's varying interests such as (these are

general) sports, arts and crafts, drama, dance, music, free-play, social games, rest and relaxation, problem solving challenges etc. Given this mix of skills and interests, it is easy to understand why qualifications across various disciplines can be helpful to the OSHC sector. (Refer to regulated Qualification requirements for OSHC in Queensland as an example of how this works.)

As educators continue their employment in an OSHC service, depending on the role they play in the service and the jurisdiction they work in, there may be a requirement to work towards a qualification. NOSHSA support the OSHC sector having a diverse workforce with varying qualifications as pathways into and beyond the sector.

The National Training Package (NTP) does not contain a full suite of training products for OSHC. In the last review of the Children's Services Training Package a significant gap arose in the access for OSHC Educators to a Certificate III level qualification. NOSHSA resolved this issue through completing the NTP with an accredited course, however because this qualification sits outside the training package it has been problematic to get traction across jurisdictions for subsidy. While uptake of the qualification continues to increase as it rolls out, there was no federal government investment or support in the development and implementation of the qualification and this has hindered the growth of Certificate III qualified educators within OSHC. This is a very specific example of both underinvestment in the OSHC workforce and a problematic federated funding model.

An OSHC educator micro-credential has been developed and is currently being trialed in Queensland. This provides an excellent opportunity to consider contemporary approaches and pathways to knowledge and skill development when building a multi-disciplinary workforce.

Participation and engagement

Typically, across Australia, there are few opportunities for OSHC educators to undertake professional development. The costs of training and re-training a casual workforce with high turnover is difficult for providers to manage and justify. The cessation of the professional support program was significant for the OSHC sector and resulted in fewer affordable professional development opportunities being available. Many educators would pay for training if not for being low income earners and not having the income spare after meeting their required living expenses just to survive.

Ongoing training and professional development opportunities are vital for the sector as given the diversity in qualification requirements and relatively low national standards. Professional development may be the only learning experiences that educators have to build their skills and knowledge for their roles. Working in OSHC is far more complex than parents, schools and the public realise. Educators need to be able to engage children in high quality programs, understand child development, build positive relationships through effective rapport, support increasingly complex behaviour, safeguard and protect children, work within laws and regulations and help children build dispositions for positive citizenship and life skills. These are significant responsibilities and require an effectively engaged workforce to ensure children's learning, wellbeing and development and promoted.



Support for inclusion

There is limited ongoing support available to improve inclusive practice across the OSHC sector and the Inclusion Support Program is not fit for purpose. NOSHSA developed and delivered a 12 month project to promote inclusive practice in OSHC throughout 2023. The project included an excellent suite of contemporary learning and development materials that are contextually relevant and deliverable in the workplace. This project was evaluated by Griffith University with positive results identified through engagement with the materials and the sector would benefit significantly through ongoing funding to evolve the training program into a skill set or micro-credential that is made readily accessible for all OSHC educators.

NOSHSA support a base level of inclusion funding provided to all OSHC services which would enable them to improve their inclusive planning through being more proactive and responsive in their preparations. The current process to access funding is restrictive and results in services being under-resourced to support children with complex needs. Educators don't get the training they need, children can't be supported effectively because the service does not have the resources and the skills and consequently children are more likely to be excluded and educators leave the sector because the job is too difficult.

Future opportunities and other insights

There are mixed views about the regulatory compliance and administrative costs associated with the delivery of high quality OSHC and there is an opportunity to consider some of this work as duplicative 'busy work' for OSHC educators, detracting from their day to day responsibilities of working directly with children. Given the numerous inquiries diving deep into the ECEC sector overall, there is an important opportunity to create a plan that takes OSHC forward more strategically into the future.

While OSHC in Australia is among some of the best provision in the world, it is not integrated with schools in the same way as countries such as Sweden where school and OSHC is a collaborative effort where teachers and educators work together to provide meaningful and rich learning experiences that complement each other promoting a stronger and healthier experience for the whole child. As the sector continues to grow, it is important that there is a holistic approach to growth that takes into account all of the important elements of quality service provision.

NOSHSA appreciate the opportunity to provide a submission. We value the time taken by the Productivity Commission to consider these ideas.

Kind Regards

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Chairperson