

Public Inquiry
Productivity Commission
Early Childhood Education and Care

To Whom It May Concern;

Thank you for the opportunity to provide a response to the draft report into the Early Childhood Education and Care Sector. The report was very clear that it focused on services provided to children aged 0 – 5 years of age. I must express disappointment that Outside School Hours Care (OSHC) did not factor into it, despite the report very clearly indicating that OSHC is a significant part of the Early Childhood Education and Care Sector – even going so far as to acknowledge that we are governed by the same set of National Laws and Regulations, and required to meet the same National Quality Standards. In this submission I will talk about my experience of the OSHC sector over the past 18 years as an educator, a leader, and a contributor.

My time in OSHC has given me experience in a number of front line, administrative support, and management roles. Through my various workplaces and experiences over the years I have acquired qualifications in Leadership and Management, Business, Operations and Compliance, WHS, Project Management, OSHC, ECE, Community Sector Management, and I am currently studying a Bachelor of Child, Youth, and Family Practice through Griffith University.

I have been in the Early Childhood Education and Care Sector for 18 years. I started in 2006, and had the privilege of learning from and working with some of the best “child care workers” of the day – people who understood that ECE and OSHC was a community service, and not just a form of convenient care.

In all of this time, up to and including the draft report released by your commission, Outside School Hours Care has rarely been a focus when it comes to the ECE Sector. Some examples, for consideration:

- 1) [Information for families: COVID-19 and early childhood education](#)
- 2) [The NSW Government’s website on Early childhood education](#)
 - a. [The role of the Early Childhood Education and Care Directorate](#)
 - b. [Early childhood careers](#)

In other, parallel issues:

- 1) [The Big Steps Campaign](#) from the [United Workers Union](#)
- 2) [Early Childhood Educator’s Day](#), leading to [OOSH Educator’s Day](#)

Anectodally, as a parent of children attending ECE services, I have been spoken down to on two occasions by ECE Educators because I “only know OSHC though”.

What the above indicates to me is that although OSHC was expected to operate at the same level as our ECE counterparts, governed by the same legal frameworks and quality standards, we have been viewed and treated as “other than” – likely because, as your report, and the research states, there is not enough information about what OSHC does or really is to the communities we work in.

The only real advocates for OSHC are people who work in the sector, and we are not always well placed to stand up and state what we need. Without the work of the NSW Peak Body for OOSH: Network of Community Activities, and their other state counterparts, I believe it is likely that we would be forgotten – but affected by – policy changes.

Therefore I must unequivocally emphasise that I believe the Productivity Commission has a responsibility to conduct an inquiry into OSHC in order to truly satisfy the scope of the initial enquiry.

Although we are governed and expected to meet the same standards as ECE services, OSHC has an entirely different subset of challenges that were not mentioned in the draft report, which I will comment on now.

1) Differences between OSHC Educators and ECE Educators

- a. ECE services are required to have at least 50% of educators diploma trained or higher. All other ECE educators must be Cert III level qualified. Services must have access to an Early Childhood Teacher (ECT) based on the number of children in attendance at the service.
- b. There are no national qualification requirements for OSHC Educators providing care for school age children. State or territory qualification requirements may apply, however.
- c. OSHC Educators are often university students – it is common to find students studying Primary Teaching degrees wanting to work in OSHC to gain experience working with school aged children.
- d. It is uncommon for OSHC Educators to be employed on a permanent full time basis. Due to the shift based nature of OSHC work, an educator working maximum face to face hours in a service would only be working approximately 70% of the time that an ECE educator could work face to face with children. I have had many educators move on from OSHC to ECE because they needed more hours that were just not available in the OSHC space.
- e. Because there is no minimum qualification for OSHC Educators, they can be placed lower on the Children's Services Award – and placing them higher creates financial strain on services, resulting in higher fees being carried by families.

Noting that OSHC services do not receive any state funding (per Figure 5 of the draft report), OSHC Educators are not required to be qualified and can be placed lower on the Children's Services Award pay scale, and rarely are employed on a full time basis, it can be argued that the provision of meaningful work and job satisfaction are even less likely in the Outside School Hours Care part of the sector. It is incredibly hard to retain quality staff in OSHC because passion does not pay the bills, and other roles require less work.

There is quite a lot of information available for educators who are working with 0-5's, and a significant range of knowledge and experience due to ECE educators needing to complete minimum requirements and services being required to employ university qualified educators. There is not a lot of funding available for OSHC professional development, likely due to the lack of research into the sector. Network, the Peak Body for OSHC in NSW was defunded a number of years ago, leading to reduced capacity to provide OSHC specific training to OSHC educators.

2) The challenges that come from working on school sites

Throughout my career I have worked for private operators, not for profit organisations, and parent managed committee run services. While all of these are different because of their different reasons for and methods of operating, one thing has remained consistent throughout the years and that is the constant need to manage relationships with school faculties and principals.

In my experience school principals seem to understand that OSHC is a necessary, if inconvenient part of their school. Where an ECE service is usually its own building and can plan programs and routines that suit the needs of the children in their care, OSHC services are almost always tenants. School principals are the site managers of their schools, and they take on the risk of things that may happen at OSHC. They can dictate to services what can and cannot happen in the spaces that OSHC operates in, and despite lease agreements to utilise spaces it is not unusual to find that an OSHC space is not able to utilise a space that is being counted in their licence agreement. There are avenues in place that services can take to address this – as someone who has taken this route it risks damaging relationships with schools and creates distrust. It can also be quite time consuming. In the meantime, children are at risk, parents are not satisfied, and it is the unqualified OSHC staff who need to navigate this.

This is so much of an issue that Robyn Monro Miller, former president of the National Out of School Hours Services Association, and Norm Hart, president of the Australian Primary Principals Association, came together after the development of My Time, Our Place and created an additional volume titled “Promoting Collaborative Partnerships between School Aged Care Services and Schools”. In 2023 the Department of Schools Infrastructure advised me that school must support their OSHC services.

Though governed by the Department of Education I do not believe that it is explicitly clear that the part of the department that oversees public schools is not the same as the Early Childhood Education and Care Directorate (or relevant state counterpart if not in NSW.) When navigating the politics of requesting a space increase in 2022, I was informed by a principal that they had no idea that OSHC did not fall under the same line as primary schools do within the department. This occurred after the NSW Government made the promise that every child who attends a public school will have access to OSHC.

Unless Principals have had any sort of involvement with OSHC services in their schools, they have absolutely no idea what is expected and required of us and can be a significant roadblock to services meeting the National Quality Standard.

It seems that despite over a decade of working together not all schools are on the same page when it comes to what OSHC means to their community.

Some of the best services in the sector at the moment are supported by their communities, and have approved providers who are prepared to stand up for what OSHC is all about. For-profit providers, and particularly services that bypass the tender process by being installed as “emergency providers”, are disincentivised from “rocking the boat.”

3) Schools Infrastructure and the Early Childhood Education and Care Directorate

The licence agreement between a school and the Department of Education is an interesting collaboration between the OSHC service provider, the school principal as site manager, the Department of Schools Infrastructure who oversees relationships between schools and OSHC services, and the Early Childhood Education and Care Directorate. (ECECD)

Under Quality Area 3 of the National Quality Standard, ECEC (and therefore OSHC services) are required to provide services that are fit for purpose. I have seen some amazing services that have their own spaces and are indeed fit for purpose – but those services that operate out of a school hall, or who share a classroom with a teacher, or are given access to a school library of all places, don't stand a chance of being able to meet that standard in the NQS. If there is to be a review for OSHC services, consideration needs to be given to the space that was approved by the department as being fit for use in the first place – penalising a service that was not given adequate space in the approval phase cheapens everything else OSHC does, especially when noting that OSHC providers often do not have approval from schools to make any sort of modifications to their space (for example, a service that I have worked at is not permitted to have any sort of signage on the outside of the building – as per the licence agreement.)

A visit from the ECECD in NSW tends to last an hour or two at most, or in the case of Assessment and Ratings may be anywhere from 6 hours to 2 days. With respect to even the most experienced Senior Field Officer this is nowhere near enough time to understand the restraints that an OSHC service must operate under, and I suspect in many cases they have no real idea of what relationships between schools and OSHC services are really like as many of them have an ECE background.

As the Commission may be aware, a service that gets just 1 element rated as “Working Towards” out of 40 elements will receive an overall “Working Towards” rating – this rating stays with the Coordinators who were present at the time, even though they may not be responsible for the factors that contributed to that result. In a time where sector knowledge and experience is disappearing, approved providers are looking to the previous service history of new hires to determine whether or not that person will be able to perform well if they are employed – this is a terrible metric!

4) Provider Category Types, and the NSW tender process

In NSW, providers are divided into categories. According to these categories, parent managed OSHC services are the priority service providers, followed by Not For Profit services, and finally private, for profit services are considered.

In 2021, the NSW Department of Education made a small change to their Shared Use of Facilities Policy, which resulted in the elimination of the parent management committee (not P&C) run service. These committees were given the option to either become organisations and tender for the service, or ask their P&C to take over. I am not aware of any service that has successfully transitioned. Despite the policy's very clear stance that parent managed services are the provider of choice, it is interesting to note that the Commission's draft report states that For Profit provision is the most common model for Outside School Hours Care.

I have not read of any Early Childhood service that experiences significant impact because of Department of Education (noting that we are talking about schools, not ECECD) policy changes. The level of whole organisation, transformational change required to successfully implement this sort of transition is of significant magnitude – not to mention the level of industry knowledge required to navigate it.

Service providers are required in NSW to submit a tender application and undergo assessment in order to win the tender. It does not always work this way, however. Some service providers are offered services as “emergency providers” – intended to ensure that OSHC is available to communities who need it, in the event that an OSHC provider folds or there is some other urgent reason for care to be provided at a school. Since the NSW Government made a promise that all public school children would have access to OSHC on site at the school their child attends, I suspect there has been an increase in the number of “emergency provisions” that have been installed – and several in regional spaces that simply do not have people who are willing to take them on at a loss.

5) For-profit OSHC costs more than Not-for-profit OSHC

As noted elsewhere in this response, the NSW Department of Education (schools) claims to prefer Parent/Community Managed OSHC, followed by NFP managed OSHC, followed by For profit managed OSHC.

When tendering for service licences, the rent for a For profit service provider is significantly higher than that for NFP providers. This makes sense if the department truly prefers all other service provider types over one that operates for profit – and yet the draft report suggests that it is the most common service provision type for OSHC.

This is important because if a For profit provider must pay significantly more in rent than a NFP, two groups of people are impacted by this:

- a) Parents, whose fees must cover the cost of renting a space in addition to many other costs
- b) OSHC Educators, who can be paid lower on the Children’s Services Award pay scale and are a significant expense to any Approved Provider

OSHC is a significant contributor to the ECE sector, with as many as 37% of children attending an OSHC service for 11.8 hours a week on average. A Productivity Commission inquiry that leaves out a significant portion of the ECE sector needs to be aware that policy changes for ECE absolutely effect outcomes for OSHC, and therefore it is essential that further inquiry is carried out into this part of the sector.

More needs to be done to identify and recognise the importance of OSHC as a part of the ECE sector, and to support OSHC Educators who are, in my opinion, disadvantaged in their practice compared to their ECE counterparts – but held to the same standard by the National Quality Standards and ECE regulatory bodies. I believe that there are a lot of good things to have come out of the NQS and regulation of the OSHC sector, but there are also situations where people not experienced with the challenges of OSHC can completely derail an OSHC service’s rating – for a significant number of years. This also stays with service leaders when they move on to other roles.

Relationships between schools and OSHC services are absolutely critical to the successful implementation of a high quality leisure and play based educational program in communities. Much work needs to be done to ensure that OSHC services are naturally seen as an important part of their school community and not an inconvenience that needs to get in line.

The difficulties of OSHC have been highlighted by peak bodies and educators in our sector for years – but it is rare that OSHC is ever directly asked or given the opportunity to have a say in what should happen to make our job easier and more appealing as a career. The NSW Peak Body for OSHC,

Network of Community Activities was defunded a few years ago leading to reduced support for OSHC services in our state.

In social media spaces that exist for OSHC educators and providers, it is clear that OSHC is a very tired and burnt out space in the ECE sector. As a long standing member of the OSHC community, I urge the Productivity Commission to continue its inquiry into the ECE sector with a special focus on the Outside School Hours Care sector. Parents need us – evidenced by the NSW Government's promise that every public school student in NSW would have access to OSHC on site at the school their child attends.

Please don't leave us out.

Regards,

Darren Brisbane
School of Health Sciences and Social Work
Griffith University

13 February 2024