

Monday, 6 January 2014

The Commissioner -Childcare and Early Childhood Learning public inquiry.

Dear Commissioner,

I have been working in Outside School Hours care as a coordinator and manager since 2001 when there were no regulations governing the running of programs only the National Guidelines of 1996. Since then we have endured many attempts to regulate our unique type of service to families including the failed NCAC process of Validation and the recent over regulation brought about by the National Quality Framework where we are rated with a 43 page report where we can fail because we were perceived as not liaising enough with the community or not promoting sustainable practices. I am all for being regulated as I understand many services were very poorly run and badly managed due to the lack of any enforceable rules. The problem with the regulation of our type of care was that we were simply lumped in with the same rules and regulations required of Long Day Care services and Kindergartens where the ages, time spent in care and actual purpose of care are totally different to ours.

As a qualified Early Childhood Teacher I understand the obligation, of services providing ongoing care for young pre-school aged children, to have the ability to teach the young minds in their extended care. My issue is that Outside School Hours Care by definition should not be required to meet the same regulatory requirements as Early Childhood Centres simply because the children have already been at school with four year trained Teachers for the day and therefore do not require an education from Certificate, Diploma or working towards teaching qualified staff. These children vary greatly in ages and their attendance in care can be sporadic and even random. Meeting planning requirements for individual children therefore becomes unrealistic, very time consuming and pointless. Children in our care need a substitute parent who will care for them, meet their basic needs and ensure their safety and wellbeing.

The system as it stands requires staff to be Diploma Qualified in Outside School Hours Care, or an Early Childhood field, or working towards such qualification due to the Teaching aspect required by the regulations that we were included in. Speaking from personal experience as a Coordinator and as a Manager and Owner of services I can state that this is just overkill. It creates a cycle of qualifying staff to then go on to Long Day Care or Kindergarten Teaching because Outside School Hours Care can only ever be a part time job and does not fulfil the requirements of Centrelink for those seeking additional support due to the part time nature and time restrictions of their work. The role is ideally suited to people who only require part time work, who also like working with children and have a caring and nurturing attitude. The only Qualification they should require would be first aid and a working with children check.

The current regulations require staff to gain supervisor certificates and to declare that they are in charge of Education and Learning within the program. Again this is over the top as any adult looking after children has a mandatory duty of care for the children regardless of a costly certificate issued by a bureaucrat. We have been in a situation where it was ok not to have the certificate because they hadn't enough staff to issue them in a timely manner (8 months) and then the same situation where we had applied but it was not okay just two days after we applied.

In closing I hope that the Commission is able to recommend that either Outside School Hours Care has its own regulations or that we are exempt from the specific regulations that are clearly intended for Pre-school aged children and that the complicated Supervisor Certificate process is either eradicated or simplified to ease the burden on staff and operators.

Alan Savage