OSHCsa (OSHC Association of SA Inc) is the peak body for OSHC services in South Australia. We would like to address several issues which we find pertinent to the successful operation of OSHC services.

Our organisation supports the National Quality Framework in principle but is concerned that the increased focus on individual assessment will detract from quality learning spaces for children in school age care. The focus on individual assessment and evaluation which occurs at preschools is very different from what children need in quality school age care settings. School age children are attending educational programs in the form of formal schooling and need downtime and leisure time to offset their more structured school time. We are concerned that the increased focus on individual evaluation and assessment in area one of the National Quality Standard is not being interpreted fairly in Outside School Hours Care (OSHC) services - at least in South Australia. There is too much focus on individual programming for **each** child and this is not consistent with contemporary theories about how children learn in groups and from each other. While OSHC services can still go a long way to improving their quality, we do not believe it is through individual programming and assessment. Families want to see their children relaxing, having fun and enjoying play and having some down time. OSHC services are ideal learning spaces – but the learning here is optimal when the children are immersed in rich play environments and learn from each other as they play. Families and children benefit from OSHC when it emulates neighbourhood play – the way children used to play in the parks and streets. Examples of this informal learning include picking teams, being a leader, negotiating disputes, sportsmanship and learning other valuable social and emotional skills. This informal learning environment is affected, and is less likely to occur, when educators feel overwhelmed and feel pressured to provide individual programs for each child. There is also currently too much focus on written evidence and this detracts from quality experiences for the children. This was something which was criticised under the old system and it does not seem to have improved. While we understand the need to streamline the legislation by having one set of regulations which applies to all service types, we believe this has now resulted in unrealistic expectations of OSHC services.

Our members are concerned with the gruelling nature of assessment and the inefficiencies which seem to be appearing with this process. Services have told us they will spend two days of interviews with the director and management and then are told the report will not be written for a matter of weeks. How can this information be accurately remembered in several weeks time? Surely a better system would be one where the assessor has time to sit down and write the report the day of, or day after the assessment.

The Child Care Benefit (CCB) and Child Care Rebate (CCR) are invaluable subsidies for families – particularly working families. However, the nature in which CCR is administered is inefficient and seemly inconsistent with other government grants or subsidies. Families receive a 50 per cent rebate in the form of money in their bank accounts even if they do not pay their fees (when registered for CCR to go to the parent). So not only do they get free child care, but they get PAID by the Australian Government to put their children in child care. This is not fair to the families who pay their fees and certainly not fair to Australian taxpayers. Would someone still be entitled to get the homeowners grant if they didn't actually pay for their house? We are not suggesting that it be compulsory for all families to register CCR to go directly to their service (although this would help) but there could be a checkbox on the CCMS software which alerts Centrelink when the child care fees have been paid by each family and they are entitled to receive their fifty percent rebate.

When undertaking an evaluation of the child care systems in Australia, OSHCsa and its members believe these three issues should be addressed.