



**Response from the  
National Out of School Hours Services  
Association (NOSHSA)  
On  
Productivity Commission Inquiry into childcare  
and early childhood learning.**

**Information About the Submission**

The National Out of School Hours Services Association provides this  
submission

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## **Our Interest.**

The National Out of School Hours Services Association (NOSHSA) represents the combined Australian voice of the peak Out of School Hours Services (community based and private) in each State and Territory.

These peak bodies are:

ACT/ NSW - Network of Community Activities  
NT – NTOSHC  
Queensland- QCAN  
South Australia -OSHCSA  
Vic - Community Child Care Association Victoria  
WA – OSHC WA

NOSHSA acts as a federated model with representation by a single peak in each state and territory. We have an active membership through our State and Territory peaks of at least 1700 community based and private OSHC providers.

Each of our state and territory associations will provide their own response where possible addressing specific issues for their membership. In some cases individual state and territory associations may have a difference of opinion, this is largely due to the differences in structure and operation of OSHC services across Australia. Despite the introduction of a National Quality framework there remains significant differences in how regulation is applied in each state and territory and management structures.

Childcare and Early Childhood learning in Australia is a large and complex system but an essential one. The terms of reference of this report are wide and the timelines are short. We are concerned that any report will not do provide opportunity for any in depth reflection and analysis of the issues raised by contributors.

We have therefore sought to provide the Productivity Commission with a series of simple points that we believe are critical for consideration when reflecting on submissions and essential for inclusion in any recommendations from the Productivity Commission.



## **1. Introduction.**

***It is important to note that Outside School Hours care is distinctly different from other forms of children's services*** and caters for a wider age range, with increasing independence and maturity who are already engaged in formal learning environments. Therefore the care needs of these children do not include a formal education component but an emphasis on play and leisure. The service type is often complemented by children's engagement in other activities and events outside the service in the local community including coaching, social events and extracurricular activities. Children in middle childhood must be partners and collaborators in how they spend their time out of school.

All regulated Outside School Hours Care Services are required to provide a balanced program of indoor and outdoor activities based on the needs and interests of children. The School Age Care Framework "My Time, Our Place" provides a comprehensive and well-rounded approach to ensuring we deliver programs that are respectful and inclusive of all children not programs dominated by adult agendas and expectations. NOSHSA was a strong advocate for the development of the "My Time, Our Place" framework and included on the working party for its development. It has received a large amount of support from the OSHC sector and we believe is leading edge in school age care provision in the world.

## **2. Government Involvement in childcare and early learning**

***We believe it is critical for Australia to have a Government that is committed to best practice in the provision of services to Australian children including the important and valuable investment quality Outside School Hours Care (OSHC) services makes in the lives of children and their families.***

The Government can do this through continued support for the implementation of the National Quality Framework (NQF), which is a bipartisan commitment to quality children's services, based on research and sector consultation.

We wish to see the Government maintain its commitment to the timeframes for the implementation of the NQF and for review. The NQF is in its infancy and the Productivity Commission must recognize this. It is inevitable that in the early stages of any new system changes will be required. However any review of its efficacy or identified challenges should take place within a formal review structure and based on sound research and sector experience.

The NQF should not be used as the scapegoat for supply and demand issues in children's services or to further any agenda for cost saving measures or to drive up profits. Overwhelmingly the majority of the sector has embraced the



NQF and there is evidence available from ACECQA to demonstrate that the sector is able to comply with the requirements.

The regulations have not been developed to undermine participation in services rather to safeguard quality. This is particularly relevant to Outside School Hours care provision. The argument that a school with 500 children in classrooms can then accommodate 500 children in OSHC does not address the reality that the structure and type of activities being conducted are different and require more space and adult supervision and child input. We are in danger of placing children and staff at risk.

The 2014 planned view of the NQF includes OSHC and we anticipate will address the changes required on the basis of their impact on quality and children's rights. This review is timely and we believe critical for addressing any concerns in the NQF including the needs for a streamlined system of management for supervisor's certificates and the inclusion of OSHC in national ratios and qualifications relevant to school age children.

In acknowledging the need for recognized and appropriate OSHC qualifications it should be noted that with the exception of Victoria, our member associations do not support mandatory qualifications for all staff and support appropriate qualifications that are relevant to the age group. This difference of opinion is articulated in individual state and territory peak body responses.

We believe the Government must commit to maintain action-based research and to undertake a full review and research into the qualifications and ratios for best practice in school age care services.

## **2. Availability and cost of childcare and early learning services.**

NOSHSA has identified a number of considerations for a more streamlined and responsive model of funding for children's services.

CCR and CCB payment is made direct to services through the current CCMS system and offsets the fees families are required to pay.

***Benefit - This combination of the payment will immediately improve perceptions of affordability of childcare for families, improve cash flow within services and reduce duplication of resources within the Government.***

Improve flexibility for families with the extension of sessional hours for approved CCB from two hours maximum in the morning session to three hours and from three hours in the afternoon session to four hours.

***Benefit- A result of this will be a improved affordability for families of***



***low and middle income and increased flexibility in supporting families with their child care needs.***

Special Child Care Benefit processes are making it inaccessible to vulnerable families. An urgent review is required to ensure the benefit assists those it is intended for.

***Benefit – increased and more effective support to vulnerable families***

JET administrative processes identify the unique nature of OSHC and adjust their processes to require only one approval per approved provider (regardless of service type).

***Benefit – Reduction in red tap and triple handling of one approval. Improved timeframes for JET clients to enter the workforce and access child care.***

Inclusion support subsidy is not sufficient to provide care for many children with diverse needs. Subsidy needs to be linked to the child not the service and paperwork must be simplified, as the current processes are not user friendly and unwieldy. The subsidy must be increased for services' catering for high needs children to avoid financial disadvantage for inclusive practice. The system is not meeting the needs if services and needs review.

***Benefit – Increased sustainability for services and a streamlining in the administration of the program to reduce duplication and ensure that the program is congruent with the NQF.***

### ***3. Demand for and expectations of childcare and early learning services***

OSHC is the fastest growing sector and the largest enabler of workforce participation in children's services. To date in WA alone we have an estimated 30-40% increases in enrolment of kindergarten children into OSHC services.

Changes to school starting ages in some state and territories coupled with changes to Government policy requiring return to work provisions for parents in receipt of benefits have contributed to the increased demand in many locations coupled with an increase in school populations.

However this sector requires assistance with the development of a growth strategy to ensure effective governance and management of services is retained. This includes a commitment to work with NOSHSA on the development of approved national ratios and qualifications for OSHC as part of the National Quality Framework. In addition a national strategy for management of the use of school premises for OSHC is also critical if we are to ensure adequate spaces for the operation of services. NOSHSA is prepared to work with Government to assist this process.

Access to current and relevant research on best practice in OSHC service provision remains limited with little attention provided to the researching the impacts of service provision on children's development as well as effective models of management and governance that support quality service provision.

To date the current regimes and awards do not recognize the complexity and differences between OSHC provision and other service types. This has resulted in a history of resource distribution being inequitable and placing the future development of OSHC services at risk.

END

NOSHSA