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Childcare and Early Childhood Learning

Productivity Commission.

**Prepared by
Network of Community Activities
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About Network

Network of Community Activities represents 1200 OSHC Services in NSW. Approximately 820 of these Out of School Hours Services (OSHC) in NSW services and ACT, are current financial members of the organisation. Network of Community Activities is the largest membership organisation in Australia dedicated to the advocacy, promotion, resourcing and development of play and leisure activities for children 5-14 years old

Established in 1974, Network provides resource, support, training, advocacy and advice to communities and OSHC services throughout NSW. Network is a Registered Training Organisation (RTO) offering qualifications in school age care and community management. We also offer accredited child protection training for the OSHC Sector in NSW.

Network represents the OSHC sector on variety of national and international forums and committees.

Introduction

Our organisation, represented by the CEO Ms Robyn Monro Miller, is willing to appear before the Productivity Commission to provide greater detail, case studies and to answer questions that arise from our submission.

Network, through the Federal Government Flexibility project with NOSHSA is currently working with services in NSW to address the demand and supply issues and will be happy to provide further information regarding this project upon request.

In responding to this submission we also wish to give our unequivocal support to the submissions tendered by the National Out of School Hours Services Association (NOSHSA) and the NSW Children's Services Forum (NCSF). Network is a member of both organisations.

In preparing our submission we have sought not to duplicate the views of our colleagues in NOSHSA and NCSF where we are in agreement but to instead focus on particular issues that we believe are high priorities for the consideration of the Productivity Commission.

Current Situation.

There are approximately 1300 Out of School Hours services (OSHC) in NSW. These services cater for 5-12 year old children and offer child care for families before school, after school and during holiday periods. Whilst the services are aimed at 5-12 year olds there is a growing number of children with a disability accessing these services up to the age of 18 years.

Quality Outside School Hours Services cater programs that individually address the needs of children in their service. These programs provide an opportunity for children to develop their own interests and extend and contribute to their leisure at their own pace and in their own time. They do not rely on a focused series of

activities that may or may not hold a child's interest for an extended period of time. We are aware that children in this age group like the opportunity to experiment and engage with activities in a free and often unstructured process that allows children to relax at the end of formal schooling, not be placed in an environment colonized by ambitious adults with adult agendas. "Down time" for children is critical, and must be provided for if we are to raise mentally healthy and resilient adults.

Neuroscience research provides telling evidence that both structured and unstructured play is essential for optimal brain growth and child development.¹ It is this research on play,² which has assisted the OSHC sector to identify best practice in our service provision and reflect this in the school age care framework "My Time, Our Place".

Children in OSHC have opportunities to be physically active or to engage in other recreational activities. We refute any suggestions that OSH services do not provide or cater for the needs of children and believe that quality services are instrumental in engaging with children from a cross section of ages, interests, abilities and family structures. We believe these services create solid foundations for the development of resilient children with the capacity to actively engage and collaborate in their community.

Network remains concerned at the suggestions of an extension of the school day for primary age children or the targeted application of compulsory enrichment activities for children that have the capacity to remove choice from children's lives and their right to access free play opportunities. We are in danger of raising a generation of play-deprived children if play is not adequately planned and supported. In quality OSHC service provision play encouraged and supported. The earliest information, only recently published, makes a link between play deprivation and anti-social behaviour³. A study of 26 young murderers identified that normal play behaviour was virtually absent throughout the lives of these men regardless of demography. The study concluding that play deprivation in children results in social and personal breakdown in adults. We are facing a generation of children experiencing play deprivation. Increasing demand for technological literacy and the belief that a virtual world is safer to play in than the real world further removes play opportunities from the lives of our children. The "domestication of childhood"⁴ is upon us, increasingly removing adventure, risk and the capacity to develop life skills.

¹ S Rushton, A Rushton, & E Larkin, 'Neuroscience, Play and Early Childhood Education: Connections, Implications and Assessment' 37 *Early Childhood Education Journal* 351. At <http://www.eric.ed.gov/ERICWebPortal/detail?accno=EJ876287> (viewed 10 May 2013).

² J Gleave & I Cole-Hamilton, *A literature review on the effects of a lack of play on children's lives*, Play England (2012). At <http://www.playengland.org.uk/media/371031/a-world-without-play-literature-review-2012.pdf> (viewed 10 May 2013).

³ (Brown and Lomax, 1969, in Brown 1998),

⁴ Chris Mercogliano in his book 'In Defence of Childhood; Protecting Kids inner wilderness'

Issues for Consideration

We believe the following issues are essential elements for consideration by the Productivity Commission;

Inclusion of OSHC Services in the NQF

Outside School Hours Services in Australia as of January 1 2012 are included in the National Quality Framework (NQF). Network supports the inclusion of the OSHC sector in the NQF and will not support any attempt to exclude the sector from this process that ensures minimum standards of quality for all school age children in OSHC regardless of where they live and which service they attend.

We acknowledge that a regulatory framework for school age children should be based on the fact that children of this age are at less risk than those children under 5 and can advocate for themselves in some capacity. Opportunities for independence, skills development and a level of safe risk taking needs to be provided for to ensure children develop resilience and life skills. With this in kind we believe there is room for further improvement in the system.

The importance of national minimums for service quality in OSHC have been emphasised in in the last few months by the Royal Commission into Child Abuse. This NQF includes as part of its regulation required policies and procedures for child protection, criminal history checks, employment policies and a requirement for staff in attendance at the service to have child protection qualifications.

NSW is the only state in Australia that has no mandatory qualifications or ratios in the regulations. Currently the ratios for staff and children in Outside School Hours care in NSW are not mandatory, despite other states and territories having mandatory ratios of between 1:12 and 1:15. In NSW the majority of services have accepted a voluntary requirement of 1 adult staff member to 15 children and on excursions this is reduced to 1 to 8. To protect staff and children it is common practice that a minimum of 2 staff members are present at any one time. In some case services do not apply this and there is no legal requirement to do so.

In creating a child safe organisation the implementation of policies and procedures is just one strategy in place to support the organisation. The monitoring of this process is currently undertaken by the State Government through it's regulatory compliance role. In this regard the system has a number of safeguards in it but remains based on the integrity of services implementing the policies and procedures.

The heavy regulation of the OSHC sector provides safeguards that do not exist in other unregulated forms of service delivery where children are involved. In exploring the concept of child safe organisations we would urge consideration of this fact.

Review of NQF.

We do concede that some levels of the current regulation detract from the quality of care able to be offered with staff overwhelmed with administration and red tape that this could be eliminated and the time and energy instead focussed back into interactions with children. A review of the current regulation is scheduled for 2014 and the findings will inevitably improve and refine the system.

We believe that this current system can be better tailored to meet the OSHC sectors needs however we are also practical in understanding that all change requires a process of review and refinement.

The NQF system is only 3 years old and therefore it would be unfair of any independent inquiry to deem it unworkable when the results to date have been so positive. We do not believe it is appropriate in the context of the Productivity Commission to pre-empt any review of the NQF. Considerable investment has already been made by the sector and all levels of Government into the implementation of the new system and this merits a considered and careful review rather than one based on ad hoc assumptions and unrealistic time frames.

However, in reflecting on the impact of the NQF on service delivery to date we would like to note that as a resource and advisory organisation for OSHC services we have seen numerous examples where some of the issues associated with the NQF rests not with NQF standards or requirements but the communication strategy and the impact of external sources.

In some cases this has been the limited expertise of the regulatory authority assessment and compliance officers attempting to interpret the NQF through the early childhood lense rather than through the school age care lense. Further training and support for these officers could alleviate that issue.

In addition, Network is aware of a high number unscrupulous consultants and businesses attempting to market their services by exploiting the insecurity of OSHC Educators and Providers with the new system by providing advice and information that is beyond the requirement of the NQF and this results in over reporting and extravagant documentation as well as generating fear and hostility towards the new system. As the not for profit peak we are responding on average to 5-10 calls a week in relation to services receiving this misinformation.

In addition we are aware of numerous large service providers who have actively promoted the NQF as complex and unwieldy to principals and parent groups in order to encourage them to relinquish their management of the OSHC service operating in the school. This is often undertaken through unsolicited mail and emails that perpetrate the myth of NQF being an insensitive vehicle of Government rather than a system based on sound research and sector consultation designed to enhance the quality of service provision for our children.

In addition, Network has no evidence of private providers leaving the OSHC sector in NSW since the inception of the NQF. Rather we are seeing rapid expansion since 2012 and increasing engagement with our organisation from new potential operators interested in establishing an OSHC service.

Network would ask the Commission to reflect on these examples and question if management of OSHC services under the NQF is so complex and unwieldy why is there an increasing number of operators keen to establish and take over existing OSHC services which they must perceive to be profitable business models under this system?

Extension of School Day

Network of Community Activities does not support the extension of the school day or the introduction of formal education plans into the Out of school Hours Setting.

The mastery of academic outcomes and completion of components of school curriculum should not replace children's time for play and leisure. Discussion on extended school days and extra curricular activities by well meaning individuals only serve to perpetrate the false belief that academic achievement is an essential indicator of biological fitness.

Current research on the effects of Play deprivation⁵ is alarming and Government must take heed of this warning before it is too late. The OSHC sector argues strongly for the recognition of the value of play and how it benefits children and the community as a whole.

Network is aware of a range of international models in Scandinavia that see the role of OSHC and Schools as complementary with shared respect and collaboration. However it should be noted that none of these services are free and there is an equal number of children who do not access them.

Extension of the school day only serves to accommodate one component of the population, there are many families who would be equally disadvantaged by a change to school hours and indeed one that reflected the European or Scandinavian models offered up as alternatives may significantly disadvantage both businesses and families.

Access and use of school premises

⁵ Brown, S. L. 1998 "Play as an organising principle: clinical evidence and personal observations", in Marc Bekoff and John A. Byers (Eds) Animal Play. Evolutionary, Comparative and Ethological Perspectives. Cambridge: Cambridge University Press.

There is a need for enhanced co-ordination between Education Departments and Community Services Departments to facilitate an understanding of the role and importance of OSHC services and access to appropriate venues is essential.

In NSW 60% of services are located in school facilities and this link is essential for the development of streamlined services. However, due to the Education Department not seeing OSHC as a core business services have a mixed response from schools and Principals in regards to their inclusion in the school community. It is critical for service quality that services have access to suitable premises located on school sites or in close proximity. Services ideally have access to a central space and the ability to utilise other areas of the school. It is not realistic for teachers or OSHC educators to 'share' a classroom that is used by the children during the day in a formal setting. OSHC is by nature different to the formal school day and the room must be able to accommodate this without disrupting the 9-3 activities of a schoolroom.

A national strategy on the use of schools by OSHC should be implemented to ensure that OSHC services are priority users and that governance structures exist that are inclusive of parents and programs that are delivered are tailored to the needs of the children in the service and reflective of the community where that service exists.

In addressing the issue of premises expectations of parents also need to be realistic to the differences in provision. The OSHC service requires more space to operate than that required in a formal school classroom environment. Expectations that a school can accommodate the same population for OSHC as it can in classrooms are unrealistic without additional provision of rooms and increased staffing.

Workforce – Recruitment and retention.

Whilst demand for OSHC is increasing the other key factor limiting access to expansion of existing services is the ability to recruit and retain suitable staff. Services in particular regions are experiencing staff shortages and incentives need to be provided to encourage people to choose a career in OSHC.

It is not unrealistic for OSHC services to have a range of staff who are studying part time and 'roll over' as their courses are completed. This generally means staff stay approximately 3-4 years and leave the service having learnt as much from the children and the children have learnt from them. This process is an effective means of building community engagement and skilling up individuals to be more collaborative and engaged in the local community. Network does not see this as detrimental to quality where there is a stable leadership within the centre, generally characterised by one or two staff who act in a full time leadership role as Co-ordinators and Assistant Co-ordinators. Within these roles there is a high number of services with very low turnover.

The majority of services in NSW, over 60%, are community owned and managed, predominantly by incorporated parent groups and in these services we are seeing a low turnover in the positions of Coordinator / Director particularly if above award wages are offered and the services is located in a supportive school with a supportive school leadership.

Network has found that where services pay above award wages to staff in general attract more candidates and have a higher retention rate.

There are specific qualifications for OSHC that adequately reflect the needs of the service delivery and age groups of children.

However, OSHC services have not benefitted from the same funding offered to services for Educators to upskill and gain qualifications and this should be addressed as it undermines the capacity to recruit and retain staff in OSHC services and offer suitable career paths.

Network is currently reviewing strategies for enhancing staff recruitment and retention in OSHC services and the major barrier we are finding is access to suitably skilled staff and the provision of a living wage for the staff member.

Review of Current Parent Subsidies and provisions to increase affordability.

There are a number of immediate changes to the current system that would improve affordability for families.

The current system of Government subsidy to families is unwieldy and does not enhance parents understanding of the benefits available. There are currently two payments available for families and this is confusing and unwieldy.

The combination of the Child Care Benefit (CCB) and Child Care Rebate (CCR) payment into one benefit made directly to services on behalf of families to offset the cost of the fees will immediately improve perceptions of affordability of childcare for families, improve cash flow within services reduce administrative burden on services and families and reduce duplication of resources within the Government.

The current option of direct reimbursement to families does not assist families to see the direct effect of the 2 benefits. It has also resulted in services carrying large amounts of debt as families defer fees and use the rebate received into their bank account to cover other living expenses

The current CCR benefit is not means tested and there should be some consideration given to this issue whilst reminding the Government that their

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current levels of cut off for CCB should be raised to a more realistic income level for 2 parent working families with the high cost of living in NSW placing increasing pressure on families.

The current CCB provisions also disadvantage families and those who use OSHC services with 100% benefit payable to families using early childhood services but only 85% benefit payable to families using OSHC. This is discriminatory and lacks logic. Further contributing to affordability issues for families.

The CCB provision of limiting hours of provision for the purposes of claiming CCB is outdated and inflexible. The current limits are 2 hours per morning, 3.5 per afternoon and 10 for vacation care. We believe this should be extended to 3 hours per morning and 4 hours per afternoon and 12 hour for vacation care to accommodate the opening hours of services.

These changes will result in improved affordability for families of low and middle income and increased flexibility in supporting families with their child care needs.

Furtherer process that would increase affordability for families and reduce administrative burden are required in special child care benefit and JET funding. Currently JET funding required services to claim up to three times, one per session of care type (before/after and vacation care).

Addressing Demand.

Families wishing to access OSHC services are limited in their ability to choose alternative services as access to a service is largely dependent on their choice of school.

Despite repeated calls for transport subsidy and access to extension of the school bus pass scheme to allow children to use public transport to attend services there has been little progress in this area.

It is not feasible to suggest that every school has a service on site due to the question of long term viability for the service. However, it should be a requirement that every school has access to a site, either at a local school with vacancies within walking distance or access to supervised transport for the children.

Network is aware that despite media reports of waiting lists and high demand vacancies are being recorded in the same location as a service with a waiting list. This is often due to parents choice of school or service to meet their needs.

The current NOSHSA project funded by the Australian Government as part of the flexibility trials is utilising 'Community Co-ordinators' to assist in trialling a model where local solutions can be found to address issues of supply and demand and

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promote great collaboration between local government, schools, services and families.

Network is currently undertaking the role of Community Co-ordinator for the Leiccharadt LGA and the results of which will be published shortly and inform the process of addressing demand.

Gaps in Research

The considerable resources invested in the early childhood sector both in terms of Government and Corporate dollars results in the access to this evidence. Focus on children 5-14 years has not been given similar advantages, funds or research.

The Secretariat for Women argued in a submission “ There is a deplorable paucity of Australian independent or Government sponsoring of research which might inform policy and practice on aspects of needs, service types, benefits and the other elements of the provision of care for school aged children.”⁶. Network supports this viewpoint and argues that until such research is undertaken Out of school Hours Care and the needs of children in middle childhood will not have the recognition it deserves.

The known international research undertaken on Out of School Hours care (OSHC) and the child 5-14 years provides supporting evidence that quality OSHC services improve outcomes for children.

In addition we have increasing research being undertaken on the importance of play and free time in children’s lives. Quality Out of School Hours Services where the focus is on play provide important opportunities for children’s development.

Role of Local Government

The framework has also omitted the role of Local Government.

In NSW Local Government is a key player in service delivery for Children’s Services both directly and indirectly through resources and support.

All levels of Government must be engaged in the commitment to the delivery of high quality Children’s services in their community.

Addressing Disadvantage.

The current “Priority of Access” guidelines in service delivery need review as they work against real disadvantage with an emphasis placed on workforce participation and access to Child care benefit (CCB) limited in hours for non work related care needs.

⁶ Security for Women (<http://www.security4women.com>), Submission to Government on Women’s workforce participation August 2008

Services for Rural and Regional Areas.

The current level of funding for services in rural and remote areas for OSHC services is not sustainable despite its title of “sustainability assistance”.

Following CCB approval, some OOSH services are eligible to receive Sustainability Assistance where their expected EFT Utilisation is below 30 places. OSHC Sustainability Assistance funding is paid quarterly and is calculated and adjusted every 3 months according to utilisation reported by services. This sustainability assistance will provide support for the service whilst utilization is increasing.

However it fails to recognise the ongoing infrastructure costs associated with service provision that has fluctuating enrolments and staff costs often higher than metropolitan areas.

Small stand alone services identified as being in a rural or remote location should have access to a core amount of infrastructure funding if it is demonstrated they have not got access to cross subsidise through other services or business models. Whilst this recommendation would require further consultation and consideration it is apparent that maintenance of infrastructure is critical as the service is to withstand the changing care patterns of families.

Current rates are not equitable with early childhood services, despite the same requirements to be met in a regulated service delivery framework.

Supporting Children with Additional Needs

Network has been advocating for many years about the increasing concerns we have on support for OSHC services catering for children with additional needs and their impact on service sustainability, accessibility to services, workforce participation and recruitment of educators. We therefore believe it relevant to include information on our concerns taken from previous submissions to Government that have resulted in no improvement in this area.

There are three aspects of considerable concerns to us

1. The financial implication on service provision to cater for children with additional needs.
2. The availability of places for children with additional needs in OSHC.
3. The impact on availability of places for 5-12 years old being impacted on by the lack of provision elsewhere for children in their teenage years.

Financial Implications

Provision of children with high and complex needs requires adequate funding.

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Services are suffering financially in order to assist families access care.

This has been raised with the Federal Government consistently over many years and remains an unresolved issue for services. The examples speak for themselves. The current finding model is not sustainable, we are heading for a crisis in care provision for children with additional needs.

The following examples provided sum up the dire situation facing OSHC services in NSW.

"Attracting disability specific trained staff due to the hours and the wages. Funding is limited to the number of hours the children are attending and capped at \$16.49 per hour. This is below the award rate for the type of staff member that you would employ for their qualifications or skills and experience to work with some of the high needs we are encountering. This therefore becomes an ongoing loss for centres that can place a financial burden on it viability, particularly when they may be more than one ISS staff member per centre. The wage that we would be paying a staff member in this situation would be around the \$21 mark per hour. Using the example of J and L from the above list we would pay out a further \$40.59 per afternoon to cover staff direct cost (not taking into consideration insurances etc). For the week the loss stands at \$121.77, for the term it equals \$1217.70 for the year it totals \$5114.34. That is a large financial loss considering that is only looking at the twins from the above list."

"With the financial costs even for the 5 to 12 year olds we get about 16.00 an hour for the so called funding, yet we have to pay staff a minimum of 23.00 an hour so it costs the service a lot of money each week to support the special needs kids, and I know at the end of the day its not about the money its about the child but it certainly takes a lot out of the budget when you have 5 special needs carers every afternoon. "

" In our Vacation Care program we extend shifts for permanent team members or employ casuals for the care to be shared. In 2008 the VC weekly wages deficit was from \$81.60 to a maximum of \$255/child, to now being from \$125 to \$320/child. We currently have 3 funded children in VC, if they all attend for the full day (8') for a week (40'), this equates to a maximum weekly shortfall of \$375 to \$960."

"I have three children and we must find an extra \$14160 a year to fund this, not that easy for a not for profit organization."

Service Accessibility.

Network believes there is an urgent need to address the issue of provision of school age care services aimed at youth in particularly those with complex and additional needs.

Whilst Network supports the right of children 12-18 years to access a service we believe that the services providing this access are inadvertently complicit in shielding Government from the lack of adequate service provision for this age group. As a result we are seeing an increase in numbers of teenage children accessing services designed for primary age children. This access is placing unrealistic pressure on services, staff, children and families.

This issue is further compounded with frequent examples parents of children with additional needs threatening services and staff with legal action and discrimination. The bullying of services into taking children with high level o complex needs and retaining them at the service is not an isolated incident. In a number of situations Network has had services report to them incidents of bullying and harassment. Some of this harassment has come from disability advocates rather than the parent themselves adding a complicated dimension to collaborative work that meets the best interests of children. The only need being met in this instance is the needs of parents with an “instant fix” for affordable childcare.

As a result, fear of litigation often keeps services hostage to a system that is not meeting the needs of the child with high and complex needs, particularly in adolescence and to the detriment of the services and other service users. In addition there appears an incentive for some funded agencies to place children with high and complex needs into OSHC services due to the ready access to some form of Government funding.

Whilst OSHC services are already struggling to meet the demands of primary age children with additional needs, the additional demands of an expectation that this care will then be extended into care for high school students with complex or additional needs is unreasonable. Services report there has been a steady increase over the last seven years in the number of families calling centres investigating and requesting care for their children with special needs.

With the changes in trends, staff find it most difficult to cater for the growing number of high school children and their specific needs. The following is a snapshot of one school age care service providers current enrolment of children over 12, all of whom have additional or complex needs;

- *J and L – 15 year old twins diagnosed with Down Syndrome, ADHD and hearing impairments. L has issues with his kidneys which is stunting his growth and causing further medical issues. Both attend 3 afternoons.*
- *T – 13 years old assessed as having Autism, ADHD along with Developmental delays. He attends five morning and five afternoons.*
- *B – 13 years old assessed as having Autism. Attends five afternoons a week.*

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- J – 13 years old assessed as having Autism. Attends five afternoons and each day in Vacation Care.
- A – 13 years old diagnosed with Down Syndrome attends Vacation Care daily.
- K – 14 years old assessed as having Autism. Attends Vacation Care daily.
- J – 14 years old diagnosed with Down Syndrome. Attends daily in Vacation Care daily.
- A – 13 years old diagnosed with Klinefelter Syndrome. Attend Vacation Care daily.
- J – 15 years old assessed as having Autism. Attends Vacation Care daily.

These trends are by no means limited to the metropolitan areas and one small rural service reported that provide care for 6 diagnosed children with high support needs and another 6 with challenging behaviour. This service caters for 31 children in total with a maximum daily participation of 26. Therefore, 46% of the children have additional support needs in this small centre. This level of service delivery is managed with 2 staff members and one additional disability worker. It could easily be said that the service staff have unrealistic demands placed on them to meet the standards of service delivery required by Government.

Provision of Age Appropriate Provision

"We currently have a boy who is now 16 years old enrolled in our service four days a week for after school care who has very high support needs. He is in a wheelchair and is both intellectually and physically disabled. He is tube (PEG) fed every afternoon by our staff as he is unable to feed himself. He is also not independent with toileting and is normally changed using a hoist and change table but we don't have these facilities. The decision was made by his parents at the time of enrolment that they were happy for him to go unchanged while in our care (the hope is that school will do one last change before he leaves for the afternoon and then he is only with us for 2.5 hours or so). We were pressured by the local inclusion support service to take on the enrolment as the family were in desperate need of care and the support service's after school care service for children with high support needs was at capacity and could not take him. The staff have built a wonderful relationship with this child and his family and do not begrudge the extra work we have taken on but he is not in the appropriate setting for either his age or his disability."

OSHC services designed for children 5-12 years of age are not appropriate settings for children in their teenage years. Despite the mental age of children there are significant factors in regards to a child's development that makes provision unsuitable.

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Due to the size of some teenagers services report that if they have challenging behaviour that is of a physical nature the degree of injuries inflicted on other younger and smaller children and the staff is more substantial. Staff also reported that adolescent children often start to display sexualised behaviour towards the other children and the staff as they move through puberty.

Access to appropriate equipment for use to meet individual needs of teenagers (i.e. hoist for toileting) is challenging in OSHC as often the children are much larger than primary age children with additional needs. The size of teenagers requires two staff for undertaking caring duties due to manual handling requirements. This results in compromised staff: child ratios in the centre. All children are placed at risk when ratios are compromised.

Due to ratios and the part time nature of OSHC service provision, specific staff rostering is not always possible in a traditional OSHC Service. This will often leave staff feeling uncomfortable particularly with toileting and assisting teenage girls who are menstruating.

The dignity of the children with additional and complex needs and their right to an age appropriate service should be respected. Currently, despite the best efforts of all parties involved, this is not the case in the provision available.

Absence of Options for Families

"We have a young man who participates in our programs, he has been coming to us since 2003 and is now 14. His Vacation Care participation is ISS approved but coping with his changing needs as a teenager whilst continuing to deliver service to primary age children is increasingly difficult. We have discussed transitioning him out but to where????"

The major issues facing families and OSHC services is that there is no or limited provision of services for children with high and complex needs once they reach high school age. Many children currently using OSHC services have no access to another service to allow for transition to occur into a more age appropriate service.

The lack of age related care results in waiting lists for younger children in OSHC services designed to take the younger child. So the effect is twofold – it restricts access to a suitable service for younger children with additional needs and it places stress on services to provide care outside their scope.

A service in the St George area, estimated that they referred at least 4 families every term to other agencies and services in relation to Vacation Care as they were unable to stretch their resources further. The referrals were to other mainstream services, which may have vacancies or are suitably resourced for inclusion. Once service stated " we are currently reviewing our

practices in relation to inclusion as being 'too inclusive' is creating issues and concerns. We are compromising the quality of care we provide to include more children than we should as there is very little choice for families".

The lack of provision also provides families with issues in relation to transport. Children with high or complex needs can frequently not be accommodated in mainstream schooling however due to lack of provision are transported back to OSHC services located in schools. This places children at an additional risk and services have reported a lack of supervision on the transport can result in children being offloaded at the OSHC service location without a staff member present to take responsibility for them.

Staff Recruitment and Retention

"In the past we have had a number of older special needs children at our service for both ASC and VP, it has been very challenging for all involved as the majority of our special needs staff are uni casuals as we cannot afford to put on a fulltime disability worker as that child may only be with us for one year or six."

"What do we do about staffing? all our good disability workers leave for fulltime work as we can only offer them a casual position of 3hrs a day as long as that child keeps coming or is not sick. This year I have had to turn away four families from the local ASPECT school due to not being able to accommodate the children with both staffing and funding with ISS."

Whilst staff recruitment and retention is not isolated to disability support work the rate of pay and the casual nature of disability support work make staff retention and recruitment challenging in OSHC services. Services complained of being stretched to meet some of the support needs of the children attending with examples of tube feeding and changing nappies increasingly being required in services whilst concurrently providing play and leisure activities for 5-12 year olds on ratios of 1:15 in venues not designed for high level support needs.

Questions regarding legal implications, occupational health and safety and duty of care have been largely overlooked in the quest to meet the burgeoning demands of care provision. There is an absence of legal advice available to services and staff to assist them make informed decisions about their ability to provide care and their liability if an issue arises.

Services cited examples of finding it difficult to recruit and roster staff in OSHC services that are able to take on the additional requirements of a child with additional needs. Lack of training and the nature of OSHC service provision make it difficult to support staff with these tasks. This is particularly common when staff are required to assist teenage girls who are menstruating which requires last minutes rostering changes that may not always be possible.

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Current funding arrangements do not support services being able to fund adequate staff and child ratios nor do the service environments allow for modifications to make them more appropriate as they are not purposely built and lack in most cases many of the features required for the provision of high support care.

Network would like to see the following consideration made in regards to supporting children with additional needs in their access to child care provision:

- Development and funding of services for 12-18 year olds to meet child care needs of families.
- Incentive grants / financial support for establishment of OSHC services in schools for children 5-12 years with additional and complex needs.
- Increase in funding levels to services providing care for children with additional needs where additional staff are required.
- Simplification of reporting process for funding requests.
- Disability workers appointed scheme to support a child and family on a long term basis across the different transitions to guide families in choices of service delivery and negotiate issues of access to services and funding.

Conclusion

We conclude by emphasizing some key principles to be considered in any deliberation on childcare and early learning

- **Children's rights** as defined under the United Nations Convention on the Rights of the Child (UNCRC) should be central to all decision making.
- Workforce participation choices should be supported for parents of all children with equitable access to affordable, quality services that are **AGE APPROPRIATE**.
- Parents and children should not be squeezed into a "one size fits all model"
- **Social Inclusion** is a critical factor for the development of **resilience** in children 5-14 years. Any recommendations should not be limited in their application to early childhood so that we effectively **EXCLUDE** children 5-14 years.
- Community Management, with parent representation gives a **VOICE** to those who often can feel they do not have one when it comes to the formal care of their children as well as enhancing community involvement. No actions should be taken that undermine this important component of the OSHC sector.

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- Social Inclusion applies not just to children but also to parents. Quality managed services where parents have the opportunity to participate in the service management and are actively consulted with regarding the service operations **promote social inclusion and communities capacity building.**

Thank you for the opportunity to provide feedback to the Productivity Commission. Our responses are however not exhaustive and we are happy to provide additional information or attend a hearing.

For Further Information.

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