

**Response from the  
National Out of School Hours Services  
Association (NOSHSA)  
On  
Productivity Commission Draft Report  
Into Early Childhood Development Workforce**

**Information About the Submission**

This submission is provided by the National Out of School Hours Services  
Association

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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 in each State and Territory.

NOSHSA has an active membership through its State and Territory peaks of at least 1700 community based and private OSHC providers.

Each state and territory association will provide its own response where possible addressing specific issues for their membership. In some cases individual state and territory associations may have a difference of opinion. NOSHSA will highlight these differences in our response

These responses will be submitted from our member associations in NSW (Network of Community Activities), Northern Territory ( NT OSHC) Queensland ( QCAN ) South Australia (OSHCSA) and Victoria (Community Child Care Victoria) .

Our response concentrates on the recommendation emerging from the draft research report and Chapter 7 in the report "The Outside School Hours Care and occasional care workforces."

This response represents the combined views and feedback on the draft research report as a national summary.

### **Key Points.**

The key points identified in Chapter 7 reflect a number of errors and misconceptions that are not only inaccurate but damaging to the OSHC sector.

NOSHSA strongly condemns the statement in the key points that is reiterated in the recommendations referring to OSHC as "non-cognitive". The school age care framework "My Time, Our Place" due to be implemented on January 1 2012 is not referred to in the Productivity Commission report and has a number of statements in regards to cognitive development in OSHC.

The footnote attributed to Robyn Monro Miller on page 110 in referring to "non cognitive" is inaccurate and disputed by her. The essence of the discussion has been taken out of context in the course of a verbal discussion with researchers about the importance of play in children's healthy development rather than an emphasis on formal educational outcomes or 'homework centres'.

Whilst the report quotes the definition of "non-cognitive" we challenge the validity of the term and believe it misrepresents the development of children. All children are constantly developing their cognitive skills through thinking, problem solving and exposure to new concepts be it through formal

education, play or a walk to the shops.

These comments do a disservice to the sector and to children and should be removed and rewritten prior to publication of a final report.

We believe the report under estimates the school age care workforce in Australia. NOSHSA estimates that the real workforce for school age care is actually three times that amount. The OSHC workforce draws on a high number of casual and itinerant staff that effectively trebles during the school vacation periods when the days are longer and additional staff are required for excursions and shift coverage. In providing care for children with additional needs additional staff are required in services and this affects ratios significantly.

Reference to "OSHC workers" should be adjusted to "OSHC Educators" or "staff" in line with current practice.

The use of the word "Directors" is not used in at least 2000 Australian OSHC services and the term should be "Directors /Co-ordinators".

The report underestimates and at times fails to address the issues surrounding the difficulty in finding staff for OSHC services. There remains a critical shortage of skilled staff and this is placing extreme demands on the sector and at times driving the quality of care down. Recruitment and retention of staff is a major issue for OSHC services.

We believe OSHC Educators should be included in any discussion regarding qualifications and training. NOSHSA believes further research is required in this area and that the importance of having strong pedagogical leadership in a service is even more critical when dealing with high numbers of casual or transient staff.

The report generally avoids the critical topic of pay and conditions. This appears to be the proverbial "elephant in the room" and should be addressed in a report on the ECEC workforce. A major factor in workforce participation is the ability of the staff to earn a living wage, at present this is compromised with pay and conditions inequitable with the responsibility and obligations of the role.

The report notes that the commission seeks further information on outside school hours care and its workforce but the absence of a recommendation that provides an opportunity for this information to be collected is a noticeable omission. Unless further research is made into the sector we will continue to be left behind in Government initiatives and inaccurately portrayed in reports due to a lack of valid research.

## **Comments on draft recommendation, findings and information requests.**

NOSHSA provides the following specific comment on the recommendations. Where no comment is provided we support recommendations or in the case of chapter 5, 6, 12 -14 refer to the expertise of relevant peak groups for their comment.

### ***Draft Recommendation 3.5.***

The conclusions drawn in the report regarding volunteers managements are in many cases wrong. Community based services are an effective form of management of OSHC services and currently nearly 90% of services in Australia follow this model. Any additional support that Government can provide is welcomes but this should be to support flexible, customized professional management support without nominating 'clusters' style management as a preferred option.

### ***Draft recommendation 3.6***

- Regulators should have mandatory qualifications, reference to "adequate resourcing" is not comprehensive enough nor does it address the necessary skills sets.
- In acknowledging the 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.

### ***Draft recommendation 7.1***

- NOSHSA disagrees with the term "non cognitive".
- NOSHSA supports qualified staff in the sector and believes that the nature of qualification and scope needs further research.
- We believe there is inadequate referencing of the current information available on brain research and the middle years and this should be considered when making any decisions that impact on school age care children.

### ***Draft recommendation 8.1 / 8.2 / 8.3***

There is support for the contents of recommendation 8.1, 8.2 and 8.3 with the following comments;

- NOSHSA believes there is a growing issue in provision of care for children with a disability. The identified lack of funding to support services with inclusion is placing services in position of financial hardship and staff are not provided with adequate support or resourcing to undertake the role.
- The growing number of 13-18 year old children accessing OSHC services designed for 5-12 years olds is also placing strain on staff and forcing them to work across a high level of age ranges and abilities without the necessary skills to do so. The report has not identified this in their recommendations or comment.

***Draft recommendation 9.1***

- NOSHSA supports the recommendation but would like to see the alternative strategies include reference to access to rent assistance, scholarships and resources for staff to travel outside their community to meet and attend other professional development opportunities to broaden their experience.

***Draft Recommendation 9.2***

- Currently the cost of rent and access to affordable housing remains a factor in attracting staff.
- NOSHSA is able to provide examples of portable housing provision in WA and Qld to assist with the issues of staff relocations.

***Draft Recommendation 10.1***

- It should also be noted that the current online courses must require practicums to ensure work readiness. It is unrealistic for qualifications to be gained online without any requirement to ever attend a service and undertake some form of engagement and assessment of their interactions with children.

***Draft Recommendation 10.2***

- Whilst we support this, the outcomes achieved should be equivalent to the requirements set for all educators.
- Caution should be taken to ensure that a parallel system is not established where opportunity for students from English and non English backgrounds to study and learn together is not provided. Regardless of cultural background the development of team work, empathy, understanding and co-operation begins with students studying child care qualifications together and developing their own understanding of working to address cultural differences.

***Draft Finding 10.3***

- Noted that there is no qualifications required for regulator or assessors in the new NQF system career pathways are limited.

***Draft Recommendation 10.7***

- NOSHSA strongly supports the “high risk” classification and recommends that organisations should be shut down where they do not meet the requirements.

***Draft Recommendation 10.8***

- This recommendation requires reference to the School Age care framework “My Time, Our Place”.
- Professional development should not be a “one size fits all” model with the availability for sector specific training and professional development.

## **Conclusion**

NOSHSA Believes that the report by the Productivity Commission requires further work to ensure it encapsulates to the OSHC sector and is a realistic portrayal of the work and the issues faces by the OSHC workforce.

The Out of School Hours care Sector in Australia is a strong and dynamic sector that is enriched by the diversity of it's workforce. As we stand on the eve of a new era in quality children's services provision it is critical that a report by the Productivity commission does not detract from the sector achievements and challenges but recognizes and articulates them.

To this end we believe a recommendation regarding further research into the workforce issues of the Out of School Hours sector is imperative.

**END**