

SA Royal Commission
GPO Box 11025,
Adelaide SA 5001
Submitted via email to: RoyalCommissionECEC@sa.gov.au

Dear Commissioner Gillard,

Thank you for the opportunity to provide a submission to the South Australian Royal Commission into Early Childhood Education and Care.

Overview

The Outside School Hours Council of Australia (OSHCA) encompasses providers who (together) account for more than 30 per cent of the national OSHC market, including Junior Adventures Group, TeamKids, Camp Australia, TheirCare and The Y. OSHCA members represent approximately a third of the 4,000+ services that are operated on school sites throughout Australia, employing more than 10,000 people across all mainland states and territories.

Within OSHCA's membership there are organisations including The Y that provide other care services in addition to OSHC. As such, The Y has provided a separate submission covering a broader range of issues that are directly relevant to the services they operate.

This submission provides insights into challenges and opportunities that exist for the Outside School Hours Care providers across Australia and how they relate to South Australia, as well as the needs and children and families who rely on these essential services.

OSHC Services provide critical support to families and an enabler of full employment

A core purpose of OSHC services is to provide care in order for parents to work the hours they need to fulfil their jobs well and support their families. Without access to these services, parents – particularly women – would be unable to work, or to work as many hours as they would like.

For families, a lack of access to OSHC services has a real impact. It can mean saying no to additional hours or shifts, being unable to take on higher paid roles and a reduced ability to progress careers. Families where both parents work are the most likely to use OSHC services.

This is supported by the fact that OSHC services make up 30% of the care market in South Australia, equal to 387 services across the State.¹ This is despite the fact that in many areas families are not able to access the level of care they would prefer.

While there are substantial benefits to families, OSHC services are also critical for business. A fully functioning OSHC sector means business has access to a larger talent pool, especially in rural and regional areas, and can invest in their employees who they know want to grow with their business or organisation into expanded roles.

¹ <https://www.acecqa.gov.au/sites/default/files/2023-05/NQF%20Snapshot%20Q1%202023%20FINAL.PDF>

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In Australia, the proportion of couple families with dependants in which one or both parents were employed was 93.7% (2.5 million) in June 2021, up from 92.1% in June 2020 meaning parents play an enormous role in Australia's workforce. Specifically, 73.7% of couple families with children under 15 have mothers who are employed. (Ref: ABS data June 2021).

In 2019, 304,002 (or 31.5 per cent) of children aged 0–12 years, attended Australian Government Child Care Benefit approved care services. (Ref: Productivity commission data). OSHC has generally been the fastest growing care type of the sector over the past five years and the largest in terms of the number of sessions of care delivered.

OSHC has been the fastest growing care type of the sector over the past five years and the largest in terms of the number of sessions of care delivered. In addition, our anecdotal experience as service providers is that in many instances, more difficult economic environments drive a greater uptake of OSHC services as parents may increase hours or days of work.

It is critical to consider the experience of children with OSHC settings

Ample evidence suggests that happy classrooms help children to thrive in their environment and the same is true of Outside School Hours Care Services. The needs of children are particularly critical when considering the inclusion of preschool aged children in OSHC services, noting that there is substantial variation in the needs and interests of 3-year olds when compared to say, 10-year olds.

As providers, OSHCA is critically aware of the importance of listening to the voice of children and providing services that are safe, enjoyable, and enriching for them. The view of OSHCA is that fundamentally children require safe, engaging, age-appropriate care. Noting it is extremely challenging to provide programming that genuinely meets the needs of children from ages 3-12.

Services that are enjoyed by children, immensely improve the experience of parents and carers as well as staff and increase a child's ability to engage and benefit from the services provided.

Listening to the voice of children means providing services that are suitable and enjoyable for school aged children before or after a full day of school. Relationships and rapport with staff are also critically important, further highlighting the need for regulation that doesn't unintentionally contribute to a higher turn over of staff.

More broadly, there are a number of unintended consequences for children that occur as a result of OSHC services being regulated under the same or similar frameworks to long day care settings which are not fit for purpose for OSHC services within school settings.

Examples include:

- Children are often prohibited from using equipment not included in the licensed space i.e., playgrounds despite being the same children in the same setting using them during the day at school.
- Qualification requirements mean children are unable to benefit from qualified and engaging staff such as sports, art or music professionals who despite regularly working with children do not have the relevant qualification.
- Excessively complex qualification requirements and the in-service administration burden contribute to a higher staff turnover and an inability to attract new staff meaning children must regularly form new attachments.

Ensuring Access to OSHC for more families including in regional areas

The viability of services is critical. In particular, in regional and rural areas and within smaller schools, services normally operate with a much smaller number of students making the majority of these services unviable.

However, there is a critical need for OSHC services to be available to be available to parents in rural and regional areas, we would recommend that the State Government pursue a model similar to that of NSW with grant funding being made available to ensure these services can continue to operate or can be supported to establish in areas where it is currently not viable to operate a service.

Staffing challenges experienced by providers in metropolitan areas are further amplified in rural and regional areas where the pool of people to draw from or number of university students is generally smaller. Adequately meeting the needs of rural and regional communities will require additional government funding as well a review of qualification and ratio requirements to ensure that regulation is not unintentionally introducing unnecessary barriers that prevent families from receiving the kind of care they need.

Regulation is complex and not fit for purpose for the OSHC sector

The OSHC sector is regulated in a very similar way to the Long Day Care sector including sharing the same frameworks despite being a fundamentally difference service supports a separate cohort of children. This impacts the way we recruit and retain staff, the experience of children and the way we deliver programs.

Like many sectors across Australia, the OSHC sector is experiencing critical staff shortages. While staff shortages existed in advance of COVID-19, for many services they are now severe and unworkable and materially impact our ability to support children and families. Furthermore, as OSHC providers rebuild their workforce depth it is invariably with educators who have less experience than those that left the sector through Covid. It is now widely recognised that OSHC is an essential service critical to the effective operation of schools and workplaces and to allow parents to work.

Our sector has a highly casualised workforce due to the before and after school hours nature of the work. Staff who want to work a split shift, are appropriately qualified and also drawn to care sector are hard to find. Additionally, many staff who begin their careers in OSHC, will then continue their work in the broader education sector either as teachers or childcare workers making OSHC a critical feeder for those parts of the sector further exacerbating workforce challenges. To put this into context, the average duration of employment for a carer amongst OSHCA member services is just over 1.5 years. This is because a substantial number of these carers will move onto other career paths as outlined above.

Unlike in other jurisdictions such as NSW and Victoria, staff working with South Australian OSHC can not be working towards achieving a diploma and must have completed the relevant qualifications prior to commencing work. While some staff are able to work when they are halfway through certain bachelor's degrees, the requirements are convoluted and could be simplified without compromising quality. In most instances a person studying towards a teaching degree for example will not immediately commence work within an OSHC setting just as they become eligible, as a result their time within the service is often short as they quickly transfer out of the service and into the area of work they have been studying towards. Further complicating staff requirements is the fact that every second staff member must be either diploma qualified or meet other, arguably more stringent requirements.

Comparing Australian jurisdictions, higher regulation or higher minimum employee qualifications is not having a direct impact on service quality or child safety. As shown in the tables below, while Victoria has significantly higher minimum qualification standards for staff, NSW has more services exceeding the national quality standards.

As providers we often see examples of tighter regulations having the inverse effect of reducing quality as they contribute to higher turnover creating inconsistency for children.

Overall quality ratings in OSHC²

State	Working Towards NQS	Meeting NQS	Exceeding NQS
VIC	9.7%	82.1%	8.3%
NSW	12.7%	76.2%	10.9%
QLD	13%	75.9%	11.1%
SA	14%	75%	11%

Working Towards (WT) NQS

- The average is 11.8% of services WT with VIC under the average. NSW and QLD are above the sector average for these states.

Exceeding NQS

- The average is 10.1%, with VIC under the average. NSW and QLD are above the sector average for these states.

Furthermore, the aim under quality area 4 as part of the National Quality Standard is to ensure the provision of qualified and experienced educators. The data included in the table below demonstrates that jurisdictions have similar outcomes regarding the National Quality Standards, suggesting that the idea that all educators need to be highly qualified in order to produce better outcomes is inaccurate, and is certainly not reflected in the ACECQA assessments.

NSW is currently OSHCA's preferred model in relation to qualification requirements because they strike a better balance between quality of care and workforce qualifications.

Quality Area 4 – Staffing arrangements³

State	Working Towards NQS	Meeting NQS	Exceeding NQS
VIC	3%	88%	9%
NSW	4%	87%	9%
QLD	1%	89%	10%

Ratio requirements in South Australia are reasonable when compared with other Australian jurisdictions. However, those ratio requirements change immediately as soon as a preschool

² [NQF Snapshot Q1 2023 \(acecqa.gov.au\)](https://www.acecqa.gov.au/nqf-snapshot-q1-2023)

³ [NQF Snapshot Q1 2023 \(acecqa.gov.au\)](https://www.acecqa.gov.au/nqf-snapshot-q1-2023)

aged child is included in a service no matter the number of preschool aged children compared with primary school age.

While OSHCA has reservations in relation the inclusion of preschool and primary school aged children within the same OSHC setting it is worth noting that the current change to ratio requirements that occur if a preschool child is added to a service act as a direction disincentive to services supporting those families.

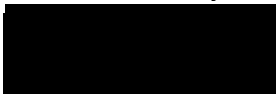
At present OSHC services operate under the same National Quality Frameworks (NQF) as long day services which in many instances is not suitable for primary school aged children. In addition, regulations vary significantly across jurisdictions.

These issues are compounded in South Australia in part due to the regulation of OSCH services being managed by the Education Standards Board which operates separately to the Department of Education. OSHC services often have to spend considerably time educating schools in relation to the requirements for OSHC services within schools which can vary substantially from those required for the same children using the same facilities during the school day.

OSHCA continues to advocate across all jurisdictions for a revised OSHC specific framework that recognises the differences between OSHC and long day care settings, in addition to the harmonisation of regulations across Australian jurisdictions.

OSHCA welcomes the opportunity to be part of this work and would be happy to provide further information or insights as required.

Yours sincerely

A black rectangular box redacting the signature of Michael Abela.

Michael Abela
OSHCA President