

**Submission from the  
National Out of School Hours Services  
Association (NOSHSA)  
for  
Regulation Impact Statement for  
Early Childhood Education and Care Quality  
Reforms.**

**Information About the Submission**

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

PO Box 481 Paddington NSW 2021

[www.noshsa.org.au](http://www.noshsa.org.au)

email [noshsa@noshsa.org.au](mailto:noshsa@noshsa.org.au)

**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 it's State and Territory peaks of at least 1700 community based and private OSHC providers.

Each state and territory association will provide it's own response where possible addressing specific issues for their membership.

The following submissions will provide further information and content in relation to the Out of School Hours Sector response to the RIS ;

- Network of Community Activities NSW
- Queensland Children's Activities Network (QCAN)
- SA OSHC Association.
- Community Child Care Victoria

The diversity of service delivery and differences in regulations across Out of School Hours Services is challenging for the National Association and this response represents the combined views and feedback on the framework as a national summary.

## **National Quality Standard and Ratings Framework.**

**Consistent minimum standards of care across Australia are supported by NOSHSA for OSHC services.**

The exclusion of OSHC from the current regulatory statement acknowledges the unique complexity of OSHC provision in Australia. NOSHSA understands that this in no means negates the intent of the Government to include OSHC in a National Quality framework underpinned by an appropriate set of national Standards.

We appreciate the careful and considered approach that COAG is taking with regards to inclusion of OSHC.

***Proposal- NOSHSA will draw on it's extensive expertise to provide COAG with an agreed national position on ratios and qualifications for OSHC services by November 2009.***

## **Licensing and Regulatory Arrangements.**

An integration of existing regulatory frameworks is essential. Currently there is huge inconsistency across States and Territories in regards to regulatory frameworks for OSHC services with 3 states/ territories currently functioning without them.

A regulatory framework for school age children should be based on the fact that children of this age face different risks and have increased independence than those children under 5 and have the capacity to advocate for themselves. Opportunities for independence, skills development and a level of safe risk taking must be provided to ensure children develop resilience and life skills.

It is reasonable to assume that a single system will minimize duplication and therefore has the potential to reduce costs. However any savings should be redirected into improved resourcing and support for services in order to meet the new requirements. For many services transition to increased standards will result in added costs.

However COAG should consider that unless there is some regulation of the fees and charges asked by the Governing body for the Quality Framework then costs for services could increase. The current system administered by NCAC has a fees and charges policy imposed without sector consultation.

NOSHSA would argue that care must be taken to ensure that the integration of existing regulatory frameworks is sector specific and developmentally appropriate for the service type.

However no State and Territory should be required to lower their current standards as a result of the establishment of a minimum standard.

NOSHSA supports the notion of current and aspirational goals for the development of improved sector ratios and qualifications.

## **Proposals**

- In establishing minimum standards States and territories should be mandated to maintain existing standards that are higher than the national minimum.**
- Any savings generated be redirected into increased resourcing and support for services during the time of transition.**
- Regulation of costs to services charged by Governing body.**

## **Implementation.**

### ***Advantages of Proposed reforms***

- The inclusion of Out of School Hours Services to the delivery of a Quality Education and care framework for children is critical for a holistic national framework.
- A streamlined system of care and education for all children birth to 12 with shared outcomes will provide a strong foundation for all Australians.
- Shared goals for children in a quality system will support the development of a Child Friendly Australia.

### ***Disadvantages of Proposed reforms***

- Currently the nomenclature is not clear and OSHC services across Australia have not felt suitably informed to participate in the current consultations. The implementation of the system must be inclusive with a birth to 12 years approach.
- A broader definition of the term “Education” is required to promote education as a life long process that can occur through play based experiences. In OSHC the perceived extension of a school day in OSHC will be detrimental to the wellbeing of children. OSHC services should offer enrichment and recreation based on children’s needs interests and strengths rather than formalized tuition.
- In order to ensure that the OSHC sector is engaged prior to any further implementation, the OSHC sector must be consulted and timelines provided for their inclusion in the process. The development of a working group formed from NOSHSA state and territory representatives would support the development of realistic timeframes and goals.
- In the development of the RIS it appears no information and advice provided in our previous submission of September 2008 regarding the National Framework was considered except for the emphasis that we were unique and needed to have special consideration in the absence

of enough substantive research on OSHC provision in Australia. Yet this uniqueness should not be acknowledged at the expense of the setting of reasonable timeframes for the inclusion of OSHC.

***Key Challenges and factors that will impact on the success of proposed reforms in OSHC services.***

- Currently there is a lack of content regarding the structure of the system and the timeframes.
- Inadequate consultation and engagement with the OSHC sector.
- Inclusivity of service types, the Government should ensure all service types are able to be included in a national framework.

NOSHSA supports

- Realistic timeframes.
- Realistic costing for reforms.
- Recognition and utilization of current expertise existing in the OSHC field
- Preparedness of Government to invest in managing transitions.
- Investment in training and professional development.
- Access to appropriate content in professional development materials.
- Funding for workplace assessment and qualification upgrades

**Proposal**

**The formation of a specific working group consisting of OSHC expertise drawn from NOSHSA and government representatives to create a set of realistic timeframes and appropriate content for the inclusion of OSHC in the proposed reforms.**

**Conclusion**

NOSHSA is committed to engaging in the National Quality Agenda and embracing reform. We anticipate that OSHC services across Australia will benefit from being part of a framework that supports the development of national goals for children. Our participation is not conditional but obligatory. We wish to work with the Government in the spirit of partnership, negotiation, co-operation and at times fierce conversation, to achieve the best outcomes for school age children. The same children who turn to us every day across Australia for the unconditional support and care that they so richly deserve.