

SA OSHC Sector Response.

Regulation Impact Statement (RIS) for Early Childhood Education and Care.

ABOUT OSHC IN SA

There are approximately 330 services in SA. Around 95% of these are located on school sites where the vast majority are operated by school councils or boards. Unlike the larger states, the peak body in SA does not receive any funding beyond its annual subscriptions from members and our current membership is around 17% of services. It is very difficult for this Association to keep abreast of change and to be positioned to make a valuable contribution to cover all aspects of our concern. This response is based on responses from several key members. The Association is working hard to ensure that service personnel are aware of the impending changes.

The initiative of reform is welcome and the focus on improved outcomes

NATIONAL QUALITY STANDARDS AND RATINGS SYSTEM.

SA supports the introduction of consistent National Standards for Out of School Hours Services across Australia that are appropriate for the needs of school age children.

SA would support consistent minimum standards of care across Australia. This is an essential platform for the development of consistent national quality.

However there are currently considerable differences across the nation and this must be addressed as change is made, .e.g. In The National Standards for OSHC (1995) were modified to give us the OSHC Standards SA. This enabled SA to address the safety aspects for staff and children by recognising the reality that some services operate with only one staff person for part or all of a session. In any changes that may be made to the child:staff, SA would ask that this matter be addressed. Currently the ratio for a single staff service is 1:12 and if this has to change there will need to be a lead in time, in keeping with the other "aspirational" suggestions we would be happy to see this ratio altered to 1:8 over a period of time.

Out of School Hours Care should be included in the National framework in terms of ratios and staff qualifications.

SA is aware that the National Out of School Hours Services Association (NOSHSA) is involved in working with all state and territory peaks to develop an agreed national position on the ratios and qualifications for OSHC. We believe the Government should support NOSHSA with this

process as the best way to seek agreement and garner the expertise to make a decision in the best interests of OSHC services in Australia.

OSHC SA supports the current recommended ratios being canvassed by NOSHSA. However, we would like to question the focus on an early childhood qualification as this has no particular significance for the provision of school age care. In line with the proposals in the early years work OSHC SA would question whether all staff working in OSHC need to have a qualification.

We would call for urgent national dialogue centred on the suitability of a range of tertiary students. As part of that process we would like to stress that a committed student can gain much practical experience if they are working in OSHC. Whilst we recognise that university study is a full time commitment, the part-time nature of OSHC work lends itself to students who need to work to supplement their income. Surely it is better all round that this income is gained in a discipline that will support their learning. Students undertaking any of the following should have skills to enhance the capacity of an OSHC service to offer diversity in its program - teaching (both primary and secondary), fine arts, science, information technology, psychology and other behavioural sciences, community services and politics. It could be that there is an assessment of the students' knowledge that would give them a provisional qualification that exists while they continue their course.

Clearly like any other applicants, students would be employed on their ability to meet other service criteria such as some experience of working with school age children in other settings.

The impact of any changes will be felt more intensely in small marginal services as well as the rural and remote services. Is it time to consider how these services are supported? Attracting and retaining staff for such services are a significant hardship as is the capacity to maintain viability. Training and professional development is costly and difficult to access. Work in OSHC is often supplemented by other work to enable people to cope and so that places a further barrier between in the area of workforce management.

A quality rating system alone will not drive Continuous improvement. Acknowledgement of innovation will drive continuous improvement.

OSHC SA is very aware of the benefits that have flowed from the introduction of OSHCQA and this momentum must be maintained and further developed.

Change must not be implemented before the OSHC sector has genuine access to relevant consultation about that change to ensure that the unique characteristics of OSHC users are addressed.

A quality rating system must be able to acknowledge vision and innovation to encourage the growth of skills and expertise to deliver programs that offer a broad range of rich experiences for children. A mouse in an OSHC venue does not have to spell disaster!

Facilities are of concern for many OSHC services and surely the current climate of change presents an opportunity to address some of the basic concerns. In seeking support from a group of OSHC staff to formulate this response the group was asked what would be on top of their OSHC wish list. The response was overwhelmingly that they should have a dedicated space.

The idea was discussed and the group was sufficiently pragmatic to realise that this probably would never happen.

However, when COAG is involved and committed, can it be noted that facilities dedicated to OSHC should clearly meet certain requirements and that the OSHC service should have tenure of that space for set periods of time which can be reviewed and that any needs to change have a healthy lead in time. It should also be negotiated that schools who undertake to have an OSHC service on site which they then use as a marketing tool for their product (enrolments) recognise that the OSHC services need the capacity to plan improvements to maintain an increasing level of quality program for children who use the service. It seems realistic that a practice of lease agreements should be developed to enable OSHC services to use the facilities of a school and that there is careful consideration given to what fees and charges OSHC services are expected to pay.

In SA, the great majority of OSHC services are run on a not for profit basis and so it is unreasonable that schools should have the benefits of the services and attempt to gain financially from the service as well.

Sadly OSHC was caught 'flatfooted' with the Building Education Revolution money – this criticism applies equally to policy makers and the OSHC sector. Here was an amazing opportunity to gain better OSHC facilities for children across the nation and we were all caught short. The horse has bolted and now we have the mess to deal with. There have been horror tales from SA and no doubt elsewhere too.

Our school age children deserved better from us all.

IMPLEMENTATION - Advantage of new System

In tandem with our colleagues in other states, SA believes the integration of the systems will provide greater clarity and consistency across Australia in relation to provision of OSHC.

In SA there are many unanswered questions that exist in part because there are no regulations. Although new services must sign an agreement

to say that they will meet the OSHC national standards and meet the requirements of OSHCQA there are no checks and balances.

Disadvantage of new System

A lack of clarity in the interpretations and the system in information provided thus far. In SA it is our belief that within the OSHC sector only a small percentage of operators and directors has an awareness of the impact of the reform agenda for OSHC.

In SA, very little information has filtered down to the people for whom change will have the greatest impact, i.e. families and staff of services. This is lamentable but information that is focused on the early years is not generally widely read in the OSHC sector.

It is also significant to note that the consultation process for the reform agenda has coincided with the roll out of CCMS within OSHC. In SA this process has been made quite complicated by the network "incompatibility" between services using the Department of Education and Children's Services server or other specific servers and the local software provider that serves the vast majority of local OSHC services. Grappling with survival has taken precedence over reading for many people in recent months.

The proposed changes generated through the implementation of a National Quality Standard and Ratings framework have the potential to provide greater national consistency in OSHC service provision.

SA supports the proposal by the NOSHSA that the Government consult more extensively with NOSHSA around determination of ratios, qualifications and the standards framework.

CONCLUSION

The initiative of reform is welcome and the focus on improved outcomes for children in the early years is commendable.

We also support NOSHSA's call for the government to convene an OSHC specific national working party to give advice and make recommendations for changes to the ELYF as well as the National Quality Standard & Rating Framework to ensure that the excellent work that has been done so far will also enhance outcomes for school age children in care.

If the government chooses to consult more widely than with NOSHSA, SA wishes to stress the following;

- the knowledge that there are real differences between how OSHC is structured across the states and territories is addressed and we do not have ill fitting recommendations being made

- that members of the working party each have a sound understanding of OSHC and preferably experience in service delivery. We believe that there are many people in policy making positions who claim to know about OSHC but frequently their knowledge is shallow and often based on very old information and experience.

Notes have been prepared by Kay Thomas, for the OSHC SA Association.