

Submission to the Royal Commission into Early Childhood Education and Care – general submissions (OSHC)

May 2023



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Introduction

As South Australia's Commissioner for Children and Young People, my mandate under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* is to promote and advocate for the rights and interests of all children and young people in the State. It is also my role to ensure that South Australia meets its obligations in relation to the United Nations Convention on the Rights of the Child (UNCRC).

I welcome the opportunity to again contribute to the Royal Commission into Early Childhood Education and Care, following on from [my submission in relation to 3-year-old preschool](#). In the current submission, I focus on out-of-school-hours care (OSHC), an important aspect of the Royal Commission and a topic on which children's views are rarely considered.

As Commissioner for Children and Young People in South Australia, I have engaged with and listened to tens of thousands of children and young people across the State and my work is directly informed by their views and experiences.

Building on my extensive engagement with 8–12-year-old children across South Australia with my Student Voice Postcards initiative, I have recently used this method of engagement with children in OSHC, exploring what they like and dislike about OSHC, as well as their suggestions for how to improve OSHC. I received 83 postcards from 4–12-year-old children in OSHC settings across metropolitan Adelaide. Their responses show that while several children have positive experiences of OSHC, many have suggestions for improvement. Alongside these postcards, my submission is informed by the numerous discussions I've had with children, parents/carers, educators, and other key stakeholders across South Australia.

Discussions around OSHC in the context of the Royal Commission so far have largely focused on the experiences and needs of adults, rather than children. For example, the key questions in the Royal Commission OSHC Issues Paper include '3. What are the elements of quality in OSHC provision that matter most to parents?' and '4. What are the elements of quality in OSHC provision that matter most to school leaders/governing councils?', without also including a similar question in relation to what matters to children.

Interestingly, the history of after school care in Australia shows that its original purpose was to provide recreation programs, before shifting to custodial care due to facilitating parent (often mothers) paid work.¹ This essentially means there has been a shift from children's rights or needs to a focus on parents' needs.²

While family experiences, including in relation to paid work, and provider experiences, are important, it is crucial to recognise children's rights in relation to their OSHC experiences.

The UNCRC recognises that children have the right to express their views on all matters affecting them (Article 12). Also particularly relevant here is the right to rest and leisure, including play and recreational activities (Article 31), which is extended at length by the Committee on the Rights of the Child in General Comment No. 17.³

The current OSHC framework *My Time, Our Place* emphasises the importance of children's rights, including in relation to play:

Educators guided by the Framework will reinforce in their daily practice the principles laid out in the United Nations Convention on the Rights of the Child (the Convention). The Convention states that all children have the right to relax and play, and to join in a wide range of cultural, artistic and other recreational activities. The Convention also recognises children's rights to be active participants in all matters affecting their lives and respects their family, cultural and other identities and languages.⁴

However, the purpose and context of OSHC often seems to deviate from this, with children often experiencing OSHC as an extension of school, where there is little downtime, too much structure, too many rules, and a culture of surveillance.

As Commissioner for Children and Young People, I strongly advocate for the importance of children's rights and experiences informing service provision. Based on the above, I recommend that, in relation to OSHC specifically, the Royal Commission:

- 1. Ensure that children's rights and experiences are central in the discussion on, and delivery of, OSHC.**
 - a. Take seriously the aspects of OSHC that are important to children.**
 - b. Individual OSHC services seek regular feedback from children attending their service, which informs their practice.**
 - c. Recognise and cater to the diversity of children attending OSHC, including by age and pattern/frequency of attendance.**
- 2. Review the relevance and current use of the *My Time, Our Place* framework, with the view to South Australia developing its own framework that:**
 - a. Responds to the issues and experiences shaping children's lives now and in the future.**
 - b. Focuses on children's voice, agency, and rights to leisure and play in OSHC and supports this in practice.**
- 3. Rethink the appropriateness of OSHC for preschool-age children.**

If you would like to discuss anything further, please do not hesitate to contact my office.

Yours sincerely



Helen Connolly

Commissioner for Children and Young People
Adelaide, South Australia

1. Ensure that children's rights and experiences are central to the discussion on, and delivery of, OSHC.

a. Take seriously the aspects of OSHC that are important to children.

My postcards with children attending OSHC show that multiple aspects of the services are important to them – activities, people, facilities and food, and excursions. These need to be taken seriously in the discussion on OSHC in the Royal Commission and beyond, informing the delivery of OSHC to primary school-age children. Overall, children often reported positive experiences of OSHC, enjoying activities and having fun, but several also reported aspects of OSHC they disliked and offered many suggestions for improvement.



Many children wrote about the activities they liked or disliked undertaking at OSHC. Several children liked outdoor activities and wanted more opportunities to engage in these. Some liked gaming and other screen activities like playing on iPads. And some liked arts and crafts activities, while others noted they specifically disliked these. Ultimately what their responses show is that children need a range of activities to be able to choose from, as some prefer certain activities to others.

The best thing about OSHC is...

"you get to play and make stuff"
 - 8 year old girl

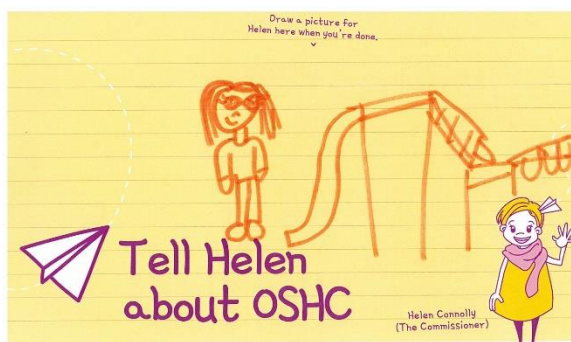
"water play"
 - 6 year old boy

"Soccer with friends"
 - 11 year old boy

"I pads"
 - 7 year old boy

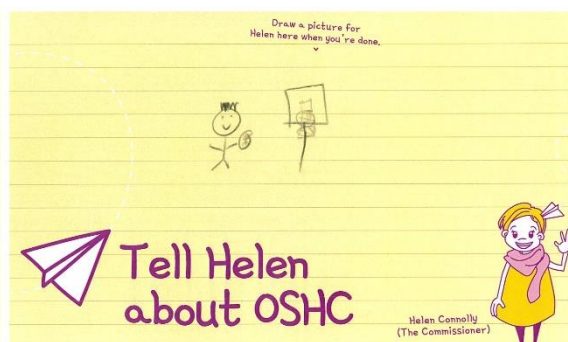
"Getting to see friends and talking to OSHC Staff"
 - 12 year old girl

"When we go on excursions to fun places like Aquatics centre"
 - 11 year old girl



Who are you and what do you care about?

Helen, The Commissioner for Children and Young People, wants to know!
Please flip the postcard over and answer a few questions.



Who are you and what do you care about?

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Please flip the postcard over and answer a few questions.



People in OSHC spaces were also important to children. Some children enjoyed being with their friends in OSHC, although others commented on the difficulties of not having friends attending OSHC or being bullied by other children. Most children mentioning staff reflected positively on the relationships they had with them, saying they were caring, nice, and helpful, although some comments were less positive.

Several children commented on the facilities and food. Younger children in particular commented on their desire for more outside play equipment in the form of playgrounds, swings, swimming pools, and trampolines. While some of these may not be possible, many OSHC services are on school grounds and could open up these facilities for OSHC, if they aren't already. In some cases, these facilities may be available but children in OSHC aren't allowed to access them.

The worst thing about OSHC is...

“Boring activities”
- 7 year old girl

“craft”
- 9 year old boy

“bullies”
- 8 year old boy

“nothing”
- 8 year old girl

“toilets”
- 9 year old girl

“they BARELY give us food! :(”
- 9 year old girl

Food was particularly important to children, with several commenting that they do not receive enough food at OSHC, would prefer more choice of food, and/or felt there were too many rules and restrictions around food. While this may seem trivial to some adults, food is an essential part of life, and children’s experiences in relation to food in OSHC is an important aspect of service provision. Children’s negative experiences in relation to food have been noted in other OSHC studies,⁵ as has the diversity of the types of food and beverage provision across OSHC services in Australia.⁶ Food has implications for children’s wellbeing, including in relation to the food insecurity that a growing number of children are experiencing at home, which links to the advocacy work I have been conducting in relation to introducing free school meals for all children at school.⁷ Access to an adequate supply of food at OSHC is also likely to be beneficial for some families.



Finally, children noted that they enjoyed excursions, and some said they would like these to happen more often. While these require more resources and may not always be possible, it is important to provide children with a wide range of engaging activities which stimulate their interests.

OSHC would be better if...

“you could use your devices”
- **9 year old girl**

*“We did more arts and crafts
and a bigger variety of snack”*
- **12 year old girl**

*“if the bottom playground
was always open”*
- **6 year old boy**

*“we could go on more excursions
at vacation care”*
- **8 year old girl**

*“They fix the toilets and find
missing sports equipment”*
- **11 year old boy**

*“they renevate every thing
even the educators”*
- **9 year old girl**

b. Individual OSHC services seek regular feedback from children attending their service, which informs their practice.

My OSHC postcards show what’s important to children across multiple OSHC settings in metropolitan Adelaide. Seeking regular feedback from children attending individual OSHC services is important to ensure the services are tailored to the specific local community and children who attend the service. One way of doing this could be to use a similar process, using postcards within individual OSHC services. These could ask children to respond to prompts such as: ‘The best thing about OSHC is...’, ‘The worst thing about OSHC is...’, and ‘OSHC would be better if...’.

These feedback processes must then be taken seriously and used to inform practice in the individual OSHC service. Where things are unable to be changed due to issues such as funding or procedural constraints, these could be discussed openly with children. While it is important to listen to children’s views and experiences, it is also important not to promise anything that can’t be delivered.

c. Recognise and cater to the diversity of children attending OSHC, including by age and pattern/frequency of attendance.

OSHC needs to recognise and cater to a diversity of children across South Australia. Children come from diverse backgrounds and families, with a broad range of life experiences. Children also have very different experiences of school, which may have an impact on how they view OSHC as this may be seen as closely connected to school. These different experiences need to be recognised, and the diversity of children supported in their OSHC experiences.

Importantly, access to OSHC may not be available as an option to all primary school-age children, and families may not find these services welcoming or encouraging. More needs to be done to make OSHC a viable option for these families, with all children having access to appropriate OSHC services if families want to take these up. Children and

families who are least likely to use OSHC and most likely to benefit from it include two-parent families where both parents are out of the paid workforce.⁸ These children, and others, may benefit from food and other services provided in OSHC, as mentioned above.

Diversity also includes children of different ages across the primary school years, as well as different patterns of attendance, and the different forms of care (before school care, after school care, and school holidays/vacation care).

In terms of age, it is well established that older children (9-12 year olds) are not always catered for in OSHC services and make up a smaller number of attendees compared to younger children.⁹

My OSHC postcards indicate that the older children (9-12 year olds) were more focused on the people at OSHC (friends and educators), and facilities (e.g., toilets, buildings) and food options, compared with the younger children (4-8 year olds). This again highlights the need to seek feedback from children about their OSHC experiences and preferences, and what would make OSHC more engaging for them.

In terms of attendance, some children are frequent attenders of OSHC, while others attend infrequently. Different forms of care are also quite different, where before school care may be short and breakfast-focused, after school care may be experienced as long after a tiring day at school, and school holidays/vacation care may be more focused on holiday activities. While there are connections between these forms of OSHC, it is also important to consider the differences between these contexts, both in terms of services provided and children's experiences of them.

There is a need to cater to all children and to recognise their attendance patterns will likely impact their experiences of OSHC. My OSHC postcards indicated that children who attended in the school holidays only may have had more positive experiences of OSHC. Again, seeking feedback from children about their OSHC experiences and preferences is needed, including in relation to children's pattern/frequency of attendance.

2. Review the relevance and current use of the *My Time, Our Place* framework, with the view to South Australia developing its own framework that:

a. Responds to the issues and experiences shaping children's lives now and in the future.

The *My Time, Our Place* framework is the key document for OSHC in Australia. However, this is a national document and is over a decade old. While useful as a starting point, South Australia could develop its own forward-thinking framework extending on from this, ensuring OSHC is relevant to children's lives now and in the future.

A central issue this new framework could address is the need for clarity on the role and purpose of OSHC. From my OSHC postcards and other consultations, it's clear that for children the purpose of OSHC should be to be to have fun, to do activities, and to spend time with friends. For adults, such as government, staff, and families, OSHC appears to

have a dual purpose of ‘childcare’ and (to a lesser extent) learning through play and recreation.

Indeed, studies have shown that parents in Australia view OSHC as useful for facilitating paid work, rather than OSHC being important for children, such as in relation to their development.¹⁰ This is similar to findings from the Royal Commission parent survey noted in the Interim Report, where OSHC was used because it allows parents to engage in paid work, although some also mentioned the importance of social interactions for children at OSHC.¹¹

Ultimately, a key aim of the Royal Commission appears to be for parents (notably mothers) to be able to engage in (more) paid work, and other studies have shown a clear relationship between paid work and OSHC attendance.¹² Regardless of this motivation, it’s children who are attending the services, so it needs to work for them and be informed by their views and experiences.



The world is very different today to when the *My Time, Our Place* framework was released, with the increasing use of technology, the ongoing impacts of the COVID-19 pandemic, and cost of living pressures. A new South Australian framework could consider many contextual issues impacting children’s lives, such as the prominence and importance of screens in people’s lives. As mentioned above, my OSHC postcards showed children enjoyed a broad range of activities. Other studies indicate that opportunities for physical activity and screen time vary widely between OSHC services in Australia.¹³

My broader Student Voice Postcards initiative with 8–12-year-old children provides a comprehensive understanding of children’s lives in contemporary South Australia. These are discussed in depth in my reports [The Things That Matter](#), [The Things That Matter 2](#), and [The Things That Matter 3](#). We need to understand children and how they experience their lives today, in order to provide the most relevant and engaging services for them, including in relation to OSHC.

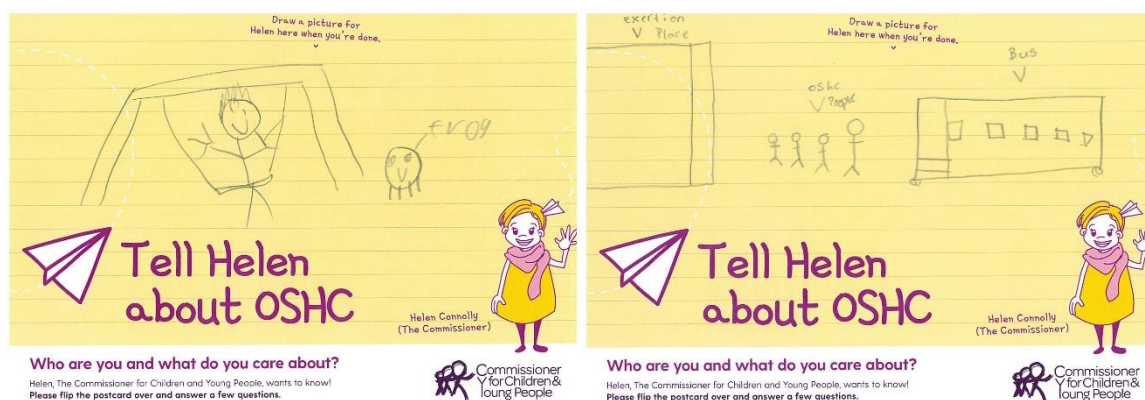
b. Focuses on children's voice, agency, and rights to leisure and play in OSHC and supports this in practice.

The *My Time, Our Place* framework recognises the rights of children to relaxation, play, and recreation, along with having a say on matters affecting them (as outlined above), and children are viewed as learning through play and leisure in OSHC. However, it is not clear if this focus on children's rights is always followed through in practice. Again, there is an issue with OSHC being viewed as both care and an extension of school, rather than as a service for children's leisure and play.

My Time, Our Place is a framework specific to OSHC. It is important to emphasise that this is not a central or integral curriculum document for children in Australia as OSHC is an optional extra for children. In other words, OSHC is an additional activity for some children only.

A different way of viewing OSHC could be to instead draw on a Guides or Scouts model, where play is the focus, and activities are based on children's interests. This would provide a space for flexibility, choice, and fewer rules and rigidity, and allow for informal learning through play and leisure. This then would be based on children's interests and friendships, which may address some of the bullying issues identified by children in Recommendation 1a. While not having links to formal learning, homework spaces for older children could be negotiated if requested by children.

A new South Australian framework could focus on children's voice, agency, and rights to leisure and play in OSHC, working with an innovative model which best meets the needs of a diversity of children and their families.



3. Rethink the appropriateness of OSHC for preschool-age children.

The Royal Commission Interim Report, OSHC Issues Paper, and other key documents and discussions appear to already be making a push for some form of OSHC services to be available for preschool age children who are attending standalone preschool (rather than preschool programs in childcare). The need for this appears to be heightened by the push for 3-year-old preschool and who will care for these children once preschool ends.

In a similar vein to [my submission in relation to 3-year-old preschool](#), I strongly suggest that this needs to be thought out in more detail as OSHC for preschool-age children would look very different to OSHC for primary school-age children. Like with the potential for 3-year-old preschool to be simply 4-year-old preschool for 3 year olds, OSHC cannot be the same thing but for a younger age group. As it is, as mentioned in Recommendation 1c above, primary school-age children themselves differ in their experiences and needs in OSHC, including in relation to age.

As concluded in the Royal Commission OSHC roundtable:

There was consensus among the group that expansion of current school OSHC in its current form to 3-year-old preschool children would be difficult to achieve for those children with a high level of safety, health and wellbeing in current OSHC environments.¹⁴

Some obvious issues in having OSHC services for preschool age children relate to things such as physical spaces (e.g., issues of safety), resources (e.g., nappy changing facilities), and staff (e.g. the need for dedicated early years staff, higher staff to children ratios required in the early years), as discussed in the Royal Commission hearing on 14 April 2023.¹⁵

Overall, more questions need to be asked about the feasibility of OSHC for preschool age children and how this would differ from childcare. Why and how would this work? What would this look like?

- ¹ Cartmel, Jennifer, and Bruce Hurst. *More Than 'Just Convenient Care': What the Research Tells Us About Equitable Access to Outside School Hours Care*. New South Wales Department of Education (June 2021). https://education.nsw.gov.au/content/dam/main-education/early-childhood-education/information-for-parents-and-carers/OSHC_PolicyLiteratureReview_CartmelHurst.PDF; Simoncini, Kym, Jennifer Cartmel, and Amy Young. "Children's Voices in Australian School Age Care: What Do They Think About Afterschool Care?". *International Journal for Research on Extended Education* 3, no. 1 (2015): 114–31. <https://elibrary.utb.de/doi/reader/10.3224/ijree.v3i1.19584>.
- ² Simoncini et al. "Children's Voices in Australian School Age Care".
- ³ United Nations Committee on the Rights of the Child. *General Comment No. 17 (2013) on the Right of the Child to Rest, Leisure, Play, Recreational activities, Cultural Life and the Arts (art. 31)*. (17 April 2013). <https://digitallibrary.un.org/record/778539>.
- ⁴ Department of Education and Training. *My Time, Our Place: Framework for School Age Care in Australia*. (2011). <https://www.education.gov.au/download/793/my-time-our-place-framework-school-age-care-australia/451/document/pdf/en>, p. 4.
- ⁵ Horgan, Deirdre, Jacqui O'Riordan, Shirley Martin, and Jane O'Sullivan. "Children's Views on School-Age Care: Child's Play or Childcare?". *Children and Youth Services Review* 91, August (2018): 338–46. <https://doi.org/10.1016/j.childyouth.2018.05.035>.
- ⁶ Crowe, Ruth K., Yasmine C. Probst, Jennifer A. Norman, Susan E. Furber, Rebecca M. Stanley, Sarah T. Ryan, Cecilia Vuong, et al. "Foods and Beverages Provided in Out of School Hours Care Services: An Observational Study." *BMC Public Health* 22, Article no. 277 (2022). <https://doi.org/10.1186/s12889-022-12652-9>.
- ⁷ Begley, Patrick. "Children Are Hiding Their Hunger to Avoid Burdening Their Parents, as Food Insecurity Rises in Australia." ABC News. (13 March 2023). <https://www.abc.net.au/news/2023-03-13/children-hiding-hunger-food-insecurity-single-parents-730/102078596>.
- ⁸ Cartmel et al. *More Than 'Just Convenient Care'*.
- ⁹ Cartmel et al. *More Than 'Just Convenient Care'*; Simoncini et al. "Children's Voices in Australian School Age Care".
- ¹⁰ Winefield, Helen, Alicia Piteo, Lisa Kettler, Rachel Roberts, Anne Taylor, Michelle Tuckey, Linley Denson, Kay Thomas, and Ian Lamb. "Australian Parents' Needs and Expectations Regarding Out of School Hours Care: A Pilot Study." *Journal of Early Childhood Research* 9, no. 3 (2011): 196–206. <https://doi.org/10.1177/1476718X10389142>.
- ¹¹ Royal Commission into Early Childhood Education and Care. *Interim Report*. Government of South Australia (April 2023). <https://www.royalcommissionecec.sa.gov.au/documents/RCECEC-Interim-Report-Version-2-Website.pdf>, p. 147.
- ¹² Rioseco, Pilar, Jennifer Baxter, and Diana Warren. "Kids' Care and Activities Before and After School." In *Growing Up In Australia – the Longitudinal Study of Australian Children, Annual Statistical Report 2017*, edited by Diana Warren and Galina Daraganova, 87–98. Melbourne: Australian Institute of Family Studies (2018). https://growingupinaustralia.gov.au/sites/default/files/publication-documents/lzac-asr-2017-chap9-out_of_school_care.pdf.
- ¹³ Crowe, Ruth K., Probst, Yasmine C., Rebecca M. Stanley, Sarah T. Ryan, R. Glenn Weaver, Michael W. Beets, Jennifer A. Norman, et al. "Physical Activity in Out of School Hours Care: An Observational Study." *International Journal of Behavioral Nutrition and Physical Activity* 18, Article no. 127 (2021). <https://doi.org/10.1186/s12966-021-01197-6>; Virgara, Rosa, Anna Phillips, Lucy K. Lewis, Mandy Richardson, and Carol A. Maher. "Physical Activity and Screen Time in Outside School Hours Care Services Across Australia: Current Versus Best Practice." *BMC Public Health* 22, Article no. 680 (2022). <https://doi.org/10.1186/s12889-022-13135-7>.
- ¹⁴ Royal Commission into Early Childhood Education and Care. "OSHC Roundtable." 2023, <https://www.royalcommissionecec.sa.gov.au/engagement/stakeholder-roundtables/oshc-roundtable>.

¹⁵ Royal Commission into Early Childhood Education and Care. *Public Hearings - April. Transcript of Proceedings, Friday 14 April PM*. Government of South Australia (2023). <https://www.royalcommissionec.ec.sa.gov.au/documents/transcripts/Transcript-Friday-14-April-PM.pdf>.