

OUT-OF-SCHOOL HOURS CARE (OSHC) SERVICES

Out-of-School Hours Care (OSHC) services in Australia play a pivotal role in providing care and development opportunities for children aged 5-12 years. These services operate before and after school, during school holidays, and on non-school days, catering specifically to school-aged children rather than preschoolers or younger children.

CURRENT REGULATORY FRAMEWORK

Given their unique purpose, OSHC services face distinct operational challenges and developmental considerations that differ significantly from early childhood education and care (ECEC) services. Despite these differences, however, OSHC services are currently governed under the National Quality Framework (NQF), which is implemented by the Australian Children's Education and Care Quality Authority (ACECQA). While ACECQA plays a crucial role in ensuring quality standards in education and care settings, its primary focus remains on ECEC, covering children from birth to five years old. This broad regulatory approach does not sufficiently consider the specific needs of school-age children, whose developmental, social, and educational requirements differ significantly from those of younger children. As a result, the existing regulatory framework fails to adequately address the operational realities and unique service model of OSHC programs.

REGULATORY SHIFT

APPA argues that the current regulatory approach does not sufficiently address the specific needs of school-age children and the operational realities of OSHC services. The establishment of a separate regulatory framework for OSHC services would ensure their success and sustainability, and the well-being of the children they serve. A regulatory shift from ACECQA to education standards boards would allow OSHC services to be governed under a framework that better aligns with the developmental and educational needs of school-aged children. By integrating OSHC within school-based regulations, services could benefit from greater consistency with school policies, improved workforce alignment, and reduced administrative burdens.

However, such a transition also presents challenges, including potential shifts in staff qualification requirements and differences in quality standards. Exploring alternative regulatory models, such as a **hybrid** approach or **state-based** decision-making, could help bridge the gap between childcare-focused and education-focused oversight, ensuring that OSHC services are both high-quality and sustainable.

Here is how that could work.

Shift in oversight from early childhood to school-based regulation

- » OSHC services are designed for school-aged children, not preschoolers or younger children.
- » ACECQA was designed to focus on early childhood education and care (ECEC), which covers children from birth to five years old and who may be in fulltime care.
- » OSHC should be an extension of the school system, rather than early childhood care.

Regulation by education standards boards

- » Education standards boards (such as state-based authorities like NESA in NSW, VIT in Victoria, or QCT in Queensland) oversee the quality and compliance of school education.
- » If OSHC were regulated by these boards, it could be subject to school-based policies and teacher standards rather than the National Quality Standards (NQS) under ACECQA.
- » This could align OSHC more closely with school operations, curriculum, and teacher professional development. ►

POTENTIAL BENEFITS

- » **Consistency with school education**
Aligning OSHC regulations with school governance would create smoother transitions for children throughout their day.
- » **Better integration with school policies**
OSHC services would follow the same standards for staff qualifications, child safety, and curriculum and excursion planning. This would ensure that supervision and safety requirements align with school-based policies rather than early childhood care regulations.
- » **Addressing unique operational challenges**
Since many OSHC services operate on school premises, a school-based regulatory framework would improve coordination with school operations, helping to manage scheduling, transitions, and safety protocols between school and OSHC areas.
- » **Recognition of OSHC's recreational and social focus**
Unlike early childhood education, OSHC programs emphasise activities such as physical play, arts and crafts, group sports, and homework assistance. The current NQF does not fully encompass these activities, reinforcing the need for regulations tailored to OSHC services.
- » **Reduced administrative burden**
Schools and OSHC providers would not need to comply with two separate regulatory systems (ACECQA vs. school authorities).
- » **Parent confidence and trust would be enhanced**
A single data base could be used across a site, reducing the need for duplication of information. This streamlining could also reduce opportunity for human error.

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SUGGESTED REGULATIONS

APPA strongly advocates for the development of a distinct regulatory framework for OSHC services — one that recognises and responds to the unique needs of school-age children and the environments in which they learn and play. Specifically, these regulations would:

- » be **separate** from those designed for childcare settings,
- » acknowledge the **developmental differences** between school-age children and younger children,
- » reflect the **safety and supervision requirements** of school-based environments, rather than those of childcare,
- » support the seamless **integration of OSHC services** with school operations, aligning regulatory requirements accordingly,
- » ensure programs provide a **balanced blend** of recreational and educational activities tailored to the needs of school-age children,
- » set clear, nationally consistent **staffing qualification requirements**, with provisions for ongoing professional learning, and
- » include **medical management** protocols that align with those already in place in schools, rather than duplicating childcare-based models.

We also wish to highlight the emerging and current OSHC workforce challenges. With the number of student teachers gaining special provision registration, the OSHC workforce has been reduced and, in some sites, decimated. Systemic support is needed to ensure OSHC services have the workforce to be viable in their communities.

SUMMARY

It is time to implement a regulatory framework that recognises the unique role OSHC plays in the lives of children and supports its continued contribution to their growth beyond the classroom. **APPA calls on policymakers and industry stakeholders to collaborate with us in creating a regulatory framework that reflects the distinct nature of OSHC.** By introducing these targeted regulations, OSHC services will be better positioned to deliver safe, engaging, and developmentally appropriate care, while also maintaining long-term sustainability. Together, we can ensure high standards of care and development for school-age children across Australia, separate from the childcare sector, but equally essential.

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