



Consultation paper: Changes to the Disability
Standards for Education 2005
To include ECEC services and OSHC services
28 February 2025

About Catholic School Parents Australia

Catholic School Parents Australia is recognised by the Australian Catholic Bishops Conference through the Bishops Commission for Catholic Education as the national body representing and advocating for the parents and guardians of over 765,000 children and young people who attend 1737 Catholic schools across Australia. CSPA works in collaboration and consultation with the National Catholic Education Commission.

Catholic School Parents Australia

Catholic School Parents Australia (CSPA) is the peak national body representing the parents and carers of over 820,000 children in 1759 Australian Catholic schools. This represents over 20% of all Australian students. Notably there are over ten remote areas in Australia where the only school is a Catholic school.

CSPA's membership is made up of the Catholic school parent associations of Queensland, New South Wales, Victoria, South Australia, Western Australia, Tasmania, Northern Territory and the ACT. In turn, each member parent body plays an advocacy role for all parents and carers through their local school parent bodies. CSPA Member State and Territory bodies also work in liaison with their Catholic education authorities at diocesan level and with their State Catholic education commissions.

Consultation Question:

We would like your views on whether the changes cover the ECEC services most suited to be included in the Standards.

- *Does the draft definition of an educational early childhood service accurately describe the types of ECEC services most suited to be included in the Standards, such as:*
 - *Child Care Subsidy approved providers under the national [Family Assistance Law](#)*
 - *Other ECEC services approved under a law of a state or territory who are also required to deliver an education program based on an [approved learning framework](#)?*

Response:

Catholic School Parents Australia believes that the draft definition of an education early childhood service accurately describes the types of ECEC services most suited to be included in the Standards. It is worth noting that there are a cohort of ECEC services that don't fall into this description. For example, some jurisdictions have ECEC services that do not meet the criteria to offer Child Care Subsidy, nor required to deliver an educational program based on an approved learning framework. These services operate under a state based legislation.

Further comment:

CSPA believes that

- anything that makes it clearer for the services to comply is helpful
- ECEC services are already a highly regulated industry
- ECEC services need to keep autonomy to be able to explain to families that their service cannot meet the needs of the child or funding must be provided to update anything required to be able to enroll the child e.g. building adjustments, staff professional learning.
- many ECEC services will require support or funding to assist with these compliance issues e.g. staff training?

Impact on Enrolment & Accessibility –additional compliance measures could severely impact service availability, particularly in rural, remote or low-income areas.

Outside Hours Care Services – important to note the contextual differences regarding the nature of this care type and the circumstances they operate under. For example, legislation requirements differ across jurisdictions and ECEC qualifications to work within an OSHC setting is not required in all states and territories. This may provide further complications and challenges regarding staff capabilities. Many OSHC services operate out of school sites or community own buildings that may provide further challenges when requiring building alterations to accommodate individual children.

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