

## **Submission to the Inquiry into Quality and Safety of Australia's Early Childhood Education and Care System**

**From the Federation of Parents and Citizens Associations of New South Wales  
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### **Introduction**

Outside School Hours Care (OSHC) - comprising before school, after school, and vacation care - is an essential component of Australia's early childhood education and care landscape. Approximately 38% of all primary school-aged children attend OSHC services,[1] underscoring its vital role in child development and in enabling parents' workforce participation. Historically, OSHC in many states (notably New South Wales, Victoria and South Australia) grew from community roots, often managed by parent committees or school councils on school grounds. Parents highly value community-run OSHC for its local accountability and focus on children's wellbeing.[2] In New South Wales alone, P&C Associations directly manage over 40 OSHC services and other parent-led non-profits operate about 115 services, reinvesting any surplus back into schools and children.[3] However, recent shifts - particularly in NSW's tender and licensing policies - have accelerated the corporatisation of OSHC, displacing community-based providers in favour of large multi-site operators.[4] This trend towards corporatised consolidation has been evident in other states (notably Victoria and Western Australia), raising concerns about quality, safety and the erosion of local engagement in OSHC.

This submission focuses on OSHC in the context of the Senate Inquiry's Terms of Reference, drawing on comparative data and case studies across Australia. In particular, NSW is presented as a cautionary tale of policy changes undermining community-run OSHC, while QLD's experience demonstrates the quality outcomes achievable under parent and community governance. We examine provider type composition in each jurisdiction, quality ratings and compliance outcomes, workforce conditions and enforcement actions. Throughout, we highlight how community-based, not-for-profit OSHC services deliver superior outcomes in educator consistency, child safety and community connection, whereas centrally managed corporate models - driven by profit incentives and economies of scale - struggle to match these outcomes and have been implicated in cost-cutting that can compromise quality and safety. The evidence supports national reforms to strengthen community-led OSHC provision, improve transparency of provider performance, and ensure regulation and funding settings prioritise children's safety and wellbeing over commercial interests.

## 1. Health and Safety of Children in OSHC

The health, safety and wellbeing of children in OSHC must be paramount. OSHC services operate at critical times of day (before and after school) when supervision and safe environments are essential. Unfortunately, there is mounting evidence that not all OSHC providers perform equally in safeguarding children. Recent high-profile incidents and data reveal significant safety lapses concentrated among certain large operators. For example, an analysis of public ratings data for NSW by the NSW P&C Federation found that one large corporate OSHC provider failed to meet National Quality Standard (NQS) Element 2.2 ("Safety") in 21% of its assessed services in the 2023-24 year - a rate "substantially higher than for the rest of the sector".[5] This indicates systemic issues with supervision, incident management and child protection in that provider's services, raising questions about whether scaled-up corporate models adequately protect children.[6] By contrast, most community-managed services meet or exceed the safety standard, suggesting that localised, not-for-profit operations may offer safer, more attentive care environments.

Empirical cases underscore these concerns. In Western Australia, Camp Australia - the nation's largest OSHC provider - was penalised by the regulator for multiple serious supervision failures. In late 2023, the WA State Administrative Tribunal ordered Camp Australia to pay a total of \$220,000 in fines after several young children managed to wander away unsupervised from its OSHC programs[6]. In one instance, two children (ages 5 and 6) on a holiday excursion were found roaming a busy carpark, leading to a \$75,000 fine for the provider[7]. In another case at a Camp Australia service, a three-year-old was found on a road in 36°C heat after slipping away from the OSHC; the company was fined \$18,500 for that incident [8][9]. These frightening lapses were not isolated - the tribunal documented multiple venues and dates where Camp Australia's inadequate supervision allowed children to leave OSHC premises unnoticed [10][11]. Similarly, OSHClub (an entity of Junior Adventures Group) has faced enforcement action: a WA investigation found a four-year-old was left behind at a Perth Zoo excursion for 15-25 minutes under OSHClub's care, resulting in a \$20,000 fine for failing to ensure adequate supervision [12][13]. Notably, that case marked the fourth time OSHClub's approved entity had been brought before the Tribunal for breaches [14], suggesting recurrent safety issues. These examples - children left on buses or wandering from centres - illustrate the potentially grave consequences when supervision and safeguards are insufficient in OSHC.

By contrast, community-based OSHC services tend to have stronger safety cultures rooted in consistent staffing and higher educator-to-child ratios. A de-identified case study from Sydney highlights this difference: a parent-run OSHC service deliberately operates with a 1:10 staff-to-child ratio (well above the minimum 1:15) to ensure closer supervision and a variety of safe activities for children [15]. Parents using both a corporate-run service and a nearby parent-managed service observed that the latter felt significantly safer, with staff who knew the children well and actively engaged them, whereas the corporate service, despite having the same NQS rating on paper, struggled with frequent staff changes and less attentive care [16][17]. This suggests that formal ratings alone may not capture on-the-ground safety quality - factors like staff continuity, local knowledge, and provider ethos matter greatly for children's wellbeing [18]. Indeed, parents often report a greater sense of trust in community-run OSHC precisely because educators are long-term, familiar faces invested in the community [19]. These relational aspects contribute to children feeling secure and supported, which is an integral part of safety.

It is also important to note that OSHC safety encompasses not just acute incidents, but children's overall health and wellbeing during care. Research confirms that play-based activities, reliable

routines, and warm relationships in out-of-school hours contribute significantly to children's emotional and social development [20]. Community OSHC services excel in this regard by creating a "home away from home" environment - many employ former students or local young adults as educators, reinforcing community ties and a sense of belonging for children [19]. In contrast, a depersonalised atmosphere with rotating agency staff (a model sometimes used by large providers) can undermine children's sense of safety and attachment. In summary, the evidence indicates that community-led OSHC models provide safer and healthier environments through consistent, caring supervision, whereas some large for-profit operations - stretched across hundreds of sites - have seen disproportionate safety failures [5]. Strengthening child safety in OSHC therefore goes hand-in-hand with supporting local, not-for-profit governance and ensuring providers are not driven to cut corners in supervision due to cost pressures.

## 2. Effectiveness of the Regulatory Framework and Regulators

Australia's childcare regulatory system - the National Quality Framework (NQF) overseen by state/territory regulators and ACECQA - applies to OSHC services as well as early learning centres. While a unified framework brings consistency, there is broad agreement that the NQF was originally designed with long day care and preschools in mind and is not ideally calibrated to OSHC settings [21][22]. School-aged care operates only before/after school and in school holidays, often on school premises, with older children who have different needs than infants or toddlers. OSHC has been "shoehorned" into a framework misaligned to its part-time, play-focused nature [21]. For example, expectations around detailed educational programming, lengthy reflective documentation, and formal planning cycles can be unrealistic for an after-school context with limited contact hours and primarily casual staff [22]. Compliance tasks that might be feasible in an early learning service (with administrators and continuous staffing) become a burden in small OSHC services run by a single coordinator for a few hours a day. The result is a system that may overemphasise paperwork "form over substance," inadvertently penalising community-run services that prioritise responsive care and relationships but have fewer resources for polished documentation [24][25]. Meanwhile, large providers can leverage corporate compliance teams to produce templated policies and binder-thick Quality Improvement Plans, potentially scoring well on assessments without truly excelling in practice [24][26]. This dynamic can skew ratings to favour those who are best at "working the system" rather than those providing the most meaningful child experiences.

Regulatory authorities at the state level have also tended toward centralised, standardised processes that may not fully appreciate local context. In NSW, the regulator's heavy encouragement of a one-size-fits-all self-assessment portal is a case in point. Many OSHC providers felt effectively forced to use the NSW online Self-Assessment and Quality Improvement Plan (QIP) template, which strictly limits narrative responses to 500 characters per section [27]. Inspectors reportedly told services that if they did not complete the "Exceeding themes" in the provided template, their on-site practices would not be considered for an Exceeding rating, "no matter how strong the practice observed" [28]. This kind of approach has been described by service directors as feeling like a tick-box exercise where genuine quality is less important than correct paperwork submission [28][26]. Volunteer-managed services in particular struggle under such compliance regimes - faced with a choice between spending scarce hours on children or on perfect paperwork, they often choose the former and then suffer in the ratings. The regulatory framework's inflexibility thus risks disadvantaging community providers and advantaging large operators with dedicated compliance staff [24][29]. It is telling that

assessors themselves privately acknowledge the gap between “authentic and performative compliance,” but feel constrained by the system’s limitations [30].

To the regulators’ credit, the NQF has driven improvements in basic standards and provides an overarching safeguard for children. Most states report around 85-90% of OSHC services are Meeting or Exceeding the NQS as of 2025, which indicates a generally sound baseline [31][32]. However, the clustering of most services in the broad “Meeting NQS” band (roughly two-thirds of all services) limits the framework’s usefulness in differentiating quality [33]. Since the 2018 revision of the NQS, the proportion of services rated Exceeding has shrunk (from ~33% down to ~22% nationally) and “Working Towards” has also dropped, while fully 66% of services now sit at Meeting NQS [33]. This convergence suggests the rating process may have become overly lenient or focused on minimum compliance - a sentiment echoed by providers who describe achieving a Meeting rating as a “box-ticking exercise” rather than a true mark of quality [34]. In OSHC, critical elements of quality like child engagement, flexible programming and community connection are hard to quantify and often overlooked during formal assessments [34]. A major research project interviewing 180 OSHC services found that the “heart of quality OOSH - child-focused, flexible, community-driven care - is often overlooked in favour of paperwork compliance” [34]. Thus, while the regulatory framework sets important safety and staffing minimums, its effectiveness in recognising and fostering excellence in OSHC is questionable under the current design.

State and territory regulators vary in their resourcing and approach. Smaller jurisdictions like NT and TAS face unique challenges regulating OSHC due to fewer services and often remote or regional contexts. These jurisdictions often rely on a handful of providers (sometimes government or council-run OSHC in remote communities), and anecdotal evidence suggests regulatory oversight can be less frequent given resource constraints. Larger states (NSW, VIC, QLD, WA) have more regulatory staff and have pursued enforcement action when serious breaches occur, as evidenced by the prosecutions of major providers in NSW and WA noted earlier. However, it is notable that most enforcement actions are not widely publicised to families, limiting the regulatory system’s transparency and deterrent effect (see Section 7 on Transparency). Moreover, regulators historically focused on early childhood centres may not always appreciate OSHC’s context; for instance, sleep and rest requirements, or the assessment of children’s learning are requirements under the National Quality Framework seemingly drafted with Early Childhood in mind, but are equally applied to OSHC. A more effective regulatory framework would involve OSHC stakeholders in policy design and possibly develop OSHC-specific quality indicators or assessment processes. We, the P&C Federation, call for a national rethink “to redesign the regulatory framework for OOSH” to include age-appropriate standards and to refocus assessment on actual practice rather than paperwork [35][36].

In summary, while the NQF has provided a backbone for OSHC quality and safety, its one-size-fits-all application has limitations. Strengthening the regulatory system’s effectiveness will require adjustments that account for OSHC’s part-time nature and community setting, plus greater empowerment of regulators to reward genuine quality (relationships, responsiveness, child engagement) rather than just compliance artifacts [37].

### 3. Provider Compliance with Quality Standards and Legal Requirements

On paper, compliance with the National Quality Standard and other legal requirements (under the Education and Care Services National Law) is high across the OSHC sector - over 85% of OSHC services nationally are rated Meeting or Exceeding the NQS[31][32], and significant enforcement actions remain relatively rare compared to the total number of services. However, a deeper analysis reveals significant differences in compliance and quality outcomes by provider type. Aggregated data and ratings suggest that not-for-profit, community-based providers tend to achieve higher quality outcomes, whereas some large for-profit or multi-site operators cluster at the minimum acceptable standards and have been involved in more frequent breaches.

For example, in Queensland - which has a mix of school P&C-run programs and external operators - the contrast is stark. P&Cs Queensland reports that among the 119 OSHC services run by school P&C Associations in QLD (serving 17,700 children), 12.6% are rated Exceeding NQS, more than double the sector-wide average, with the remainder mostly Meeting NQS [38]. Notably, *all* P&C-operated services in QLD have been assessed and rated (0% unrated), reflecting a commitment to engaging with the quality system [39]. By contrast, several major multi-site providers in QLD - including a large charity (Catholic Archdiocese), community organisations (PCYC, YMCA) and the private operator Camp Australia - recorded 0% Exceeding ratings across hundreds of combined sites [40]. In other words, none of their many services achieved an Exceeding rating, indicating that these providers generally meet only the baseline (or in some cases fall short). This pattern is corroborated by qualitative feedback: P&C-run services aim high, and some excel, whereas the big chains appear satisfied with "Meeting" and may not invest in the extra staff, training or innovation required to exceed the standards [41]. While an Exceeding rating is not the only measure of quality, the absence of any Exceeding services in a large portfolio is a red flag suggesting a ceiling on quality imposed by standardised, cost-driven practices. It aligns with parent anecdotes that programs run by large for-profits often feel adequate but not exceptional - "care just to the minimum standard."

Differences in compliance can also be seen in the record of regulatory violations and sanctions. As highlighted earlier, some of the most serious National Law breaches in OSHC (involving child endangerment through lack of supervision) have come from the major for-profit players. Camp Australia has been prosecuted in multiple jurisdictions: in NSW it was convicted and fined for operating over the approved number of children at a service (breaching a condition of its service approval)[42], and in WA it has faced proceedings for repeated supervision failures resulting in children going missing [43][44]. Junior Adventures Group's OSHClub brand likewise has a history of compliance issues (e.g. the Perth Zoo incident) and was noted to have appeared before regulators multiple times[14]. Even large non-profits are not immune - for instance, YMCA of Perth was fined \$15,000 in 2020 after a child was mistakenly left alone on a bus during an OSHC excursion [45]. By contrast, parent-run single-site services have rarely been the subject of prosecutions or serious sanctions, according to public registers. It reflects the fact that any community services surpluses are directed to quality improvements, with services exhibiting an acute awareness of maintaining trust with their school community. When issues do occur at community services, they tend to be promptly addressed with support from volunteer management committees, rather than recurring patterns of non-compliance.

It should be noted that data on incidents and compliance by provider type is not routinely published, hindering a comprehensive comparison [46]. We have previously called for regulators to release de-identified data on critical incidents or substantiated complaints by provider category (private, non-

profit, community)[46]. Such transparency would help identify if certain business models correlate with higher risk. At present, we rely on piecemeal information: for example, the aforementioned NSW analysis of NQS Element 2.2 (Safety) outcomes suggests Junior Adventurers Group underperformed significantly on safety[5], and separate WA data show OSHClub (a brand of Junior Adventurers Group) appearing in multiple enforcement actions[14]. Meanwhile, ACECQA's quarterly snapshots give broad quality ratings distribution but do not break them down by management type publicly. The evidence we do have, however, consistently points to higher-quality compliance among community-governed OSHC services and recurrent compliance challenges among some large-scale operators. These large operators often operate very close to capacity and with tight staffing, which may contribute to issues like over-enrolment or lapses in supervision (as seen in the Camp Australia over-capacity case and others).

In terms of general quality standard compliance: OSHC services nationwide have strengths in areas like relationships with children (Quality Area 5) and community engagement (QA6), but struggle more with documentation-heavy areas like program planning (QA1) and governance (QA7). Interestingly, P&C-run services buck this trend somewhat - they significantly outscore other providers on relationships with children and community partnership metrics (e.g. in QLD, 14% of P&Cs rated Exceeding in QA5 vs 6% of others)[47][48], reflecting their community embeddedness. At the same time, volunteer-led services show slightly more "Working Towards" ratings in Governance and Leadership (QA7)[49], likely due to the comparative ease for multi-service providers to produce the same evidence in this area for all of their services. This is further compounded by a governance skills shortage in Educators, who carry out the bulk of documentation in P&C and parent-operated services, in comparison to professional staff in a central location in larger multi-service providers. This suggests targeted support in governance for community providers could further elevate their rating. Overall, the compliance picture is not black-and-white: there are diligent, high-performing services and also mediocre ones in each category. However, the balance of evidence indicates that the multi-site for-profit OSHC chains consistently deliver lower quality while extracting profit, and they feature disproportionately in serious compliance breaches. Community and school-run services, when properly supported, often deliver above-average quality but may need help navigating regulatory compliance burdens. Recognising these patterns is important for shaping policy that holds all providers to account and uplifts the sector as a whole.

#### **4. Employment Practices and Their Impact on Quality and Safety**

The quality of OSHC is inseparable from the people providing the care - educators, coordinators, and support staff. Employment practices used by OSHC providers (hiring, rostering, training, turnover, etc.) have a direct impact on children's daily experience and safety. A clear divide has emerged between community-based OSHC services, which typically prioritise stable and invested staffing, and some large providers who rely on more casualised, interchangeable workforce models. This divide affects educator-child relationships, consistency of care, and ultimately the outcomes for children.

Community-managed OSHC services (such as those run by school P&Cs, parent committees, or local councils) often boast long-serving staff and low turnover. Many intentionally recruit educators from within the community - for example, hiring former students or local university students and retaining them for years[19]. This approach means children see familiar faces over time and build trust. A stable team is more likely to detect subtle changes in a child's behaviour or needs (a key aspect of safeguarding) and to form positive relationships that support children's social-emotional

development. Parents frequently cite consistent staffing as a major advantage of community-run OSHC, saying their children feel comfortable and “known” by the carers[19][51]. In practice, these services become an extension of the school community. Importantly, many community OSHC providers pay above the industry Award rates and offer opportunities for staff to grow into leadership roles[51]. Without any profit object, they choose to reinvest any surplus generated into quality staff - through slightly higher wages, additional training, or more generous staff-child ratios - or reducing fees. This results in better morale and dedication from staff. Indeed, a sector study in NSW found OSHC services with low staff turnover had measurably higher child wellbeing outcomes and stronger family relationships[52]. Continuity of care allows deeper understanding of each child and smoother routines, which directly enhances safety (since staff can anticipate issues and manage groups more effectively).

In contrast, several large for-profit OSHC providers operate with a “fly-in fly-out” staffing model. They maintain pools of casual or part-time educators who are rotated between multiple school sites as needed[53]. Frontline decisions at the service may be left to relatively junior staff, with managerial oversight coming from regional managers who oversee dozens of sites and may not know any one school community well[53]. This distributed model is driven in part by cost efficiency - maximizing staff utilisation across sites - but it can undermine the consistency and personal connection that are so critical in childcare. Children in such services might have a different supervisor from one afternoon to the next, making it hard to establish rapport or for staff to fully understand individual children’s triggers and needs. It also poses safety risks: inconsistent staffing and communication can lead to supervision gaps (as new or relief staff may be unfamiliar with the venue layout, escape risks, or certain children’s health needs). The recent supervision failures in some corporate-run programs hint at this problem: e.g. relief staff on an excursion not accounting for a child, or turnover leading to lack of adherence to safety protocols[13][54]. Additionally, when staff are stretched across locations, training quality can suffer - a central office might provide online modules, but there is less on-site mentoring compared to a stable team environment.

Another concerning practice tied to some private operators is the use of minimal staffing to meet the required ratios and no more. While all OSHC must meet at least the mandated educator-to-child ratio (typically 1:15), community services often schedule above the minimum - focusing on high levels of supervision based on assessment of risk for their service, rather than a strict 1:15 ratio. For-profit chains under cost pressure may be less inclined to roster extra staff beyond the bare minimum needed to accommodate enrolments, since every additional educator cuts into profit. This approach leaves little margin for error - if someone calls in sick at the last minute, the service might operate shorthanded or scramble for a last-minute casual, disrupting program quality. It also means less flexibility to give children individualised attention or to properly supervise a wide range of simultaneous activities. By contrast, a generously staffed program can run multiple engaging activities while still closely supervising all children. Parents have observed that community-run centres with a philosophy of “staffing where it matters most - with the children” deliver richer programs and safer environments[56][57]. The profit-driven imperative to minimise labour costs can thus directly conflict with best practice in care and safety. Perhaps most concerningly is the reports from parents in large for-profit providers of operating at on a ‘single staff model’, where, when there are fewer than 15 children at the service, only one educator is present. One parent at a regional, multi-service for-profit OSHC provider told us of her experience:

*“It takes me an hour to travel from work to school, so I’m usually the last to pick up the kids. Every day when I rush in at 6:00, there’s only one staff member there, usually vacuuming*

*while my kids sit colouring in. Often I don't know that adult at all, or maybe have seen them once or twice. I don't feel my kids are 100% safe, but what can I do? It's the OOSH at their school, it's not like I have a choice of where to send them."*

The tendering and outsourcing policies in some states have also had detrimental effects on the workforce. In NSW, for instance, the shift in 2021-22 to mandate competitive tenders for school site OSHC contracts (rather than preferentially retaining community providers) sent a destabilising message to many long-term OSHC staff [58][59]. Educators who had devoted years to building up a school's OSHC suddenly faced the prospect of their service being taken over by an outside company or having to compete via complex procurement processes to keep their jobs. Educators have interpreted this as "a vote of no confidence" from the system they had long supported [60]. Some have indeed left the sector, unwilling or unable to navigate onerous tender applications that favour organisations with dedicated bid-writing teams [61]. This loss of experienced, passionate educators - essentially forced out by a bureaucratic change - is a blow to quality. The incoming providers may hire new staff at lower pay, or transfer in rotating personnel, erasing the continuity that existed. As countless educators told us "I will never work for a corporate provider" - instead, they have left the sector along with decades of expertise and relationships with families and communities. In short, employment practices that ignore the value of local staff (such as abrupt outsourcing or treating OSHC workers as interchangeable) are counterproductive for quality and safety. Policymakers should recognise that OSHC educators are not easily replaceable commodities - their relationship with the school community is part of the service's fabric. Employment stability, recognition, and fair remuneration for OSHC workers directly correlate with better outcomes for children.

## 5. Worker Compensation and Pay in OSHC

Compensation and working conditions for OSHC educators are another critical factor influencing service quality. The sector as a whole is plagued by relatively low wages (often close to the minimum Award for childcare, given the split-shift nature of the work) and limited career pathways. Yet, as noted, there is a divergence between provider types: community-based services tend to invest more in staff pay and development, whereas some large providers - driven by financial returns - keep wages at the minimum and rely on a churn of casual staff. This has significant implications for attracting and retaining the calibre of workforce needed to deliver high-quality, safe care.

Many community OSHC services make a deliberate effort to pay above-Award wages or provide additional benefits to their educators [51]. For example, a P&C-run OSHC might pay a few dollars more per hour than a corporate competitor, or offer greater stability of shifts (normally locked in a term in advance). Further, the practice of hiring from within local communities builds lasting relationships that result in reports of high job satisfaction. These community-based providers often promote from within; a casual educator who shows commitment might become an assistant coordinator, then coordinator over time[51]. These practices foster loyalty and skill growth. The payoff is seen in workforce stability - some parent-managed OSHC have had the same coordinator for decades, and very low turnover among the team. Even though "staying in the profession is a labour of love" and many veteran educators have accepted modest pay for years out of dedication [62], community employers do what they can to reward and acknowledge that dedication within tight budgets. This stands in contrast to the explicit cost-minimisation strategies of certain private operators. For-profit OSHC providers must act to minimise costs to satisfy shareholder expectations, which naturally translates to pressure towards lower wages and minimal staffing as well as cheaper

food and resources [63]. Indeed, labour is the highest cost in childcare, so cutting wages (either by hiring less qualified staff at lower pay or reducing staff hours) is the primary way to increase profit margins [63]. The consequence, however, is a workforce that is often transient, less experienced, and less invested in the job as a long-term career.

The impact of compensation is evident in staff turnover rates. Industry-wide, OSHC struggles to retain educators because of split shifts (e.g. a 7-9am morning shift, then a 2-6pm afternoon shift, with an unpaid gap in the middle of the day) and the generally low pay relative to the responsibility held. Many educators use OSHC as a stepping stone while studying or as a secondary job - usually outside of the Early Childhood sector. This is even more pronounced when employers do not offer incentives to stay. A corporate OSHC provider might hire many university students at base Award wages; once those staff graduate or find a better-paying job, they leave, requiring constant recruitment of new, inexperienced staff. High turnover not only disrupts children's experience but incurs costs (recruitment, training) that arguably offset the savings from low wages. Community services have demonstrated that paying moderately above Award rates and cultivating a positive workplace culture can flip this script - staff feel valued and thus remain longer, which in turn improves program quality and reduces the need for continuous hiring. Furthermore, better pay can attract more qualified candidates, raising the skill level in the service.

It should also be considered that OSHC staff compensation ultimately ties into safety. A well-compensated, well-trained educator is more likely to be vigilant and confident in enforcing safety protocols (such as headcounts on excursions, challenging unknown people who come for pickup, etc.). Conversely, if staff feel overworked, underpaid and unsupported, complacency and errors can creep in. Some of the serious incidents cited earlier (children slipping away) might have been prevented with more experienced, engaged staff on duty. In recognition of this, there have been calls to improve OSHC workforce conditions nationally - for instance, through OSHC-specific training and career pathways to retain skilled educators[64][65]. This inquiry should examine whether current Award rates and funding mechanisms (including the Child Care Subsidy) adequately value OSHC educators. If we expect high quality and safety, the workforce needs to be compensated accordingly.

We note that we do not call for blanket mandatory tertiary qualifications for OSHC educators, though we do support investment in OSHC-specific training and career pathways for educators who wish to build a profession in the sector. Mandating ECEC qualifications would predictably divert staff to long-day-care roles with better shift patterns (longer, uninterrupted shifts and fewer split shifts), worsening OSHC workforce shortages and eroding the community benefit of young, local educators who serve as relatable role-models for children in middle childhood (ages 5–12). Quality in OSHC is best lifted through targeted, practice-proximate training that reflects middle-childhood needs. We therefore endorse mandatory training for all staff on shift to be completed in the first 3 months of employment - current First Aid/CPR/Asthma/Anaphylaxis and child protection/mandatory reporting - delivered via a new accredited OSHC-focused model, and complemented by optional, stackable OSHC micro-credentials and recognition of prior learning for experienced staff, supported by funded access to training in regional and remote areas.

## 6. Impact of Private For-Profit Incentives on Quality and Safety

The OSHC sector today includes a mix of provider types: government or school-operated services, community or charitable not-for-profits, and private for-profit companies (ranging from small local businesses to large national chains). For-profit incentives have become a significant force in OSHC, especially as private equity and large corporations have entered the market over the past decade. The fundamental motive to generate profits and growth can influence business practices in ways that do not always align with the best interests of children and families. Numerous stakeholders have raised concerns that the drive for profit - and the consolidation of the sector into a few dominant companies - is leading to cost-cutting, reduced quality, and less accountability.

As mentioned, major for-profit chains like Camp Australia and Junior Adventures Group (JAG, which now operates OSHClub, PrimaryOSHC and Helping Hands) rapidly expanded to hundreds of sites nationally, often through competitive tenders to run OSHC in schools. In 2017, these two giants even proposed a merger to create a single mega-provider, a move that the Australian Competition and Consumer Commission (ACCC) scrutinised. The ACCC's investigation is telling: it warned that eliminating competition between Camp Australia and JAG could lead to "higher prices for parents and lower quality care for students"[66]. The regulator noted that although there are many small OSHC providers, the vast majority are tiny single-site operations, and a merged Camp/JAG would be far larger than any competitor, able to exercise market power [67]. In practical terms, this means schools would have had fewer choices and less bargaining ability - the provider could dictate terms knowing alternatives were limited. In a market where parents already have limited choice at best - with only one provider operating on a school site - the impact on families would have been devastating. The merger was eventually abandoned [68], but the episode highlights the trajectory of the sector toward consolidation and the very real risk that corporate concentration can erode quality. With less competitive pressure to maintain high standards (or keep fees affordable), a dominant provider might prioritise profit margins. The ACCC explicitly linked profit incentives to quality, which is significant coming from a competition watchdog: when large providers compete mainly on financial offers (e.g. paying schools rent or return), they might recoup those costs by cutting back on food quality, activities, or staffing in the service, thereby diminishing the care experience for children[63].

The NSW experience since 2021 is a case study in how for-profit incentive structures can undermine community-centred quality. Prior to 2021, NSW's Department of Education had a policy that treated parent-managed, not-for-profit OSHC services as the "preferred providers" on public school sites - these community services were generally exempt from routine tendering, acknowledging their reinvestment of funds into the service and school community, and the value of parent involvement [69]. However, a policy change removed this preference (unless the service transferred to a newly registered P&C Association provider, which has proven unfeasible in all 135 cases to date) [70]. Consequently, many long-standing parent-run services have been, and will continue to be forced into open tenders against large companies. Inevitably, in tender evaluations, the big commercial providers offer attractive financial incentives - the Department of Education has set significantly higher license fees paid to them in licences to operate on public schools than they do for community-based not-for-profit providers. Quality considerations like community governance, benefits for children or parent satisfaction carries little weight compared to the additional fees generated for schools from corporate providers. The result has been a first wave of contracts awarded to for-profit operators, displacing parent-operated OSHC in over 20 schools. In the two years since the policy shift, over 20 parent-managed services in NSW have been lost - a 16% decline in the number of parent-run OSHC

on school grounds [71] - despite the policy change not yet being fully operational. Parents in those school communities have reported distress and frustration at losing their beloved community service, often without genuine consultation [71]. This is a tangible example of how a profit-driven model (bolstered by unfavourable procurement processes) can displace community-oriented care. The corporatisation trend is eroding the fabric of community-led OSCHC and is ultimately detrimental to children's safety, health and wellbeing [4][72]. When OSCHC shifts from being an extension of the school community to being a revenue-generating opportunity, the focus shifts away from children.

Specific business practices of large for-profits illustrate where quality can suffer. One practice is cherry-picking service offerings based on profitability. For instance, vacation care (full-day programs during school holidays) often has slimmer profit margins than term-time before/after school care, due to higher staffing needs per child-hour. A cited case in Sydney found that a corporate OSCHC provider chose not to offer vacation care at a particular school because it was less profitable, forcing parents to find alternative arrangements during holidays [73]. Those families ended up having to transport their children to a different suburb's parent-run OSCHC for vacation care, at personal inconvenience and cost - a community service effectively subsidising care because of the corporate provider's failure to meet their responsibilities [73][74]. This demonstrates a profit-first calculus that ignored community needs. A parent committee would likely never refuse to offer a needed service solely due to lower profit, but a corporation answerable to shareholders might. Another practice is standardising programming and resources to reduce costs - we hear of identical weekly activity schedules being rolled out across dozens of schools by a single provider, using bulk-purchased kits, rather than activities tailored to each community's interests. While efficient, this can result in a thin, generic experience for children, lacking the richness that a passionate local coordinator might bring. Food in some corporate services has also drawn complaints (e.g. pre-packaged snacks replacing the fresh sandwiches, fruit platters and daily-changing meals made from scratch that P&C services often pride themselves on) - again a likely result of cost management from a central procurement office.

For-profit incentives can also discourage investment in quality improvement beyond what is needed to avoid regulatory issues. If a service is already Meeting NQS (and parents continue to enrol), a company might not see a financial rationale to aim for Exceeding (which could require additional staff training, lower ratios, etc.). This "good enough" mindset is borne out in the QLD data where big providers had 0% Exceeding services [40]. In contrast, not-for-profit and school-run services often have an intrinsic motivation to excel - driven by community pride or ethos - and thus pursue higher quality even if it costs more or is effortful (e.g. seeking an Excellent rating from ACECQA, something no commercial OSCHC has achieved to date to our knowledge). The culture set by corporate ownership - especially private equity owners - tends to prioritise financial performance metrics. Camp Australia, for example, was acquired by a private equity firm (Bain Capital) in 2017[75] and subsequently sold to a consortium of lenders, including Allegro Funds and Tanarra Capital of investment firms in 2022. Such owners typically seek to streamline operations, increase earnings and valuations within a few years and exit profitably. Some reports from staff inside these companies (gleaned from media investigations and staff turnover patterns) suggest that cost-cutting measures - like reducing paid planning hours for educators, maximising child enrolment per staff, and deferring maintenance expenditures - have occurred, with potential negative effects on quality. Not every for-profit is the same; there are smaller private providers who run excellent services out of personal passion. But the large-scale corporate model inherently faces pressure to put profit above all else, unless checked by strong regulation and informed parent choice.

In conclusion, the influence of profit incentives in OSCHC has led to: (a) aggressive expansion and consolidation that threaten diversity and choice; (b) business decisions contrary to children's best interest; and (c) a general floor-leveling of quality rather than a race to the top. Rebalancing the sector towards community and not-for-profit provision would help realign incentives with outcomes. The ACCC's observation remains salient - healthy competition (especially via community alternatives) is needed to keep even the private operators focused on quality and value, rather than merely returns to investors[66][76].

## 7. Transparency, Data and Public Information

Transparency in the OSCHC sector is essential for accountability and informed decision-making by parents, schools, and policymakers. Currently, however, there is limited public visibility of important information about OSCHC services - including quality performance, compliance history, fees, staffing, and other metrics - especially on a per-provider basis. Improving the collection, evaluation and publication of reliable data on OSCHC would greatly enhance the sector's quality over time. It would enable recognition of high-performing services, pressure under-performers to improve, and help families choose care based on more than just convenience or word-of-mouth.

At present, parents seeking information on an OSCHC service can typically find the basic details on the national registers (available through the ACECQA website or state portals): the service's overall NQS quality rating and the ratings in each quality area, the date of last assessment, and any rating changes. While useful, this information is static and limited. It does not tell a parent why a service is Meeting versus Exceeding, nor anything about the service's philosophy, turnover, community feedback, or whether it has had serious incidents. While some of this information is required to be displayed at upon entry to the service, the nature of OSCHC is such that parents are not able to spend the same lengths of time reviewing and discussing the service's performance or their child's experience with educators at drop off or pick up times. A child's experience at OSCHC is part of a school day. Often the first question a parent asks a child as they leave an OSCHC service is "how was school?", not "how was OSCHC?". As a child of primary-school age is able to articulate their own experience, there is often a reliance on children to recount their experience of OSCHC, and if concerns arise, these can be later addressed by the parent. This relaying of information from children is often the primary way parents gauge the quality of their OSCHC service - indicating there needs to be a significant change to the way information is shared with parents about their OSCHC service.

Furthermore, public registers do not aggregate data by provider - a parent would have to individually look up each service run by a company to discern a pattern. Regulators do hold richer datasets. For example, NSW's regulatory authority collects incident notifications and substantiated complaints. However, data on incidents of harm has not been made public in a way that can be broken down by provider type or entity[46]. Making such de-identified data available (e.g. number of serious incidents per 100 services for private vs community providers) could highlight systemic issues or success stories[46]. Similarly, information on enforcement actions (fines, prosecutions, license sanctions) is technically public but not easily accessible - some states publish registers or media bulletins, others do not. A national, easily searchable enforcement action register for ECEC including OSCHC would increase transparency. It is concerning that a parent could unwittingly enrol in an OSCHC service that has a history of letting children wander off, and not know about it unless they dug up old news articles. Regulators should aim to share more of this information proactively.

Another gap is outcomes that parents and children care about which are not captured in the current data. NSW stakeholders have called for a statewide OSCHC data strategy to track things like staff retention rates, child and parent satisfaction, community involvement in governance, inclusivity of children with additional needs, and service-level investment in programming[77][78]. These indicators would give a much fuller picture of quality than the blunt NQS ratings alone. For instance, a service might be officially “Meeting NQS” but have very low parent satisfaction and high staff turnover. Conversely, a service could be rated Meeting but have glowing parental feedback and stable staff, indicating quality that the rating didn’t capture. As things stand, such nuances are lost. Queensland has taken a step in this direction: P&C’s Queensland’s survey “What Parents Want” collected data from families on their usage and needs for OSCHC (finding that 21% of QLD families with access still couldn’t secure a place when needed, and that if OSCHC was unavailable, around 30% would have to reduce work hours)[79][80]. This kind of data underscores demand and the social impact of OSCHC, informing planning for capacity. A national approach could involve incorporating a parent satisfaction survey into the Child Care Subsidy system (e.g. an annual feedback requirement tied to subsidy, as suggested by P&C NSW) [81][82], or mandating providers to report staff turnover and serious incidents as part of public disclosures.

Transparency is also hampered by the fragmentation of data responsibilities. In NSW, for example, the OSCHC procurement team in the Department of Education separately collects data from services on things like attendance, fees, etc., but this information is not shared with the regulatory side or made public [83]. There is a missed opportunity for joined-up data that can be analysed to identify trends (for instance, fee increases vs quality outcomes, or correlation between low fees paid to schools and better service quality - perhaps indicating reinvestment in service rather than rent). ACECQA and state regulators could work together to standardise data collected and publish key performance metrics for OSCHC nationwide. ACECQA already produces the NQF Snapshot each quarter; an expanded “OSCHC quality report” could include breakdowns such as quality ratings by provider management type and by jurisdiction, number of services with repeated non-compliance, average educator qualifications in OSCHC vs other sectors, etc. Transparency is not about shaming providers but about driving improvement and informing consumers. When Camp Australia was fined by WA’s tribunal, following subsequent media attention the provider’s executive responded that they had since “overhauled” training and supervision protocols[84] - a clear example of public accountability prompting quality improvement.

Finally, the level of public knowledge about each OSCHC service should be boosted. One suggestion is to require services (or their managing providers) to publish an annual report to their parent community, covering key aspects like fees and how they are used, staffing levels, any incidents and responses, and plans for improvement. Community-run OSCHC do this as a consequence of being operated by parents - either at P&C or parent management committee meetings. For-profit operators could similarly be obliged to disclose local service information (beyond the bare compliance postings). This could build trust and allow parents to raise questions. Increased transparency around financials would also address concerns about fee-setting - parents should know if fee hikes are going into educator wages and program enrichment or into corporate profit. Robust transparency measures and data publication are vital to ensure an OSCHC system that is accountable and continually improving - but this must be coupled with an opportunity to replace an under-performing provider on a school site. The current opacity benefits only those who might wish to downplay quality issues or avoid competition on merit. By contrast, a well-informed public and government can make targeted reforms.

## 8. Funding of OSHC and Access for Families

Unlike preschool or long day care, Outside School Hours Care has historically not been directly government-run (except on some school sites by school councils, or some local council providers) and is not universally available at all schools. Funding for OSHC primarily comes from parent fees, which are heavily subsidised by the Commonwealth's Child Care Subsidy (CCS). This means that taxpayer dollars are flowing into OSHC (through CCS paid to providers on families' behalf), even though OSHC is "user-pays". The way funding is structured and allocated can influence providers' behaviour and families' access to care. It's important that funding arrangements encourage quality and equity, rather than subsidising business growth.

Our concern is that significant public subsidies (CCS) are going to for-profit providers without sufficient checks on how those funds are used. During school hours, public education is free and on non-profit footing; yet at 3pm, when OSHC commences on the same public school grounds, the system allows hundreds of millions of dollars of public child care subsidies to be funnelled to private operators[85]. Policymakers should reconsider whether certain funding (or at least access to public school facilities) should be conditional on not-for-profit service provision. Some states and territories (ACT, for example) have tended to give school OSHC contracts to non-profits or school associations for this reason. NSW's reversal of that stance in 2021 has effectively meant that more CCS flows are now going to corporate profits instead of being reinvested in the school community. A realignment of funding incentives - via higher CCS or grants for community OSHC, or capital funding to help new non-profit services start - could strengthen the not-for-profit sector, which demonstrably channels resources back into quality.

Access to OSHC is another funding-related issue. Surveys in Queensland show about 44% of families lack OSHC or vacation care at their school (or nearby), and even among those who do have a service, 21% have experienced being unable to get a place when needed [79]. Particularly in outer-suburban and regional areas, there are "OSHC deserts" where no provider finds it financially attractive to operate, leaving working families in the lurch. The Federal Government's recent, targeted funding to increase the number of places in Early Childhood services is a great step, and further targeted grants and viability subsidies to ensure OSHC coverage in every community and deliver universal OSHC access would be welcomed. It should be a national policy goal could be that every public primary school has access to an OSHC program, either on-site or through a nearby shared arrangement. Achieving this will require funding to seed new services where private providers won't go. Community-based organisations or school P&Cs are often willing to fill gaps, but they need up-front financial support. We recommend a grant program to encourage establishment of new parent or P&C-run OSHC service to boost capacity especially in underserved areas [86].

The funding of OSHC needs to strike a balance between affordability for families, sustainability for providers, and incentives for quality. Strengthening community and school-based providers through targeted funding will yield returns in better quality and equitable access. Conversely, simply pouring more subsidies into the current market without accountability may only enrich large for-profit providers without solving access gaps or quality shortfalls.

## 9. Choice and Availability of Care Options for Families

Because OSHC is almost always delivered on school grounds under an exclusive licence, parents rarely “choose” their service; the real choice happens upstream - when the school (or Department) selects who may operate on site. This makes the procurement and appointment process the single most critical determinant of family experience and community fit. NSW is a cautionary tale: competitive tenders that overweight revenue to schools can consolidate provision under a few large chains, displacing long-standing parent/community-run services and leaving families with no practical alternative if quality or philosophy is misaligned. To preserve genuine choice and safeguard quality, selection processes must be transparent and community-informed, with criteria that prioritise middle-childhood pedagogy, continuity of relationships, inclusion, and fee stability; require demonstrated local engagement and governance; avoid excessive regional concentration by any one provider; and build in safeguards such as transition plans, periodic market testing, clear KPIs with independent review, and remedies where performance slips. In short, when procurement narrows the field, “take it or leave it” becomes the default for families - so getting the selection process right is essential to the future of OSHC in public schools.

Ensuring a competitive, diverse OSCHC sector with a strong contingent of community providers is key to preserving parental choice. Where choice is currently lacking due to monopolies or absence of services, intervention is required. Families should not be faced with “take it or leave it” when it comes to OSHC. The availability of multiple care options also creates healthy competitive pressure on providers to maintain quality and keep fees reasonable, knowing that parents could vote with their feet.

## **10. Conclusions and Recommendations for Reform**

The analysis across Australia’s states and territories points to a consistent message: community-based and parent-managed OSHC services deliver better outcomes for children and families, and these models should be protected and expanded as a matter of public policy. The trends of corporate consolidation and centralised, profit-driven provision have exposed weaknesses in that model of care at - including concerning safety incidents, reduced quality and the loss of local accountability. To secure a high-quality, safe OSHC system nationally, we recommend the following key reforms:

### **1. Reaffirm and Strengthen Community OSHC Provision**

Governments should actively support not-for-profit, community and parent- OSCHC services. For example, exemptions or preferences in tendering for parent-managed or P&C-run services (as NSW historically had) should be introduced or reinstated[69][70]. NSW’s abrupt policy change in 2021, which removed these protections, has proven detrimental[4]; it should be reversed, and other states should avoid similar moves. We recommend federal leadership in encouraging state education departments to prioritise community-led models when OSHC is established on school sites.

### **2. Invest in New Community OSHC Start-ups**

To address areas with limited access and to foster competition, a grant program should be created to help establish and scale up not-for-profit OSHC providers[90][86]. This could fund initial staff recruitment, training, or equipment for parent/community groups looking to start an OSHC, particularly in underserved regional or outer metro areas.

### **3. Enhance Transparency and Data Sharing**

A national OSHC data strategy should be developed under ACECQA's guidance, to regularly publish meaningful metrics. This should include provider-level quality profiles (aggregating how each large provider's services perform on ratings and incidents) and sector-wide indicators like staff turnover, serious incidents, parent satisfaction scores, etc. Regulators should publish enforcement actions in a clear, accessible format, and consider an annual collated "national state of OSHC" report to Parliament. Better data will enable evidence-based decisions and inform parents.

### **4. Tighten Oversight of Large Providers**

Given the disproportionate compliance issues observed, regulators should exercise vigilant oversight of the major for-profit OSHC providers. This could involve more frequent unannounced inspections, audits of their incident reporting and staffing arrangements, and if necessary, conditions on approvals (e.g. requiring additional supervision measures if a pattern of safety breaches is found). Repeat offenders should face escalating consequences under the National Law - including suspension of licenses for systemic failings and ineligibility to operate on public school sites for providers, any related entities, and persons with management or control.

### **5. Adjust the Regulatory Framework for OSHC**

Convene a review with state and territory Education Ministers to tailor the NQF to better suit OSHC. This should create OSHC-specific quality elements or guidelines - incorporating school-age appropriate programming standards and crediting strong child engagement and community involvement as markers of quality even if documentation is simpler. Streamlining the administrative burden on small services is crucial: regulators should simplify QIP requirements for single-service OSHC and provide compliance templates. Assessment processes should be reformed to focus more on observing practice and interactions on-site, and less on pre-submitted documentation. These changes would level the playing field, allowing community services to shine through their actual service provision, not their paperwork.

### **6. Support the OSHC Workforce**

National and state initiatives are needed to improve OSHC workforce attraction and retention. This includes recognising OSHC educators in wage reviews (the predominance of part-time, split shifts should be considered in pay scales, not merely split shift allowances), funding professional development specific to school-age care, and creating career pathways. Subsidies, incentives, or formal reward and recognition should be offered to services that retain staff for certain milestones. The staff who care for our children day in and day out deserve fair compensation - it is both just and linked to quality outcomes.

### **7. Increase Inclusion Support**

Community feedback indicates that children with disabilities or high needs are often better included in community-run OSHC, whereas some corporate services have turned families away citing lack of resources. The Inclusion Support Program funding should be reviewed to ensure OSHC services get adequate support to include all children. Currently many find the ISP process too burdensome and underfunded. By bolstering inclusion funding and expertise in OSHC, we remove any incentive for providers to cherry-pick only "easy" children, and uphold every child's right to care. This also aligns with quality: the most inclusive services often have highly attentive and trained staff.

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