



15 March 2019

Fair Work Commission
11 Exhibition Street
MELBOURNE VIC 3000

By email: amod@fwc.gov.au

RE: Submission to the Modern Awards 4 yearly review - Children's Services Award 2010 and Educational Services (Teachers) Award 2010

Thank you for the opportunity to provide a submission to inform the 4 yearly review of the *Children's Services Award 2010 and Educational Services (Teachers) Award 2010*.

The Australian Children's Education and Care Quality Authority (ACECQA) is the independent national authority established under the *Education and Care Services National Law*¹ to guide the implementation and administration of the National Quality Framework (NQF).

The NQF is the national system for regulating education and care services, setting standards for safety and quality so that all children who attend long day care, preschool/kindergarten, outside school hours care and family day care are supported to have access to high quality early learning and care. The NQF is jointly governed by the Australian Government and all state and territory governments as a means of driving continuous improvement in the quality of these services, and realising the efficiency benefits and cost effectiveness of a unified national system.

Early childhood education and care is an integral part of the Australian education system and sets the foundations for children's later learning and development. It is also an area of significant government investment.

There is a large and growing body of research that shows high quality early childhood education and care leads to better health, employment and education outcomes later in life.²

Attendance at high quality early childhood education and care services is shown to contribute to children's learning and development, including their cognitive, health, social and emotional development. In particular, evidence indicates that children from disadvantaged backgrounds stand to gain the most from quality education and care.

One of the recognised components of 'structural' quality, a concept elaborated upon below, is staff working conditions and wages³. Low wages and difficult working conditions can act as barriers to recruiting staff, as well as to enabling or motivating existing staff to invest additional time and

¹ The National Quality Framework (NQF) operates under an applied law system, comprising the *Education and Care Services National Law* and the Education and Care Services National Regulations. The National Law is not a Commonwealth law.

² OECD, *Starting Strong V: Transitions from Early Childhood Education and Care to Primary Education*, June 2017.

³ Mitchell Institute, *Quality is key in Early Childhood Education in Australia*, October 2017.

resources in up-skilling. They can also aggravate and curtail efforts to retain highly skilled and qualified staff.

Supporting a highly skilled workforce

A fundamental feature of the NQF was the introduction of qualification requirements to build a highly skilled workforce, ensuring educators are equipped to facilitate children's learning and development.

Higher educator qualifications are strongly associated with improved child outcomes, as educators are better able to involve children, stimulate positive interactions, and use a range of strategies to extend and support their learning.

There is growing evidence linking structural mechanisms in staff workforce development and working conditions to higher quality staff-child interactions, as well as to overall gains in child development, learning and well-being⁴.

Since its introduction on 1 January 2012, the NQF has progressively introduced higher qualification requirements, most notably improved educator to child ratios, a requirement to employ an early childhood teacher in all relevant services, and a requirement for at least half of educators included in relevant ratios to hold, or be actively working towards, an approved diploma level (or higher) qualification.

A further step-up in qualification requirements will come into effect from 1 January 2020, when long day care services and preschools/kindergartens educating and caring for 60 or more children will be required to have an additional early childhood teacher or 'other suitably qualified person' in attendance.

The 2016 National Early Childhood Education and Care Workforce Census, the most recent comprehensive workforce census undertaken (covering all parts of the sector, except preschools/kindergartens), reports that 85% of early childhood educators hold an early childhood related qualification. This is an increase from 80% in 2013 and 69% in 2010. Approaching half (46%) are qualified at diploma level or higher, with 12% qualified at bachelor degree level or above⁵.

Other noteworthy findings from the 2016 Workforce Census include:

- the size of the workforce increased by more than 50% between 2013 and 2016
- 91% of the workforce are female with a median age of 34 years.

Meeting future demand

In line with the above increasing regulatory requirements and forecast demand for early childhood education and care services, the Department of Jobs and Small Business Employment predicts the sector will require approximately 35,000 additional educators, including around 9000 additional early childhood teachers, by May 2023⁶ (the Australian and New Zealand Standard Classification of Occupations refers to early childhood teachers as 'Early Childhood (Pre-primary School) Teacher' and

⁴ OECD, Supporting quality early childhood education and care through workforce development and working conditions, in *Engaging Young Children: Lessons from Research about Quality in Early Childhood Education and Care*, March 2018.

⁵ Australian Government Department of Education and Training, 2016 Early Childhood Education and Care National Workforce Census, September 2017.

⁶ Australian Government Department of Jobs and Small Businesses, 2018 Employment Projections - for the five years to May 2023, December 2018.

early childhood educators using the outdated terminology of ‘Child Care Worker’). This represents an almost 20% increase for the workforce over the next five years.

With this growth in mind, attraction and retention of educators and teachers to the sector remain a key issue. Based on the 2016 Workforce Census, the average years of experience of educators in the early childhood sector is around seven years, with the average tenure at their current workplace being around three years.

In addition, enrolments in the Diploma and Certificate III in Early Childhood Education and Care decreased by 6% between 2016 and 2017, and commencements and completions in early childhood initial teacher training degrees both decreased by more than 10% between 2015 and 2016⁷.

Increasing professional standards

A fundamental aspect of the NQF is the quality assessment and rating of all education and care services against the National Quality Standard (NQS).

The NQS drives continuous quality improvement and encompasses components of both ‘structural’ quality (for example, educator qualifications, educator to child ratios, learning frameworks and professional development and support) and ‘process’ quality (for example, interactions between educators and children).

Through the NQS, there is an increased focus on educators’ practice, including:

- intentional and responsive teaching
- assessment and quality improvement planning
- critical reflection
- professional collaboration, standards and development.

As a result, early childhood educators are subject to high expectations in terms of professional practice and continuous improvement. This is reinforced by the requirements for an approved provider and nominated supervisor, under the National Law and Regulations, to ensure the education and care service meets minimum staffing arrangements, including:

- a responsible person⁸ (the approved provider or a person with management or control, a nominated supervisor or a person in day-to-day change of the service) to be present at all times a centre-based service is educating and caring for children. This is an important requirement and it is an offence to operate the service unless the responsible person is present
- a suitably qualified and experienced educational leader⁹ at each education and care service, who leads the development and implementation of the educational program, and the assessment and planning cycle, with support from their colleagues
- qualifications and training for staff, such as degree, diploma and certificate III level qualifications, and first aid, asthma and anaphylaxis management, and child protection training
- educator to child ratios, including stipulating the minimum number of educators required to be working directly with different ages of children.

⁷ Australian Children’s Education and Care Quality Authority, National Quality Agenda National Partnership Annual Performance Report, December 2018.

⁸ Australian Children’s Education and Care Quality Authority, Responsible Person Requirements for Approved Providers, August 2017 –

<https://www.acecqa.gov.au/sites/default/files/2018-09/ResponsiblePersonRequirements.pdf>

⁹ Australian Children’s Education and Care Quality Authority, The Role of the Educational Leader, April 2018 - https://www.acecqa.gov.au/sites/default/files/2018-05/QA7_TheRoleOfTheEducationalLeader.pdf

In addition, early childhood teachers are now required to be registered/accredited in four jurisdictions (South Australia, Western Australia, Victoria and New South Wales), aligning expectations for practice and ongoing professional development with the rest of the teaching profession (for example, primary and secondary school teachers). Given that more than three quarters of long day care services and preschool/kindergartens operating under the NQF are located in New South Wales, Victoria, Western Australia and South Australia, most early childhood teachers nationally are required to be registered/accredited.

The changing nature and range of work is also reflected in employer expectations for diploma and certificate III qualified educators.

A major update of the national children's education and care training package (which includes the Certificate III and Diploma in Early Childhood Education and Care) is currently being undertaken and is due for completion this year¹⁰.

ACECQA and other sector stakeholders are engaging with SkillsIQ, the Skills Service Organisation responsible for the training package, to help inform and guide the review, with an emphasis upon ensuring that the national training package reflects the requirements and objectives of the NQF and NQS.

In making this submission, ACECQA seeks to raise awareness of the importance of staff who are well qualified, experienced and consistent in the delivery of a high quality early education and care service. The current and persistent workforce concerns in the early childhood education and care sector reflect ongoing challenges around recruiting and retaining high quality educators and teachers, particularly in the context of a sector that is subject to a range of increasing qualification and workforce related requirements as it aligns with the broader teaching profession¹¹.

I trust that this information is of assistance in informing this important review.

Yours sincerely



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¹⁰ <https://www.skillsiq.com.au/FeedbackForum/TrainingPackages1/CHCCommunityServices>

¹¹ Australian Institute for Teaching and School Leadership, One Teaching Profession: Teacher Registration in Australia, September 2018.