



Australian Education Union

Submission to the

Productivity Commission

Early Childhood Development Workforce Study
(Second Stage)

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Introduction

The Australian Education Union represents approximately 186,000 teachers and educators in the public primary, secondary, early childhood and TAFE sectors throughout Australia. We welcome the opportunity to table this submission to the second stage of the Productivity Commission study on Early Childhood Development Workforce.

This submission addresses the issues and draft findings and recommendations in the Productivity Commission Draft Research Report *Early Childhood Development Workforce* (June 2011). This submission concentrates on the draft findings and recommendations most relevant to the work of AEU members, namely public sector¹ pre-school/early childhood education teachers and assistants/support staff. Many issues were addressed in the AEU submission to the first stage of the inquiry, and this is referred to when relevant.

Marketisation

The AEU agrees with the report's statement in draft finding 3.2, that market pressures alone are unlikely to lead to the provision of quality ECD, particularly that accessible to the community in a manner that cost is not an impediment to access. There appears to be somewhat of a contradiction, however, between this contention and that expressed in various stages of the report that the market should be the driving factor in determining salaries and other elements of the ECD workforce. There are references in a number of places to "market wages". Salaries in the sector should be determined by the relevant industrial agreement negotiated with unions, and the relevant recommendations should acknowledge this. Similarly, the term "cost effective" is used in recommendations 9.1 and 11.1, with the implication being that the requirements of the ECD workforce must be driven by the market.

Rather than the market, the AEU believes that the shared vision for Early Childhood Education, endorsed by COAG in 2009², namely, *that by 2020 all children have the best start in life to create a better future for themselves and for the nation*, must be central to all aspects of ECEC reform, including workforce development. Universal provision of ECE should continue to be seen as a long term investment in Australia's future, recognising that the interests of children are not best determined by the application of market forces. The AEU believes the language of the market in this regard is misleading and should not be used.

Chapter 3 Government involvement in the early childhood development sector

The AEU agrees with the need for a strong regulatory system to ensure standards and produce quality improvement. It supports the NQF and agrees with draft finding 3.1 that it has the potential to deliver substantial additional benefits to the community.

The AEU believes ECE services can most efficiently and equitably be provided through the public education system, with strong links to the early years of schooling and wrap-around services, such as health.

¹ Government and government funded not for profit sector.

² http://www.coag.gov.au/coag_meeting_outcomes/2009-07-02/docs/national_ECD_strategy.pdf

DRAFT RECOMMENDATION 3.1

To assist parents' decision making with respect to their choice of early childhood education and care (ECEC) services for their children, governments should require ECEC regulators to publish all relevant information on service quality. Published information should be comprehensive, comparable across services, clearly explained and easy to access.

The AEU supports the concept of accountability for centres, preschools, teachers and staff. Parents and the community have a right to know that providers, teachers and staff are competent, qualified and professional, provide quality facilities and are engaged in high quality practices. It is essential, however, that information be presented in a manner that is neither misleading nor unfairly damaging to centres and preschools or the quality of education they provide.

There is little evidence that publication of ratings would support quality improvement. The purpose of the ratings system should be to facilitate improvement in a collaborative manner rather than 'naming and shaming' centres and preschools.. The AEU has concerns as to how the rating may be perceived, and the potential for the rating system to create misunderstandings and damage relationships with parents. This includes understandings of the 'excellent' rating. Parents may expect an 'excellent' rating, even though only a small percentage of centres and preschools will achieve it.

In smaller centres and preschools a rating may reflect unfairly on teachers and staff working there. For example whilst teachers can control the manner in which the physical environment is best utilised within the educational plan, they have little control over investment in and the broader management of the physical environment.

The AEU believes that ratings should not be published. However, in recognising that governments are committed to this course of action the AEU urges ACECQA to ensure that safeguards are put in place to avoid misuse or misunderstanding of the quality ratings system. Information should be supplied to parents and the community by departments that explains the ratings system and counters misunderstanding and misuse of the ratings process. Such information must accompany any public display of ratings, whether on the My Child website, on display at centres, preschools or elsewhere.

DRAFT RECOMMENDATION 3.2

To achieve the goals of the Council of Australian Governments' (COAG) ECEC reforms without disadvantaging low-income families through the anticipated increase in fees, governments will need to ensure that there is adequate financial support for such families.

Under the COAG framework, the central responsibility of governments is to ensure that Early Childhood Education is available to all children in Australia regardless of their circumstances. They must ensure that sufficient resources are supplied so that cost is not an impediment to access by disadvantaged communities and families. The AEU's position is that ECE should be secular, public and free of fees. In this context we should note that Australia is amongst the lower spending countries on ECEC in the OECD. The OECD *Education at a Glance* report, 2010, states that Australia spends only 0.1% of GDP on ECEC, compared to the OECD average of 0.5%.³

³ OECD, (2010) *Education at a Glance*, Table B2.2, p. 218.

Further expenditure in this area is required to bring us more into line with other OECD countries. Ensuring access by disadvantaged children and communities should be a priority in this process.

Whilst supporting adequate financial support for disadvantaged families and communities, the AEU believes the goals of ensuring equity of access to ECE is best achieved by resourcing ECE itself. This should include funding to improve the public provision of ECE including seamless transitions to school. Priority for the establishment of government preschools should be in areas with a high number of developmentally vulnerable students as identified by AEDI.

DRAFT RECOMMENDATION 3.3

ECEC regulators should publish the number of service waivers granted, to whom they have been granted, and whether they are permanent or temporary.

The AEU agrees with this draft recommendation. The draft research report recognises the dangers of waivers being linked to poor quality of provision, and that research in NSW indicates that waivers may have detrimental effects on quality.⁴ Safeguards need to be in place to prevent this occurring and the compliance mechanisms regarding waivers must be vigorous, consistent and transparent. A temporary waiver should include an action plan for full compliance by the conclusion of the initial waiver period.

Table 5.8 of the draft research report indicates that 7.5% of preschool centres and 8.8% of long day care centres were granted one or more service waivers from the requirement to employ a qualified member of staff for a position.⁵ As noted in the report, in the case of long day care centres it is likely the salaries offered were lower than those offered by schools to ECE teachers.

An examination of the key differences between the modern Educational Services (Teachers) Award 2010 provisions and the industrial benchmark terms and conditions provided by the relevant enterprise agreements in Victoria, for example, as provided in Appendix 1, indicates stark differences between the two. It is understandable that the for-profit long day care providers offering lesser salaries and conditions find it difficult to attract qualified staff to meet the regulatory requirements and will seek waivers.

The AEU believes that waivers should not be granted in a manner that allows employers to avoid their obligations regarding quality of provision or the salary and conditions provided to employees. We would be concerned if services were granted waivers on the basis of their failure to recruit as a result of inadequate, unrealistic or disingenuous endeavours to do so, such as attempts to recruit qualified early childhood teachers for terms and conditions below the relevant State or Territory industrial benchmark terms and conditions. Simply put, temporary waivers should not be granted because an employer is not prepared to pay an appropriate wage nor provide appropriate conditions to support the teacher in their work. The process should be sufficiently rigorous to ensure the reasons for a waiver are genuine and the waiver is needed.

⁴ Ibid, p. 39.

⁵ Australian Productivity Commission, (2011). *Early Childhood Development Workforce. Productivity Draft Research Report*, p. 76.

DRAFT RECOMMENDATION 3.4

ECEC regulators should provide for ongoing consultation with stakeholders and timely dissemination of best practice. Governments should ensure that all ECEC regulators initiate robust evaluative processes so that regulatory impacts are minimised.

The AEU supports this draft recommendation. The processes employed by government in the development of the National Quality Framework are a good model, as they engaged a range of stakeholders, including unions, using a variety of strategies. Similar models should be employed in the implementation of this draft recommendation.

DRAFT RECOMMENDATION 3.5

Where voluntary committees currently manage ECEC services, governments should ensure that professional management support (such as cluster management or other shared services) is readily available to assist with management and leadership.

The AEU supports this draft recommendation. Notwithstanding this, processes for ongoing quality assurance should be put in place for cluster management or other shared services to ensure that professional practice including human resource and industrial relations management continue to be conducted at a professional level.

DRAFT RECOMMENDATION 3.6

In implementing the National Quality Standard, governments should ensure adequate resourcing for regulators to enable appropriate training of their staff in the new regulatory arrangements and their effective implementation.

The AEU supports this draft recommendation. The AEU believes it is essential that all assessors be qualified and experienced ECE teachers, fully trained about the requirements and application of the ratings system.

Chapter 4 The early childhood education and care workforce

Attraction and retention of an ECE workforce is vital to the achievement of the COAG goals of universal provision. A recent survey by the Victorian AEU indicated that the ECE workforce is aging, with only 23.3% under forty and 42.7% over fifty.⁶ A considerable proportion of the existing ECE workforce will be retiring in the near future. Together with the requirements to increase the ECE workforce to meet the National Quality Standard and the National Partnership Agreement on Early Childhood Education, recruitment of a substantial number of ECE teachers will be a necessity. This can only be achieved if important workforce issues that impact upon attraction and retention are addressed.

These issues were addressed in the AEU submission to the first stage of this inquiry.⁷

There is evidence that low recognition and high stress in the ECE workforce coupled with the number and speed of changes in the sector is impacting on the attraction of new teachers. The Victorian AEU survey showed that an alarming 47.1% of ECE teachers were distressed to a high

⁶ AEU, Victoria, (2010). *AEU survey of Victorian pre-service early childhood teachers 2010*. Unpublished survey.

⁷ AEU. *Submission to the Productivity Commission Early Childhood Workforce Study*, February 2011, pp. 17-20.

degree by changes in the sector and that this was impacting on decisions by teachers whether or not to remain in the sector.⁸ In this regard, recommendation 10.8 addresses some of the issues regarding professional development to support the implementation of the National Quality Standards and other and other changes.

The AEU believes that salaries and conditions for ECE teachers should be consistent across the sector, and that they should be based on parity with the broader teaching community. Draft finding 5.2 goes some way to acknowledging this, although this position would be strengthened by a specific recommendation along these lines.

In its submission to the first stage of this inquiry, AEU expressed concern about the extent of unwanted casualisation and part-time work in the sector, a factor which clearly impacts strongly on attraction and retention of workers. The *2004 Census of Child Care Services* found that 55% of staff in private child care and 54% in community child care were employed casually or part time.⁹ Quoting these figures, a research paper by ACER noted that issues of casualisation, turnover and continuity “has been of concern within the early childhood sector for some years because of its potential impact on children’s development and learning and on staff security and morale”.¹⁰ The 2010 National Early Childhood Education and Care Workforce Census found that across the sector only 33.6% of workers were employed full-time, with 29.3% described as long part-time (30 to 34 hours) and 29.6% as short part-time (up to 19 hours).¹¹ The AEU believes this study should put forward a recommendation concerning security of employment for all ECEC workers, including strategies to avoid unwanted casualisation and under-employment.

Draft finding 10.3 identifies career paths as in issue for the ECEC workforce, and supports “clear pathways for career advancement” in the sector. More specifically, the AEU believes that leadership roles in stand-alone centres and preschools should be filled by qualified ECE teachers and that where ECE provision is co-located with primary schools or linked to the early years of schooling, ECE teachers should have access to the same or equivalent career paths as other teachers. The AEU believes this study should put forward a specific recommendation concerning career paths, including the substance of the AEU’s position.

The attraction and retention of workers would be strengthened by improved community understanding of the role and status of ECEC workers. In its submission to the first stage of this inquiry, the AEU recommended that state, territory and federal governments should work with teacher unions, teacher professional associations and other relevant stakeholders to promote understanding in the community about the importance of ECE in the community and campaign for the recognition of ECE and the vital and unique role of ECE teachers. The AEU believes this inquiry should put forward a recommendation along these lines.

⁸ Ibid.

⁹ Quoted in Elliot, A, (2006) *Early Childhood Education. Pathways to quality and equity for all children*. ACER, p. 34. http://www.acer.edu.au/documents/AER_50-QualityAndChoice.pdf

¹⁰ Ibid, p.34.

¹¹ DEEWR (2011). *2010 National Early Childhood Education and Care Workforce Census*, p. 2. http://www.deewr.gov.au/Earlychildhood/Documents/National_ECEC_WorkforceCensusReport.pdf

Chapter 5 The preschool and long day care workforce

DRAFT RECOMMENDATION 5.1

To assist in the transition to the National Partnership Agreement on Early Childhood Education, governments should permit:

- ***any currently employed 3-year-qualified early childhood teacher to deliver the preschool program***
- ***any 3-year-qualified teachers returning to or entering the workforce to deliver the preschool program, provided a plan is in place for them to upgrade their qualification to the equivalent of a 4-year degree.***

The AEU supports this proposal. We recognise that the realities of teacher supply mean that the rollout of the NPA goal will require transitional arrangements. The AEU understands that the Victorian government, for example, is examining registration of both three and four year qualified teachers. Some universities are still graduating teachers with three year degrees and students are exiting with such qualifications. As the recommendation states, transitional processes and grandparenting provisions must take the position of under-graduates in these courses into account and also provide mechanisms by which universities are required to transition to delivery of four year degree courses. Governments should work with all stakeholders, including unions, in the development and implementation of these plans. This work needs to correspond to the work of AITSL in the accreditation of initial teacher education courses.

DRAFT FINDING 5.1

In order to attract and retain a sufficient number of early childhood teachers to achieve the National Quality Standard and the National Partnership Agreement on Early Childhood Education, salary and conditions offered by long day care centres will need to be competitive with those offered to primary teachers in the school sector. Community- and privately-managed preschools in New South Wales will also need to offer similarly competitive salaries and conditions for their teachers, which is already the case in other jurisdictions.

Whilst this finding largely relates to NSW, the AEU notes that similar issues are relevant to Victoria and to AEU members there. In some settings in Victoria ECE teachers are significantly disadvantaged, particularly those working in day care.¹² There is a need to address these conditions and to recognise the important role teachers in such settings play if workforce issues are to be effectively addressed.

Chapter 8 The early childhood education and care workforce for children with additional needs

DRAFT RECOMMENDATION 8.1

To ensure that children with additional needs benefit fully from the COAG ECEC reforms, governments should modify the structure and operation of inclusion programs and reassess funding levels so that such programs:

- ***provide sufficient funding to support the inclusion of all children with additional needs***
- ***cover the full cost of employing inclusion support workers at market wages***

¹² Appendix 1.

- *provide funding for an inclusion support worker to enable children with high support needs to attend preschool for 15 hours per week in the year before school*
- *have simple and streamlined application processes, which do not place an undue burden on ECEC services*
- *make funding available to ECEC services in a regular and timely manner*
- *provide multiple-year funding, requiring re-application or adjustment only where there is a significant change in the level of need of a particular child or cohort of children.*

The AEU is strongly in support of this draft recommendation. The requirements of students with additional needs must be supported by the provision of adequate funding above other costs of ECEC. Support should include access to specialised multidisciplinary services, professional support staff, trained integration aides and professional development for ECEC teachers and staff on issues related to children with additional needs as well as specialist teachers in appropriate ratios. Group sizes and staff/student ratios should be reduced for each child who meets the criteria for this assistance.

Significant inconsistencies in funding policies and financial arrangements between the States/Territories have led to variations in access and quality of education for students with additional needs. Differing eligibility criteria make it very difficult for parents/carers when they move between states and find that the special educational needs of their child which had been recognised and attracted funding in one jurisdiction are not recognised in another.

The AEU is aware that work is currently being undertaken by the Ministerial Standing Council on School Education and Early Childhood on the development of a national definition of disability. We welcome this much needed initiative, which will assist in the inclusion of all identifiable cohorts of students and overcome differing interpretations of target groups and levels of provision.

Resources should be provided for the needs of children with disabilities that require early intervention and may require students attending specialist facilities.

For children with special needs that cannot be met by integration programs, governments should provide special early intervention classes in preschools attached to existing preschools as occurs in some NSW DEC preschools. This assists in the transition to school. Further teachers and support staff should hold or be supported in obtaining special education qualifications.

Whilst strongly supporting the integration of students with additional needs into mainstream ECE provision as far as is practicable, the AEU is aware that there are risks. If not adequately supported teacher workload increases with students with high needs, detracting from the quality of education they provide to others. Integration must be properly resourced or it will not work, and there must be close monitoring and a high level of support for students. A significant increase in funds is required to meet these goals. State, Territory and Federal governments must work together to integrate the Inclusion and Professional Support Program with other Federal, State and Territory programs to ensure adequate and consistent support is provided for students.

The AEU agrees with the goal of streamlining application processes and providing funding on a multiple-year basis to establish stability in resourcing and employment conditions for support workers and professionals. As the draft report indicates, a major element of providing stable support services is the creation and maintenance of a viable support services workforce. This is closely related to salaries and conditions, career paths, and long term job stability for these

workers. Inadequate and insecure resourcing is detracting from these goals, as low salaries combined with the insecure nature of employment create disincentives to enter the industry. Establishing a more secure basis for the delivery of programs and the stability of jobs and careers of professionals providing support services is vital. The AEU strongly supports the last three points of this draft recommendation.

The AEU agrees that mainstream workers need skills in inclusive practice. In this context the AEU notes that the draft research paper rejects the AEU contention that “all pre-service teacher education courses must include significant units on teacher students with special needs and those from CALD background and those from lower SES backgrounds”.¹³ The AEU believes in the case of ECE teachers, this study should reconsider this matter on the following grounds:

- a) Initial pre-service accreditation processes require that all courses cover these areas¹⁴
- b) These areas are also a requirement of Certificate III in Children’s Services¹⁵
- c) Teachers have a legal and moral responsibility to ensure that the needs of all the children under their care are met.

Such education would provide an important introduction to a wide range of issues around additional needs that could later be built upon, and provide an important basis from which teachers could later further enhance their skills. It would provide for a teaching workforce more qualified in this area in the future, and enhance the ability of centres, preschools and teachers to address the needs of students with additional needs.

The AEU supports resourced ongoing professional development on the requirements of students with special needs, noting that this and inclusion of studies in this area in pre-service education courses are not mutually exclusive. We are in agreement with the draft research paper’s contention that “the effectiveness of such [PD] training is enhanced when it is relevant and linked to workplace needs and goals” and that address the needs of the children they work with.¹⁶ The AEU also agrees that such professional development should be additional to services currently provided to bilingual support staff, and should not impose an additional burden on them. Issues concerning the provision of professional development are discussed in more detail in the section of this submission dealing with Chapter 10.

¹³ Australian Productivity Commission, (2011), Op Cit, pp. 138-139.

¹⁴ AITSL, (2011). Accreditation of Initial Teacher Education Programs in Australia.
http://www.aitsl.edu.au/verve/resources/Accreditation_of_initial_teacher_education.pdf

¹⁵ CHC30708 - Certificate III in Children's Services. <http://training.gov.au/Training/Details/CHC30708>

¹⁶ Australian Productivity Commission, Op Cit, p. 141.

To provide inclusion support staff with the necessary skills to ensure children with additional needs benefit fully from the COAG ECEC reforms, governments should provide additional, priority funding to cover both the cost of relevant in-service training in child development, disability and ECEC, and the cost of replacement staff.

The AEU supports the goal of ensuring that support staff for children with additional needs have the skills required to support the children in their care and benefit fully from the COAG ECEC reforms. An important way of supporting this goal is by ensuring that support workers for children with additional needs are included in the qualification requirements for the National Quality Standard and hold appropriate qualifications. In this regard the AEU disagrees with the view expressed in the draft research report that qualifications need not be a requirement for such workers.¹⁷ If support workers for children with additional needs are not required to hold equivalent qualifications to other ECEC staff it would be a significant detraction from the COAG goals under the early childhood NPA, as well as a contradiction to the NQS itself, which requires that by 2014 staff at a minimum have, or be working towards, a Certificate III qualification.¹⁸ It would be a considerable injustice both to children with additional needs and to support staff if the qualifications expected of them were to be different to those of other support workers.

The AEU is aware that there are not presently sufficient qualified support workers for students with additional needs. Long term planning and processes, including transitional arrangements, will be required to bring this part of the ECE sector into compliance with the NQF and ensure that support workers for children with special needs are appropriately qualified. State, Territory and Governments should work with ACECQA, the Australian Skills Quality Authority and other relevant stakeholders to ensure that processes and timelines are put into place to achieve this goal. An important part of this process is provision of appropriate in-service training, as recommended by the draft research report. There is no contradiction between the provision of such in-service and the goal of achieving a qualified ECE support workforce for students with additional needs. On the contrary, the systematic provision of quality in-service education would be enhanced when the attainment of a qualification is its long term end, as would the motivation of workers studying for it.

The AEU is also aware, as the report discusses, that at present the insecure and casualised working conditions of support workers for students with additional needs lessens incentives for these workers to invest in qualifications. However, this is a further reason that such poor working conditions should be improved. Maintaining a situation of insecure and casualised employment for such workers is neither supportive of them to remain in their positions nor advantageous to the needs of children with additional needs. As discussed under Chapter 4, improving the salaries and working conditions of ECEC support workers must be an essential part of the rollout of quality universal provision, and support workers for children with additional needs should be no different in this regard.

The AEU believes this study should support and reinforce the qualification requirements of the NQF. To separate one part of the workforce, namely those who support children with the most needs, is in our view discriminatory.

¹⁷ Ibid, p.131.

¹⁸ COAG (2009) *National Quality Standard for Early Childhood and Care*. Early Childhood Development Steering Committee, p. 19.

DRAFT RECOMMENDATION 8.3

Children with additional needs require the services of allied health and early intervention professionals to benefit fully from the COAG ECEC reforms. To enable early childhood development services for children with additional needs to sustain an appropriately skilled workforce of allied health and early intervention professionals, governments should ensure that funding for such services:

- ***is based on relevant market wages and conditions for equivalent positions***
- ***takes into account the skill sets required to perform the purchased services***
- ***is indexed to market wage growth within the relevant industry sector***
- ***includes provision for professional development and support.***

The provision of an effective support workforce for children with special needs is vital to support their educational provision and inclusion. The AEU supports this proposal.

As illustrated in our comments relating to Draft Recommendation 3.3, however, it is imperative to sustaining an appropriately skilled workforce that where employers have not entered into industrial agreements with unions that the terms and conditions of their employees holding equivalent qualifications to those covered by those agreements are on a par.

The AEU supports the provision of government early intervention classes for students with specific disabilities and learning needs. Government provision makes it easier to ensure qualified staff and access to professional development.

Chapter 9 The early childhood education and care workforce in rural and remote areas

DRAFT RECOMMENDATION 9.1

To meet the workforce goals of the COAG ECEC reforms, rural and remote areas will need to attract and retain more workers. Governments should assess the cost effectiveness of existing incentives aimed at increasing recruitment and retention in rural and remote areas. These incentives should be compared against alternative strategies such as:

- ***targeted recruitment of workers from rural and remote backgrounds***
- ***the delivery of training in rural and remote locations***
- ***support for pre-service teachers to experience working life in rural and remote areas.***

The AEU supports this proposal.

Consideration must be given to the issue of under-employment (insufficient hours) resulting from small populations. Systems, which support options for cross-sectoral employment, for example EC/Primary, as well as across the pre-compulsory years, will provide greater opportunity. Similarly, attraction and retention of staff may also be impacted upon by hours of employment resulting from fluctuations in the birthrate and resultant ECE enrolments. These must be dealt with by long term workforce planning projections and processes.

The AEU supports the targeted recruitment of ECE workers from rural and remote areas. This should include opportunities for ECEC workers in such areas to upgrade their qualifications to become teachers.

The AEU also supports provision of opportunities for pre-service experience for ECE students in rural and remote areas as an effective way in which to introduce students to such communities and encourage them to take up employment there.

DRAFT RECOMMENDATION 9.2

To attract and retain sufficient staff to achieve the goals of the COAG ECEC reforms for children in remote areas, governments should provide all ECEC workers in remote communities with timely access to appropriate housing at reasonable cost, including housing for students undertaking placement.

The AEU strongly supports this proposal. Access to appropriate housing is essential to the goal of attracting and retaining ECE teachers to rural and remote communities, as well as to retaining individuals who have qualified as teachers and are recruited to work in their local communities. It is unfortunate that the policies of State and Territory education departments currently prevent this from happening.

Chapter 10 Training the early childhood education and care workforce

DRAFT RECOMMENDATION 10.1

The Community Services and Health Industry Skills Council should consider specifying the minimum periods of training and practicum associated with children's services qualifications. These minimum periods should be decided in consultation with ECEC providers.

The AEU supports this recommendation.

An issue of importance in this regard is the integration of the compulsory inclusion of a practicum in ECEC courses for children under three. At present the pre-service qualifications that are intended to be approved in ECEC pre-service qualifications under the new National Law and Regulations do not require a theoretical or practical component relating to this age group. This means that staff employed to work with such children may have no experience or expertise with them, a situation the AEU does not believe is acceptable. At present the situation varies by jurisdiction. In Victoria ECE teachers are required to complete a minimum twenty day placement in the under three age group. The AEU believes similar requirements should be included in the new National Law and Regulations and that this study should put forward a recommendation supporting such a position for teachers working with children.

DRAFT RECOMMENDATION 10.2

Governments should facilitate access to VET by developing ECEC training programs targeted at contact workers from culturally and linguistically diverse backgrounds (including English language programs delivered in conjunction with ECEC training).

DRAFT RECOMMENDATION 10.4

The requirement for VET assessors to demonstrate knowledge of current ECEC practices should be enforced by VET regulators. The Department of Employment, Education and Workplace Relations should design and implement a program of professional development for VET assessors working in ECEC to identify and address gaps in their knowledge of current practice.

The AEU supports these draft recommendations. State, Territory and Federal governments should work with ACECQA, the Australian Skills Quality Authority and other stakeholders to facilitate the introduction of programs which support these goals.

DRAFT FINDING 10.4

Recognition of prior learning provides a means by which both the direct and opportunity costs of training may be reduced. The proposed development of a national recognition of prior learning assessment tool in children's services training will promote efficient, effective and consistent recognition of prior learning.

As discussed in the AEU submission to the first stage of this study, whilst the AEU supports the appropriate application of RPL, we do not support RPL programs that damage the quality of pre-service ECE courses or undermine the integrity of ECE qualifications. Research clearly indicates the dangers of the inappropriate application of RPL.¹⁹ It is important that RPL processes meet the high standards equivalent to the study which they replace. Any nationally recognised prior learning assessment tool must be based on these principles. It is also important that processes must be made clear and transparent, and proactive methods put into place to ensure that workers who may benefit from such processes are aware of them.

DRAFT RECOMMENDATION 10.5

Governments should provide the Australian Skills Quality Authority with sufficient resources to establish and maintain processes and staff to ensure ECEC training is of a consistently acceptable standard. The Australian Skills Quality Authority should:

- ***apply more robust conditions for the initial registration of ECEC training providers***
- ***establish a rigorous and targeted system of audits and penalties to ensure that any registered training organisation that does not consistently produce graduates of acceptable quality is no longer able to provide ECEC training***
- ***externally validate the competencies of a targeted sample of VET graduates to ensure graduate quality is maintained***
- ***consider relaxing its focus on ongoing registration in the future, as poor quality training providers are both denied entry and progressively removed in the short-to-medium term.***

¹⁹ Price, & A, Jackson-Barrett, E. (2009). Developing an Early Childhood Teacher Workforce Development Strategy for Rural and Remote Communities. *Australian Journal of Teacher Education*, Vol. 34, 6, pp. 41-51.

DRAFT RECOMMENDATION 10.6

The Australian Skills Quality Authority should be subject to a performance audit within its first two years of operation. This performance audit should:

- ***focus on the ability of the Australian Skills Quality Authority to ensure that ECEC workers receive quality vocational education and training***
- ***review the effectiveness of the Australian Skills Quality Authority in enforcing the minimum conditions and standards for initial and ongoing registration***
- ***consider the adequacy of the funding allocated to the Australian Skills Quality Authority.***

DRAFT RECOMMENDATION 10.7

ECEC qualifications should be regarded as ‘high risk’ by the Australian Skills Quality Authority and audited accordingly. Organisations found to consistently provide high-quality ECEC training should be subject to progressively less regulatory intervention over time.

The AEU supports these proposals.

DRAFT FINDING 10.6

Registered training organisations are likely to play an important role in meeting increased demand for higher education qualifications for teachers. This will require strong oversight on the part of regulators responsible for quality assurance.

The AEU is aware that universities in some jurisdictions are presently subcontracting aspects of their teaching to private RTOs. Evidence suggests that this practice has lowered the quality of training provided. We therefore support strong regulatory oversight in this area.

DRAFT RECOMMENDATION 10.8

Governments should ensure that all workers in ECEC services have access to professional development and support programs. Priority should be given to enabling workers to participate in professional development that will assist them to:

- ***implement the National Quality Standard and the Early Years Learning Framework***
- ***include children with disabilities and children from culturally and linguistically diverse backgrounds in ECEC services***
- ***enhance the leadership and governance of ECEC services***
- ***work effectively in integrated ECD services.***

The AEU supports this draft recommendation. There is strong evidence that systematic and ongoing professional development and teacher capacity building is a very effective way in which to support teachers and maximise the educational achievement and development of children.²⁰ Effective professional development is also important in supporting career pathways. The AEU supports a collegial approach to improvement which encourages teachers and educators to support each other and work together to improve their professional capabilities. Such professional development should draw on the professional expertise of teachers and educators. The collegial approach the AEU endorses also provides for adequate resourced time for the ECEC teams of

²⁰ Schleicher, A (2008) *Seeing School Systems Through the Prism of PISA*. Commissioned paper in Luke, A, Weir, K & Woods, A. (2008). *Development of a set of principles to guide a P-12 Syllabus framework. A Report to the Queensland Study Authority*. pp. 72-85. http://www.qsa.qld.edu.au/downloads/publications/ksa_p-12_principles_dev_ppr.pdf

staff, teachers and their co-workers, to share opportunities for professional development. This is seen as particularly important to the effective implementation of the quality agenda for ECEC.

It is essential that professional development address the requirements of teachers and educators in a range of settings. Supporting professional development in rural and remote areas in particular is vital to the provision of quality and equitable ECE. At present professional development in the ECE sector is arguably very city-centric, and opportunities must be provided to allow ECE teachers and educators working in rural and remote areas to improve their participation in professional development and communication with colleagues in the wider teaching/ECEC community. Strategies to address these issues include paid time release over and above that of other teachers and educators, as well as travel and accommodation allowances. Such provision should be the responsibility of the employer and resourced accordingly. The Federal government should use mechanisms of funding and regulation to ensure that employer responsibilities to provide professional development and processes to support it are met in all sectors. In the case of public provision State and Territory governments should set aside funding for PD.

Finding relief teachers to allow time releases is often difficult, and State and Territory departments in consultation with teachers, unions and tertiary providers need to investigate innovative strategies to address this issue. Strategies may include ‘flying squads’ of qualified ECE teachers to provide time release as well as mobile professional development units to travel to rural and remote locations on an ongoing basis.

Some, although not all, professional development activities may be provided online. Such provision is only effective when it is properly supported, and once again teachers and educators in rural and remote areas face particular issues in this regard over and above those located in cities and large regional towns. IT facilities can be particularly important in rural and remote areas, and State and Territory departments must ensure that adequate support is provided for IT in these areas in particular. However, whilst online professional development can be effective in some areas, in the context of overall workforce capacity building it can never be a complete substitute to professional development activities involving person to person contact. Online professional development resources should be regarded as a supplement to, rather than a replacement for, directly provided professional development.

DRAFT FINDING 10.8

Increased use of technological solutions such as online training packages should continue to be explored as a means of facilitating support networks, mentoring arrangements and providing structured feedback regarding teacher–child interactions. This approach requires ongoing provision of adequate resources.

ICT can be an effective way in which to facilitate a range of educational provision as well as provide support networks and facilitate communication between teachers. Such provision must be adequately resourced and supported on an ongoing basis, and at present such provision is uneven. ACECQA should work with State and Territory governments to ensure that adequate IT and support services are provided, particularly in rural and remote areas where provision can be particularly important in bridging the gap for services and support networks not otherwise available. The AEU believes this study should produce a specific recommendation along these lines.

While there is no case for excluding teachers working in ECEC settings from existing teacher registration requirements in all jurisdictions, governments should not endorse or contribute funding to a registration scheme for non-teacher ECEC workers.

The AEU is in agreement with the first part of this draft recommendation. The AEU supports nationally consistent teacher registration, and this should include ECE teachers. As with the registration of other teachers, it is important to ensure that such processes ensure high standards and are linked to the integrity of qualifications.

The AEU supports the accreditation of ECEC educators.

Chapter 11 Planning the ECEC workforce

The Early Childhood Development Working Group should ensure that the Early Years Development Workforce Strategy:

- *contains clearly identified objectives*
- *uses sound data on the current workforce and clear, robust assumptions about future policies to make projections of expected ECEC workforce demand and supply*
- *employs the most cost-effective policy instrument (that also takes into account non-financial factors) to address supply limitations*
- *takes into account both direct and community-wide effects in assessing cost effectiveness.*

The AEU supports this draft recommendation. The Early Childhood Development Workforce Strategy must contain clearly identified objectives and be based on sound data. State, Territory and Federal governments must work together to ensure that governments are collecting data that is sound, consistent and comparable.

To support the development, monitoring and evaluation of the Early Years Development Workforce Strategy, governments could usefully consider:

- *improving access to the National Census of Population and Housing*
- *incorporating ECEC service costs in the National Early Childhood Education and Care Workforce Census*
- *expanding the Childhood Education and Care Survey collection.*

The AEU supports this draft recommendation and believes these instruments should be considered in the development, monitoring and evaluation of the Early Years Development Workforce Strategy.

Broader issues concerning the Early Childhood Workforce Strategy were discussed in the AEU submission to the first stage of this inquiry.²¹

²¹ AEU, Op Cit, pp. 11-12.

Chapter 14 Workforce for Indigenous ECEC services

The AEU supports draft recommendation 14.1. Indigenous services should be included in the National Quality Standard. Resources must be provided to enable Indigenous services to reach the standards required, and State, Territory and Federal governments should work together to prioritise and achieve this goal.

The AEU also supports draft recommendations 14.2 to 14.8.

Workforce strategies designed to place suitably qualified staff in Indigenous-focused services should be supported by strategies to attract larger numbers of Aboriginal and Torres Strait Islander peoples into the ECEC workforce. This was discussed in the AEU submission to the first stage of this inquiry.²²

The AEU, together with its Branches and Associated Bodies in each state and territory, indicates its preparedness to negotiate changes aimed at improving the educational well being of Indigenous students. Variations to existing arrangements need to be negotiated and reflected in new/varied Awards/EBAs/Agreements as appropriate. Arrangements to allow Indigenous students to study to qualify for work in ECEC settings must include travel allowances and other support where necessary.

In supporting draft recommendation 14.8, the AEU believes that all teachers employed in the public education system in Australia should complete a comprehensive sequence of Indigenous studies as a minimum requirement for their employment. This was discussed in the AEU submission to the first stage of this inquiry.²³

Chapter 15 The integrated ECD services workforce

DRAFT RECOMMENDATION 15.1

Future ECD workforce censuses and surveys should identify integrated ECD services separately to facilitate analysis of the workforce and subsequent policy development.

The AEU supports this draft recommendation.

DRAFT FINDING 15.1

A more flexible approach to the pay and conditions of different occupations will be necessary to avoid recruitment and retention problems in integrated ECD services and to foster true integration.

The AEU supports moves for greater workplace flexibility, including the application of strategies, where appropriate, such as job-sharing, part-time work and paid maternity leave. However, the AEU is concerned about what the term “a flexible approach to the pay and conditions of different occupations” may be taken to mean in some circumstances. It is essential that the integrity of qualifications be maintained, along with pay and conditions associated with them, which should be based on industrial agreements negotiated through appropriate unions.

²² AEU, Ibid, pp. 12-13.

²³ Ibid, p.13.

The AEU is concerned that “a flexible approach to the pay and conditions of different occupations” may mean a broad brush/common denominator approach to the pay and conditions of staff. Employers will often choose the lowest common denominator approach to flexibility. This would in our view and experience be diametrically opposed to endeavours to attract and retain teachers to the sector, could well be in conflict with the requirements of the modern awards providing minimum standards for staff, and would be actively opposed by the AEU.

DRAFT RECOMMENDATION 15.2

The Community Services and Health Industry Skills Council should consider introducing VET qualifications:

- *that focus on leading and managing integrated ECD services*
- *for contact workers at the certificate IV or diploma level.*

Leadership and management of ECE centres and preschools should come from experienced early childhood teachers and educators.

DRAFT RECOMMENDATION 15.3

The Professional Support Program should provide introductory professional development in integrated ECD services to ECEC staff working in such services. Consideration should be given to the provision of similar courses for managers of such services.

DRAFT RECOMMENDATION 15.4

The Australian Government should consider if workers in non-ECEC components of integrated ECD services should have access to professional development under the Professional Support Program. Further, the Early Years Development Workforce Strategy should focus on the professional development requirements of the integrated ECD services workforce, and how to meet them.

The AEU supports these draft recommendations. The AEU believes ECE teachers should be provided with professional development to further enhance and extend their leadership skills.

Appendix 1

The modern Educational Services (Teachers) Award 2010 provisions and the industrial benchmark terms and conditions provided by the relevant enterprise agreements in Victoria.²⁴

Starting salary (four-year qualified teacher)

Agreements: \$55,459

Award: \$40,201

Top of the scale salary

Agreements: \$81,806 (in May 2012)

Award: \$53,493

Preparation and planning time

Agreements: 12.5 hours per week

Award: Two hours per week

Annual leave

Agreements: 11.4 weeks per year (same as school holidays)

Award: Four weeks per year

Personal leave

Agreements: 15 days per year

Award: 10 days per year

Paid maternity leave

Agreements: 32 weeks — 14 weeks full pay plus federal parental leave (18 weeks minimum wage)

Awards: 18 weeks minimum wage only

²⁴ **VECTAA 2009 (Victorian Early Childhood Teachers and Assistants Agreement 2009) and the LGECEEA 2009 (Local Government Early Childhood Education Employees Agreement 2009).** These agreements cover the bulk of preschool providers in the preschool sector and a small number of the community managed long day care providers.