



Tuesday 3 April 2018

Red Tape Committee  
Department of the Senate  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Senators,

United Voice welcomes the opportunity to provide feedback to the Red Tape Committee into the effect of 'red tape' on 'childcare'.

United Voice is a union of workers organising to win better jobs, stronger communities, a fairer society and a sustainable future. As the Early Childhood Education and Care (ECEC) union we represent early childhood directors, teachers and educators across Australia. We have members in every state and territory working in both large organisations and smaller centres. We are proud of the work we do educating over one million young Australians. As professionals working in centres delivering early education and care every day, United Voice members have unique insights into the strengths and weaknesses of current and proposed policy settings. It is the expertise of these professionals that informs this submission.

United Voice views this inquiry as an unnecessary and ill-timed attack on the National Quality Framework (NQF). There is a consensus across the sector that quality matters in ECEC and this means maintaining, strengthening and appropriately funding the NQF. Educators, in particular, strongly support the NQF because they know the difference it makes to quality. They know that education is the key to unlocking a child's potential and that early childhood is the best time to do this. Most of the brain's development—between 85 per cent and 90 per cent—happens in the first five years of a child's life. This is when the foundations are laid for learning, behaviour, thinking, and communication, emotional and social skills. These foundations last a lifetime. Investing in quality early learning should be and is a priority of clever governments around the world.<sup>1</sup>

Clever governments also know that a national regulatory system, like the NQF, is key to delivering and ensuring high quality ECEC. Since 2012, the NQF has done just this in Australia. It has delivered benefits to families, children and Australian society through improved educator-child ratios; increased workforce professionalisation and qualifications; the implementation of world-class learning frameworks; and the provision of consistent and transparent information about service providers. The NQF is not red tape, rather a crucial part of the Australian ECEC system.

It is also not a coincidence that the NQF focuses on workforce issues. Research shows that educators are absolutely key to quality ECEC. In fact, the most important indicator and guarantee of quality are

---

<sup>1</sup> See <https://www.learningpotential.gov.au/your-child-and-neuroscience-2> and <http://www.scseec.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/Publications/Early%20childhood%20education/Engaging%20Families%20in%20the%20ECD%20Story-Neuroscience%20and%20ECD.pdf>

engaged and stimulating interactions between educators and children.<sup>2</sup> The NQF has moved Australia towards a world-class system in this respect. It has improved ratios to ensure more one-on-one time between educators and children allow these meaningful and stimulating interactions happen on a daily basis across Australia. The NQF has also improved staff qualifications, following clear agreement in international research and policy circles that skilled and qualified educators are *the principal factor* leading to quality ECEC.<sup>3</sup> Similarly, the NQF has ensured that educators can tailor quality early learning programs for every Australian child through the Early Years Learning Framework (EYQF). The most recent OECD report, *Starting Strong 2017*, identified that like parents, *educators and pedagogies* are the most influential factors on child well-being, development, and learning.<sup>4</sup> There is no debate: valuing children means valuing educators and this means valuing the NQF. Both are integral to high quality ECEC.

Modern, high quality ECEC is a complex field that requires educators to have significant professional skill and knowledge to assist children to develop emotionally, cognitively and socially. We require those educating our youngest members of society to possess an understanding of early childhood developmental stages, language acquisition, individualised play-based pedagogy, behaviour management, and the knowledge of how to work with families to support every child's learning and development. These skills are preconditions to working in our system, and rightly so. This is about ensuring a world-class ECEC system for every Australian child, and attempts to convey the NQF or the professionalisation of early childhood educators as red tape should be strongly opposed.

In addition to the clear links between quality ECEC and the NQF, United Voice supports the NQF as one single and nationally consistent system of regulation for ECEC. It unites nine different ECEC regulatory frameworks and appropriate systems are already in place to monitor its effectiveness through the Australian Children's Education and Care Quality Authority's (ACECQA) longitudinal survey. The sector wide support of the NQF, in particular providers, is clear through this survey. As ACECQA states in the annual performance report 'Overall support for the NQF amongst providers of education and care services has been consistently above 95% and remained very strong in 2017'.<sup>5</sup>

United Voice would also like to note that this inquiry is ill-timed due to the widespread and complex changes coming to the sector on 2 July 2018. The implementation of the new Child Care Subsidy in July increases the administrative burden on families, educators and providers. Many of these changes were not foreshadowed in the Regulatory Impact Statement (RIS) process. United Voice is particularly concerned about the impact the activity test will have on vulnerable and disadvantaged children who stand to benefit the most from high quality ECEC. United Voice is also on record several times stating our concerns around the unknown workforce, and thus quality, implications of the Government's changes. For example, there are connections between moves to hourly billing practices, workforce casualisation, quality standards and additional requirements for attendance data for each child entering and leaving a service. United Voice joins the sector in recommending the Government monitor and review the impact of these changes and any other regulatory issues post July 2018. United Voice also strongly recommends that any review should be conducted in the pursuit of a world class early education system for every Australian child, not an attack on the NQF dressed up as an inquiry into 'red tape'.

---

<sup>2</sup> Fox, Stacey & Kate Torii (2017), *Quality is Key in Early childhood Education in Australia*, accessible at <http://www.mitchellinstitute.org.au/papers/quality-key-early-childhood-education-australia/>

<sup>3</sup> Goodfellow, J. (2007) 'Childcare provision: Whose responsibility? Who pays?' *Kids Count: Better early childhood education and care in Australia*, p. 248 and Productivity Commission (2014) *Childcare and Early Childhood Learning and Inquiry Report*, Volume 2, p.310.

<sup>4</sup> OECD (2017) *Starting Strong 2017 – Key OECD Indicators on Early Childhood Education and Care*. Paris: OECD Publishing, pg. 101.

<sup>5</sup> <https://www.acecqa.gov.au/sites/default/files/2018-02/NationalPartnershipAnnualPerformance.pdf>, pg 71.

United Voice has always been on the frontline fighting for quality ECEC and will continue to do so.<sup>6</sup>

Yours Sincerely

Helen Gibbons  
Assistant National Secretary

---

<sup>6</sup> Logan, H., F. Press and J. Sumsion (2016) 'The shaping of Australian early childhood education and care: What can we learn from a critical juncture?', *Australasian Journal of Early Childhood*, 41(1), p. 68.