



ACA Submission: Review of National Agreement for Skills and Workforce Development

#BestStartInLife



December 2019

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Executive Summary

This paper is presented to the Productivity Commission by the Australian Childcare Alliance (ACA) in response to the call for submissions to contribute to the Review of the National Agreement for Skills and Workforce Development.

ACA is grateful for the opportunity to contribute to this review, in the context of ensuring that the Vocational Education and Training (VET) system achieves its goal of delivering a productive, highly skilled workforce which meets the needs of the early learning sector.

As the national peak body in the Australian Early Childhood Education and Care (ECEC) sector, ACA represents more than **2,500 members** and cares for the children from over **360,000 families** throughout Australia.

We work on behalf of early learning (centre based, long day care) service owners and operators, predominantly private, as a reputable source of evidence-based advice to policy makers and a trusted source of practical guidance to service operators.

Our vision is a future where **every child in Australia** has access to high quality, affordable and sustainable early learning services.

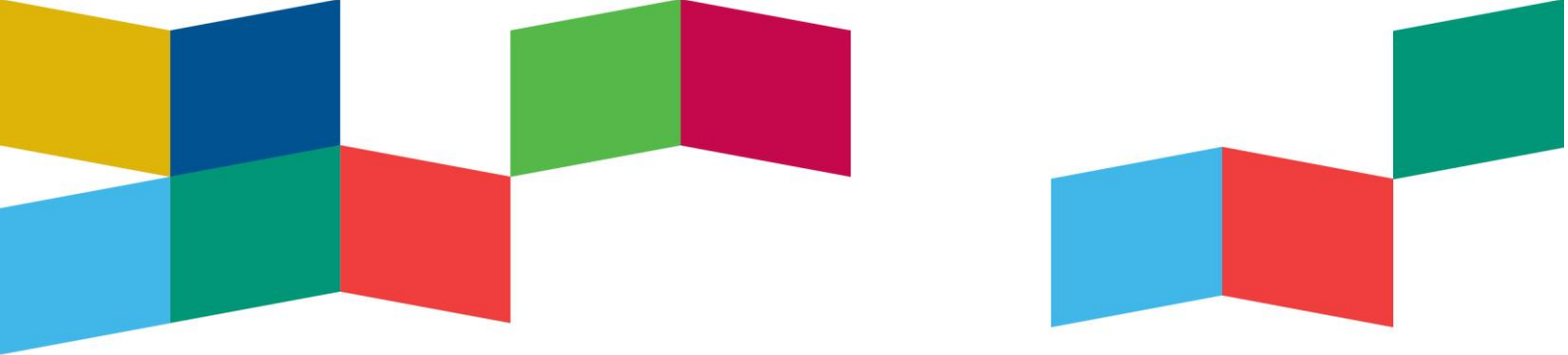
In the December quarter 2018, there were over **1.369 million children** across over **974,600 families** using approved early learning services in Australia with **over 58% in centre-based care**¹, reflecting the continued demand for early learning services and the ongoing demand for qualified, skilled candidates.

In this context there are many emerging fault lines in workforce shortages that must be addressed now before the Government's well-intentioned reforms to early learning are undermined.

ACA believes that the early learning sector is facing a **recruitment crisis**: there is a critical shortage of qualified, competent candidates for the positions of early childhood educators and Early Childhood Teachers, and services are struggling to fill these roles.

The vocational training framework that services the early learning sector is **falling** in its role to deliver an adequate pool of highly skilled graduates. Early learning services are struggling to find suitable, highly-skilled employees, and there is very little consultation between training providers (Registered Training Organisations (RTOs) and TAFE institutions) and the sector.

¹ <https://www.education.gov.au/child-care-australia-report-december-quarter-2018>



The result is a **monumental gap** between professional development outcomes and employer expectations.

ACA believes the government funding for vocational education is insufficient to support quality outcomes required against the Australian Skills Quality Authority (ASQA), state/territory regulatory requirements and training package requirements.

We believe that **greater funding** coupled with more meaningful, ongoing consultation with the early learning sector is critical, to ensure better outcomes for vocationally trained entrants into the early learning sector.

ACA is extremely proud of the early learning sector and we have worked tirelessly in collaboration with the Government and other peak bodies to ensure that the education and care that takes place each and every day, informed by the Early Years Learning Framework (EYLF) and the National Quality Framework (NQF), is appropriately recognised.

As the sector continues to grow in size, its benefit to young children as well as to future prospects of the Australian economy are increasingly being recognised, both by government and the general community. However, the **ongoing supply of highly-skilled, capable employees** is **imperative** to ensure that the early learning sector **continues to thrive**.

We welcome the opportunity to contribute to the **National Agreement for Skills and Workforce Development Review**, and we look forward to working with the relevant Departments to address the critical issues identified in this submission paper, in the context of ensuring that **every child in Australia** has access to high quality, affordable and sustainable early learning services, and therefore the **best start in life**.

Paul Mondo
ACA President





Early Learning Sector: Vocational Snapshot

BACKGROUND

The two relevant vocational training courses in the early learning sector are:

- **Certificate III** (Cert III) in Early Childhood Education and Care (ECEC)
- **Diploma** in Early Childhood Education and Care (ECEC)

Cert III is the current industry minimum standard to become a qualified assistant and educator in an early learning service (long day care, family day care, community-run kindergarten/preschool service).

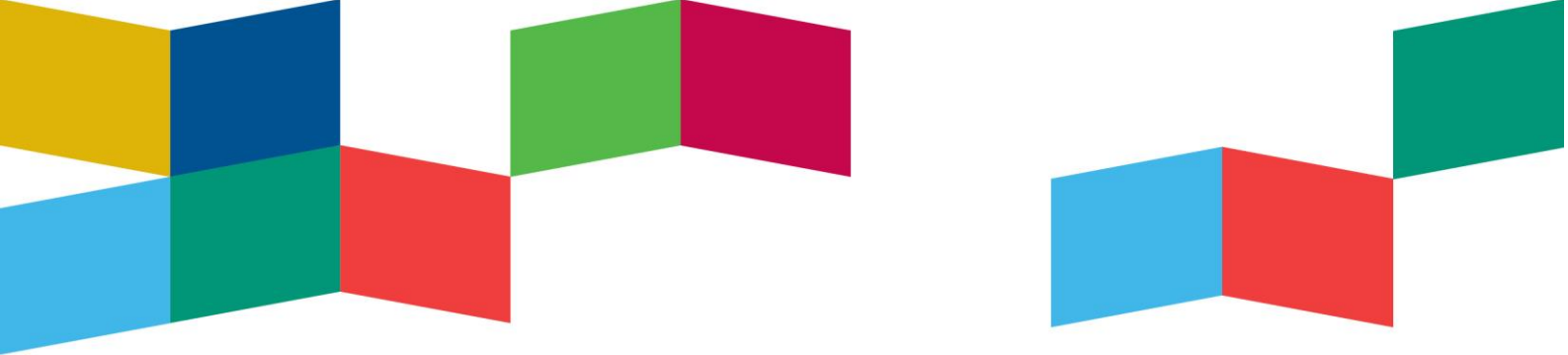
The Diploma involves further study. Typically, those undertaking this Diploma level course are seeking employment as a:

- Group Leader in a Childcare Centre
- Child Development Worker
- Children's Services Manager
- Centre Coordinator/Supervisor
- Centre Director/Manager

The training package for Cert III is designed to take 12 months to complete, while the Diploma training package has been designed to take 24 months for new entrants.

Early learning services generally employ a team of staff which includes early childhood educators (Cert III and/or Diploma-qualified) and Early Childhood Teachers (degree-qualified).

With the national completion rate sitting between 30% to 35% for these courses, a substantial portion of government funding for vocational training in the early learning sector is utilised for students who do not complete their qualification. Additionally students may choose to shop around based on duration and workload and often change RTOS throughout the qualification, which reduces quality outcomes.



SHORTAGE OF QUALIFIED, COMPETENT CANDIDATES

Sourcing quality candidates to fill the role of early childhood educators remains a significant problem Australia-wide.

This has been an ongoing issue since the introduction of the National Quality Framework (NQF) in 2012, which introduced a minimum qualification level and created an urgent need to employ a higher number of vocationally trained educators. The early learning sector is still "playing catch up" to meet the needs of this regulatory reform.

This undersupply will be further exacerbated by the NQF requirement for an additional Early Childhood Teacher (ECT) for centres from 2020, along with a growing oversupply of the number of services in some geographic areas.

The Australian Government predicts² that the sector will need to fill an additional 29,000 ECT jobs in Australia by 2023. If action is not taken soon, one-third of kindergarten/preschool services will not have a trained teacher on staff within four years.³

The *Federal Department of Employment Report* (April 2017)⁴ and the NSW Department of Education's *Early Childhood Education Workforce Review* (October 2017)⁵ have confirmed labour shortages for Cert III and Diploma-qualified educators, along with Degree-qualified ECTs.

Whilst some progress has been made in eradicating poor quality training providers, many employers still find a high variance in the quality and job readiness of many vocationally trained educators. This results in ongoing professional development and leadership training being required to ensure an appropriate level that Cert III and Diploma-trained educators are able to cope with the demands of the role.

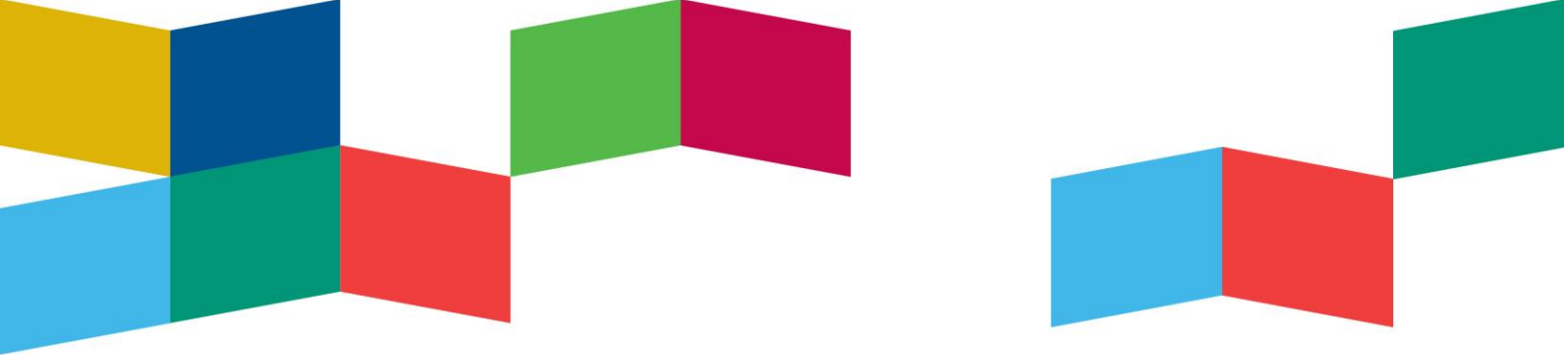
The reality remains that there is a **critical shortage** of qualified candidates who are adequately skilled, job-ready candidates for the early learning sector; upon completion of their study, students are not at a quality level that meets employer expectations.

² Executive Summary, Upskilling in Early Childhood Education Report, Futuretracks and FrontProject - <https://www.futuretracks.org.au/images/downloads/UpskillReport.pdf>

³ One-third of all preschool centres could be without a trained teacher in four years, if we do nothing, [Megan O'Connell](https://theconversation.com/one-third-of-all-preschool-centres-could-be-without-a-trained-teacher-in-four-years-if-we-do-nothing-120099), Honorary Senior Fellow, University of Melbourne - <https://theconversation.com/one-third-of-all-preschool-centres-could-be-without-a-trained-teacher-in-four-years-if-we-do-nothing-120099>

⁴ Federal Department of Employment Report (April 2017), <https://www.employment.gov.au/employment-services-outcomes-reports>

⁵ NSW Department of Education's Early Childhood Education Workforce Review (October 2017), <https://education.nsw.gov.au/media/eccec/pdf-documents/2017/Workforce-Literature-Review.pdf>



ACA would like to acknowledge the Australian Government's commitment to establishing a *Skills Organisations Pilot Program* under the *Delivering Skills for Today and Tomorrow* initiative, which will trial new approaches to address this issue. ACA endeavours to work with the pilot program as a sector stakeholder to help in addressing some of the early learning sector's concerns.

However our concern is meeting the needs for qualified staff in the **immediate future** as well as the longer term; the early learning sector needs a large pool of both vocationally trained and tertiary-qualified candidates, with the vocational training providing an adequate platform to allow study progression to the level of a teacher's degree.

There is currently **no Federal Government funding in place** to support the professional development of Australia's early childhood educators and teachers and the **growing demand** for vocationally trained educators and tertiary trained teachers.

ASQA ECEC STRATEGIC REVIEW 2015

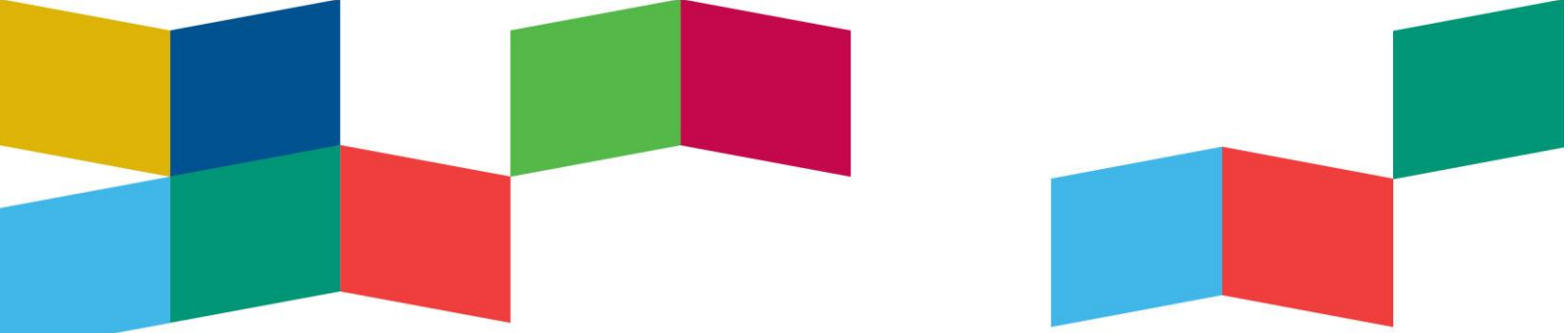
The *ASQA ECEC Strategic Review 2015*⁶ was initiated by the Australian Skills Quality Authority (ASQA) in response to concerns raised by the Productivity Commission in its 2011 research report, *Early Childhood Development Workforce*⁷, about the quality of vocational education and training (VET) and assessment being provided.

Key findings of the review included:

- The CHC30113 Certificate III in Early Childhood Education and Care and CHC50113 Diploma of Early Childhood Education and Care are critical qualifications for early childhood education and care workers under the sector requirements of the National Quality Framework for Early Childhood Education and Care.
- Most registered training organisations have difficulty complying with assessment requirements.
- When given time to rectify areas where they were not compliant, most registered training organisations became compliant with the national standards for registered training organisations.
- Training courses are often being delivered in too short a time to enable the development of sufficient skills and knowledge and for valid assessment decisions to be made.

⁶ <https://www.asqa.gov.au/about/strategic-reviews/early-childhood-education-and-care-2015>

⁷ <https://www.pc.gov.au/inquiries/completed/education-workforce-early-childhood/report>

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- Learning and assessment in a structured workplace environment is not being done well by many registered training organisations delivering early childhood education and care.

The report also made the following recommendations:

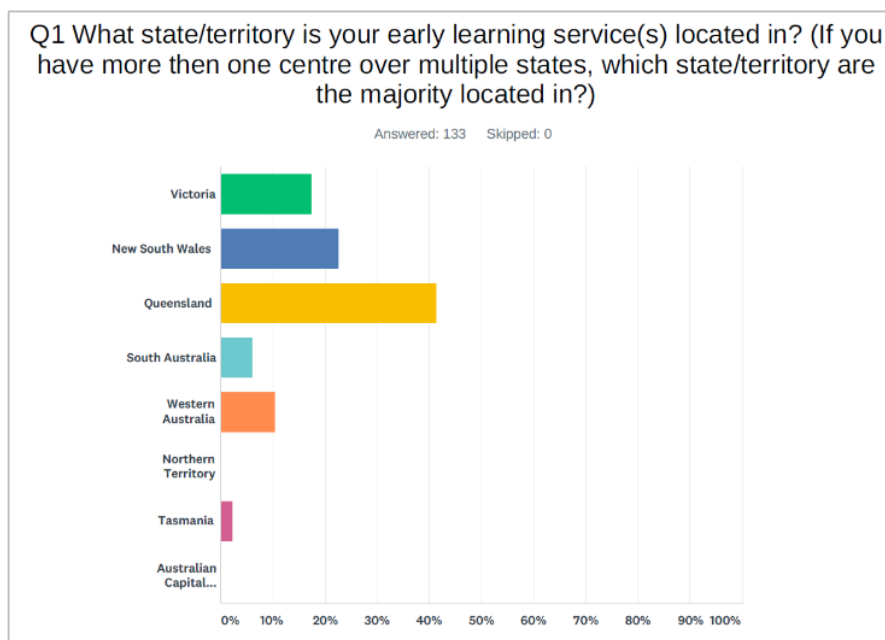
- Training packages to include minimum benchmarks around the amount of training required for units of competency and VET qualifications
- ASQA to obtain intelligence from early childhood and care providers about the quality of training and assessment
- The quality of assessment to improve
- Greater clarity in training packages in relation to assessment evidence
- Adequate provision of training and assessment in an actual or simulated workplace, and
- Trainers and assessors to gain and maintain vocational competence.

ACA MEMBER FEEDBACK

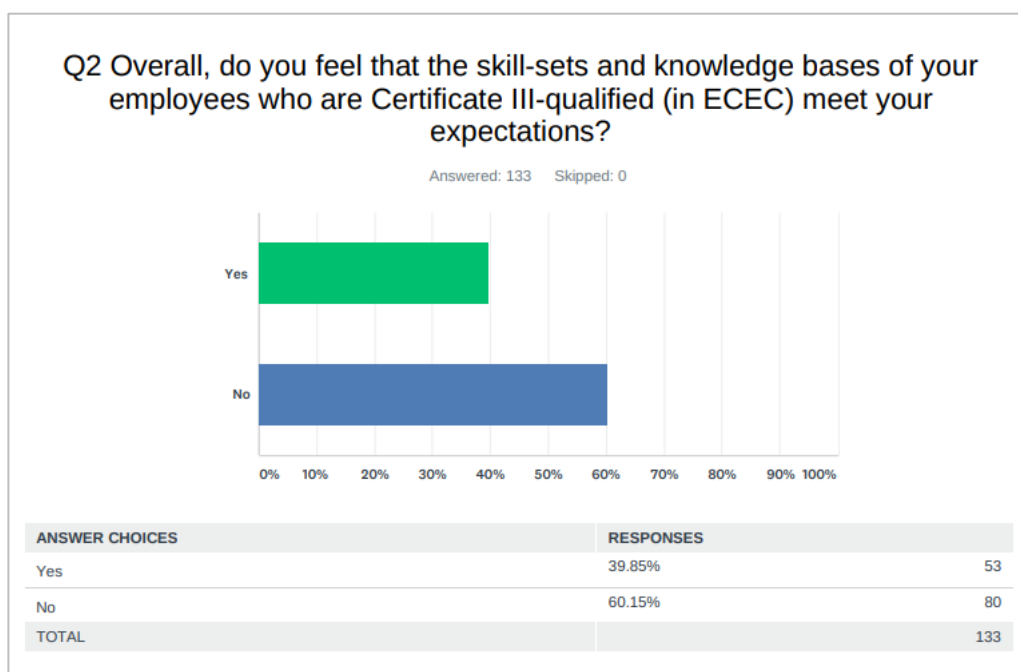
The key findings of the *ASQA ECEC Strategic Review 2015* **continue to present themselves** in recent feedback from ACA members on vocational training for the early learning sector, with the same issues being front and centre of the discussion.

For the purposes of this submission, ACA surveyed its members to explore their views on the outcomes of the vocational training for the early learning sector. The survey was run over a 12 day period (5th December - 17th December 2019), which is traditionally an extremely busy time for the early learning sector.

However in this short time we received 133 responses from Australia-wide, with the following state/territory breakdown.



Overall, the majority of respondents (**over 60%**) felt that the skillsets and knowledge bases of the Cert III and Diploma graduates **did not meet their expectations**.



When asked what **technical skillsets** they thought newly qualified **Cert III** educators required further training/knowledge in, with the option to select one or more responses, respondents have the following responses.

Q3 If you answered no to the previous question, which technical skill-sets do you think newly qualified Cert III educators require further training/knowledge in?		
ANSWER CHOICES	RESPONSES	
Basic understanding of National Regulations & EYLF (including educational programming)	88.75%	71
Food safety	33.75%	27
Sleep safety	43.75%	35
Child safety	57.50%	46
Hygiene and nappy changing	31.25%	25
Computer literacy	25.00%	20
Understanding of operational systems, policies and procedures	67.50%	54
First aid	15.00%	12
Language & literacy skills	73.75%	59
Total Respondents: 80		

When asked what **technical skillsets** they thought newly qualified **Diploma** educators required further training/knowledge in, with the option to select one or more responses, respondents have the following responses.

Q6 If you answered no to the previous question, which technical skill-sets do you think newly qualified Diploma educators require further training/knowledge in?		
ANSWER CHOICES	RESPONSES	
Solid understanding of National Regulations & EYLF (including educational programming)	91.03%	71
Understanding the educational programming cycle	91.03%	71
Food safety	20.51%	16
Sleep safety	29.49%	23
Child safety	37.18%	29
Hygiene and nappy changing	20.51%	16
Computer literacy	24.36%	19
Understanding of operational systems, policies and procedures	78.21%	61
First aid	12.82%	10
Language & literacy skills	64.10%	50

These are fundamental skillsets that appear to be lacking in qualified job candidates.

Comments included:

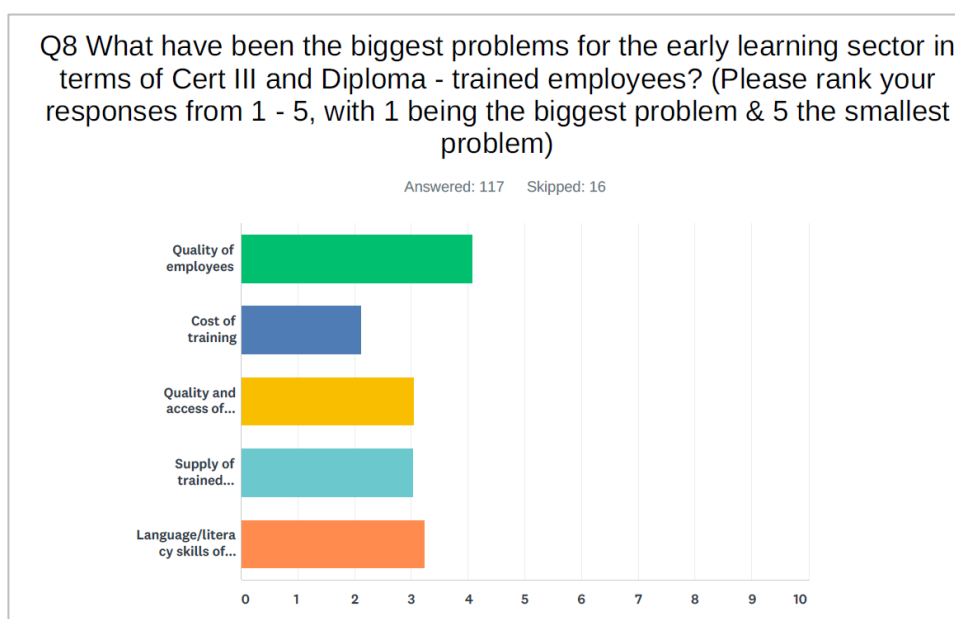
"I feel that most of the educators don't have a proper understanding of the general requirements of their role or an understanding of how child care settings operate. Educators learn how to complete their assignments and when they start their placement, they are not competent to meet the expectations. Not even after the finish their placements, directors hesitate to hire as they need more training."

"Need more practical experience"

"Understanding child to educator ratios. Lack of practical experience means that multi-tasking and effective supervision skills are absent."

"Many Diploma trained people have significant less than acceptable skills unless they are also working within the industry while studying."

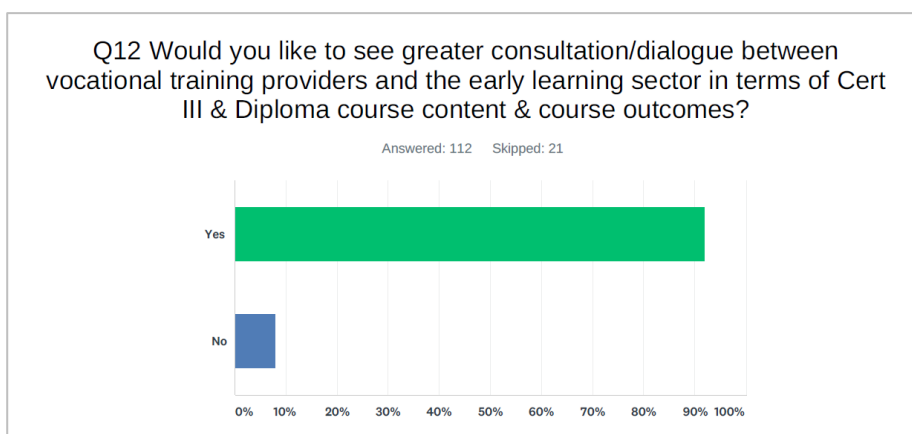
Furthermore, when asked to rank the biggest problems facing the early learning sector in terms of Cert III and Diploma graduates, respondents ranked **"quality of candidates"** as the **number one problem**, with **"language/literacy skills"** ranked as the **second highest problem**.



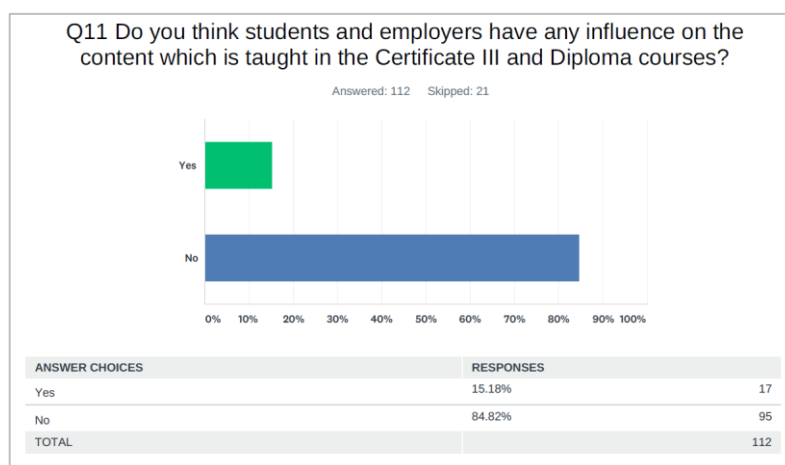
The **ability to speak and write in fluent English** was noted as a huge concern, with many ACA members complaining that Cert III and Diploma-qualified candidates are often lacking this basic skill.

In terms of practical placements, **over 67%** of the sample did not think the **practical placement component** of the Cert III and Diploma courses were adequate; many suggested the placement time frames should be longer to allow for more face to face teaching and on-site learning, the tasks undertaken should be relevant to the role of early childhood educators, and there should be appropriate assessment of the practical placement, with regular visits from assessors. A mentoring program was also recommended.

In terms of **consultation with the early learning sector**, when asked about whether students and employers have any Influence on the Cert III and Diploma content, over 84% said "no".



When respondents were asked if they would like to see greater consultation/dialogue between vocational training providers and the early learning sector in terms of Cert III and Diploma course content and outcomes, as resounding 91% said "yes".





NATIONAL CONSISTENCY

In addition to the consistent feedback from ACA members that newly qualified Cert III and Diploma students are simply not job-ready candidates, there are also clear inconsistencies in the delivery of vocational training to the early learning sector across jurisdictions.

The funding provided to training providers (Registered Training Organisations (RTOs) and TAFE institutions) varies from state to state/territory, resulting in variances in the cost of courses to students from state to state.

In some states (eg. Victoria, South Australian and Queensland) there are little or no cost barriers to the Cert III or Diploma courses as there are state government-funded subsidies available which result in minimal costs to students (eg. \$40 in Victoria), whether the course is completed at an RTO or a TAFE provider.

However, these subsidies at RTOs only apply to people who don't already have a higher qualification. Someone who is degree-qualified would not be eligible for the subsidised fee and the cost for a Diploma course would be approximately \$10,000.

In other states the government subsidies are not as generous. In Western Australia the cost of a Diploma course for a student is approximately \$10,000 at their personal expense.

Additionally, in some states the Diploma of ECEC is an apprenticeship, while in others it's a traineeship. This creates discrepancies in the funding amount and duration of the course as well as confusion for potential entrants to the sector.

Finally, access to courses and practical placement becomes difficult for people living in regional and remote areas, with limited early learning services to offer a practical placement.

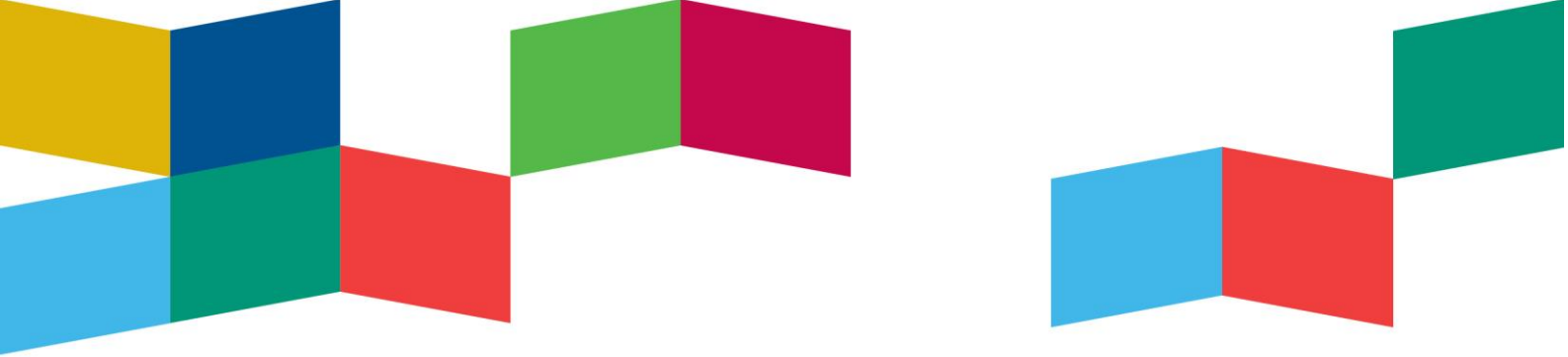
INADEQUATE FUNDING

ACA is concerned about the repercussions resulting from inadequate funding for training providers.

According to the Mitchell Institute's recent report on *Australian Investment in Education: Vocational Education and Training*⁸, most states and territories are spending less in real terms on VET recurrent funding than they did ten years ago. There are some signs of an increase in investment in the VET sector in certain jurisdictions; however, overall investment in VET is still trending downwards.

The funding provided to training providers by some states does not cover the cost of meeting the training package and regulatory requirements. The resulting regulatory non-compliance is evidenced in the ASQA

⁸ <http://www.mitchellinstitute.org.au/reports/australian-investment-in-education-vet/>



ECEC Strategic Review 2015⁹, which stated that "most registered training organisations have difficulty complying with assessment requirements".

LACK OF CENTRAL INFORMATION HUB

The information resources available to prospective students of early childhood education vocational courses are limited, with most information provided by the RTOs themselves rather than an impartial source.

Prospective students, along with their prospective employers, would greatly benefit from a government-recognised, reliable, central hub of information about the courses available, along with those courses which are recommended and held in high esteem by the early learning sector, and how they feed into the career path of an early childhood educator/Early Childhood Teacher.

With schools clearly being one of the primary pathways for entry into vocational courses, such a resource would be useful to career counsellors and school students.

ACA would support and promote such a resource, should it become available.

WHO IS RESPONSIBLE FOR ENSURING QUALITY?

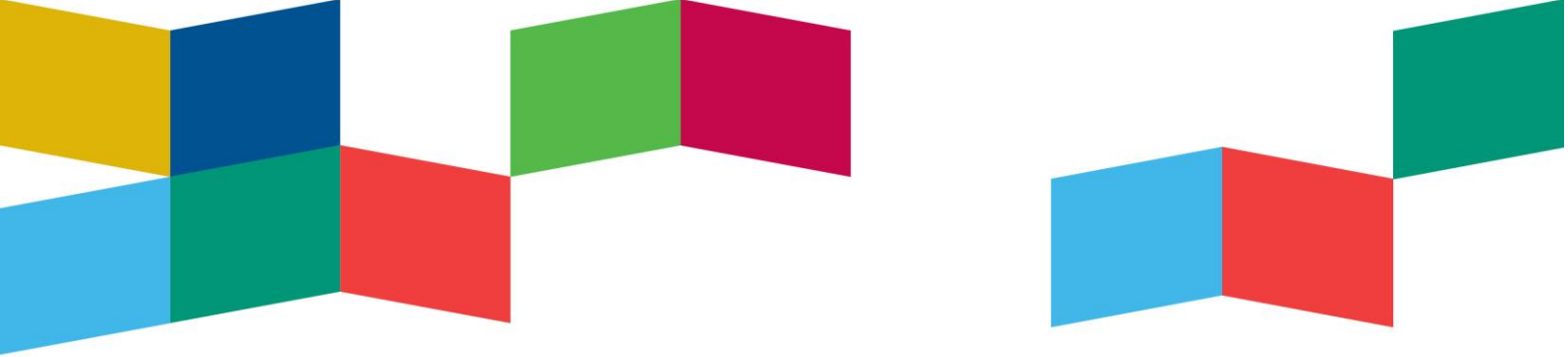
As the structure currently stands, ASQA is the national regulator for Australia's vocational education and training sector, while RTOs are registered and engage primarily with their state/territory Department of Education.

It is clear that the existing structure has not successfully met the NASWD objectives as they apply to the early learning sector, and it remains unclear to the early learning sector which agency is ultimately responsible for ensuring that the course content and the course outcomes adequately meet the needs of the sector, or if ASQA has adequate regulatory authority and resources to successfully fulfil its role.

ACA is concerned by the lack of auditing of RTOs, both at the state and federal level. Full qualifications are often delivered without the RTO receiving an audit throughout the duration of this process, raising concerns about the assessment and quality of the training.

Moreover ACA has concerns that some training providers are allowed to deliver substandard qualifications, which does a disservice to the early learning sector as well as those private RTOs that provide quality

⁹ <https://www.asqa.gov.au/about/strategic-reviews/early-childhood-education-and-care-2015>



training. Training providers that don't have experience or engagement with the early learning sector often put Early Childhood with their scope, as it is seen as an "easy to deliver" course outline.

Ongoing changes from ASQA and SkillsIQ to the training package mean that students may have to complete additional study to address these changes, and training providers need to map these students across to the new packages. During this process no additional funding is received, despite the often substantial resources required to fulfil this obligation.

Training is often rushed and RTOs may not deliver the required number of hours of face to face training and assessment, due to the fact that funding amounts received by the training provider has not increased over the last 10 years and therefore hasn't kept up with the increase in expectation of course outcomes.

ACA believes a renewed Workforce Agreement should be more clearly defined in terms of which agency has ultimate responsibility to manage and oversee the quality of training delivered, the relevance of the training packages, their currency and their ongoing assessment, with a view to improve quality and ensure nationally consistent outcomes Australia-wide.

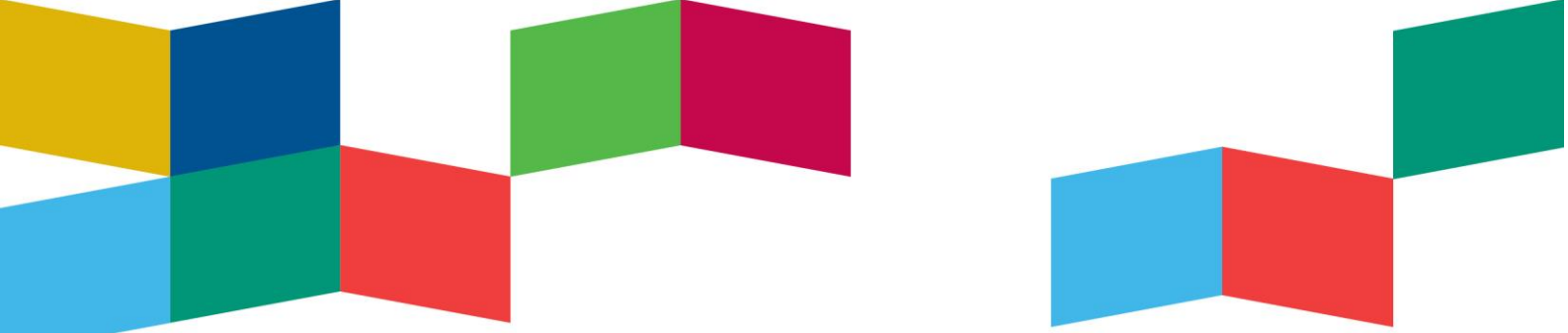


NASWD's objectives: How well have they been achieved?

The following table provides a summary of how ACA believes the NASWD objectives apply to the early learning sector.

Objectives <i>as they apply to the early learning sector</i>	ACA Assessment
<p><i>A VET system that delivers a productive and highly skilled workforce and which enables all working age Australians to develop the skills and qualifications needed to participate effectively in the labour market and contribute to Australia's economic future; and supports the achievement of increased rates of workforce participation.</i></p> <p>(COAG 2012b, para. 18)</p>	<p>Not met</p> <ul style="list-style-type: none"> - ACA members report a serious shortage of qualified and job-ready candidates in the early learning sector - Newly qualified Cert III and Diploma graduates are simply not job-ready candidates and are not meeting employer expectations. - This has been an ongoing issue since the introduction of the National Quality Framework (NQF) in 2012, which introduced a minimum level qualification for the sector and created the urgent need to employ a higher number of vocationally trained educators. The sector is still playing catch up in trying to meet this urgent need created by this major regulatory reform. - There is very little consultation with the early learning sector to ensure that the course content and outcomes are aligning with employer expectations.
<p><i>Meets industries' needs promptly as the economy changes</i></p>	<p>Not met</p> <ul style="list-style-type: none"> - Australia's growing economy has contributed to growth in the early sector, with greater demand for highly skilled, qualified, job-ready candidates. - The existing vocational training sector is simply not keeping up with the demand as the sector grows.
<p><i>Is accessible to all working-age Australians</i></p>	<p>Varies from state to state/territory</p> <ul style="list-style-type: none"> - In some states (eg. Victoria, South Australian and Queensland) there are little or no cost barriers to the Cert III or Diploma courses as there are state government-funded subsidies available which result in minimal costs to students (eg. \$40 in Victoria). However, these subsidies only apply to people who

	<p>don't already have a higher qualification. Someone who is degree-qualified would not be eligible for the subsidised fee and the cost for a Diploma course would be approximately \$10,000.</p> <ul style="list-style-type: none"> - In other states the government subsidies are not as generous. In Western Australia the cost of a Diploma course for a student is approximately \$10,000 at their personal expense. - Access to courses and practical placement becomes difficult for people living in regional and remote areas, with limited early learning services to offer a practical placement.
<i>Works with businesses to provide Australians with the opportunity to develop and use their skills</i>	<p>Not met</p> <ul style="list-style-type: none"> - As previously stated, the course content and course outcomes do not adequately meet the needs of the sector - Not enough consultation with the sector - Practical placements are not adequate, with service providers reporting that they would like them to be longer time frames, held in appropriate settings to align with the student's future employment setting and have more appropriate assessment with regular visits from assessors. <p>A mentoring program would also benefit students.</p>
<i>Is accessible to, and meets the needs of, people experiencing disengagement or disadvantage who may need additional support, including young people, Aboriginal and Torres Strait Islander people and people in certain locations</i>	<p>Varies from state to state/territory</p> <ul style="list-style-type: none"> - RTOs need more appropriate funding to service regional and rural locations.
<i>Is centred on quality teaching and learning outcomes</i>	<p>Not met</p> <ul style="list-style-type: none"> - As previously stated above, trained candidates are simply not meeting employer's needs or expectations.
<i>Provides individuals, businesses and jurisdictions with access to information about training products, services and outcomes so that they can make informed choices</i>	<p>Not Met</p> <ul style="list-style-type: none"> - No central resource to provide prospective students with information about the courses and qualifications available, which courses are most recognised by employers and how the courses feed into the career path of an early childhood educator or Early Childhood Teacher.
<i>Provides pathways into, and removes barriers between, schools, vocational and higher education and employment</i>	<p>Not met</p> <ul style="list-style-type: none"> - With schools being one of the primary pathways for entry into vocational courses a central, government-recognised resource that provides information about the courses available for entry into the early learning sector would be a useful resource for school students - Tertiary institutions should offer consistency in terms of credits available under degree courses, for subjects/units taken as part



	<p>of Cert III & Diploma courses.</p> <p>More co-ordination between tertiary institutions and RTOs. more structure and more consistency Australia-wide would create a clearer career path from early childhood educator to Early Childhood Teacher, thus supporting the sector.</p>
<p><i>Is efficient, in that government efforts appropriately respond to areas of future jobs growth and works to support the skills needs of the Australian businesses and industries (COAG 2012b).</i></p>	<p>Not met</p> <ul style="list-style-type: none"> - As previously stated, there is a serious shortage of qualified and job-ready candidates in the early learning sector. - The existing vocational training sector is simply not keeping up with the demand as the sector grows. - Additionally, newly qualified Cert III and Diploma graduates are simply not job-ready candidate and are not meeting employer expectations. - There is very little consultation with the early learning sector to ensure that the course content and outcomes are aligning with employer expectations.



Improving VET to support the early learning sector

In order to ensure that the vocational training servicing the early learning sector meets the needs and expectations of early learning service providers Australia-wide, ACA has developed the following recommendations.

RECOMMENDATIONS

- A revision of the Working Agreement National Agreement for Skills and Workforce Development which:
 - clearly defines which agency is ultimately responsible for ensuring that the course content and the course outcomes adequately meet the needs of the sector.
 - Includes a framework that ensures national consistency in terms of access, quality and cost, regular engagement between the RTOs, tertiary institutions and the early learning sector.
 - Provides for ongoing assessment, to ensure that course content aligns successfully with the job role and employer expectations and reflects the quality outcomes required.
 - Ensures the development of a central, government-endorsed, information resource about the training options available to people seeking work in the early learning sector and how they feed into the career path of an early learning educator and Early Childhood Teacher.
 - Ensures a more controlled approach to the practical placement component in terms of
 - Duration
 - Appropriate supervision (by service provider & by RTO assessors)
 - Setting type it is delivered in (ideally aligned with service type of future role)
 - Funding for services to support these students in their placements



RECOMMENDATIONS CONTINUED

- Includes formal linkages with Adult Migrant English Program (AMEP) service providers and RTOs to ensure the inclusion of AMEP study before and also in parallel with Cert III and Diploma training where required.
- Provides ASQA or the relevant agency with effective deterrent and enforcement capabilities to address any rorting of the system.
- A review of the Australian Government funding model for vocational training as it applies to the early learning sector, against the quality of delivery, training package requirements, sector standards and regulatory compliance (under both Federal & State regulators - difference requirements)
 - Better government funding and programs to ensure training packages meet Australian Skills Quality Authority (ASQA) and state regulatory requirements and training package requirements, including the need for all graduates to write and speak in English proficiently.
 - Funding mechanism that is closely aligned to the quality of the graduates rather than focussing on completion of course.
 - Stricter assessment of students to meet an acceptable minimum standard with the appropriate skills before graduating, including an assessment of proficiency in reading, writing and speaking in English.
 - Funding mechanism that addresses the variances in cost to deliver quality training of these courses in rural and remote locations.

FURTHER RECOMMENDATIONS

(THAT MAY FALL OUT OF THE SCOPE OF THIS REVIEW)

- Development of government policy and programs that:
 - Ensure adequate availability of 0-5 Early Childhood Teacher Degrees that are recognised by ACECQA as well as the individual state teaching registration authorities.
 - Ensure that the practical placement component of these Degrees take place in the appropriate setting type (ie early learning settings as opposed to schools)
 - Ensure consistency across tertiary institutions in terms of the number of course credits they offer for subjects/units studied as part of Cert III and Diploma courses. This would support the creation of clear and adequate pathways from vocational training to tertiary training.



FURTHER RECOMMENDATIONS CONTINUED

- Remove the barrier to entry caused by the NSW and SA government policy which doesn't comply with the national recommendations for a 3 months probationary period of employment while included in the ratios before having to sign up to Cert III.

This is a major barrier to recruitment of trainee candidates in SA and NSW and is adding to the shortage of sufficient suitable candidates. The South Australian childcare sector as a result has the worst record in Australia for trainees.

- This is in line with the following recommendation from the the Productivity Commission Enquiry Report Volume 2 Childcare & Early Childhood Learning Report 9/03/2015:

“Unqualified trainees – From 1 June 2014, the NQF was amended to allow services to hire new educators without a qualification on a three month probationary period, and have this educator counted as a certificate III qualified educator during this time. A number of submissions (for example, The Crèche and Kindergarten Association, sub. 272; Minister's Education and Care Advisory Council, Tasmania, sub. 290; Australian Childcare Alliance, sub. 310) had voiced support for such a change before it was introduced. However, this change does not apply in New South Wales or South Australia. These states should adopt the new amendment in line with the actions of all other jurisdictions.”



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