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National Review of Teacher Registration Secretariat  
Australian Institute for Teaching and School Leadership  
PO Box 299  
Collins Street West  
Melbourne VIC 8007

Dear Chris Wardlaw PSM and expert panel members,

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 teachers, educators and directors 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 and maximising the contribution their parents make to the economy. As professionals working in centres delivering education and care every day, we have unique insights into the strengths and weaknesses of current and proposed policy settings, especially in relation to workforce issues such as training, qualifications and registration.

Families and the government accept that modern, high quality ECEC is a now complex field that requires educators to have significant technical skill and knowledge in order 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.

Thus, United Voice welcomes the opportunity to provide feedback to the National Review of Teacher Registration Secretariat on a national approach to the registration of early childhood teachers (ECTS). Our members support moves to a national approach to the registration of ECTS as well as diploma qualified educators working in ECEC in recognition of the complexity and importance of all early childhood educators' work. However, we have some concern with using a registration approach and body that is fundamentally designed for school teachers when ECEC educators work in a different educational environment, use different pedagogies and experience different working conditions. United Voice sees the need for the creation of an ECEC specific regulatory and registration body, potentially linked to ACECQA. An ECEC specific body could promote ECEC relevant professional standards and administer the registration of ECTS and diploma qualified educators, eventually progressing to include Certificate III qualified educators. Registration and the associated continuing professional development could be designed fit-for-purpose for each qualification, all with the view of ensuring high quality ECEC. This type of model exists in Ontario and California, and is outlined

in more detail below. United Voice believes that eligibility for some type of registration should be offered regardless of the qualification educators have or the age cohort they teach.

Secondly, United Voice believes a national approach to registration would align with the national approach to quality and curriculum that exists in ECEC under the National Quality Framework (NQF) and Early Years Quality Framework (EYQF). For ECEC educators, registration would mean inclusion in a community of practice, where they are supervised and supported through an advice and guidance programme and continued professional development. This is integral to high quality ECEC. Registration is also a key policy lever to ensure rewarding and professional career paths are the norm in the sector.

Research shows that educators are absolutely essential to quality ECEC. In fact, the most important indicator and guarantee of quality are engaged and stimulating interactions between educators and children.<sup>1</sup> High quality education and training is also essential to a high quality workforce.<sup>2</sup> 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>3</sup> There is no debate: valuing children means valuing educators and this means valuing the workforce. This means providing professional development opportunities and rewarding career paths for educators of all qualifications. Registration for both degree and diploma qualified educators, and eventually certificate III qualified educators, is an appropriate policy lever to facilitate this.

In fact, registration for early childhood educators has its basis in the International Labour Organisation expert guidelines on the promotion of decent work for early childhood.<sup>4</sup> The ILO guidelines recommend that “in the interests of high-quality teaching and learning, all ECE personnel, including those in informal services, should possess a degree, diploma or certificate ... and be certified by the relevant education authorities on the basis of minimum qualification levels.” The ILO guidelines also encourage that registration be renewed periodically based on the completion of professional development that is accessible and affordable to all educators. Hence, United Voice supports a national approach to registration for educators at all qualification levels.

Best practice models internationally are increasingly working towards registration of the ECEC workforce, including early childhood teachers and educators. In New Zealand, three year teaching qualifications (both diplomas and bachelors) are the norm. All qualified teachers are strongly encouraged to register with the New Zealand Teachers' Council, with the result that as of 2017, 66.7% of the ECEC workforce was registered, with plans to increase this to 80% within the next three years.<sup>5</sup> This compares with a maximum registration of 11.9% of the Australian ECEC workforce if a national approach to registration proceeds without including diploma qualified educators.<sup>6</sup>

Similarly, in Ontario, Canada, a Province regarded as taking a progressive approach to ECEC, all educators, whether qualified with a two year diploma or a four year bachelor's with honours, are

<sup>1</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>2</sup> Goodfellow, J. (2007) 'Childcare provision: Whose responsibility? Who pays?' *Kids count: Better early education and care in Australia*, p. 248.

<sup>3</sup> OECD (2017) *Starting Strong 2017 – Key OECD Indicators on Early Childhood Education and Care*. Paris: OECD Publishing, pg. 101.

<sup>4</sup> ILO (2013). Meeting of experts on policy guidelines on the promotion of decent work for early childhood education personnel, p.13.

<sup>5</sup> Ministry of Education-New Zealand (2017). The National Picture: What does the ECE census 2017 tell us about ECE teaching staff?

<sup>6</sup> The percentage of ECTs in the Australian ECEC workforce, quoted in: Social Research Centre (2017). 2016 Early Childhood Education and Care National Workforce Census 2016.'

required to register with the College of Early Childhood Educators (CECE), unless a special exemption is granted. Currently, over two thirds of the Ontario ECEC workforce is registered, with strategies in place to increase this.<sup>7</sup> California also requires all educators to hold a ‘Child Development Permit Matrix (CDPM).’ The CDPM effectively acts as a form of registration, with different levels for each type of qualification an educator can hold. As a result, California has effectively almost complete ECEC workforce registration. This model could be implemented in Australia to recognise appropriate registration for educators of all qualification levels, including certificate III qualified educators. In both the Ontario and California models, registration is administered by bodies specific to ECEC, rather than the extension of a school-centric teacher registration entity. International best practice is moving towards ECEC workforce registration through workforce professionalisation, ensuring educators are supervised and supported through an advice and guidance programme. Australian children deserve a world-class ECEC system, and implementing international best practice workforce policy levers like educator registration can help us achieve this goal.

Currently, ECTS face significant variation in terms of registration across the states and territories. ECT registration is required for ECTS in four states and in others is not required at all, or only in some situations, for example, if the ECEC service is co-located with a school.<sup>8</sup> In Queensland, where ECT registration is not required, some employers nevertheless require teacher registration as a condition of employment. As with other teachers, early childhood teachers accredited in New South Wales do not receive mutual recognition from other states and territories. This inconsistency undermines progress in lifting ECEC quality made at a national level through the NQF. The ongoing success of this national approach to quality suggests the importance of a corresponding national approach to registration. A national approach to registration that includes degree, diploma and eventually certificate III qualified educators is also advisable because of the evidence around quality noted above. Furthermore, many of our diploma qualified members work in the role of educational leader because of their significant experience and skill in the sector and it is thus appropriate that the career path ways and professional development opportunities that come with registration are open to them. Diploma educators are highly skilled professionals, often with decades of experience, and in many centres are the principal educators responsible for each child’s education during this critical developmental stage. Any professionalisation strategy for the ECEC workforce must include diploma qualified educators and eventually certificate III qualified educators.

United Voice also notes that the inclusion of the ECEC workforce in teacher registration has been mooted for some time. The now expired 2012-2016 Early Years Workforce Strategy proposed to “engage with AITSL to explore how the National Professional Standards for Teachers could be extended to early childhood teachers”.<sup>9</sup> This was to align with ACECQA’s work with AITSL to bring a national approach to the development of professional standards in the ECEC sector. To provide the most effective outcome for the ECEC sector, the National Review of Teacher Registration would

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<sup>7</sup> Ministry of Education-Canada (2017). Workforce study for early years and childcare employees

<sup>8</sup> ECT registration is required in New South Wales, South Australia, Western Australia, and Victoria, while in the Australian Capital Territory, Northern Territory, Queensland, and Tasmania, ECT registration is only required in some situations. In the Australian Capital Territory and Northern Territory, ECT registration is only required for preschools connected to schools, while in Tasmania registration is required for all kindergartens (which are considered part of Tasmanian schools) and other centres connected to schools. Queensland does not require registration in NQF settings, although some employers require registration.

<sup>9</sup> SCSEEC (2012). The Early Childhood Education and Care Workforce Strategy for Australia 2012–2016.

ideally be informed by an ECEC workforce strategy. This review is therefore an important reminder that an up to date ECEC workforce strategy is required.

Furthermore, United Voice would argue that the most effective approach to ECEC educator registration is not negotiating the extension of a framework fundamentally orientated to teaching in schools, but the establishment of a registration model specific to ECEC. Employing an ECEC specific registration model would reduce the challenges encountered in previous attempts to extend teacher registration to ECEC. A dual approach to professional standards allows those standards to be relevant to school and ECEC settings respectively, rather than broadening standards in a way that fails to support either professional group adequately. Nevertheless, the present review into a national approach to teacher registration is an important opportunity to progress the ECEC workforce registration intended in the now expired Early Years Workforce Strategy. As stated by Susan Pascoe and Professor Deborah Brennan in their milestone review to achieving excellence in Australian schools through early childhood interventions entitled '*Lifting our Game*',<sup>10</sup> Australia needs to "take a broader view of education to encompass both early childhood and schools."

To value every child, we must value every educator, yet the paid *professional* work of educators remains socially undervalued and underpaid. This relates directly to a lack of professional recognition of the workforce, and a gendered construction of early childhood education as 'care work' and 'women's work'. The reality for ECEC educators is that their wages and conditions are not commensurate with the qualifications and skills required in their roles and the responsibilities that they hold. Certificate III, diploma and degree qualified educators earn \$21.29, \$23.97 and \$26.57 per hour respectively, compared to a national average wage of \$41.80 per hour. For degree qualified ECTS, their hourly wage sits significantly below that of their equivalently qualified peers working in primary and secondary schools. These wages do not reflect the value of their work, or the value of the children for whom they care and educate. That 97% of ECEC workforce are women and that there is an ongoing perception of ECEC as caring rather than education is directly linked to low compensation. Pay inequity and inadequate incomes are one of the key reasons up to 20% of the workforce is considering leaving within a year.<sup>11</sup> Early childhood education has been seen as 'women's work', a job that one does out of love for children. But love doesn't pay the bills. With estimates of workforce growth of 18% needed by 2022,<sup>12</sup> challenges with recruitment and retention have major implications for the future of the sector. A historical lack of professional recognition is a key factor in low ECEC pay, and registration of ECTS and diploma qualified educators in all states is an important step towards raising the status of the ECEC profession in the community. Furthermore, retention of early childhood teachers and educators requires a clear career development pathway for educators. Diploma qualified educators are skilled professionals, many with decades of work experience, yet they have nowhere left to go in the award after only very minimal increases for the first four years of their career. For our members, professional recognition through their inclusion in national registration is an important step in their campaign towards equal pay and the development of meaningful career pathways.

<sup>10</sup> Pascoe, S. & Brennan, D. (2017). *Lifting our game: Report of the review to achieve educational excellence in Australian schools through early childhood interventions.*

<sup>11</sup> Irvine, S., Thorpe, K., McDonald, P., Lunn, J., & Sumsion, J., (2016, May). *Money, Love and Identity: Initial findings from the National ECEC Workforce Study. Summary report from the national ECEC Workforce Development Policy Workshop, Brisbane, Queensland: QUT.*

<sup>12</sup> Department of Jobs and Small Business, 2017 Occupational Projections – Five Years to May 2022. Available here: <http://lmip.gov.au/default.aspx?LMIP/EmploymentProjections>

While United Voice supports a national approach to degree and diploma qualified ECEC staff, we have some concerns about implementing a process largely designed for government run and funded schools. In particular, United Voice has some concerns around the element of registration that requires at least 100 hours of professional development activities across the previous five years. If this is applied in the same manner to early childhood educators, United Voice is concerned how this will play out in a sector where professional development and training is not always employer funded. Educators in ECEC will not always have the professional development or financial support that schools offer teachers including paid leave for training. Furthermore, ECTS in ECEC do longer face-to-face teaching on a daily basis and only receive four weeks paid leave per annum. While United Voice fully supports continued professional development for all ECEC educators, the reality of ECEC workforce employment arrangements must be considered. The ILO guidelines, which lay out the importance of CPD, recommend that CPD is either free of charge or provided on a cost sharing basis with employers and governments to ensure that ECEC educators on low incomes can access courses.<sup>13</sup>

In terms of maintaining quality in CPD, currently ECEC CPD is completely unregulated, with a number of providers offering courses which are not assessed for quality, and that are delivered in formats which have varying impact on professional practice. Consideration should be given to the New South Wales model in which a certain portion of the CPD a teacher must complete to maintain their accreditation is registered with the NSW Education Standards Authority (50% of CPD hours from a registered provider for maintaining proficient accreditation). Where a registration fee may be charged to educators, United Voice argues for a free or heavily discounted fee for educators in ECEC to reflect the lower wages they receive. Furthermore, where suspension occurs for failure of prompt payment of fees, as occurs in some States and Territories under current registration frameworks, United Voice recommends some provisions for hardship and/or payment plans be developed. United Voice will continue to advocate for wages of qualified early childhood educators to meet those for equal work in other sectors, and professionalisation through registration is an important step towards this goal, but until it has been met, fees for registration should reflect the sector's lower wages.

For the registration of ECEC educators to have the greatest positive impact on ECEC quality, registration must be relevant to the ECEC context. While United Voice acknowledges the progress made in the 2015 revision of the APST to extend the definitions within the standards to ECTS, the language used still applies primarily to school contexts and primary aged pedagogies. United Voice's position is that rather than ongoing reviews of professional standards designed to be relevant to school settings, equivalent professional standards need to be established for ECEC. As the primary representative of early childhood educators, United Voice looks forward to actively contributing to such a review to ensure educators and teacher voices are heard.

One significant benefit of such an ECEC specific approach to registration is the capacity to offer relevant career progression. The current teacher registration framework offers progression through career stages, from provisional to full, highly accomplished and lead levels which applies to schools. An equivalent approach to career progression is critical to ECEC and should allow for transitions between career stages, but also for transitions from certificate III to diploma qualifications and

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<sup>13</sup> ILO (2013). Meeting of experts on policy guidelines on the promotion of decent work for early childhood education personnel.

diploma to educational leader and/or teacher qualifications and registrations. Specific consideration of the challenges ECEC educators outside the school system may face in accessing mentoring and support networks because of the fragmented nature of the ECEC sector is also needed. Educators are likely to face challenges with finding suitable professional development in rural areas.

## Conclusion

United Voice is keen to work with AITSL to progress a smooth transition to a national approach to registration that includes early childhood teachers, diploma qualified educators and eventually certificate III qualified educators. Educators working in ECEC need rewarding and professional career paths, and registration is a key policy lever for the normalisation of career path development across the sector. Professional recognition through ECEC educators' inclusion in a national approach to registration is an important step in the campaign towards equal pay and is appropriate for their skill and responsibilities. Finally, a national approach to registration is necessary to align with the national approach to quality and curriculum that exists in ECEC under the NQF and EYQF. However, United Voice strongly advocates for an ECEC specific regulatory entity supported by ECEC relevant professional standards for all qualifications to implement registration for all educators in line with the NQF. United Voice looks forward to future consultations with AITSL that support the professionalisation of the ECEC workforce, and calls on AITSL to consider the ECEC workforce throughout the review process.

For more information on this submission, please contact [REDACTED] [REDACTED]  
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Yours Sincerely

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