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Jay Weatherill
Director
Thrive by Five
Minderoo Foundation

By email: jweatherill@minderoo.org

Dear Jay,

RE: IEU Feedback on the Exposure Draft for The Thrive by Five Early Childhood Guarantee Bill 2024

Thank you for providing a copy of the exposure draft for The Thrive by Five Early Childhood Guarantee (Universal access to early childhood services and benefits) Bill 2024, for review and feedback.

Our union welcomes your *Make it Law* campaign and the Minderoo Foundation's consultation and engagement with education professionals and their unions in the development of this important bill.

IEU supports in principle the establishment of an Australian Early Childhood Development Commission. The aims of the Thrive By Five Early Childhood Guarantee are unlikely to be achieved without the creation of a body to oversee the development of a cohesive and effective Early Childhood Development System. Appropriate parental leave for both partners, systematic maternal health and child development checks, and free or low fee quality early childhood education for all families are essential components of a plan to meaningfully address the persistent access and equity issues facing Australian families.

IEU offers seven recommendations to inform the development and finalisation of the exposure draft:

Recommendations

1. IEU offers in principle support for establishment of an Australian Early Childhood Development Commission. However, vigilance is needed to avoid unnecessary bureaucratic layers which negatively impact directors, teachers, and educators. In particular, interaction between the Commission and bodies such as ACECQA must be carefully monitored to ensure it does not result in duplication of regulatory requirements or increases in compliance. Duplication and excess compliance adversely impact frontline workers and therefore the quality of care in the ECEC sector. The focus on quality education and care must be preserved.

2. The process for conducting maternal health and child development checks must not interrupt the education programs in centres. These checks should take place on-site at services and be conducted in consultation with staff to reduce disruptions and maintain focus on the programs.
3. The exposure draft sets out information about the number of Commission members and rules for appointment. The draft omits any specific requirement that Commission members possess experience or qualifications in ECEC. It may be appropriate for some members of the Commission to come from governance or regulatory backgrounds. However, we recommend it be a requirement that most Commission members demonstrate a strong understanding of the diverse contexts in the ECEC Sector, and possible impacts on workloads and staffing posed by proposed legislation or policy changes.
4. Wide consultation must take place whenever the Commission intends to provide advice on quality education, early childhood strategies and policies, and regulatory enforcement. Because of the ongoing teacher shortage crisis, any proposed initiatives must be carefully scrutinised to ensure they do not result in regulatory duplication or workload exacerbation. Any review must include wide consultation, specifically with practicing representatives of the ECEC sector and unions operating in the sector, to avoid workload intensification for directors, teachers, and educators.
5. IEU applauds the objective of providing 30 hours or three days a week of quality early childhood education for all children aged 0-5 years. However, in working towards this objective, the Commission must ensure there are no negative impacts on the recruitment and retention of teachers and educators. Provisions to mitigate the shortage of qualified staff will need to be established promptly to ensure that education and care standards are not compromised.
6. Realistically increased levels of support for children with special or additional needs (such as allergies, medical conditions, or complex socio-emotional and behavioral needs) and their teachers and educators must be carefully considered by the Commission. Adequate resourcing is necessary to guarantee the rights of each child and ensure quality training, remuneration, and support for staff.
7. IEU strongly supports the free or low-fee objectives of the Early Childhood Guarantee, but the current model is complex and confusing. It will be necessary to substantially improve the transparency and simplicity of the funding model to ensure parents and services have a clear understanding of how funding is applied.

We look forward to the finalisation of the exposure draft and ultimately the successful passage of The Thrive by Five Early Childhood Guarantee Bill 2024 into legislation.

Regards

BRAD HAYES
FEDERAL SECRETARY