The IEU (SA) Branch commends the work of the Royal Commission and in the most part the interim report is very good and we agree with the vast majority of recommendations.

For efficiency and expedience, we have focussed on the few areas where we believe there needs to be a reconsidered approach, or that have a level of controversy, rather than commenting on each part.

Recommendation 4 – with regard to qualification of the workforce, we don't accept that early learning programs delivered by diploma qualified staff is appropriate, we need teacher involvement. Currently under the NQF there is a requirement for a teacher to be in charge of the oversight of the education program, however our stance has been always stronger. Teachers need to be central to curriculum development and delivery. This should be an aim, and one that can be achievable post the skills shortage. Any deviation from this should be time bound, expressly as a result of the current skills shortage and there must be significant resources put in to support any trial model. Most importantly there must be robust checks that ensure that the employer is delivering on what was agreed. We believe that any diploma qualified person engaged in any such trial should be enrolled in a teaching ITE program and there could be scope for the Government to pay a portion of that cost. Student members of the IEU report that having to self-fund practicums, while taking leave without pay from their employer, is a barrier to becoming an early childhood teacher. Removing this barrier by providing funding for practicum placements would remove this disincentive. Funding directly to the pre-service teacher should be considered, but funding to employers to enable pre-service teachers to continue to be paid could be an alternative but would need checks and criteria to make sure that the pre-service teacher was receiving the benefit and that the service was paying them the appropriate rate.

Recommendation 5 – registration of teachers, birth to five degree. This is something that we support, as it will recognise the profession and allow recognition of overseas B-5 qualifications. It must be in line with other teaching requirements. That is a 4 year degree. Any dumbing down, for example to a 3 year qualification requirement will only re-confirm the perception that teaching pre-school aged children is a lesser status career.

Recommendation 7 – Early Years Learning framework has brought quality play base curriculum to the preschool sector and we support the extension of such a curriculum program for three year olds. It needs to be grounded in best practice evidentiary models. Developmental play is fundamental to ECEC learning and we must keep this central to the consideration of age appropriate curriculum.

Other comments (outside the scope of the interim report)

We believe there is an opportunity to develop a portable long service leave provision in the sector. The most recent workforce census showed that educators and early childhood teachers had an average of 7.2 years of experience in education but the average tenure at their current service was 3.6 years. Not enough employees currently have access to long service leave, even though they have had many years working in the sector. Access to Long Service Leave has been shown to reduce burnout and can aid retention in the sector.

Workforce considerations as they were not touched upon in the interim report have not been included here.

Regards,

Tim Oosterbaan **Branch Secretary**

