



# Gender Undervaluation Priority Award Review

Submission AM2024/23 Children's Services Award

August 29 2025

A Joint Submission by:



Community Child Care Association



Community Early Learning Australia

## About Us



### Community Child Care Association

From a small beginning, Community Child Care (CCC) has grown significantly, and is now the peak body in Victoria for community-owned education and care, supporting long day care, outside school hours care (OSHC), kindergarten, family day care and occasional care educators, teachers, leaders, coordinators and directors. CCC's vision and purpose are underpinned by the belief that all children deserve the best possible start in life, regardless of their circumstances. Our vision is for excellent early childhood and outside school hours education and care for all and our purpose is to lead, support and advocate for accessible high-quality opportunities for children and families.

As a trusted sector leader, CCC provides leadership and advocacy, works with governments toward improvement in the sector and supports services with membership, quality professional development and consultancies. CCC equips and supports early childhood and outside school hours care services, educators and their communities with the skills and confidence to deliver high quality inclusive education and care services.

CCC's advocacy helps to enable and strengthen the development and retention of Victoria's community-owned education and care sector.

[www.cccinc.org.au](http://www.cccinc.org.au)



## Community Early Learning Australia

Community Early Learning Australia™ (CELA) is the voice for Australia's early education and care sector. As a peak body, our vision is for all of Australia's children to have access to quality early education, regardless of economic circumstance or where they live.

CELA supports over 1,800 members employing more than 27,000 educators and teachers nationally. Our members include community-managed not-for-profit, government, and privately owned small providers, delivering preschool, long day care, outside school hours care, and family day care services.

Our Mission is to:

- Deliver effective and expert support for our members, enabling them to deliver quality early education and care for all Australia's children.
- Influence policy makers and government by amplifying the voices of community based and small providers.
- Promote the value and importance of community-based early education.

## Introduction

1. CCC and CELA are peak bodies, representing the views of community managed not-for-profit organisations as well as small private providers.
2. Our members provide services in the education and care sector across long day care, family day care, outside school hours care and preschool/ kindergarten services.
3. The majority of our member services in long day care, outside school hours care and Family day care are funded federally through the Child Care Subsidy (CCS). However, preschool/ kindergarten services are predominantly funded through State and territory governments.
4. This submission addresses the following matters:
  - a. Response to ACA draft determination
  - b. Capacity to pay and government funding.
  - c. Phase in

## Response to ACA draft determination

5. CCC and CELA were consulted on the proposed draft determination prepared by ACA for this matter. Attachment A.
6. CCC and CELA confirm our consent to the draft determination as proposed.

## Capacity to pay and government funding.

7. On 1 August 2025 correspondence on behalf of the Commonwealth Government was provided, including information regarding the Commonwealth funding arrangements for early childhood services. Attachment B
8. The correspondence detailed the Worker Retention Payment which provides funding for a 15% uplift in wages for employees in Child Care Subsidy (CCS) funded services.
9. The Worker Retention Payment provides funding to eligible provider to cover:
  - a. a 10 per cent wage increase for all eligible staff from 2 December 2024 to 30 November 2025;
  - b. an additional 5 per cent wage increase (15% total) for all eligible staff from 1 December 2025 to 30 November 2026; and

- c. a minimum of an additional 20 per cent funding to contribute towards eligible on-costs (calculated as a percentage of base funding).
10. The correspondence confirms that the Commonwealth has not yet made any further decisions regarding funding program adjustments as the result of the Gender Undervaluation proceeding.
11. CCC and CELA submits that on the current available information funding for the Worker Retention Payment is available to eligible providers until 30 November 2026.
12. Funding has not been confirmed for eligible provider past this date. CCC and CELA submit that consideration of the availability of funding and this timing should be given to the final phase in arrangements for the Decision.
13. The Worker Retention Payment Grant Guidelines states to be eligible to apply for the Worker Retention Payment The provider must "be approved by the Department of Education to administer CCS payments as evidenced by a valid CCS approval number." (Part 4.1 attachment C)
14. Employers operating services who are not eligible to administer CCS payments are not eligible for funding.
15. ACECQA reports there are 17, 842 ECEC services operating in Australia. 3,063 of these (approximately 17%) are stand alone preschool or kinder services which are funded by State and Territory governments and are not eligible to administer CCS<sup>1</sup>.
16. ACECQA reports that 1,932 stand alone preschool/ kindergarten services are operated by non-government operators and are likely to be covered by the Children's Services Award<sup>2</sup>.
17. CCC and CELA submit that there is no evidence of government funding being available to services to in these circumstances. Consideration of capacity to pay and impact on family and child access to these services should be given in consideration to the final phase in arrangements for the Decision.

#### Proposed phase in

18. CCC and CELA submit that the phase in of the wages made under the Decision should balance the availability of funding to services eligible to apply for the Worker Retention Payment, with the impact on services who are not eligible and are not receiving additional funding.
19. Consultation with CCC and CELA preschools/ Kindergartens in NSW indicate that government funding is currently provided on a quarterly basis. Therefore, significant increases at either the commencement or end of the calendar year may lead to significant budgetary issues.

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<sup>1</sup> NQF Snapshot, Q4, Table 1 Pg 6: <https://www.acecqa.gov.au/sites/default/files/2025-02/NQF%20Snapshot%20Q4%202024%20FINAL.pdf>

<sup>2</sup> NQF State of the Sector, QA SS12: <https://snapshots.acecqa.gov.au/Snapshot/stateofthesector.html>

20. CCC and CELA therefore submit the following proposed phase in of the wage increases under the Decision.
- a. 5% from 1 March 2026
  - b. 5% from 1 July 2026
  - c. 5% from 1 December 2026
  - d. 5% from 1 July 2027
  - e. Remaining increases from 1 July 2028
21. CCC and CELA submit that this will allow for services not funded under the Worker Retention Payment to sustainably apply the increases. In addition, we support submissions that the commencement date of 1 March 2026 will support services to have sufficient time to implement the Decision, if made on or after November 2025.

**29 September 2025**

Laura Stevens

Director Policy and Strategy

Community Child Care Association (CCC) and Community Early Learning Australia (CELA)