



**ELACCA submission to Senate  
Committee Hearing on *Migration  
Amendment Bill 2024***



The Early Learning and Care Council of Australia (ELACCA) welcomes the opportunity to submit our response to the *Migration Amendment (Strengthening Sponsorship and Nomination Processes) Bill 2024*.

## About ELACCA

The Early Learning and Care Council of Australia (ELACCA) was established to promote the value of quality early learning and care as an integral part of Australia's education system. Our 17 CEO members include some of the largest early learning providers in the country, representing both not-for-profit and for-profit services.

ELACCA members operate 1,984 long day care services, 310 preschool/kindergarten services and 92 OSHC services, covering every state and territory. They offer one-quarter of all the early learning places in Australia. Together, our members serve 369,776 children and their families, and employ more than 56,708 staff.

As well as promoting the value of quality early learning and the need for greater public investment, ELACCA advocates for the right of all children to access quality early learning and care, particularly children facing disadvantage. We do this by drawing on the knowledge and practical experience of our members and representing their views to decision makers in government, the media and the public.

## Strategic context

The early learning and care sector is facing chronic significant workplace shortages, we are particularly in need of early childhood educators.

Attraction and retention of a qualified early learning workforce is vital for Australian children to ensure access to high quality early childhood education and care in their first five years. Targeted, skilled migration can play a strong role in supporting the needs for this sector for a qualified and quality workforce.

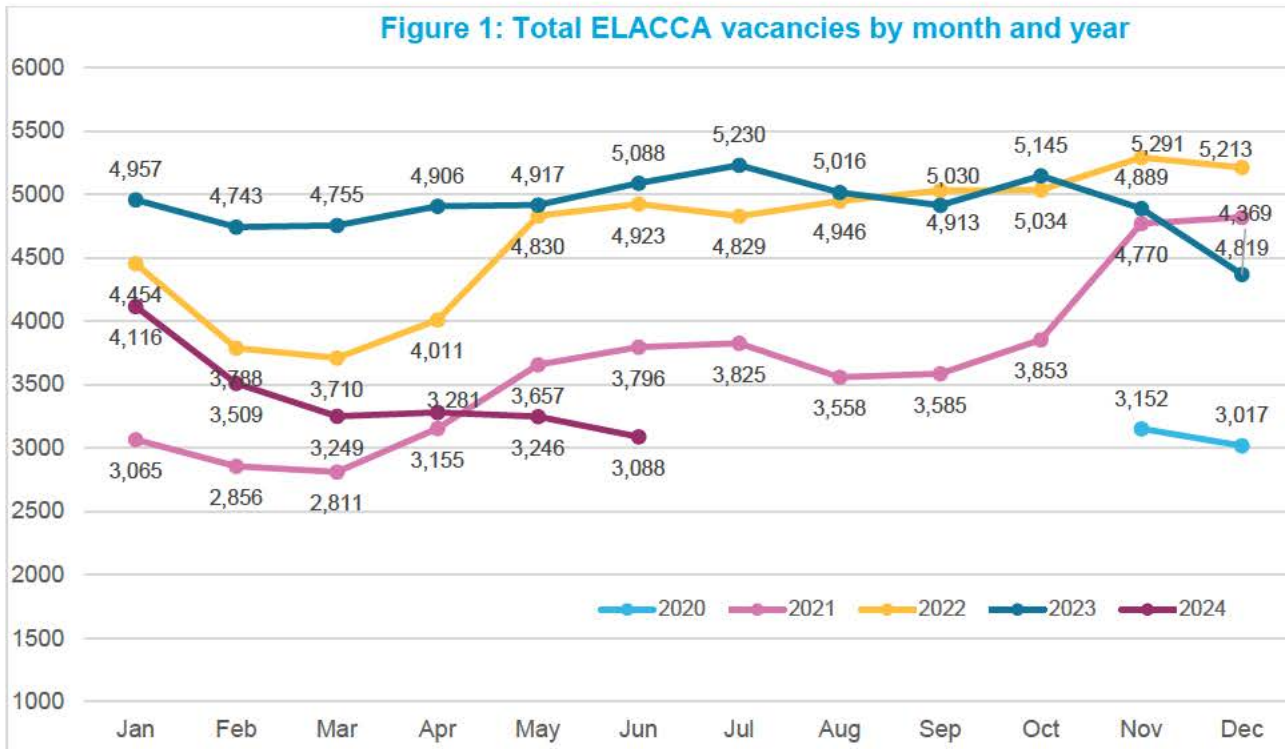
The early learning and care sector underpins and enables workforce participation of parents and carers across Australia. Workforce shortages can result in capped enrolment and attendance across services and rooms, unable to be staffed at capacity. This impacts children's opportunity to learn and development, as well as parents and carers' ability to work and study. Increased workforce participation of parents and carers offers considerable productivity gains to the Australian economy.

The early childhood education and care workforce operates under an internationally regarded regulatory system through a National Quality Framework and National Quality Standard<sup>1</sup>. Minimum qualification requirements are required to work as an early childhood teacher and educator. Meeting current shortages, and building the pipeline of a future workforce, takes time, due to the qualification requirements of these roles. Attracting qualified, job ready migrant professionals to Australia, is an important component in maintaining a quality workforce, while we work with governments to build a strong domestic skills pipeline and future workforce.

Figure 1 (on following page) shows total vacancies across ELACCA's membership from November 2020 to our most recent data at end of June 2024<sup>2</sup>. This data demonstrates chronic unfilled vacancies in our sector.

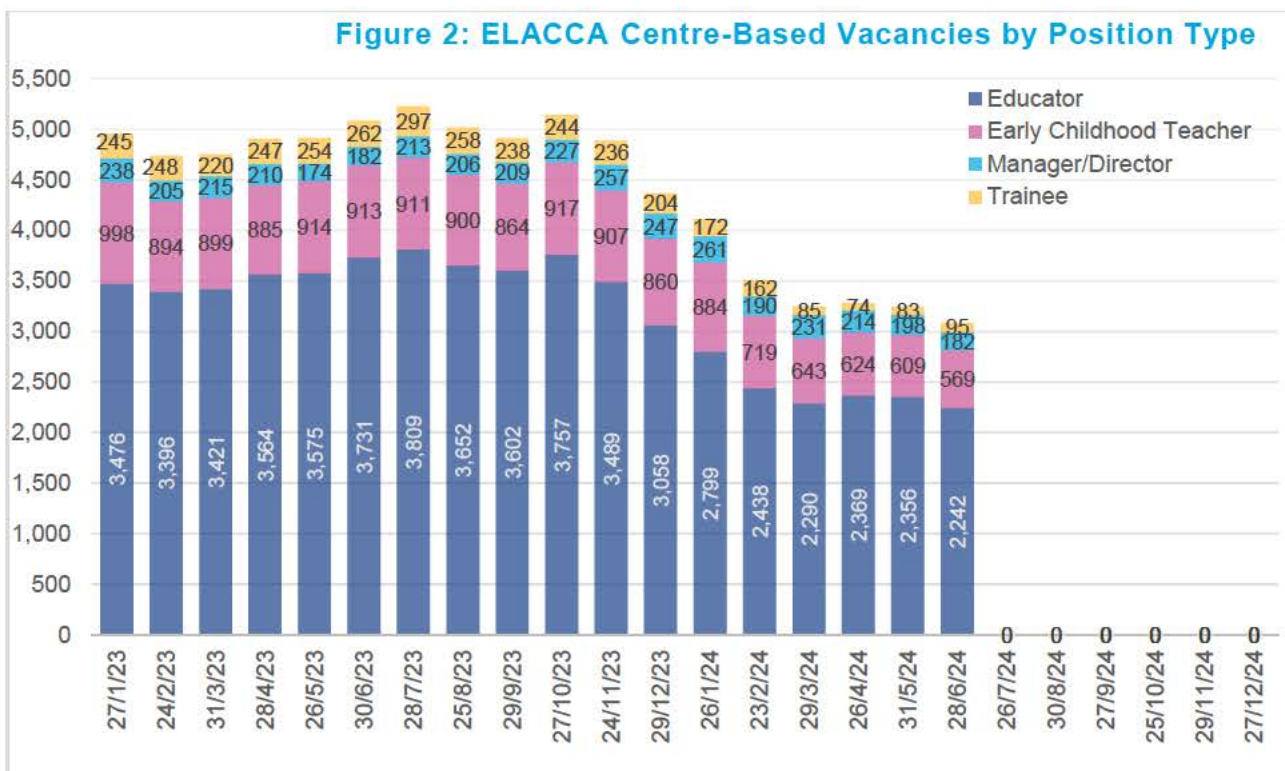
<sup>1</sup> See ACECQA website for further information: <https://www.acecqa.gov.au/national-quality-framework>

<sup>2</sup> Note that from March 2024, data includes 17 rather than 18 members which will impact the total numbers in Figures 1 and 2.



The total number across our membership hovers just under 3100 vacancies. Noting that ELACCA members comprise approximately a quarter of licensed places across Australia, this data suggests that current vacancies across the sector could total more than 12,400 nationally.

Figure 2 (below) uses monthly data provided by ELACCA members to demonstrate the number of vacancies by position. As clearly shown, the bulk of vacancies are early childhood educators.



## ELACCA response to the Migration Amendment Bill

ELACCA participated in Australian Government's recent review of the migration system that informed the development of the Migration Strategy, released by the Minister for Home Affairs in 2023.

ELACCA supports the objective of the Bill, which amends the *Migration Act* to strengthen arrangements around skilled entry to Australia. Of relevance to ELACCA and our members is legislating income threshold requirements for skilled workers and amending the labour market testing provisions in the *Migration Act*. ELACCA notes measures that promote transparency and worker mobility, including the introduction of a public register of approved sponsors.

### *Core Skills Income Threshold*

Clause 22 of the Bill provides:

*It is intended that this streamlined approach and the income threshold of at least \$73,150 will attract skilled migrants to work in occupations identified by Jobs and Skills Australia as being in national shortage or where Australia has committed to providing access to the Australian labour market in relation to that occupation through international trade agreements.*

ELACCA notes that through this legislation, the Temporary Skilled Migration Income Threshold (TSMIT) will be replaced under the new Skills in Demand visa with a Core Skills Income Threshold (CSIT), set in alignment with the TSMIT. Through this Bill, the CSIT is set at \$73,150. The annual salary of most early childhood educators, can range from approximately \$51,000 to \$76,000, depending on level of experience, location, qualification and employer. The bulk of early childhood educators – qualified professionals – are locked out of this pathway by the CSIT. Anecdotally, we are aware from our members that changes to TSMIT from \$53,900 to \$70,000 from 1 July 2023 has impacted the employment of migrant educators in our workforce. Though it should be noted that ELACCA remains hopeful of a well-deserved increase in salary rates for early childhood educators, commensurate with their skill, qualification and workload.

In recent consultation led by Jobs and Skills Australia on the Core Skills Occupations List, ELACCA strongly advocated for the inclusion of early childhood educators. The absence of early childhood educators from the Core Skills Occupations List, together with the CSIT set at \$73,150, limits the scope for appropriately qualified foreign educators to join Australian early learning and care services, at a time when the sector is facing chronic shortages. A solution to this current impediment, which will be set in legislation by this Bill would be welcomed by our sector. An Industry Labour Agreement to support targeted skilled migration of an early learning workforce could be considered, similar to the Aged Care Labour Agreement.

### *Labour market testing*

ELACCA notes and supports the provision that labour market testing be completed within 6 months (increased from 4 months) prior to the sponsor of a skilled migrant worker lodging a nomination. This is a minimal change, but sensible improvement from the current requirement.

ELACCA appreciates the opportunity to provide feedback on the Bill.

Thank you for considering our submission.



[elacca.org.au](http://elacca.org.au)