



Matter No.: C2013/6333

Submission pursuant to:
Amended Directions of the Fair Work
Commission made on 2 May 2018

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Lodged by:	Australian Federation of Employers and Industries	Telephone:	(02) 9264 2000
Address for Service:	Australian Federation of Employers and Industries PO Box A233, Sydney South NSW 1235	Facsimile:	(02) 9264 5699
		Email:	jessica.mcdonald@afei.org.au

BEFORE THE FAIR WORK COMMISSION

Fair Work Act 2009

Title of matter: Application for an Equal Remuneration Order

Section: 302

Matter number: C2013/6333

Applicant: Independent Education Union of Australia (IEU)

Respondents: The Australian Federation of Employers and Industries (AFEI) &
Ors

SUBMISSION OF THE AUSTRALIAN FEDERATION OF EMPLOYERS AND INDUSTRIES

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A. Summary

1. The Australian Federation of Employers and Industries (**AFEI**) opposes the application on three grounds:
 - a) The application does not attract the jurisdiction under section 302 of the *Fair Work Act 2009* (Cth) (the **Act**).
 - b) In the event that it finds jurisdiction, the Fair Work Commission (**Commission**) in its discretion should not make an order.
 - c) If the Commission finds jurisdiction and exercises its discretion to make an order, the order sought by the Applicant would not ensure equal remuneration for work of equal or comparable value.

B. Jurisdiction

(a) Female Early Childhood Teachers and Male Primary School Teachers

2. With regard to female early childhood teachers (ECTs) and male primary school teachers, the jurisdiction for an order under section 302 is not established.
3. The jurisdictional prerequisite to the making of an equal remuneration order is established by Full Bench authority.¹ In relation to this jurisdictional prerequisite, the Applicant bears the onus of proof.²
4. The elements of the jurisdictional prerequisite are established where the group of employees to be covered by the order and an identified comparator group:
 1. perform work of equal or comparable value; and
 2. are of the opposite gender; and
 3. are unequally remunerated.³
5. Importantly, each element must be proven. This means that if only one or two elements are proven, the jurisdictional prerequisite is not made out.

¹ *Application by United Voice, Australian Education Union and Independent Education Union of Australia for an Equal Remuneration Order* [2017] FWCFB 2690, [18].

² *Application by United Voice & Australian Education Union* [2015] FWCFB 8200, [246].

³ *Application by United Voice, Australian Education Union and Independent Education Union of Australia for an Equal Remuneration Order* [2017] FWCFB 2690, [18].

Comparator of the Opposite Gender

6. The Applicant has further refined its particulars and proposes a comparison between female ECTs and male primary school teachers in New South Wales (NSW).⁴
7. Full Bench authority is that the comparative task is based on gender.⁵ Superficially, the comparative exercise proposed by the Applicant is based on gender. However, close analysis reveals otherwise.
8. Primary school teaching in government and catholic systemic schools in NSW and across Australia is female dominated. In NSW public primary schools in 2017, 82.2 per cent of teachers were female.⁶ This appears to be a consistent trend with the proportion of female teachers in NSW public primary schools being 82 per cent in 2016, 81.7 per cent in 2015 and 81.3 per cent in 2014.⁷ Teaching staff in the other states and territories, and in government and catholic primary schools are shown by ABS statistics to also be dominated by females in 2017.⁸ From the 1980s to 2016, there has been a steady decline in the percentage of male teachers in Australian schools.⁹ Australian Government Schools have had the sharpest decline in the percentage of male teachers compared to Catholic and Independent schools.¹⁰
9. As males represented only 17.8 per cent of public primary school teachers in NSW in 2017, it follows that the comparison urged by the Applicant in these proceedings is effectively a comparison between two female dominated vocations. This approach does not assist in achieving the remedial purpose of the provisions of Part 2-7 to “*remedy gender wage inequality and promote equal pay*”.¹¹
10. It also follows that the work performed by primary school teachers is not characteristically male work and therefore that the wage outcomes for primary school teachers cannot be explained as either the manifestation of considerations unique to male workers or some form of advantage enjoyed predominantly by male workers. The rates in the *Crown Employees (Teachers in Schools*

⁴ IEU, ‘Outline of Submissions’, Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017, [3].

⁵ Application by United Voice & Australian Education Union [2015] FWCFB 8200, [279].

⁶ NSW Department of Education | Gender Analysis of School Teachers 2017, page 2. Attached as Annexure A

⁷ NSW Department of Education | Gender Analysis of School Teachers 2017, page 2.

⁸ Australian Bureau of Statistics (ABS) 4221.0 Schools, Australia 2017; Table 51a: In-school Staff (FTE) by School Level, Function, Sex, Affiliation, States and Territories, 2001-2017. Extract attached as Annexure B

⁸ NSW Department of Education | Gender Analysis of School Teachers 2017, page 2.

⁹ Kevin F. McGrath and Penny Van Bergen, ‘Are male teachers headed for extinction? The 50-year decline of male teachers in Australia’ (2017) 60 *Economics of Education Review* 159, 162. Attached as Annexure C

¹⁰ *Ibid* 165.

¹¹ [2015] FWCFB 8200, [178].

and TAFE and Related Employees) Salaries and Conditions Award are paid to both female and male primary school teachers working in a female-dominated industry regardless of the teacher's gender. Male and female teachers in NSW have received equal pay since it was phased in between 1958 to 1962.¹²

Value of Work

11. If the Commission is satisfied that there is validity in the comparison between, on the one hand, the relevant ECTs, and on the other hand, the relevant primary school teachers, then the next consideration is whether the two groups perform work of equal or comparable value. On this point, the Applicant bears the onus of proof.¹³

Job Evaluation Assessments of Work Value

12. The Commission identified that evidence of work value by job evaluation methodology could be relevant to an assessment of whether roles were of equal or comparable value.¹⁴ This is consistent with the explanatory memorandum that '*evaluating comparable worth...relies on job and skill evaluation techniques*'.¹⁵ Included in material filed on behalf of the Applicant is a report by Mercer entitled, *Early Childhood Teachers – Comparative Review with Engineers – Independent Education of Australia* (the Mercer – IEU Report). The Mercer – IEU Report notes that '*job evaluation is a method for assessing the work value of jobs*'.¹⁶ The Applicant relies on the Mercer – IEU Report in support of its claims that the work value of graduate engineers and graduate ECTs are comparable.¹⁷ The Mercer – IEU Report concludes that at the graduate level, the work value of the ECT role is slightly higher than in the engineering stream.¹⁸
13. Included in AFEI's witness evidence is a report by Egan Associates (**Egan Report**). Egan Associates have, utilising the same job evaluation methodology used in the Mercer – IEU Report, the CED methodology, as well as Egan Associates' own methodology, evaluated the respective positions

¹² John Michael O'Brien, *The New South Wales Teachers' Federation, c.1957-1975* (PhD Thesis, University of Wollongong, 1985) 211; *Industrial Arbitration (Female Rates) Amendment Act 1958* (NSW).

¹³ *Application by United Voice & Australian Education Union* [2015] FWCFB 8200, [246].

¹⁴ [2015] FWCFB 8200, [281].

¹⁵ Explanatory Memorandum, Fair Work Bill 2009 (Cth) [1191].

¹⁶ Mercer-IEU Report, 7.

¹⁷ *Ibid* 14-15.

¹⁸ *Ibid*.

of graduates and positions requiring 5 years experience for ECTs, primary school teachers and professional engineers (engineers).

14. Job evaluations conducted by both Egan Associates and Mercer involved the determination of work value points and assigned numerical points, for a set of job factors.
15. In relation to comparisons between ECTs and school teachers, the Egan Report using the same position descriptions used by Mercer for ECTs and utilising ANZCO position descriptions for school teachers¹⁹, found higher work value scores for primary schools teachers at both the graduate and experienced levels, as noted at paragraph 17 and in the detailed evaluations, reported on pages 6 and 7. The Egan Report identifies a significant difference in job (eJE) points at the graduate level, resulting in a different job (eJE) grade.
16. In relation to the comparison of ECTs and engineers, Egan Associates conducted job evaluations using the same position description used by Mercer for ECTs, and also using the *Professional Employees Award 2010* (the **PE Award**) classification structure, as used by Mercer. The CED evaluations conducted by Egan Associates include higher scores in all sub-factors for graduate engineers and experienced engineers (5 years' experience) than those identified by Mercer, with only one exception.²⁰ Contrary to the conclusions reached by Mercer, the Egan Associates' CED evaluation scores for engineers were higher than ECTs at both the graduate and experienced levels.²¹ The Egan Report findings included substantial differences in job evaluation scores for ECTs and engineers using both the CED and Egan methodologies as reported on pages 6 and 7.
17. Further, in relation to the comparisons between ECTs and Engineers, the Egan Report identified a number of deficiencies in the analysis used in the Mercer Report, as described in paragraphs 35 to 49.
18. The job evaluation findings in the Egan Report are significant, not only for its conclusions concerning the relative work value of ECTS, primary school teachers and engineers, but also for identifying significant problems associated with the Mercer job evaluation scores for Engineers.

¹⁹ Egan Report paragraph 14

²⁰ With the exception of expertise points for an Engineer with 5 years' experience.

²¹ Ibid [pp 6-7].

Other matters concerning comparisons of work – ECTs and Primary School Teachers

Responsibilities

19. The Applicant's contentions concerning the nature of work performed by ECTs includes the following, at [14] of its Application, that:

early childhood teachers have overall responsibility for the educational program provided by the long day care centre or preschool...Teachers develop the curriculum applying their tertiary level skills and knowledge, are the pedagogical leaders at the service, and professionally developed and support the delivery of education by other employees.

20. The Applicant relies on a statement by Ms Carol Matthews, Assistant Branch Secretary of the NSW/ACT IEUA that states '*Early Childhood Teachers are responsible for the educational program provided by the preschool or long day care centre.*' Ms Matthews then refers to the centre's responsibility to base their educational program on an approved learning framework, based on the National Law and Regulations.²²

21. The National Law and Regulations applying to centres does not, however, place the overall responsibility for program development and delivery with ECTs. Rather, it is the centre and its Nominated Supervisor that holds responsibility for ensuring a program is delivered to children based on the learning framework, and for ensuring that an educational program is delivered which contributes to specified outcomes.²³

22. In turn, responsibility for leading the development and implementation of educational programs in the service must be designated to the Educational Leader.²⁴

23. The responsibilities of the centre, the Nominated Supervisor, and/or the Educational Leader are not necessarily, however, the responsibilities of an ECT.

24. While an ECT may be appointed to the role of Nominated Supervisor, there is no regulatory requirement for every ECT to be a Nominated Supervisor. There is also no regulatory requirement for a Nominated Supervisor to be an ECT, or even hold the qualifications of an

²² Statement of Carol Matthews [37].

²³ *Children (Education and Care Services National Law Application) Act 2010* (NSW) s168.

²⁴ *Education and Care Services National Regulations 2011* (NSW) reg 118.

ECT.²⁵ The Guide to Operational Requirements of the National Quality Framework advises that *'evidence of completing an approved diploma level education and care qualification may indicate that the person has adequate knowledge and understanding of the provision of education and care to children'* to be a Nominated Supervisor.²⁶

25. While an ECT may be appointed to the role of Educational Leader, again there is no regulatory requirement for an ECT to be an Educational Leader, or for the Educational Leader to hold the qualifications of an ECT.²⁷ The Guide to the NQF states that *'The educational leader may be...an early childhood teacher, or a diploma or certificate III qualified educator within the service. The regulations do not specify a minimum qualification or the number of hours the educational leader should work, or whether this person must work directly with children.'*
26. Centres, Nominated Supervisors and Educational Leaders have responsibility for educational program development and delivery for children who may have minimal or no contact with an ECT at the centre. There is no regulatory requirement for an ECT to form part of the educator to child ratio for every child in a centre²⁸. For centres with fewer than 25 approved places, they must merely have access to an ECT, which may be by information communication technology, for at least 20 per cent of the time that the centre provides education and care.²⁹
27. There will therefore inevitably be children attending centres who are not in direct contact with ECTs, and who are nonetheless delivered an educational program which meets the standard of education to meet the requirements of the NQF and requisite learning frameworks.
28. Even though centres with more than 25 children in attendance are required to have an ECT in attendance, a centre will have met this requirement by employing an ECT whose responsibilities are no greater than an educator who is actively working towards a Certificate III level

²⁵ *Education and Care Services National Regulations 2011* (NSW) reg 117C.

²⁶ ACECQA, *Guide to the National Quality Framework* (February 2018) Guide to the NQF <<http://files.acecqa.gov.au/files/NQF/Guide-to-the-NQF.pdf>>. 405.

²⁷ *Education and Care Services National Regulations 2011* (NSW) reg 118 only requires that the Educational Leader is a suitably qualified and experienced educator. The Guide to the NQF states that *'The educational leader may be...an early childhood teacher, or a diploma or certificate III qualified educator within the service. The regulations do not specify a minimum qualification or the number of hours the educational leader should work, or whether this person must work directly with children.'*

²⁸ *Education and Care Services National Regulations 2011* (NSW) reg 126 requires that at least 50 per cent of the educators who are required to meet the relevant educator to child ratios for the service must have, or be actively working towards, at least an approved diploma level education and care qualification; and all other educators who are required to meet the relevant educator to child ratios for the service must have, or be actively working towards, at least an approved certificate III level education and care qualification.

²⁹ *Education and Care Services National Regulations 2011* (NSW) reg 130.

qualification and who is working directly with children as part of the educator to child ratio.³⁰ Witness statements filed by the Applicant recognises that ECTs can be expected to ‘*work as equals, with other educators within the room.*’³¹

29. Accordingly, where evidence is provided by a Director of a childcare centre, for example, Ms Emma Louise Cullen, a distinction must be drawn between the duties of an ECT, and the additional duties of a Director that are currently compensated by an allowance in the *Educational Services (Teachers) Award 2010* (the **EST Award**). The allowance for the Director’s duties is maintained in the order.³²
30. Further, evidence of duties that are required of an employee where they are engaged as an ‘Educational Leader,’ such as the evidence of Emily Jayde Vane-Tempest, must be distinguished from the mandated, due to regulatory or award classification based, duties of an ECT.
31. Even where the additional duties of a Director and an Educational Leader are removed from the comparison of the value of work performed, there remain substantial differences between the work of an ECT in a preschool or long day care centre and the work of a primary school teacher in NSW government and catholic systemic schools. Certainly, the Applicant who bears the onus of satisfying the Commission that the value of work of the two groups is at least comparable, has not filed persuasive material as to why, despite these differences, the value of the work performed by the two groups is still capable of being compared.

Teacher to Child Ratios

32. The National Quality Framework applicable to ECTs mandates an educator to child ratio of between 1:4 and 1:15 depending on the age of the child.³³ In order to be treated as part of the ratio, the educator must be ‘working directly with children at the service.’ In contrast, there are no regulated maximum class sizes (or ratios) for Teachers in NSW primary schools, although

³⁰ According to the Guide to the National Quality Framework, an ECT in attendance at the Centre for the purpose of meeting minimum qualification requirements involves performing one or more identified activities, which include working directly with children providing education and care as part of the educator to child ratio. See also *Education and Care Services National Regulations 2011* (NSW) reg 118 for minimum qualification requirements of educators included in ratios.

³¹ Statement by Amanda Sri Hilaire [43].

³² IEU Application, Appendix A.

³³ *Education and Care Services National Regulations 2011* (NSW) reg 123.

there are guidelines included in an agreement between the Department of Education and the Teachers Federation³⁴.

33. The age range of students taught in NSW primary schools in the year before grade 1 (Kindergarten) includes 4–6 year olds.³⁵ Centres may also provide primary education and care to a child who is within this age range, as part of a preschool program (for children aged 3-6) or as part of a program for children over preschool age.³⁶ Notwithstanding the similarity in age for children in preschools and kindergarten (in primary schools), their respective teachers will have responsibility for the direct supervision and care of children in significantly different teacher to child ratios.
34. In 2017, kindergarten classes in NSW primary schools had a state-wide average of 19.1 students.³⁷ For children over preschool age, early childcare centres must have an educator to child ratio of no higher than 1:15.³⁸ Accordingly, for children of the same age, primary school teachers will on average have direct responsibility for the supervision and care of 27 per cent more children than ECT who are included in the child/educator ratio.
35. Given primary school teachers and ECTs may be required to work with children in a range of age groups, it is also noteworthy that in 2017, primary school teachers in NSW schools taught class sizes which averaged 24.1 students.³⁹ By contrast, the educator to child ratio required for an early childhood centre for the peak age of attendance, being 3 - 4 years old,⁴⁰ is a maximum of 1:11.⁴¹ On average, a NSW primary school teacher will likely have the direct responsibility for supervision and care of substantially more children than ECTs.

³⁴ Agreement between the NSW Department of Education & the NSW Teachers Federation on the staffing of NSW Public Schools 2016 – 2020. Attached as Annexure D.

³⁵ *Education Act 1990* (NSW) s 21B requires compulsory enrolment in a school if the child is 6 years or older. Students may however enrol in the year they turn 5 before 31 July in that year.

³⁶ See *Education and Care Services National Regulations 2011* (NSW) s 4, definition of ‘child over preschool age’ for children enrolled at a school and attending (or in the current calendar year attending) school in the year before grade 1 or higher.

³⁷ *Ibid*

³⁸ *Care Services) National Law* (NSW) s169; *Education and Care Services National Regulations 2011* (NSW) regs 122-123; *Children (Education and; ACECQA, Guide to the National Quality Framework* (February 2018) *Guide to the NQF* <<http://files.acecqa.gov.au/files/NQF/Guide-to-the-NQF.pdf>>. Part 4.4.

³⁹ NSW Department of Education, *Average Class Size 2017* (2017) NSW Education Datahub Attached as Annexure E.

⁴⁰ Statement of Martel Menz [31] states that the most common ratio in Victoria is 36 months of age.

⁴¹ *Care Services) National Law* (NSW) s169; *Education and Care Services National Regulations 2011* (NSW) regs 122-123; *Children (Education and; ACECQA, Guide to the National Quality Framework* (February 2018) *Guide to the NQF* <<http://files.acecqa.gov.au/files/NQF/Guide-to-the-NQF.pdf>>. Part 4.4.

NSW school teachers' employment

36. The statutory framework for employment of ECTs and NSW School Teachers is notably different. Teachers in NSW schools are employed as part of the state wide teaching service. Their employment is subject to, inter alia, the *Teaching Services Act 1980 (NSW)*. The Department of Education has broad statutory authority for the regulation of various aspects of a Teacher's employment and termination. This includes:
- a. The Secretary may temporarily, or permanently, transfer a teacher to another location⁴²;
 - b. The Secretary may terminate a person's employment if the person refuses to comply with a direction for transfer;⁴³
 - c. Where the Secretary is satisfied that a Teacher is in receipt of a greater salary than the maximum fairly appropriate to the work, the Secretary may transfer the Teacher to a vacant position which is appropriate to the salary;⁴⁴
 - d. Teachers may not undertake any other paid work without the permission of the Secretary of the Department;⁴⁵
 - e. Salary payable to a teacher may be withheld during any period of suspension for the purpose of investigating allegations of misconduct, and subsequently forfeited to the State,⁴⁶ and
 - f. The Teaching Services Act limits the power of Courts and Tribunals to order reinstatement or re-employment of a person contrary to a termination of employment.⁴⁷
37. Employment prospects for graduate teachers seeking employment in NSW primary schools may also be constrained. Graduates seeking employment as a primary teacher could be joining a continuously replenishing employment list, which as at March 2015, had nearly 27,000 persons seeking permanent employment as a teacher,⁴⁸ and only an average of 2,200 new permanent teachers being appointed each year, to both primary and secondary schools.⁴⁹

⁴² s51A(a) *Teaching Service Act 1980 (NSW)*

⁴³ s75 *Teaching Service Act 1980 (NSW)*

⁴⁴ s73 *Teaching Service Act 1980 (NSW)*

⁴⁵ s92B *Teaching Service Act 1980 (NSW)*

⁴⁶ s93L(3)-(4) *Teaching Services Act 1980 (NSW)*

⁴⁷ s93Z *Teaching Services Act 1980 (NSW)*

⁴⁸ NSW Department of Education, *2015 Teaching Workforce Supply and Demand*, p10. Attached as Annexure F.

⁴⁹ *Ibid*, p12

According to a Report in 2015, 'the net supply of primary teachers is more than sufficient to meet the Department's needs'.⁵⁰ The Department of NSW now advises that a willingness to teach in rural and/or remote locations of the state is more likely to enhance opportunities for employment.⁵¹

NSW award wages – school teachers and ECTs

38. The history of the state awards applying to ECTs in NSW was considered in detail in the Special Case decision of Schmidt J in *Teachers (Non-Government Pre Schools) (State) Award*.⁵² The New South Wales Industrial Relations Commission (**NSWIRC**) noted that as a matter of history there was an agreed position between the union and early childhood education employers in 1970 for parity between the two types of teachers.⁵³ To the extent that it is relevant, such a position was specifically abandoned by the parties in 1990.⁵⁴ The more recent history of the early childhood teachers awards also makes it clear that parity has not applied in recent years, with considerable differences in salary between the two groups.⁵⁵ Such differences arose due to NSWIRC decisions on work value or by approval of the consent of the parties.
39. In recent years decisions of the NSWIRC to increase wages, for both early childhood and government school teachers have been mainly focused upon changes in the workplace specific to each sector.
40. In 2001 the Applicant in those proceedings brought a Special Case before the NSWIRC on the basis of work value changes for ECTs, claiming an increase of 26 per cent, to bring their wages in line with those of NSW government school teachers. The NSWIRC rejected such parity.⁵⁶
41. The state award wage claims, moreover, were in a jurisdiction that was not constrained by 'properly fixed minimum wage rates'. The NSWIRC found that there had been a fragmentation of the market since the last Special Case assessment. It noted that teachers in early childhood education were not employed under similar conditions within the industry, with different enterprise agreements or the award applying; their work now spanned the public/private sector divide; and the conditions of their employment also varied significantly with the type of

⁵⁰ Ibid, p14

⁵¹ <https://www.teach.nsw.edu.au/find-teaching-jobs/choose-rural>.

⁵² [2001] NSWIRComm 335.

⁵³ *Teachers (Non-Government Pre Schools) (State) Award* [2001] NSWIRComm 335 [6].

⁵⁴ Ibid [395].

⁵⁵ Ibid [10].

⁵⁶ Ibid [401], [403].

organisation of the employer.⁵⁷ Another significant factor was that NSW government school teachers' salaries had increased over the years through a number of successive consent agreements and the NSWIRC could not determine on what basis the increases had occurred – or whether they took into account increased work value, productivity increases, or attraction and retention benefits.⁵⁸ Instead the NSWIRC awarded increases, not parity, based upon changes in the particular industry which included:

- a. The increased awareness of the importance of early childhood education;⁵⁹
- b. Increased requirements to report and record the activities of the children;⁶⁰
- c. Participating in managerial responsibilities regarding legislative compliance, policies and procedures, and child protection responsibilities;⁶¹
- d. Preparing children for readiness for school;⁶²
- e. The expectation that teachers liaise with external bodies and parents; and⁶³
- f. Care for special needs children.⁶⁴

42. In June 2004 the NSWIRC determined an application for an increase in award rates under the 'special case principle' and 'work value principle' for government school teachers.⁶⁵

43. In 2006 the Applicant in those proceedings brought another Special Case application seeking further significant increases to ECTs rates of pay, however the matter settled by consent.⁶⁶

44. In 2009 the Applicant in those proceedings brought a further special case application seeking to remedy the disparity between the two groups of teachers' wages that had grown since 2001, now approximating 18-20 per cent.⁶⁷ In reaching its decision on this matter the NSWIRC gave

⁵⁷ Ibid [399]-[400].

⁵⁸ Ibid [396].

⁵⁹ Ibid [367].

⁶⁰ Ibid.

⁶¹ Ibid [105].

⁶² Ibid [376].

⁶³ Ibid [118]-[119].

⁶⁴ Ibid [376].

⁶⁵ *Crown Employees (Teachers in Schools and TAFE and Related Employees) Salaries and Conditions Award* [2004] NSWIRComm 114 [5].

⁶⁶ *Crown Employees (Teachers In Schools And Related Employees) Salaries And Conditions Award* 2006.

⁶⁷ *Teachers (Non Government Early Childhood Service Centres other than Preschools) (State) Award* 2006 [2009] NSWIRComm 198 [27].

extensive consideration to the level of government funding for early education at the time of the decision.⁶⁸ The NSWIRC awarded increases to rates of pay primarily on the basis of:

- a. The introduction of a more rigorous, structured and documented education program – including the impending introduction of the national quality framework for early childhood educators;⁶⁹
- b. Increased administrative responsibilities;⁷⁰
- c. More onerous and changed regulatory requirements, including those relating to child protection;⁷¹
- d. Further accountability to parents through communication and documentation; and⁷²
- e. Caring for increased numbers of special need children.⁷³

45. The NSWIRC noted however that a significant portion of the new responsibilities were actually the responsibility of the licensee or owner of a centre – rather than those of the teacher.⁷⁴ It further refused to make a direct comparison on work value between ECTs and school teachers. The NSWIRC awarded increases of 12 per cent each year until 2011.⁷⁵

46. Despite the special case applications to increase ECTs wages based upon work value principles between 2000 and the time modern awards commenced, the NSWIRC did not accept parity in wages between the two groups of teachers.

47. Apart from the persistence of a significant differential in salaries for school teachers and ECT under NSW awards, it should be noted also that salaries for NSW school teachers, and in particular, graduates, are unusually high.

48. By 2017 the commencing salary for a graduate was described by the NSW Department of Education as being ‘not only above the average salary for new graduates, but one of the highest starting salaries in Australia’.⁷⁶ The same document provides a comparison table highlighting

⁶⁸ Ibid [20], [230].

⁶⁹ Ibid [97], [105].

⁷⁰ Ibid [123], [168].

⁷¹ Ibid [168].

⁷² Ibid [175].

⁷³ Ibid [176].

⁷⁴ Ibid [179], [201].

⁷⁵ Ibid [269].

⁷⁶ Department of Education, *Salary of a teacher, Teach NSW* <https://www.teach.nsw.edu.au/exploreteaching/salary-of-a-teacher>.

how these salaries are significantly higher than graduates in other sectors. This is confirmed by the 2017 Graduate Outcomes Survey which shows that graduate NSW public school teachers earned more than the median starting salaries for graduates in all other sectors except for graduates in medicine and dentistry.⁷⁷

(b) Female Early Childhood Teachers and Male Professional Engineers

49. With regard to ECTs and male engineers, the jurisdiction for an order under section 302 is not established. This is because the material filed on behalf of the Applicant does not establish that the relevant workers perform work of equal or comparable value. More detailed explanation follows.

Value of Work

50. Significantly, the different skills and responsibilities between ECTs and engineers are demonstrated in the Applicant's filed material and do not meet the comparison test.⁷⁸

Technical skills

51. Engineers will generally plan, analyse and develop products, processes and systems which requires advanced analytical skills.⁷⁹ An engineer will generally be required to apply a high level of applied mathematics, science and technology to their work.⁸⁰
52. The nature of the work of ECTs has been broadly summarised by the Applicant as being the teaching of a curriculum, developing and supporting the delivery of education by other employees,⁸¹ and ensuring the safety of children.⁸²
53. When compared to an ECT, an engineer is required to apply a higher level of technical knowledge, reasoning and judgment.⁸³ Examples of this are included in the material filed by the

⁷⁷ 2017 Graduate Outcomes Survey (January 2018) Social Research Centre, 40, Table 28. Attached as Annexure "14" to the Egan Report

⁷⁸ Application by United Voice & Australian Education Union [2015] FWCFB 8200, [287].

⁷⁹ Egan Report, [18].

⁸⁰ Egan Report, [16].

⁸¹ IEU, 'Outline of Submissions', Submission in Equal Remuneration Case, C2013/6333, 22 December 2017, [82].

⁸² Ibid [102].

⁸³ Egan Report, [15].

Applicant. For example, software engineers are required to write software which organises and communicates data in a way that is accessible and meaningful,⁸⁴ and build computer systems to meet business requirements.⁸⁵ A civil engineer in the construction industry is required to understand the AS 3600 Australian Standard for Concrete Structures, and be knowledgeable in the principles of structural engineering mechanics⁸⁶ before they can redesign a structure to ensure that steel reinforcement is inside the frame before concrete is poured in.⁸⁷

54. The CED evaluations conducted by Egan and Associates conclude that the higher level problem solving and analysis conducted by engineers indicates a difference between the respective work value of an ECT and an engineer.⁸⁸

Location of work

55. The conditions under which engineers and ECTs generally perform work is so significantly different that the work cannot be compared.⁸⁹
56. An engineer may be required to perform work in a variety of spaces including offices,⁹⁰ construction sites,⁹¹ plants, in the field, and laboratories.⁹²
57. A construction site presents a multitude of work health and safety issues. The safety risks include an environment with large pieces of moving machinery and equipment. An engineer may be required to work at heights or in confined spaces.⁹³ Experienced engineers are also expected to ensure that new employees become aware of policies and procedures to ensure safety on site, and to complete all necessary work health and safety paperwork.⁹⁴
58. The location of work for an ECT is a preschool or long day care centre. While these spaces can be noisy and confined,⁹⁵ they cannot reasonably be compared to a construction site.

⁸⁴ Statement of Kenan Toker, 3 [10].

⁸⁵ Ibid 6 [7].

⁸⁶ Statement of Brad Broughton [20].

⁸⁷ Ibid [19].

⁸⁸ Egan Report, [15].

⁸⁹ *Application by United Voice & Australian Education Union* [2015] FWCFB 8200 at [311].

⁹⁰ Statement of Kenan Toker, [27]; Statement of Brad Broughton [27].

⁹¹ Statement of Brad Broughton, [34].

⁹² Engineers Australia, *The Engineering Professional: A Statistical Overview*, (13 edn 2017) 78. Attached as Annexure 17 to the Egan Report

⁹³ Statement of Brad Broughton, [34].

⁹⁴ Ibid [26].

⁹⁵ IEU, 'Outline of Submissions', Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017, [84].

Travel

59. When an engineer is required to perform work in different locations they are compensated for this significant change in working conditions. This may include receipt of allowances for living away from home and working in remote locations in order to compensate employees for the conditions associated. These allowances also have specific tax benefits and require records to be kept.
60. The location of the work impacts the ordinary hours and days of work performed by an engineer. For example, an engineer may only work from 7am to 5pm on a regular Monday to Friday basis in an office.⁹⁶ However, an engineer working on site may have altered days of work, e.g. 10 days on and 4 days off,⁹⁷ and longer hours, e.g. 6:30am-6pm Monday to Friday and 6:30-2:30pm on Saturdays.⁹⁸
61. The Applicant's submissions recognise that engineers are required to travel for work and may be required to work on building sites and has filed no material demonstrating, for example, that ECTs would be similarly required to travel for work.⁹⁹
62. The material filed on behalf of the Applicant does not satisfactorily demonstrate that the irregularity in work location and the hours of work for an engineer is capable or worthy of comparison with the regular location and hours of work of an ECT.¹⁰⁰

Career mobility and specialisation

63. Engineering is not homogenous and offers numerous areas of practice.¹⁰¹ This gives engineers greater capacity for career mobility as a result of their qualifications, skills and experience in comparison to ECT.
64. An engineer has opportunities to work across the public and private sector, including across multiple tiers of government. An engineer may work in diverse industries which could include information technology, telecommunications, defence, cyber-security mining, electricity, water,

⁹⁶ Statement of Brad Broughton, [27].

⁹⁷ Ibid [27].

⁹⁸ Ibid [33].

⁹⁹ IEU, 'Outline of Submissions', Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017, 138.

¹⁰⁰ *Application by United Voice & Australian Education Union* [2015] FWCFB 8200, [287].

¹⁰¹ Engineers Australia, *The Engineering Professional: A Statistical Overview*, (13 edn 2017) page 6.

technical services and manufacturing. Engineers are able to move between engineering intense industries and are incentivised to do so through work demand.¹⁰²

65. By comparison an ECT does not have the same level of mobility as an engineer or the same ability to move between multiple industries and disciplines.¹⁰³
66. The material filed on behalf of the Applicant also suggests that the two occupations do not experience the same opportunities in terms of specialising in their practice. Specialisation for engineers can begin with academic study by choosing to major in a particular discipline. Once qualified an engineer can choose to further specialise through work experience, for example a graduate with a degree in civil engineering could choose to practice as a structural engineer, a geotechnical engineer, a coastal engineer or as a civil engineer.¹⁰⁴ Despite majoring in a discipline, others find themselves working in areas for which they did not directly study¹⁰⁵, but were nonetheless qualified for and able to become specialised in as a result of their broader education.¹⁰⁶
67. As an engineer becomes more experienced they have the option to lead teams or become technical experts in whichever of the many areas they were working in.¹⁰⁷ An engineer can become a seasoned individual contributor with increased depth and breadth of technical knowledge.¹⁰⁸
68. By comparison, ECTs do not experience the same level of specialisation. The typical career path of an experienced early childhood educator is that they become more experienced in performing the same teaching role, or become a Director of a service. Both functions would involve performing similar functions and responsibilities, working under the curriculum and applicable industry standards with a limited degree of role change.¹⁰⁹

¹⁰² Egan Report, [61] and [57]-[59].

¹⁰³ Egan Report, [61].

¹⁰⁴ Engineers Australia, *The Engineering Professional: A Statistical Overview*, (13 edn 2017) 6.

¹⁰⁵ Statement of Kenan Toker, [3].

¹⁰⁶ *Ibid.*

¹⁰⁷ Egan Report, [22].

¹⁰⁸ *Ibid* [31]-[32].

¹⁰⁹ *Ibid* [31]-[32].

Relevance of market factors in remuneration setting

69. It is uncontroversial that the purpose of the relevant legislative provision is to eliminate gender based discrimination.¹¹⁰ When interpreting the legislation, effect should be given, so far as possible, to the result which will best give effect to the purpose of the legislation.¹¹¹ Accordingly, while the Applicant may not be required to demonstrate gender discrimination in the setting of remuneration (for comparator roles) as a *threshold* issue,¹¹² the provision will not achieve its purpose if an Order is made to increase remuneration where there is evidence that the unequal remuneration is caused by identifiable factors other than gender.
70. An order made with disregard for this evidence would go beyond the purpose of the provision by increasing remuneration on the basis of industry-specific drivers of remuneration which are unaffected by gender.
71. Evidence of both work value comparisons as well as factors in the setting of remuneration should be taken into consideration in determining whether an order should be made.
72. It is the case for engineers that even if the role was of equal work value to ECTs (which it is not), the difference in remuneration is market driven¹¹³, subject to factors including:
- a. the engineer's specialisation in either mining, civil, chemical, electrical, mechanical, industrial, petroleum and emerging technologies;¹¹⁴
 - b. job conditions, including the location of the role which could be a fly-in-fly-out role in the mining or energy sector;¹¹⁵
 - c. the significance of the infrastructure if involved in civil engineering or property development in the residential commercial or retail sectors;¹¹⁶
 - d. the employer's ownership;¹¹⁷ and

¹¹⁰ IEU, 'Outline of Submissions', Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017 [169].

¹¹¹ *Project Blue Sky Inc v Australian Broadcasting Authority* (1998) 194 CLR 355 [70].

¹¹² Explanatory Memorandum, *Fair Work Bill 2009* (Cth) [1191].

¹¹³ Egan Report [66].

¹¹⁴ *Ibid.*

¹¹⁵ *Ibid.*

¹¹⁶ *Ibid.*

¹¹⁷ *Ibid.*

e. the value assessed by buyers/sponsors of the educational foundation for the profession.¹¹⁸

73. Moreover, ECTs and engineers are remunerated differently. It is not uncommon for engineers to be paid an annual salary that compensates for all hours worked including any additional hours, the days and the time of the day on which the hours are worked, and the requirement to work at multiple locations. This is unsurprising as the PE Award, unlike the ECT Award, does not provide penalties for overtime, shift work, or penalty rates for work on weekends and public holidays.

(c) Further Alternatives for Relief

74. The Applicant foreshadows further alternative claims that would provide the primary or alternative remedy to only those ECTs who provide evidence during these proceedings.¹¹⁹

75. For the same reasons outlined above at paragraphs [4]—[77], the jurisdictional prerequisite is not established for the further alternative remedies that may be sought by the Applicant.

¹¹⁸ Egan Report [69].

¹¹⁹ IEU, 'Outline of Submissions', Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017, [7].

C. Discretion

76. In the alternative, if the Commission decides that the application attracts the jurisdiction under s 302, then the Commission should exercise its discretion and not make the order sought. The same reasons apply in relation to the primary relief, alternative relief or further alternative relief sought by the Applicant.

77. In *Application by United Voice, Australian Education Union and Independent Education Union of Australia for an Equal Remuneration Order* [2017] FWCFB 2690, the Commission identified circumstances which may be relevant to the exercise of the discretion.¹²⁰

78. In summarising its decision in *Application by United Voice & Australian Education Union* [2015] FWCFB 8200, the Commission stated:

*“Part 2–7 is not intended to operate as an automatic mechanism for creating comparative wage justice. The general purpose of the provisions is to remedy gender wage inequality and promote pay equity. It follows that in exercising its discretion it would be open for the Commission to take into account the reasons for any difference in remuneration between different gendered employees performing work of equal or comparable value.”*¹²¹

79. It appears to be uncontroversial that the relevant sectors, being preschools and child care services, consist primarily of not-for-profit employers and employers with small profit margins.¹²² Government financial support has been the main driver for growth in this sector. Wage costs constitute a large percentage of revenue for preschools and long day care centres.¹²³ Any increase in those costs could impact fees or, alternatively, the already small profit margins for many for-profit centres. According to the Productivity Commission about half of approved services overall are provided on a for profit basis, with two thirds of long day care provided on a for profit basis.¹²⁴

¹²⁰ [19].

¹²¹ [367].

¹²² IEU Application 27 September 2017, Annexure B, [11].

¹²³ Productivity Commission, *Childcare and Early Childhood Report, Report No 73* (2014)

¹²⁴ *Ibid* ch 2.

80. Profits in for profit services are crucially linked to occupancy rates given the high fixed costs in this sector. Revenue in this sector is determined by the number of licensed child places within a given centre, the occupancy rate of the centre and the centres' daily childcare fee. Given the heavy dependency of centres on government funding and parental capacity to pay, revenue growth in the sector occurs through growth in places and low vacancy rates. Maintenance of high occupancy rates is crucial to the viability of a service and sector revenue growth; there is a direct correlation between revenue and occupancy rates.¹²⁵
81. However the reported number of vacancies, and unused capacity over the past five years in centres has increased. Over the past 5 years the population of under five year olds has grown by 0.6 per cent but the number of childcare places has grown by 17.7 per cent.¹²⁶ The proportion of long day care services with vacancies is persistently around 90 per cent.¹²⁷
82. A 2017 survey undertaken by Community Learning Australia found that 66 per cent of respondent services had more vacancies and a lower occupancy rate than they did in 2015.¹²⁸ The decline in occupancy rates was attributed to over supply of centres, and as a result, 42.5 per cent of services had increased their fees.
83. The National Childcare Barometer indicates a low level of service provider confidence in the sector despite its high levels of growth, primarily because of the rate of expansion, reported occupancy rates of between 72 to 82 per cent and concerns about over supply of services.¹²⁹ Significantly it found that whilst headline revenue is increasing, costs are also rising, thereby eroding underlying earnings.
84. The sector is sensitive to cost increases and limited in its capacity to offset cost rises by regulatory constraints requiring, inter alia, a fixed ratio of qualified teachers, labour costs being a high proportion of total costs and low capitalisation. There are limits to the level of funding available; the industry is already heavily funded¹³⁰ by the taxpayer and there have been no

¹²⁵ Australian Childcare Alliance, Rose Partners, and Bankwest, *Australian Childcare Barometer - Performance and Sentiment of the Australian Early Childhood Education and Care sector in 2017: survey findings* (2017) Australian Childcare Alliance. Attached as Annexure G.

¹²⁶ Early Learning: *Everyone Benefits* (2017). *State of early learning in Australia 2017*. Canberra, ACT: Early Childhood Australia. Attached as Annexure H.

¹²⁷ Department of Education and Training, *Early Childhood and Child Care in Summary Report June quarter 2017* (5 May 2018). Attached as Annexure I.

¹²⁸ Diana Lawson, *Are we spoilt by choice? When vacancies rise, quality suffers* (22 June 2018) Community Early Learning Australia <<https://www.cela.org.au/2017/06/22/are-we-spoilt-by-choice-when-vacancies-rise-quality-suffers/>>. Attached as Annexure J.

¹²⁹ Annexure G

¹³⁰ As estimated at the 2017-18 Budget, the Commonwealth Government is investing an additional \$2.5 billion over four years to support the 1.2 million families who will be using approved child care in 2018-19.

announcements from any government in relation to funding to support the payment by employers of an equal remuneration order. The sector response to increased costs which cannot be absorbed or offset is to increase fees. This is evident in the rising price of child care over the past decade and in particular, the past five years.

85. The child care cost component of the consumer price index has increased by 52.9 per cent in the past five years and, in the absence of additional government assistance since 2012, family out-of-pocket costs have risen at the same pace. The growth in the cost of child care was around 20 percentage points higher than that of education services and just over five percentage points more than growth in gas and other household fuels prices over the same period.¹³¹
86. HILDA data reports significant increases in household expenditure on child care. The survey data shows sustained and substantial rises in median expenditure over the 2002 to 2015 period for both couple families and single-parent families.¹³²
87. Further the proportion of parents reporting child care difficulties with cost and availability has increased since 2010-11. A significantly higher proportion report substantial cost difficulties compared with those that report moderate cost difficulties. In 2014-15 nearly 60 per cent (59.8 per cent) reported substantial cost difficulties and nearly 40 per cent (37.8 per cent) moderate cost difficulties. Moreover, the proportion experiencing substantial difficulties with the cost of childcare has risen over the period since 2002.¹³³
88. A 2015 NAB survey reports similar issues with child care affordability, finding around 27 per cent of families believe the cost of child care outweighs the value of working and a further 29 per cent believe they are barely breaking even. Low income earners are most impacted with one in three families earning under \$50,000 saying it was not worth their while to work and 29 per cent saying it costs about as much as they earn.¹³⁴
89. In July 2018 the new child care subsidy (CCS) will come into operation with far reaching implications for the childcare sector. Significantly, child care payments will be linked to a daily price cap of \$11.77 for long day care, \$10.90 for family day care and \$10.29 for out-of-school

¹³¹ ABS 6401.0 Consumer Price Index, Australia TABLE 7. *CPI: Group, Sub-group and Expenditure Class, Weighted Average of Eight Capital Cities*. Extract attached as Annexure K.

¹³² University of Melbourne, *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15, HILDA Statistical Reports*, page 24. Attached as Annexure L.

¹³³ Ibid page 26.

¹³⁴ Nab Group Economics, *NAB Special Report Series: Work and family dynamics in Australia Part 2: Caring for Children (March 2015) National Australia Bank*. Attached as Annexure M.

hours care.¹³⁵ Child care prices will only be subsidised at these set maximum levels. Families will be required to make a co-contribution, which will be the difference between the fee charged and the subsidy amount. It remains to be seen how this benchmark price would be adjusted every year, and whether or not this will lead to an increasing gap between subsidies and actual costs to families.¹³⁶

90. While the Jobs for Families Childcare Package is focussed on affordability, access to childcare for parents, and keeping downward pressure on child care fees, it is not intended to provide additional funds to services for operating cost increases.
91. Wage increases of the magnitude sought by the IEU's application can be expected to have significant adverse effect on the accessibility or viability of preschools and long day centre.

¹³⁵ Department of Education and Training, *New Child Care Package Fact Sheet* (2 May 2018) *New Child Care Package – Information resources for providers*. Attached as Annexure N.

¹³⁶ Rober Breunig, *FactCheck: has there been a massive increase in child care costs under the Coalition government?* (18 March 2016) *The Conversation* <https://theconversation.com/factcheck-has-there-been-a-massive-increase-in-child-care-costs-under-the-coalition-government-55931>. Attached as Annexure O.

D. Remedy

Order must ensure equal remuneration

92. If the Commission decides in the alternative, that in relation to early childhood teachers and professional engineers the application attracts the jurisdiction under section 302 and decides to exercise its discretion and make an order, the order must ensure that there is equal remuneration for work of equal or comparable value.¹³⁷
93. The order sought by the Applicant in relation to early childhood teachers and professional engineers does not meet the ‘all or nothing remedy’ available under s 302 for three reasons.
94. First, the application refers to amounts alleged to be paid to the relevant engineers at the 25th percentile.¹³⁸ As 25 per cent of organisations pay less, and 75 per cent of organisation pay more than the monetary amounts sought by the Applicant, an order in the form sought would not ensure that there is equal remuneration for work of equal or comparable value.
95. Second, the application refers to remuneration paid to the relevant engineers as ‘total package’ amounts.¹³⁹ ‘Total package’ is defined as including not only substantial components such as the employer’s compulsory superannuation contribution (9.5 per cent) but also motor vehicle benefits, overtime, fringe benefits tax and other benefits.¹⁴⁰ An order that ECTs be paid an amount equivalent to the ‘total package’ paid to an engineer is not an order that will ensure equal remuneration. The Applicant seeks the ‘total package’ amounts payable to ECTs by way of an Equal Remuneration Order, effectively elevating the ECT base rate of pay, with all other award entitlements, such as overtime, remain intact.¹⁴¹
96. Third, the PE Award does not provide penalties for overtime, work on weekends, public holidays or shift work.¹⁴²

¹³⁷ *Application by United Voice & Australian Education Union* [2015] FWCFB 8200, [226] – [229].

¹³⁸ 25th percentile is explained at page 32 of the Mercer-IEU Report.

¹³⁹ IEU, ‘Outline of Submissions’, Submission in *Equal Remuneration Case*, C2013/6333, 22 December 2017, [150]; *Professional Engineers Employment and Remuneration Report 2017*, The Association of Professional Engineers Australia, [18].

¹⁴⁰ *Professional Engineers Employment and Remuneration Report 2017*, The Association of Professional Engineers Australia, [58].

¹⁴¹ IEU Application Annexure A, clause 5.3.

¹⁴² *Professional Employees Award 2010*, clause 18.2-18.4.

E. Conclusion

97. The application should be dismissed as it does not attract the jurisdiction under section 302 of the Act. With regard to female ECTs and male primary school teachers, the comparator is not of the opposite gender and material filed on behalf of the Applicant does not establish that the work is of equal or comparable value. With regard to ECTS and engineers, the material filed on behalf of the Applicant does not establish that the work is of equal or comparable value.
98. In the event that the Commission finds jurisdiction, then the Commission should exercise its discretion and not make an order for the reasons outlined at paragraphs [76] to [91].
99. If the Commission finds jurisdiction and exercises its discretion to make an order, the alternative remedy sought by the Applicant would not ensure that there would be equal remuneration for work of equal or comparable value.

Australian Federation of Employers and Industries

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- B. 4221.0 Schools, Australia 2017; Table 51a: In-school Staff (FTE) by School Level, Function, Sex, Affiliation, States and Territories, 2001-2017
- C. Kevin F. McGrath and Penny Van Bergen, 'Are male teachers headed for extinction? The 50-year decline of male teachers in Australia' (2017) 60 Economics of Education Review 159
- D. Agreement between the NSW Department of Education & the NSW Teachers Federation on the staffing of NSW Public Schools 2016 – 2020.
- E. NSW Department of Education, Average Class Size 2017 (2017) NSW Education Datahub <https://data.cese.nsw.gov.au/data/dataset/cdbb3e43-a60c-3c9d-9dfb-52b00f79a046/resource/74cae4f7-a961-46be-8abb-b4a5ab9cd89f/download/average-class-sizes-1997-2017.pdf>
- F. NSW Department of Education, 2015 Teaching Workforce Supply and Demand
- G. Australian Childcare Alliance, Rose Partners, and Bankwest, Australian Childcare Barometer - Performance and Sentiment of the Australian Early Childhood Education and Care sector in 2017: survey findings (2017) Australian Childcare Alliance, <<https://www.childcarealliance.org.au/documents/policy/national-childcare-barometer/68-national-childcare-barometer-2017/file>>.
- H. Early Learning: Everyone Benefits (2017). State of early learning in Australia 2017. Canberra, ACT: Early Childhood Australia.
- I. Department of Education and Training, Early Childhood and Child Care in Summary Report June quarter 2017 (5 May 2018).
- J. Diana Lawson, Are we spoilt by choice? When vacancies rise, quality suffers (22 June 2018) Community Early Learning Australia <<https://www.cela.org.au/2017/06/22/are-we-spoilt-by-choice-when-vacancies-rise-quality-suffers/>>.
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- L. University of Melbourne, The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15, HILDA Statistical Reports
- M. Nab Group Economics, NAB Special Report Series: Work and family dynamics in Australia Part 2: Caring for Children (March 2015) National Australia Bank.
- N. Department of Education and Training, New Child Care Package Fact Sheet (2 May 2018) New Child Care Package – Information resources for providers.
- O. Rober Breunig, FactCheck: has there been a massive increase in child care costs under the Coalition government? (18 March 2016) The Conversation <https://theconversation.com/factcheck-has-there-been-a-massive-increase-in-child-care-costs-under-the-coalition-government-55931>

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