

# Australian Childcare Centres Association

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Email: [acca\\_info@bigpond.com](mailto:acca_info@bigpond.com)Regulation Review  
Independent Pricing and Regulatory Tribunal  
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## **Investigation into the burden of regulation in NSW and improving regulatory Efficiency**

The Australian Child Care Centres Association (ACCA) represents children services centre owner's industrial interests at the national level. ACCA has become increasingly concerned at the impact on labour costs (around 70% of total operating costs) of the diverse state regulatory requirements in a setting where the Commonwealth through the Child Care Benefit scheme for parents, also applies accreditation Standards that are uniform across Australia (NQIAS) and are often in tension with the various State regulations.

ACCA notes the repeated references to this phenomenon in the Tribunals Draft Report. ACCA supports the thrust of the Tribunals observations and believes that the Tribunal has a unique opportunity to decisively and unequivocally encourage the development of a nationally consistent and unambiguous regulatory framework. The harmonisation of many regulatory elements has an irrefutable capacity for improved economic efficiency

Clearly the Commonwealth's quality accreditation system (NQIAS) is a well established system that links standard of care (via outcomes) to parental access to fee relief – demonstrably a tried and tested set of incentives for providers to comply with standards.

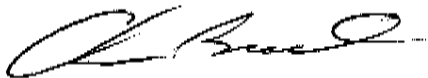
ACCA believes this has become a more important priority now that the federal government has legislated for a national industrial system that in practical terms only "preserves" the state industrial systems for a period of three years. That is, a further significant reason has emerged to warrant the Tribunal stressing the importance of moving to a nationally consistent minimum standards framework.

ACCA acknowledges that the Tribunal charter is to recommend improvements to the regulatory system in New South Wales. It is barely surprising that the Tribunal has found existing regulations are either being misapplied or being inconsistently and confusingly applied. ACCA does not object to the proposed means of improvement but believes this should be proceeded with in the context of the primacy of the Tribunal's Recommendation 38.

ACCA is concerned that the Tribunals recommendations going to measures to induce greater consistency, no doubt meritorious of themselves, should be articulated as an interim step on the path towards a national regulatory framework to be principally pursued via the COAG mechanisms.

In this regard ACCA believes that Recommendation 38 is the keystone recommendation that the Tribunal should, in its Final Report, elevate to a status of Primary Recommendation.

Yours sincerely



Chris Buck  
National Secretary