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Sent: Friday, 13 September 2019 11:45 AM

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Subject: Re: AM2018/18 and AM2018/20: Final Submissions

Dear Associate,

This is in relation to the [attached note](#) following closing submissions filed by the ACA on 16 August 2019.

From paragraph 5.6 onwards, the ACA assert that quality standards have not changed significantly since 2000, and give the example of the now defunct Quality Improvement and Accreditation System (QIAS) which was in operation prior to the National Quality Framework (NQF).

To the extent relevant, it is **not conceded** by the IEU that:

- a. The QIAS and the National Quality Framework are identical; or
- b. The regulation of the early childhood education sector has not changed significantly since 2000.

There is no basis on which the Commission could make such a finding. In particular, the only evidence relied on by the ACA is Annexure KV-1 of Ms Viknarah's statement. This does not contain the 2005 QIAS, or any document by which that system could be properly understood. It is rather a "Quality Trends Report" showing the percentages of centres reaching various quality standards.

Kind regards

Arthur Dowdle
Industrial Officer

