

IEUA-QNT SUBMISSION

11 December 2025

Submission: Consultation Paper

Expanding mandatory teacher registration to require all early childhood teachers employed in centre-based services as the ECT under the National Quality Framework (NQF) in Queensland to be registered

The Independent Education Union – Queensland and Northern Territory Branch (IEUA-QNT) welcomes the opportunity to provide feedback in response to the Queensland Government's Consultation Paper – *Expanding mandatory teacher registration to require all early childhood teachers employed in approved centre-based services as the ECT under the National Quality Framework (NQF) in Queensland to be registered* [1].

We thank the government for providing an extended timeframe for submissions, which has allowed us to gather input from our members in the early childhood sector.

About IEUA-QNT

IEUA-QNT represents ~16,000 teachers, support staff and ancillary staff in non-government education institutions in Queensland and the Northern Territory and consistently engages in industrial and education debate at both state and national levels through its Education and Industrial Committees and through its national counterpart, the Independent Education Union of Australia, which receives input from teachers in all States and Territories.

Our members work in kindergartens, schools and post-secondary institutions and work with students from a wide variety of backgrounds, in a wide variety of sociocultural contexts.

Responses to Feedback Questions

1. Do you support the move to mandatory ECT registration, as proposed? Please provide further information as to the reasons for your answer.

1.1 We are broadly supportive of ECT registration as conducive to both enhanced child safety, and recognition of the value and significance of the work undertaken by early childhood teachers.

1.2 In the early childhood context, our members are predominantly four-year degree-qualified early childhood teachers (ECTs), eligible for full registration with the Queensland College of Teachers (QCT) and working in community kindergartens.

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- 1.3 This is a distinctly different context to centre-based long day care services; though we note that a significant number of community kindergartens are transitioning to offering long day care as an extension of hours (in addition to the kindergarten program).
- 1.4 In that context, the introduction of registration for ECT who do not meet the requirements for full teacher registration requires careful management to preserve the integrity of the teacher registration system and ensure that children have access to high-quality, age-appropriate educational programs.
- 1.5 Our responses to the discussion questions below provide further detail regarding specific matters that we believe require attention.

2. What are the anticipated costs associated with implementing mandatory ECT registration:

- **on ECTs - for example initial and ongoing registration costs, ongoing professional development, time/costs to move from provisional to full registration**
- **on early childhood services - including the obligations attached with becoming an “employing authority”, such as notifying regulatory authorities of certain matters related to the ECT, conducting certain investigations etc**
- **on Government through the QCT and the ECRA?**

- 2.1 A proportion of early childhood teachers would have enrolled in their Initial Teacher Education (ITE) program with no intention of ever teaching in a school context
- 2.2 Many of these ECT will have been employed exclusively by for-profit centres providing pay and conditions in accordance with the National Award [2].
- 2.3 These ECTs are paid significantly lower wages, and have access to fewer professional conditions, than their counterparts in both community kindergartens and schools with registered collective agreements.
- 2.4 There is the issue of the current, deeply flawed, Assessment and Ratings process [3], which detracts from the core business of providing safe, high-quality learning and development environments.
- 2.5 While services invest in attaining high ratings, with limited consideration of genuine education and development, there will be no discernible increase in quality within the sector, and no meaningful decrease in critical incidents.
- 2.6 We would also indicate that the QCT would require legislative change and greater levels of resourcing and funding to expand its remit to the early childhood sector.
- 2.7 The QCT would need to employ staff with knowledge and experience in the early childhood sector and invest in the development of resources to support early childhood teachers to understand and comply with registration requirements.

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- 2.8 If the remit of the QCT is to be expanded, we would indicate that there must be explicit attention to:
- 2.10.1 The extent of modification of the Education (Queensland College of Teachers) Act [4] and/or the associated Regulation [5] required to provide a best-practice framework for the sector that meets the needs of ECTs and children.
 - 2.10.2 Funding and resourcing of the Queensland College of Teachers, particularly in the introductory period, up to the point where numbers of registered ECT make the initiative self-funding.
 - 2.10.3 Systems and supports that will allow ECTs to access mentoring and reviewers, as required to meet requirements for transitioning from provisional to full registration and professional/career development processes.
 - 2.10.4 Arrangements for Highly Accomplished and Lead Teacher (HALT) certification, noting that there is currently no certifying authority for the sector, and no link to higher rates of pay for certified teachers in the early childhood sector.
 - 2.10.5 The application of the current Australian Professional Standards for Teachers (APST) [6] in early childhood contexts; noting that the Standards are soon to undergo review [7].
 - 2.10.6 There is a necessity that any application of the APST to early childhood settings not erode the significance of play-based pedagogies as best-practice in early childhood education [8].

3. Are there any additional impacts, on whom?

- 3.1 As the union representing qualified, registered teachers in the non-government sector, it is our position that teaching is rightfully a regulated profession, and that the integrity of the registration system is central to quality of teaching and learning.
- 3.2 There is, however, a clear need to recognise the value of early childhood education, its character and the importance of play-based pedagogies that apply in the pre-school years.
- 3.3 This creates a fundamental tension that arises from ACECQA's recognition of initial teacher education programs that are not also recognised by the teacher registration authority.
- 3.4 In a submission we made to the introduction of registration for ECTs in the Northern Territory, we suggested that those who complete Birth-Five qualifications that are recognised by ACECQA (but not the Teacher Registration Board of the Northern Territory) be granted provisional registration, with a requirement to complete further study that meets literacy and numeracy teaching requirements and includes a school-based practicum in order to obtain full registration [9].

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- 3.5 As the registration of early childhood teachers has been introduced in other jurisdictions, we have refined our position.
- 3.6 We acknowledge that ECTs who undertook their qualification with no intention of ever working in school settings may view the need to complete additional study as problematic.
- 3.7 We also understand that it would be challenging for ITE providers (universities) to develop and deliver suitable bridging courses for a relatively small cohort of ECTs.
- 3.8 We would suggest that the content of Birth-Five initial teacher education programs should be reviewed, to provide optional electives that meet literacy and numeracy teaching requirements and include a school-based practicum.
- 3.9 For those who opt not to undertake those electives and later seek employment in a P-12 context, we propose that a conditional registration be applied, similar to the Return to Teaching conditions [10, 11] applied for those who have not taught in schools for a specified period of time.
- 3.10 We acknowledge that the administration of such a system would impose an additional burden on the QCT, particularly if they are to develop and maintain resources that are comparable to those provided for school-based teachers.

4. What support, if any, do you think will need to be provided to ECTs to facilitate their progress to registration? Consider: • the cost of registration application/renewal fees • access to professional development requirements to maintain registration • support to complete relevant qualifications.

- 4.1 As noted in our response to Feedback questions 2 and 3, it is to be expected that a proportion of those currently recognised as early childhood teachers under the ACECQA framework undertook their studies with no intention of teaching in schools.
- 4.2 Our union has raised concerns in previous submissions/consultations about:
 - 4.2.1 The lack of infrastructure and professional networks required for ECTs to meet requirements for moving from provisional to full registration.
 - 4.2.2 The lack of any Highly Accomplished and Lead Teacher (HALT) certification authority for the early childhood sector (see also our responses to Feedback questions 2 and 3, above).
- 4.3 The QCT is not adequately resourced to provide supports to ECTs wanting to pursue registration and/or certification and, without government funding, will not be able to provide the required support until the ECT registration scheme becomes self-funding.
- 4.4 With respect to completion of additional relevant qualifications, we refer to our response to Feedback question 3; in particular paragraphs 3.6-3.9.

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5. **Is a two-year transitional period for mandatory teacher registration sufficient time to allow ECTs to progress in their qualifications and engage with the registration process? Please provide further information as to the reasons for your answer.**

- 5.1 Data from the 2024 Early Childhood Education and Care National Workforce Census indicates that only 10.5% of the workforce in the (Queensland) sector held qualifications at Bachelor Degree and above [12].
- 5.2 Although the census data does not link qualifications with age, the overall age distribution in the (Queensland) sector is relatively even, with a slight peak in the 20-24 age group [13].
- 5.3 It is important – for both workforce management and quality of learning experiences - that the introduction of mandatory ECT registration is not administered in a manner that forces a cohort(s) of experienced teachers out of the profession.
- 5.4 We would therefore repeat our suggestion that the introduction of registration for early childhood teachers might reasonably require:
- 5.5.1 The content of ITE programs to be modified to provide optional electives that would meet the requirements for full registration.
- 5.5.2 Conditional registration for those who do not undertake these electives and;
- 5.5.3 A modification of the APST to better align with practices in the early childhood sector.
- 5.5 We would strongly caution against any use of Permission to Teach (PTT) provisions, noting that these are not a substitute for quality Initial Teacher Education programs with an embedded practicum component.
- 5.6 We would also indicate that the introduction of mandatory registration for Early Childhood Teachers requires a willingness of registered teachers, from suitable settings, to take on reviewer and mentor roles. This is challenging even in a school context and is likely to require even greater attention in the early childhood sector, with smaller numbers of staff in a larger number of locations.
- 5.7 While a two-year timeframe for full introduction is reasonable, we would suggest there is a considerable amount of work required to ensure the changes have the desired impact and do not overburden an already stressed early childhood sector.

6. **What are the key challenges that need to be addressed when transitioning to mandatory registration and how should they be addressed?**

- 6.1 As noted in our responses to the preceding feedback questions, we acknowledge that earlier rounds of national and jurisdictional consultation [14] have established that there is widespread recognition of the benefits of registration and are broadly supportive of ECT registration in Queensland.

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- 6.2 It is not clear however, that the approaches taken in other jurisdictions are well-suited to the unique context of early childhood education and care.
- 6.3 Also as noted above, we would suggest that both the APST, and existing registration processes, are not well-tailored to EC settings.
- 6.4 We acknowledge that there is federal and jurisdictional work underway to address this (including this round of consultation), but we believe there are a number of outstanding matters that need to be considered before a decision on the best model for ECT registration is made.
- 6.5 Introduction of mandatory ECT registration cannot, in the first instance, be implemented without resourcing the QCT, nor incentivising the growth of professional networks in the sector, which are a prerequisite to the communities of practice and professional development opportunities needed for individuals to meet registration requirements.
- 6.6 We note that page 3 of the Consultation Paper [1] indicates that registration will supported increased workforce mobility, diversification of career pathways, and enhanced teaching quality.
- 6.7 These outcomes will not be achieved unless, as a first step, it is recognised that a proportion of existing ECTs may not aspire to registration as there is little to no incentive, particularly for those employed under Award conditions.
- 6.8 Further, once registered, ECTs are unlikely to have access to the supports required to progress from provisional to full registration or to access further, high-quality professional development and that ECTs are as yet unable to achieve the higher levels of certification (HALT) that are available to their counterparts in schools.

7. Are there any other issues that should be considered in introducing mandatory registration and how should they be addressed? Do the benefits outweigh the costs?

- 7.1 Introduction of mandatory registration has the potential to bring early childhood teachers into professional networks comparable to those of teachers working in school contexts and to recognise the complexity and intensity of their work.
- 7.2 We would caution however, that introduction of mandatory registration also has the potential, if not managed well, to create both a tiered system of registration that is not conducive to the stated aim of enhancing professional status [1] and an administrative burden on the QCT to provide equivalent support to ECTs in terms of access to professional development, and resources and processes related to registration and HALT certification.
- 7.3 It is important to note that even the Collective Agreements with major sector employers in the kindergarten sector are outdated in terms of the provision of professional pay and conditions.

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- 7.4 Many smaller employers will struggle to provide pay and conditions that will support sector engagement with registration.
- 7.5 While we note there is currently significant, ongoing national debate about funding and resourcing of the early childhood sector, which may, in due course, result in positive changes, there is no firm commitment to the level of resourcing required to transform the operational reality for many ECTs.

Concluding Comments

IEUA-QNT thanks the Queensland Government for the opportunity to provide feedback in response to the Consultation Paper Expanding mandatory teacher registration to require all early childhood teachers employed in approved centre-based services as the ECT under the National Quality Framework (NQF) in Queensland to be registered.

We are particularly appreciative of the realistic timeframe for provision of our response, which has allowed articulation of a more developed position.

While we affirm the benefits of practitioner registration and its alignment with greater professional recognition for workers in the early childhood sector and acknowledge that earlier rounds of national and jurisdictional consultation have resulted in a more considered proposition for mandatory registration, we would suggest that Queensland has an opportunity to improve on what has been implemented in other jurisdictions.

Kind regards,



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Independent Education Union of Australia - Queensland and Northern Territory Branch
Thursday 11 December 2025

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References

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