

IEUA-QNT SUBMISSION

8 May 2026

Submission: Education and Other Legislation Amendment Bill 2026

The Independent Education Union – Queensland and Northern Territory Branch (IEUA-QNT) welcomes the opportunity to make a submission to the Education, Arts and Communities Committee’s inquiry into the *Education and other Legislation Amendment Bill* [1].

About IEUA-QNT

IEUA-QNT represents ~16,500 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.

As it is only the amendments to the various Education Acts and Regulations that are of immediate relevance to our members, our submissions relate solely to those. No comment is made in relation to the amendments to Acts and Regulations that relate primarily to the Arts.

Amendment of the *Education (Accreditation of Non-State Schools) Act 2017* and the *Education (Accreditation of Non-State Schools) Regulation 2017*

1. We acknowledge that the amendments to the Education (Accreditation of Non-State Schools) Act 2017 are either technical in nature, or where they have greater impact, that impact is consistent with the findings of the Queensland non-state schools accreditation framework review [2].
2. In the broadest sense, we are supportive of the movement toward a risk-based model of regulation for non-government schools, as recommended by the review [2].
3. The proposed amendments to allow specific low-risk changes to accreditation attributes to be dealt with more efficiently will reduce the burden on schools and the NSSAB.
4. The proposed amendments regarding NSSAB’s delegation of limited functions or powers is appropriate.
5. We are supportive of the suggested amendments to the Act to enable timely information sharing between NSSAB and the Department of Education.

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6. We do not oppose amendments to the Act that will enable non-state schools to partner with a recognised overseas school to administer the Queensland Certificate of Education.
7. We do however, note that the enabling administration and governance of the offshore QCE program by QCAA, is likely to require additional resourcing (see also submissions 21-23 below).
8. In relation to the amendments that will enable the Minister to provide a statement of expectations regarding priorities for non-state school regulation of the Board's performance, we presume that this is not proposed as a way of diminishing NSSAB's independence.
9. We understand that a capacity for the Minister to make a statement of expectations exists within other legislation within the Education portfolio. Amendments here to provide that capacity need to be consistent with that elsewhere in legislation.

Amendment of the *Education (Capital Assistance) Act 1993*

10. IEUA-QNT supports the proposed amendment as a clarification that what is provided is accredited education, rather than special assistance.

Amendment of the *Education (General Provisions) Act 2006* and the *Education (General Provisions) Regulation 2017*

11. Our union supports the recognition of Education and Training Centres (ETCs) located in youth detention centres as state educational institutions.
12. This recognition will increase alignment with what occurs in other state schooling settings and deals appropriately with teachers employed in ETCs.
13. We also support the intent of proposed amendments to enable information sharing between the department and a non-government organisation providing an education re-entry and transition service program.
14. We do however, have concerns that the amendments may mean that teachers will become recipients of sensitive and confidential information without clear guidance on their legal obligations and accountability.
15. For that reason, we would suggest there is a need for safeguards and training for teachers.
16. It is also possible that the proposed amendments will mean that schools receive students with complex behavioural and social needs, who require intensive support; without a parallel commitment to ensure those schools are able to access additional staffing, specialist services or targeted support.
17. To ensure that the proposed changes produce the intended outcomes, we recommend that information sharing and re-engagement initiatives are supported by system-level investment, clear protocols and appropriate safeguards.

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Amendment of the *Education (Queensland College of Teachers) Act 2005 and the Education (Queensland College of Teachers) Regulation 2016*

18. We acknowledge that the proposed amendments to the Queensland College of Teachers Act 2005 and the Education (Queensland College of Teachers) Regulation 2016 are consistent with the aim of improving business operations for the College.
19. The alignment of financial reporting periods and administrative updates are reasonable measure to support streamlined operations.
20. We would emphasise however, the need to ensure that these reforms do not compromise the College's core regulatory functions, or the independence and integrity of the QCT.

Amendment of the *Education (Queensland Curriculum and Assessment Authority Act 2014 and the Education (Queensland Curriculum and Assessment Authority) Regulation 2025*

21. As noted above, we do not oppose the amendments to the Act that will enable non-state schools to partner with a recognised overseas school to administer the Queensland Certificate of Education.
22. Given the administration and governance of the offshore QCE program will reside with the QCAA, we believe the integrity of the QCE system will be preserved.
23. We do note however, that this transfer of function from Department of Education International may require additional resourcing of the QCAA.

Concluding Comments

IEUA-QNT thanks the Education, Arts and Communities Committee for the opportunity to provide a submission to the inquiry into the *Education and other Legislation Amendment Bill 2026* [1].

We understand that the majority of proposed amendments are concerned with clarification and simplification of procedural and operational matters of the affected authorities (NSSAB, QCT and the QCAA).

We do hold concerns that reforms related to information sharing, student behaviour management and re-engagement initiatives will require parallel consideration of appropriate resourcing, system-level accountability and safeguarding to ensure that outcomes for students are improved without placing additional unresourced workload or risk on teachers.

In the case of the Non-State Schools Accreditation Board, we acknowledge the ongoing work by the Board, the Department, and other stakeholders, to implement the recommendations of the Vardon review; in particular the shift toward a more contemporary risk-based model of regulation.

We look forward to opportunities to consult on further legislative change in relation to those reforms.

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In relation to the amendments to the NSSAB Act in particular, we are broadly supportive of the move toward a contemporary, risk-based model of regulation.

Kind regards,



Terry Burke
Branch Secretary
Independent Education Union of Australia - Queensland and Northern Territory Branch
Friday 8 May 2026

References

1. *Education and Other Legislation Amendment Bill 2026.*
2. Vardon, C., *Queensland non-state schools accreditation framework review Final Report.* 2023, Commissioned by the Queensland Government: Brisbane.