

IEUA-QNT SUBMISSION

02 October 2026

Submission: Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026

The Independent Education Union – Queensland and Northern Territory Branch (IEUA-QNT) welcomes the opportunity to provide feedback in response to the *Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026* [1].

We note that the Explanatory Notes for the Bill [2] refer to consultation processes undertaken in 2025 and 2026. As per our submission [3] in response to the 2025 Consultation Paper [4], we are broadly supportive of Early Childhood Teacher (ECT) registration, within a framework that does not compromise the integrity of the teacher registration system and ensures that children have access to high-quality, age-appropriate educational programs.

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 the proposed amendments

1. Support for the general concept of ECT registration

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.

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.

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1.4 In that context, the introduction of registration for ECT who do not currently meet the requirements for teacher registration requires careful management.

2. Support for the proposed imposition of ECS conditions

2.1 We recognise the imposition of ECS conditions, as outlined in the Bill, as a response to concerns that registration of ECT with qualifications that do not meet the requirements for unconditional registration would compromise the integrity of the registration system.

2.2 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.

2.3 Many of these ECT will have been employed exclusively by for-profit centres providing pay and conditions in accordance with the National Award [5].

2.4 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.

2.5 It is appropriate that the qualifications, skills and knowledge of these individuals be recognised and the imposition of ECS conditions is a way to ensure that early childhood specialists have access to professional registration, without compromising the standard of teaching in schools.

2.6 We would hope that, over time, professional registration will be recognised through enhanced pay and conditions for ECTs across the sector.

3. Support for limitations on use of Permission to Teach

3.1 We strongly support the inclusion of the new Section 82A, which will work in conjunction with the new Section 6B to ensure that Permission to Teach (PTT), as defined in the Act [6], will not apply in early childhood settings.

3.2 While we note that the most recent NQF Snapshot (Q2 2026) [7] does not provide data about the number of Queensland services with staffing waivers, it does indicate that 4.3% of the total Australian centres have current staffing waivers.

3.3 It is widely understood that staffing waivers are most common in rural, regional and remote services and that centres in these areas often service vulnerable cohorts [8, 9].

3.4 There is reason to expect that allowing PTT in early childhood settings would counteract other initiatives to attract and retain qualified ECTS in rural, regional and remote communities.

3.5 We support the amendments that make it clear that PTT is not appropriate in an early childhood context.

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4. Concerns regarding funding and resourcing of the Queensland College of Teachers

4.1 As noted in our submissions in response to the initial Consultation Paper [3], we recognise that legislative change is an essential first step to enhance the professional status of ECTs.

4.2 We would also indicate that the Queensland College of Teachers will require greater levels of resourcing and funding to expand its remit to the early childhood sector.

4.3 This resourcing is necessary 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.

4.4 Given the QCT is essentially a self-funded entity, drawing on registration fees paid by practitioners, additional government funding will be required for the implementation phase.

4.5 We would also indicate that there is a need for 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.

4.6 We note that the insertion of new section 83A attends to this, to some extent, by indicating that ECS conditions on registration will not prevent a currently registered ECT from acting as a reviewer or mentor for early career ECTs; but we would suggest that the number of registered ECTs, and the level of connectedness of practitioners across the sector, are too low to ensure that all early career teachers will be able to access the required supports for attaining registration themselves.

4.7 In that context, there is a need for some transitional supports until the number of registered ECTs, and their engagement with the regulator and its processes, is sufficient to ensure sustainability.

5. Access to Highly Accomplished and Lead Teacher certification

5.1 We note that this Bill does not include amendments to allow ECTS to access Highly Accomplished and Lead Teacher (HALT) certification.

5.2 We would suggest that the Bill should introduce additional amendments that would establish the QCT as a certifying authority for the early childhood sector.

5.3 This would establish true parity with registered teachers in schools and provide an opportunity to establish stronger links to higher rates of pay and better conditions, which are known to influence quality of education in early childhood settings [8] [10].

6. Supports for ECTs to facilitate their progress to registration

6.1 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.

6.2 Our union has raised concerns in previous submissions/consultations about:

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6.2.1 The lack of infrastructure and professional networks required for ECTs to meet requirements for moving from provisional to full registration.

6.2.2 The lack of any Highly Accomplished and Lead Teacher (HALT) certification authority for the early childhood sector (see also our responses in Section 5, above).

6.3 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 [11].

6.4 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 [12].

6.5 We would therefore repeat our suggestion that the introduction of registration for early childhood teachers might reasonably require:

6.5.1 The content of ITE programs to be modified to provide optional electives that would meet the requirements for full, unconditional registration.

6.5.2 A modification of the Australian Professional Standards for Teachers (the APST) to better align with practices in the early childhood sector; noting that our union, including our federal body (the Independent Education Union of Australia) is participating in the current review of the APST.

7. Additional challenges that need to be addressed when transitioning to mandatory registration

7.1 We acknowledge that earlier rounds of national and jurisdictional consultation [13] have established that there is widespread recognition of the benefits of registration and are broadly supportive of ECT registration in Queensland.

7.2 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.

7.3 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.

7.4 We would caution however, that introduction of mandatory registration will also create an administrative burden on the QCT, and on registered ECTs, to provide supports to other ECTs.

7.5 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 that can support the broader goals of ECT registration.

7.6 Many smaller employers will struggle to provide pay and conditions that will support sector engagement with registration.

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7.7 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.

7.8 Further, there is a need for consideration of initiatives to ensure that, once initially registered, ECTs have access to the supports required to progress from provisional to full registration or to access further, high-quality professional development.

7.9 In that context, we would suggest that this Bill fails to recognise an opportunity to ensure that ECTs are also able to achieve the higher levels of certification (HALT) that are available to their counterparts in schools.

Concluding Comments

IEUA-QNT thanks the Queensland Government for the opportunity to provide feedback in response to the *Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026*.

We affirm the benefits of practitioner registration and its alignment with greater professional recognition for workers in the early childhood sector. We also recognise that the Bill has benefitted from earlier rounds of national and jurisdictional consultation, resulting in a considered proposition for mandatory registration in Queensland.

We are supportive of the use of ECS conditions to ensure that there is no erosion of the registration framework that applies in school settings, and of the limitations on use of Permission to Teach.

We do however, continue to assert that introduction of mandatory ECT registration requires sufficient resourcing of the Queensland College of Teachers, and attention to the broader professional conditions and rates of pay that are required to build the professional networks required to make ECT registration sustainable over the long-term.

This must also include access to the higher levels of voluntary (HALT) certification.

Kind regards,



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Independent Education Union of Australia - Queensland and Northern Territory Branch
Friday 02 October 2026

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References

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