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National Review of Teacher Registration Secretariat
Australian Institute for Teaching and School Leadership
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By electronic upload: <https://www.aitsl.edu.au/teach/national-review-of-teacher-registration>

ACECQA submission to the National Review of Teacher Registration

Thank you for the opportunity to provide a submission to the Australian Institute for Teaching and School Leadership's (AITSL's) national review of teacher registration.

Please see below for a summary of the Australian Children's Education and Care Quality Authority's (ACECQA's) submission, including responses to three questions (2, 4 and 5) posed by the review.

Summary

ACECQA is the independent national authority established under the Education and Care Services National Law to guide the implementation and administration of the National Quality Framework (NQF).

The NQF is the national system for regulating education and care services, setting standards for safety and quality so that all children who attend long day care, preschool/kindergarten, outside school hours care and family day care are supported to have the best start in life.

The objectives of the NQF include improving the educational and developmental outcomes for children attending education and care services, and promoting continuous improvement in the provision of quality education and care services.

Under the NQF, all services are assessed and rated by state and territory regulatory authorities against the National Quality Standard (NQS), which comprises seven quality areas. These include:

- staffing arrangements, for example the organisation and continuity of educators, and whether professional standards guide practice, interactions and relationships
- educational program and practice, for example whether intentional and responsive teaching, and critical reflection are used by educators

- relationships with children, for example whether the dignity and rights of every child are maintained
- collaborative partnerships with families and communities, for example whether parent views are respected, and continuity of learning and transitions are supported
- governance and leadership, for example the professional development of educators.

The early childhood education and care sector is both large and diverse, with more than 7,000 education and care service providers approved to operate almost 16,000 services under the NQF (approaching 7,500 long day care services and more than 3,000 preschools/kindergartens).

More than 80% of providers are approved to operate a single service, while the 10 largest providers each operate more than 100 services, for a combined total of more than 3,000 services.

The high proportion of single service providers illuminates the different context of the early childhood education and care sector when compared to the school sector, particularly given that the majority of these services will most likely only employ a single early childhood teacher (ECT). The mentoring and support structures that are so embedded and routine within schools are often not available or possible in these services, a reality acutely felt in regional and remote services.

Another point of difference compared to the school sector is that some large providers operate hundreds of long day care services in multiple states and territories, namely Goodstart Early Learning Ltd and G8 Education Ltd, emphasising the importance of nationally consistent, efficient and effective approaches to teacher registration/accreditation.

Recognising the range of different state and territory qualification requirements previously in place, as well as ongoing workforce pressures and challenges, the NQF has progressively introduced higher qualification requirements, including an increased number of ECTs from 1 January 2014, as well as improved educator to child ratios from 1 January 2016. A further step-up in qualification requirements will come into effect from 1 January 2020, when centre-based services educating and caring for 60 or more children under school age will be required to have an additional ECT or 'other suitably qualified person' in attendance.

With the continual and increasing demand for ECTs, it is important to have a nationally consistent, efficient and effective approach to registration/accreditation, as well as appropriate alignment between the requirements of AITSL, state and territory teacher regulatory authorities, and ACECQA to ensure a pool of suitably qualified ECTs that are eligible to work in the early childhood education and care sector.

It is also important to remember that registration/accreditation in and of itself will not necessarily drive quality without efforts being made to recognise and accommodate the unique and different aspects of the early childhood sector (a one size fits all approach based on what is in place for the school sector will almost certainly be inadequate), and ensure that, once registered/accredited, ECTs can adequately and appropriately meet the requirements of registration/accreditation, and progress against the Australian Professional Standards for Teachers (APST).

2. Should early childhood teachers be part of a national approach to teacher registration?

- *Should nationally consistent approaches to the registration of early childhood education teachers be considered?*
- *How could a nationally consistent approach to teacher registration support and improve the quality of early childhood teaching in school and non-school settings?*
- *How could the Teacher Standards be applied for early childhood teacher registration?*

Currently, four jurisdictions (South Australia, Western Australia, Victoria and New South Wales) require the registration or accreditation of ECTs in early childhood settings.

Apart from in South Australia, the registration or accreditation of ECTs is relatively new, with Western Australia introducing the requirement in December 2012, Victoria in September 2015 and New South Wales in July 2016.

In late 2012, AITSL published a report providing advice on the potential to apply the APST to teachers working in early childhood education and care services. The report advised that, with adequate time and support, the APST could be applied to ECTs, with the main area of difference being some of the language used in the APST. The report highlighted a need to “ensure that there is sufficient flexibility and cognisance of the particular contexts and needs of teachers in the sector”.

Building on the advice and recommendations of the report, ACECQA engaged with AITSL and a number of state and territory teacher regulatory authorities in 2013 and 2014 to review the APST and consider potential changes that would make the APST more inclusive of all teachers, including ECTs and other teachers based in non-school settings.

While some progress was made, the ultimate view was that the language of the APST should not be amended ahead of a planned comprehensive review, which would not occur before 2018.

This has meant that the APST remain ‘school-centric’, with several references to ‘students’, ‘lesson plans’ and ‘classrooms’.

In light of this, various interim solutions have been implemented. AITSL published a glossary to the APST in July 2015 that provides explanations of four key terms (‘student’, ‘school’, ‘lesson’ and ‘classroom’) to expand their definition to encompass ECTs and early childhood settings, while not amending those terms in the APST itself.

The Victorian Institute of Teaching has published a version of the APST that “acknowledges the diversity of teaching contexts and uses inclusive language”, for example by replacing ‘student’ with ‘learner’, and ‘lesson plan’ with ‘learning and teaching program’. While the New South Wales Education Standards Authority has published an evidence guide for ECTs that is “intended to assist early childhood teachers to feel confident in using and interpreting the Standards by building a more consistent understanding of the practice application of the Standards”. The descriptors for each of the Standards in the evidence guide have been amended to use terminology that reflects early childhood teaching practice.

While acknowledging that some helpful progress has been made, ACECQA believes that a nationally consistent approach to ensuring that the APST are fully inclusive of ECTs and early childhood settings would be preferable to disparate localised approaches. A comprehensive review of the APST would allow for this to occur, and ACECQA looks forward to being actively engaged in such a review.

ACECQA has a function under the Education and Care Services National Law to determine the qualifications required to be held by educators, including the assessment of equivalent qualifications. To exercise this function, ACECQA's Board has developed a set of guidelines that have been revised over time and are used to assess both applications from institutions and organisations to have their qualification course published as part of ACECQA's list of approved qualifications, as well as applications from individual educators seeking to have their qualifications recognised.

Any individual graduating from a qualification course on ACECQA's list of approved qualifications is automatically recognised as an approved educator in an NQF education and care service, and any individual whose qualifications are recognised as equivalent (mostly overseas trained educators) receives a qualification certificate from ACECQA that allows them to work as an approved educator in an NQF education and care service.

There are four main types of approved qualifications on ACECQA's published list and as part of individual educator recognition – outside school hours care giver, certificate III level educator, diploma level educator, and early childhood teacher.

ACECQA's Board approved guidelines ensure that ECT level qualifications have appropriate pedagogical focus and professional experience with children aged birth to five, with a preference for qualifications that span the birth to eight age range.

In jurisdictions where ECT registration/accreditation is currently required, the qualification requirements vary. For example, in New South Wales and Victoria, an ACECQA approved ECT qualification is acceptable to satisfy the respective teacher regulatory authority's requirement. While in South Australia and Western Australia, an ACECQA approved ECT qualification may or may not be sufficient to satisfy the teacher regulatory authorities.

The main area of misalignment concerns qualification duration, with both South Australia and Western Australia requiring four year qualifications for ECT registration. While acknowledging that the domestic standard is for four year initial teacher education degrees, ACECQA's Board approved guidelines are intentionally silent on course duration so as not to exclude potential ECTs, particularly those with overseas qualifications, who hold a qualification that is rich in early childhood content.

ACECQA also notes that there is a lack of available evidence to demonstrate that longer qualifications are necessarily of higher quality or that international qualification length is directly comparable to Australian qualification length (i.e. the three vs four year distinction would appear to be a somewhat unsophisticated demarcation that does not recognise the amount of learning that goes into a given year, nor the comparable length of semesters/terms).

Furthermore, longer qualifications do not necessarily equate to more of an early childhood focus, particularly in the case of domestic qualifications that span the birth to 12 age range, which place increased pressure on the early childhood curriculum content and professional experience due to the additional required primary school content and experience.

To demonstrate the complexity of the qualifications environment, it is helpful to consider the example of an overseas trained early childhood teacher, who may well be required to be assessed by AITSL for the purposes of skilled migration (as an 'Early Childhood (Pre-primary school) teacher (ANZSCO 241111)'), assessed by ACECQA for the purposes of being recognised as an ECT in an NQF approved service, and assessed by a state and territory teacher regulatory authority for the purposes of teacher registration/accreditation.

While acknowledging the different roles and responsibilities that the respective organisations have been given, ACECQA remains committed to pursuing opportunities to streamline and align the respective qualification assessment processes to provide a consistent and efficient approach to ensure a pool of suitably qualified ECTs that are eligible to work in the early childhood education and care sector.

The registration/accreditation of ECTs by state and territory teacher regulatory authorities formally recognises the occupation as part of the broader teaching profession. Of the roughly 7,400 long day care services and 3,100 preschools/kindergartens approved to operate under the NQF, more than three quarters (76%) are located in New South Wales, Victoria, Western Australia and South Australia, meaning that current ECT registration/accreditation already covers most of the workforce.

In tandem with a revised version of the APST that is inclusive of ECTs and early childhood settings, and an agreed efficient and effective approach to ECT registration/accreditation qualification requirements, structures would then firmly be in place to enable a consistent national approach to ECT registration/accreditation.

ACECQA would also support teacher registration/accreditation in any of the eight states and territories being sufficient to be recognised as a registered/accredited teacher in all states and territories. This would be in keeping with the Mutual Recognition Act 1992, whereby people holding a license in one jurisdiction are entitled to a license in another jurisdiction if equivalent work is licensed in both. The Trans-Tasman Mutual Recognition Act 1997 operates under similar principles where New Zealand license holders are able to apply for recognition of their existing licence in Australia. The benefits of this include increased opportunities for ECTs to work across the country, improved cooperation between state and territory teacher regulatory authorities, certainty for ECTs considering moving between jurisdictions, as well as certainty for large providers of education and care services with services in multiple jurisdictions.

4. How does teacher registration support entry into the teaching profession?

- *How do current teacher registration processes support graduates:*
 - *seeking provisional registration*
 - *employed in different circumstances (e.g. casual, full-time or permanent)?*
- *Are there barriers/challenges presented by teacher registration for those entering the teaching profession? How could these be overcome?*

The APST comprises seven Standards, which teachers will meet at differing levels depending on their career stage and level of experience. Meeting the Graduate Standards should mean that a teacher has completed a qualification that meets the requirements of a nationally accredited program of initial teacher education, while meeting the Proficient Standards should mean that a teacher has met the requirements for full registration through demonstrating achievement of the seven Standards at this level.

As already discussed above, the fact that the APST are not currently inclusive of ECTs and early childhood settings poses challenges for ECTs working in jurisdictions with mandatory teacher registration/accreditation to evidence and demonstrate their achievements against the seven Standards.

The processes and procedures for ongoing professional development as part of teacher registration/accreditation also differ between state and territory teacher regulatory authorities. For example, the New South Wales Education Standards Authority coordinates a process of endorsing professional development providers, who are then able to deliver professional development that contributes to mandatory requirements for maintaining teacher accreditation. While the Queensland College of Teachers allows individual teachers and their employers to source the professional development that they deem relevant and valuable, having regard to the APST.

A number of domestic higher education institutions offer birth to eight or birth to 12 initial teacher education courses that qualify graduates to work as either primary school or early childhood teachers. These courses are assessed and approved by both the relevant state and territory teacher regulatory authority to ensure that there is appropriate school aged curriculum content and professional experience, and ACECQA to ensure that there is appropriate early childhood content and experience.

The recommendations from the Teacher Education Ministerial Advisory Group (Action Now: Classroom Ready Teachers) in late 2014, notably the requirement for primary teachers to graduate with a subject specialisation, have placed increased demands upon higher education institutions in terms of the required volume of school age content and experience in birth to eight and birth to 12 courses, sometimes to the detriment of the volume of early childhood content and experience. The fact that primary teachers are required to graduate with a subject specialisation, while early childhood is not recognised as an equivalent 'subject' specialisation, exacerbates this issue.

Other recent initiatives, for example the literacy and numeracy test for initial teacher education (LANTITE), and the graduate teacher performance assessment (GTPA), have been developed with school teachers as the primary target.

In combination, and notwithstanding the overarching issue of incomparable pay and conditions between school teachers and ECTs, this can result in early childhood teaching being considered a 'second class' or inferior teaching occupation. This runs contrary to the growing body of research that indicates that children's participation in high quality early childhood education and care leads to better health, employment and education outcomes later in life.

Feedback from higher education institutes suggests that students completing birth to eight or birth to 12 initial teacher education courses often work in early childhood settings while studying and then seek employment in schools once they graduate. There is also anecdotal evidence of students who do not pass the LANTITE being offered an early childhood teacher exit point from birth to eight and birth to 12 courses.

ACECQA is highly supportive of the Australian Teacher Workforce Data Strategy being implemented by AITSL in partnership with the Australian Government, states and territories, teacher regulatory authorities and the Australian Institute of Health and Welfare. The strategy aims to connect teacher workforce data from around Australia and deliver key insights to support better informed investment and decision making, and deepen understanding of shared workforce issues.

If successful, the strategy will provide nationally consistent data on how many teachers graduate, how many get jobs, their professional development, and whether or not they stay in the profession (including what part of the profession, early childhood or schooling, they stay in and/or move between).

This would mean that, for the first time, a much more informed discussion could be had concerning the career paths and progression of school and early childhood teachers.

5. How can we ensure that registered teachers satisfy the fit and proper person requirement?

- *How do regulatory authorities (within legislated responsibility) ensure the fit and proper person requirement of registered teachers?*
- *How can teacher registration processes support a nationally consistent approach to satisfying the fit and proper person requirement of registered teachers, at the point of registration and throughout their teaching career?*

Under the Education and Care Services National Law, applicants for provider approval must satisfy the state and territory regulatory authority that they are a fit and proper person to be involved in the provision of an education and care service. The regulatory authority may also, at any time, assess whether an approved provider continues to be a fit and proper person, and whether a person with management or control of an education and care service operated by an approved provider continues to be a fit and proper person.

ACECQA recognises the value in placing dual responsibility on both the provider (employer) and registered teacher to satisfy the fit and proper person requirement.

ACECQA also believes that, while satisfying the fit and proper person requirement of registered teachers at the point of registration as part of a nationally consistent approach is vital, having systems and processes in place that have reference to the requirement throughout a teacher's career is also important.

Current relevant pieces of work include the Child Safe Organisations project. Megan Mitchell, the National Children's Commissioner, is leading the development of National Principles for Child Safe Organisations, as part of the National Framework for Protecting Australia's Children 2009-2020. The goal is to build child safe cultures in organisational settings to advance the safety and wellbeing of children and young people across Australia.

The project is also connected to the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse, which set out ten standards for making institutions in Australia child safe.

If you would like to discuss our responses to the inquiry, or would like further information, please contact Chris Mason, Senior Manager, Research and Qualifications Assessment.

Yours sincerely



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