



[Australian Institute for Teaching and School Leadership \(AITSL\)](#)
[National Teacher Registration Review Submission](#)

Introduction

The Early Learning and Care Council of Australia (ELACCA) is pleased to provide the following submission to the National Review of Teacher Registration.

ELACCA is a national association of large providers of early learning and care, with members operating close to 2000 services across metropolitan, regional, rural and remote environments. Our members employ at least 3000 degree qualified early childhood teachers and deliver quality early learning to more than 15 per cent of children in approved services. We are committed to building sector capacity and capability to enable delivery of quality, accessible and affordable early learning and care to every child.

The evidence regarding the importance of the early years and the critical role they play in setting a child up for future success is overwhelming and undisputed. Within Australia, this has been recognised by governments and policy makers with the introduction and continuation of the National Partnership Agreement on Universal Access to Early Childhood Education; and the establishment and embedding of the National Quality Framework (NQF). Whilst Australia lags OECD countries in terms of its investment in the early years and the number of preschool years before formal schooling; the NQF is internationally recognised as a driver for lifting quality and clearly articulating key elements of quality early learning.

Early childhood teachers undertake the same depth and duration of study and training as their colleagues in the schooling sector. They follow the Early Year Learning Framework (curriculum), undertake program planning and evaluation, engage in parent teacher meetings, create individualised learning plans, participate in staff and sector discussions and support the child and their family through the learning journey.

Given the compelling evidence regarding the rapid brain and overall development of the child in these early years and the importance of the early years in determining a child's disposition for learning and lifelong education, health, social-emotional wellbeing and long term success in life, teachers in the early years require equitable professional recognition as teachers in the schooling sector.

ELACCA recommends that a nationally consistent approach to teacher registration be implemented and that all early childhood teachers, regardless of which age cohort they teach, should be eligible to apply for nationally recognised teacher registration. This submission focuses on the key areas of the discussion paper relevant to the early childhood sector and reflects our experience and expert knowledge.

Recommendations

1. Australia implement a nationally consistent and nationally recognised approach to teacher registration.
2. The National Teaching Standard be reviewed by AITSL, in collaboration with the Australian Children's Education and Care Quality Authority (ACECQA), to reflect requirements under the Education and Care Services National Law and Regulations incorporating the National Quality Standard and Early Years Learning Framework.
3. All degree qualified early childhood teachers be eligible to apply for teacher registration regardless of which age cohort they teach.
4. That registration bodies better support teachers in all settings to access the necessary supervision and mentoring required to progress from provisional to full teacher registration.
5. That all teachers seeking registration be required to demonstrate competence in and compliance with the reviewed Teacher Standards, including those working in early learning and care services as teachers and early years leaders (eg early childhood degree qualified teachers who are centre directors).
6. That the Standard for Principals (and early years leaders) be reviewed, in collaboration with ACECQA, and broadened to be inclusive of leadership in a variety of educational settings.
7. That a national early childhood evidence guide be developed, in collaboration with ACECQA, to better support teachers in settings other than schools (e.g. early years' settings) demonstrate their understanding, competence and compliance with the Standards.

Areas for discussion

How is the national teacher registration framework working across Australia?

Elements of registration

How well are the implementation and content of the eight elements of the Framework working? Please consider consistency, best practice and challenges and barriers in your response.

The ability of the National Teacher Registration Framework to achieve its objectives is hampered by its mixed application across the jurisdictions and selective application to teachers working in particular settings. As such, not all qualified teachers working in early learning centres have the opportunity to formally engage with the Framework. This is largely a result of the different approaches to teacher registration and outdated regulatory frameworks that do not recognise the importance of the early years and the specialised skills and expertise of qualified early childhood teacher.

Where the Framework and Standards are applied in early years' settings, they provide valuable information to inform future practice as well as benchmarking data to track the impact of teaching approaches and ultimately the achievement of learning outcomes for children.

The patchy effectiveness of the Framework highlights the need for teacher registration processes to provide a nationally consistent and nationally recognised approach to registration of qualified early childhood teacher. With 90% of a child's brain developed in the first five years of life, it is difficult to understand why degree qualified teachers supporting the learning and development of children at this critical foundational stage are not afforded the same professional recognition as teachers in later years.

Regulatory authorities also need to consider how they support teachers in early years' settings progress from provisional to full registration. There are often limited opportunities for professional mentoring in early years' services as qualified teachers are generally fully occupied with a full early learning program. It is therefore essential that Regulatory Authorities provide an avenue for qualified early childhood teacher to receive the necessary mentoring and supervision on-site in order to successfully progress to Proficient stages of Registration.

Teacher quality

How has the embedding of the Teacher Standards in the Framework supported teacher quality? In particular, how have the Teacher Standards influenced the way in which teachers move from provisional to full registration and through renewal of registration?

The embedding of Teacher Standards in the Framework is reflected in the professional development program of some of our member organisations and has been shown to reflect teacher quality. Through embedding the Standards in the Framework, there are considerations of the Standards in all facets of the teacher lifecycle and in their act of teaching. The upholding of the Standards during these critical points provides a benchmark of teacher quality through consistent expectations.

However, mutual recognition, does not support teacher quality in early childhood as there are inconsistencies across States and Territories. Teachers moving across States and Territories have shared experiences whereby their qualification was accepted in one State but not recognised for teaching in another (see Appendix 1 for case study).

Moving from provisional to full registration also remains problematic for the sector, particularly for smaller providers. The requirement for mentoring supervision is particularly challenging in services where there may only be one qualified early childhood teacher and the opportunity for them to support a provisionally registered teacher progress to full registration is restricted by their own work loads and the lack of professional networking opportunities.

Within our member organisations, there is significant investment, albeit varied, in professional development of teachers. In order to ensure that all children receive a high quality learning program, delivered by a fully qualified early childhood teacher, it is imperative that registration authorities provide more access to support, mentoring and supervision for provisionally registered teachers who may have limited access to experienced teachers within their own workplace.

Renewal of registration. While not all early childhood teachers are currently eligible for registration in all jurisdictions, there is a growing appreciation of the important pedagogical role played by early childhood teacher not only in the early years but the setting up of children to successfully transition to school and beyond.

The renewal of registration requires that early childhood teachers be able to demonstrate their understanding and practice of the Standards. Some member organisations have embedded this into their professional development programs for early childhood teachers to support their renewal of registration; however, with inconsistent approaches to teacher registration, particularly for the early years, this is at best sporadic across the sector.

Member organisations that have engaged with the Standards and used them to inform the professional development program for their teachers, have found this has resulted in a marked increase in inquiry-based learning for teachers, noting that practitioner inquiry increases engagement in learning and improves teaching quality and outcomes for children. We have found that embedding the Standards in our professional development program has been critical to building early childhood teachers' professional knowledge and their ongoing professional growth.

Improvements

How could teacher registration arrangements be improved to strengthen both teacher registration implementation and teacher quality? Are the eight elements of the 2011 Framework relevant and appropriate?

In addition to the points stated above (need to include early childhood teachers as part of national registration; support for early childhood teachers in settings other than schools; embedding of Standards and Framework), consideration also needs to be given to the different approaches to "Suitability" and eligibility to enroll in an under graduate teaching qualification.

In many respects, the "suitability" measures are duplicated under various pieces of legislation and regulatory frameworks which apply in the early years settings. Despite this, there is not yet a consistent approach and this needs to be a goal of a revised National Teacher Registration Framework. Each jurisdiction has a different approach to which subject areas it requires candidates to demonstrate proficiency. In some jurisdictions, the inclusion of subject areas other than English, as a pre-requisite to undertake a teaching degree has impacted negatively on enrolments in under-graduate courses. This needs to be carefully considered in light of the increased demand for early childhood teachers in order to comply with the second early childhood teacher requirement under the Education and Care Services National Law and Regulations commencing in 2020.

How could improvements be implemented, acknowledging different legislative, regulatory, administrative and resourcing contexts? What are some expected benefits and success measures?

Introducing a nationally consistent approach to registration of early childhood teacher and providing national recognition of the qualifications, expertise and skills of early childhood teacher would improve the integrity and relevance of the national teacher registration framework across Australia.

As registration processes are generally school-centric, it would be useful if there was a guide to support teachers in early years settings understand and unpack how the Framework and Standards apply in their particular environments. The value of this resource would be further strengthened if it took into consideration the significant expectations and quality standards that already apply to teachers in early years settings as part of the Education and Care National Law and Regulations incorporating the National Quality Framework and Early Years Learning Framework. A collaboration with ACECQA would enable understanding the particular challenges, complexities and intensive family partnerships which apply in early years settings to inform this work.

Explicitly articulating the early years as the critical foundation for achieving successful learning outcomes will further enhance the quality, relevance and integrity of the Framework and the Standards, as well as the registration process more generally.

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?

A nationally consistent approach to teacher registration is necessary to achieve professional recognition of early childhood teachers and realise the benefits that flow to the individual child and the broader society as a result of high quality early learning.

At present, there is little consistency across Australian states and territories around the decision-making process and evidence requirements regarding both recommendation for a provisional teacher to gain full registration and maintenance of proficient registration. Variation in the processes, requirements and expectations across jurisdictions does not allow for valid, transferable, fair and reliable identification and recognition of teachers' competence in quality professional knowledge, practice and engagement. A nationally consistent benchmark for teachers being considered to move from provisional to full registration is required.

A national approach to teacher registration would better enable teachers to move across jurisdictions and retain their registration without financial penalties and the additional stress that this has caused many teachers (See Appendix 2). This approach also needs to consider the specific expectations and obligations placed upon teachers in early years' settings under the Education and Care Services National Law and Regulations. A contemporary national teacher registration framework would be strengthened by incorporating the relevant elements of the law and regulations.

How could a nationally consistent approach to teacher registration support and improve the quality of early childhood teaching in school and non-school settings?

Where available, teacher registration in early childhood settings has already significantly increased the quality of early childhood teaching by providing teachers with a framework that articulates the elements of high quality and effective teaching.

The Teacher Standards provide a consistent language with which teachers can identify, discuss and understand quality teaching practice and the Standards encourage teachers to continually reflect on their practice and progress across the career stages. Teacher registration is crucial for maintaining and supporting teacher quality. The processes for teacher registration need to be inclusive and reflective of the early learning and care sector for this to be able to occur effectively.

A consistent approach across all States and Territories to teacher registration would also result in a stronger commitment by the early years' sector to embedding the Teacher Standards in the work of teachers, thus improving teacher quality. The inconsistent approach to teacher registration in the early years works to fracture the professional identity of the sector and restrict the professional development of early childhood teachers. Furthermore, the end result is that children attending early years'

services in jurisdictions where registration is not an option, are at risk of having teachers who are not as competent in contemporary pedagogical practice.

For example, in the Northern Territory, teachers are not required to be registered in long day care settings but do require registration if they are working in a prior to school setting which is part of a school. This suggests that teachers who are working in long day care setting are not of equal importance or required to teach at a consistent standard to those in a school setting, and that children who attend long day early learning (across all ages including children in the preschool/kindergarten age group) do not deserve the same high quality outcomes. Teachers working in long day early learning settings in the Northern Territory do not generally engage with the Teacher Standards, as it is not a requirement in that jurisdiction. A nationally consistent approach to registration would mean that all early childhood teachers teaching in early learning and care services, irrespective of what State or Territory they are working in, would engage with the Teacher Standards, thus lifting teaching quality and children's learning and development outcomes.

Testing of English language proficiency, as part of registration in all States and Territories, would also ensure that all teachers are able to demonstrate achievement of a level of professional proficiency in spoken and written English, which is essential for high quality outcomes for children. A national approach to teacher registration for early childhood teachers working in early years settings, which includes testing for English language proficiency through the Literacy and Numeracy Test for Initial Teacher Education (LANTITE), would ensure that children in long day settings have access to teachers who are proficient in English, lifting outcomes for all children. This already occurs in Western Australia and could be rolled out nation-wide.

How could the Teacher Standards be applied for early childhood teacher registration?

The Teacher Standards for early childhood teacher registration are currently being applied inconsistently across early childhood settings (school/kindergarten/preschool/early learning centres) in moving from graduate to full registration and for renewal of registration. In the States and Territories where registration is available to early childhood teachers, the Teacher Standards form the basis for teachers to transition from provisional registration to full registration. Registered early childhood teachers review and reflect on their engagement with the Standards to show how they demonstrate meeting Proficient, Highly Accomplished and Lead Standards.

Early childhood teachers can also be engaged as leaders within long day early learning services from their first appointment as a teacher, and this is not reflected in the linear structure of the Standards. Early childhood teachers working in early years settings, will often be called upon to fill leadership roles, akin to that of a Principal. As such, teacher's knowledge, practice and engagement may sit across all of the Standards simultaneously. AITSL has acknowledged the role of the School Principal through their Standard for Principals. The Standard should be extended to incorporate teachers in leadership/centre director positions.

A challenge for early childhood teachers is that they do not currently see early childhood reflected within the Standards, as the language is not reflective of contemporary early childhood pedagogical practice. The Standards are school-centric in the language, terminology, concepts and curriculum references. In some States, additional documents have been developed which sit alongside the Standards to support early childhood teachers to use the Teacher Standards for teacher registration/accreditation purposes. These documents support early childhood teachers' engagement with the Standards, linking the Standards to knowledge, practice and engagement that is reflective of early childhood contexts.

We recommend that AITSL formally recognise the early years as a particular phase of learning that requires teachers to have specialist knowledge and skills that effectively

shape children's learning and development, and to develop additional resources and documents that help early childhood teachers navigate the Standards alongside practice in the early years.

How does teacher registration support entry into the teaching profession?

These questions have been addressed elsewhere in the submission.

How can we ensure that registered teachers satisfy the fit and proper requirement? Teachers in early years' settings are subject to ongoing fit and proper considerations as part of the Education and Care Services National Law and Regulations and depending on their specific role in a centre, they will also have obligations under the Family Assistance Law.

AITSL should consider the myriad of legislative and regulatory checks already imposed on teachers in early years' settings and provide a streamlined, comprehensive and consistent approach to this issue. Currently, teachers in early years settings are often required to comply with multiple and overlapping obligations which do not apply to teachers in school environments. This extra burden on teachers in early years' settings needs to be reviewed and a consistent, comprehensive approach adopted. The recommendations of the Royal Commission's Report into Institutional Responses to Child Sexual Abuse need to inform future policy and practice in this area.

Closing comments

ELACCA welcomes the opportunity to provide this submission and put forward recommendations for AITSL's consideration in regard to teacher registration. The outcomes Australia seeks to achieve through its education systems, is reliant upon a strong foundation which is formed in the early years of a child's development. It is therefore imperative, that in order to improve the integrity, strengthen the relevance and boost the quality of the Australian education system, that teachers in the early years be included in a national registration scheme. It is only through such an approach, that we will continue to develop the leading pedagogical practice that has been brought about through the introduction and embedding of the National Quality Standards under the Education and Care Services National Law and Regulations. ELACCA members have services nation-wide and would welcome the opportunity to further discuss these recommendations with you.

References

- Australian Children's Education & Care Quality Authority. (2018a). Early Childhood Teaching Qualifications. Retrieved from <https://www.acecqa.gov.au/qualifications/requirements/children-preschool-age-or-under/early-childhood-teaching-qualifications>
- Australian Children's Education & Care Quality Authority. (2018b). Recognition as an 'equivalent early childhood teacher.' Retrieved from <https://www.acecqa.gov.au/qualifications/requirements/children-preschool-age-or-under/recognition-as-an-equivalent-early-childhood-teacher>
- Australian Children's Education & Care Quality Authority. (2018c). Qualifications for centre-based services with children preschool age or under. Retrieved from <https://www.acecqa.gov.au/qualifications/requirements/children-preschool-age-or-under>
- Australian Children's Education & Care Quality Authority. (2017). Guide to the National Quality Standard. Retrieved from: <https://www.acecqa.gov.au/nqf/national-quality-standard>
- Cleveland, D. (2010). Confronting pre-service teachers' stereotypes: The road to self-awareness and self-reflection. *National Forum of Applied Educational Research Journal*, 24(1/2), 73-84.
- Earl, L. M., & Timperley, H. (2008). *Professional learning conversations: challenges in using evidence for improvement* (1. Aufl. ed. Vol. 1.). Dordrecht: Springer.
- Fleet, A., De Gioia, K., Patterson, C. (2016). *Engaging with educational change: Voices of Practitioner Inquiry*. London: Bloomsbury.
- Gibson, M. (2013) 'I Want to Educate School-Age Children': Producing early childhood teacher professional identities. *Contemporary Issues in Early Childhood*, 14(2), 127-137.
- Heckman, J. J. (2011). The economics of inequality: The value of early childhood education. *Education Digest: Essential Readings Condensed for Quick Review*, 77(4), 4.
- Krieg, S., & Whitehead, K. (2015). Where are the early years of school in contemporary early childhood education reforms? An historical perspective. *The Australian Educational Researcher*, 42(3), 319-333. doi:10.1007/s13384-014-0161-0
- Pascoe, S. & Brennan, D. (2017, December). *Lifting our Game. Report on the Review to Achieve Educational Excellence in Australian Schools Through Early Childhood Interventions*. Retrieved from <https://education.nsw.gov.au/early-childhood-education/whats-happening-in-the-early-childhood-education-sector/lifting-our-game-report>
- Ramos, F. (2012). Steering a drifting ship: Improving the preparation of first-year catholic school teachers through self-reflection. *Patroneando un barco a la deriva: Mejorando la preparación de los maestros de los colegios católicos durante el primer año a través de la autorreflexión*. (22), 73-91.
- United Nations Educational Scientific and Cultural Organization. (2016). Early childhood care and education. Retrieved from <http://en.unesco.org/themes/early-childhood-care-and-education>

Attachment A – Case studies

A national approach to teacher registration would better enable teachers to move across jurisdictions and retain their registration without financial penalties and the additional stress that this has caused many teachers. The following stories from some of our early childhood teachers highlight this issue:

Case study #1

Having completed my BA in Teaching in the UK I needed to complete a year induction period working alongside a mentor before becoming recognised as proficient. I taught in schools during this time and for the next few years before moving to Australia and during this time went on to complete my Masters in Teaching. To teach in schools in Queensland I had to register as a teacher with QCT and because my qualifications were from overseas had to complete another year under supervision with a mentor before becoming recognised as proficient. I then wanted to work as an Early Years teacher in a kindergarten so had to do additional study to complete a bridging course before taking up this role. I maintained registration in QLD for 6 years keeping my professional development as required and paying annual fees. In October 2017, I transferred to NSW to teach in a preschool and was informed I would need teacher registration in NSW. I had paid my QCT fees in August at the cost of \$83.75 as it was due for renewal. In October of the same year I paid \$100 to register in NSW and then had to pay another \$100 in December for the following year as it does not run the same as in QLD; in addition to \$80 for a NSW working with children check as in QLD teachers receive their blue cards for free. I had to grant permission for information to be shared between states from QCT to NESAS or else I would have had to complete yet another provisional year alongside a mentor. This all took time and left me feeling confused and anxious about my registration requirements. Did I now have to complete two lots of professional development as in NSW some of it has to be NESAS approved? I wanted to maintain registration in QLD as I was informed I needed to be registered in the state you are working and if my transfer was not a successful one I may want to go back and teach in QLD. I had lots of questions at this time. I have since discovered I could have taught in NSW with QCT registration which is frustrating as I have done a lot of professional development maintaining my registration in QLD which does not transfer to NESAS automatically, so I have 2 years' worth of unrecognised PD. Currently I am still registered with both states and need to find clarification about the issues raised above before I let one of them lapse and will be doing this before renewal is an issue again. I am also a mentor in QLD and have mentored provisional teachers and now am undergoing training to become one in NSW. Again, having different systems in place can be confusing. As we are all working within the same Teaching Standards it would be much more beneficial if the documentation requirements were more consistent especially for those living and working across borders. I feel teachers in Australia definitely should just have one registration in place to stop all this confusion as we are all teaching from the same curriculum and working within the framework of the same Standards for teachers. For those teachers wanting to become highly accomplished or lead and possibly live and work across borders the process would become much more complicated. (ECT NSW)

Case study #2

I graduated in 2011 with a Bachelor of Teaching (birth -5years) in NSW. Following this I worked as a Preschool teacher being the only Teacher in the centre for 3.5 years. This was for a privately-owned childcare/Preschool in Bondi NSW. During this time the registration for NSW early childhood teachers had not come into effect. NSW early childhood teacher registration came into effect in 2016/2017 making it compulsory for all early childhood teachers to be registered. All teachers became provisional teachers with no regard for the years of work beforehand. Teachers then had to pay a teacher registration fee of \$100 per year. I then began working as a Director for a large not for profit provider. In NSW all Directors within the organisation are to be early childhood teachers. Transferring to Melbourne, Victoria at the end of 2017 within the same company I then had to reregister with VIT and had to pay another additional

registration fee even though I had previously paid my registration fee for that year in NSW. Now being a Director in Victoria I am being told I am a provisional teacher and that I have to work an additional 80 hours as a Teacher to gain experience to become a teacher even though I already have several years of this experience. I am also required to do an enquiry-based project. I am always in the rooms helping the children/educators and taking classes when needed in addition to being a director. I believe that the current registration system is not effective as it is state-based and there is no consistency across Australia for early childhood teachers. In addition to this inconsistency it is not a fair system where teachers that had been working as teachers prior to the registration taking place not receiving their full registration but being made to be provisional teachers. (ECT VIC)

Case study #3

I have completed my Pathway to Teaching (Primary) and my Early Childhood Teaching Degree in NSW. When applying for registration in Queensland I was told my qualifications could not be considered. I was unable to seek any solution to fill the requirements such as volunteering or professional development courses and I was told I would have to complete another degree in Queensland. After two University degrees and changing life circumstances this is impossible for me. I was told I had to remove my application, I would not receive provisional registration and I should give up. (ECT Qld)

Case study #4

Historically in Tasmania kindergartens have always been in schools, and organisations have offered "pre-school" on the days that the children do not attend kindergarten. Teachers who teach kindergarten in schools are required to hold teacher's registration with the Teacher Registration Board and must hold a 4 year degree. The organisation I work for recently become the first external provider of kindergarten in Tasmania, with our centre successfully being approved to provide funded kindergarten in 2017. One of the requirements for providing funded kindergarten is that the teacher must be registered with the TRB (and hold a 4 year degree) as I do. Due to the huge success our funded kindergarten program, other centres in Tasmania have also started the process to become approved providers, however they have encountered an issue. Many of the teachers currently providing the pre-school programs only hold 3 year degrees. Their qualifications have been approved by ACECQA and under the national law they are considered "early childhood teachers" - however the TRB will not let them register as teachers unless they hold a 4 year degree. As you can imagine this has caused issues with our centres who planned on applying to run funded kindergarten programs. It is also different to the system in Victoria where 3 year degrees are accepted for VIT teacher registration if they are ACECQA approved. (ECT TAS)