



Early Childhood Australia
A voice for young children

**OUR
VISION:
EVERY
YOUNG
CHILD IS
THRIVING
AND
LEARNING**

Automatic Mutual Recognition of Occupational Registrations: Exposure Draft Legislation – Consultation Paper

Feedback on impacts for Early Childhood Teachers

February 2021

About us:

Early Childhood Australia (ECA) is a not-for-profit organisation that has been a voice for children since 1938. We have a federated structure with branches in every state and territory in Australia and our membership includes individual professionals, early childhood services and schools, as well as public, private and not-for-profit organisations that share a commitment to young children.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school.

Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight. ECA specifically acknowledges the rights of Aboriginal and Torres Strait Islander children and their families, and the past and current injustices and realities for them around Australia.

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1. Executive Summary

Early Childhood Australia (ECA) welcomes the opportunity to provide comment on the Automatic Recognition of Occupational Registrations: Exposure Draft Legislation Consultation Paper.

In January 2021, ECA participated in a national education industry roundtable with the Department of the Prime Minister and Cabinet to discuss occupational mobility for teachers.

This submission focuses on early childhood teachers (ECTs) working in early learning services approved under the [Education and Care Services National Law](#) and [Education and Care Services National Regulations](#).¹

Mutual recognition of teacher registration already exists, allowing teachers registered in a state or territory (or New Zealand) to be eligible for recognition of their registrations in other States and Territories.

Context for early childhood education and care

The Education and Care Services National Law and Regulations set a national standard for children's education and care across Australia. In effect, it means the same law is applied in each state and territory but with some varied provision as applicable to the needs of each state or territory.

Minimum quality requirements include a requirement for engaging or accessing an early childhood teacher (ECT) based on the number of children in attendance at centre based services.

The requirement for ECTs to hold teacher registration or accreditation is not consistent in all states and territories. For example, in Tasmania, Northern Territory and ACT, early childhood teachers are only required to be registered if they work in state/territory operated schools and preschool/kindergartens. In Western Australia and Victoria, all ECTs must be registered. A list of registration requirements is available [here](#).

Many ECT qualifications recognised under the Education and Care Services National Law and Regulations are three year degrees or degrees that cover age groups of children that may make them ineligible for teacher registration. Individual employers may specify higher qualification requirements (for example, a four year ECT degree) as part of their employment policy.

ECA Member comment:

While some eligible early childhood teachers engage with the registration process, many do not, as it is not compulsory and not therefore not valued. The lack of recognition of certain early childhood teachers with certain early childhood Bachelor degrees would mean that many of our Queensland teachers would be impacted by an AMR situation as they are ineligible for registration in their own state.

¹ <https://www.acecqa.gov.au/nqf/national-law-regulations>



Comments on the exposure draft legislation

It is not clear from the consultation paper the extent of issues around existing mutual teacher recognition arrangements, cost benefit analysis of options, or strengths and weaknesses of the proposed automatic mutual recognition (AMR).

The introduction of an AMR provides an opportunity to build a robust system that aligns and integrates processes wherever possible, ensuring child safety and integrity are paramount.

ECA agrees that minimising costs to teachers wishing to access AMR is positive and likely to support mobility, but notes this is likely to have significant impacts for teacher registration bodies who rely on fees to administer a range of functions, not just registration.

A key issue raised during the education industry roundtable was risk, in particular, safety of children. If the AMR is introduced too quickly without detailed assessment of risks, the sector may not be sufficiently prepared for implementation and exposed to risk.

ECA supports the section 42T requirement for guidelines and information to be developed and made available regarding the operation of AMR. ECA suggests these should be made available sooner than the six months proposed as they will be vital to understanding the AMR and addressing concerns such as use of personal information.

The provision for interim deemed registration in section 25, means that a person can commence working as a teacher in another State or Territory before the AMR process is complete. Whilst the process should be completed within one month, this provision may present unintended consequences.

A requirement for teacher registration bodies to furnish information to other teacher registration bodies 'as soon as reasonably practicable' in section 37 may present issues in terms of readiness, systems and information handling.

ECA Member comment:

I enquired about the requirements to teach in all states and territories. I was disappointed to discover that I would have to undergo a process for every and each state that seemed arduous and repetitive yet also vastly different in application of paperwork. In addition, there was a fee for every state and territory with no guarantee that I would find work. The required period to complete all these processes was also long and untimely.

Due to these reasons, I did not pursue work as it seemed not worth it.

ECA welcomes the opportunity for further discussion on Automatic Recognition of Occupational Registrations.