



Early Childhood Australia

A voice for young children

Mandatory Registration of Early Childhood Teachers Employed in Approved Centre-based Services

Submission

Early Childhood Australia

December 2025

EVERY
YOUNG
CHILD IS
THRIVING
AND
LEARNING



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**OUR
VISION:
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About us

Early Childhood Australia (ECA) is a not-for-profit, membership-based organisation that was first incorporated in 1938. We work at both the national and local levels, with active State and Territory Committees in each Australian jurisdiction and a National Board of Directors. Our membership includes early childhood professionals, services, schools and organisations that share a commitment to the rights and wellbeing of 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 acknowledges the unique place of Aboriginal and Torres Strait Islander peoples in our society, the past and current injustices and realities for them across Australia, and the enduring strength of their cultures and identities. We commit to being at the forefront of achieving a reconciled nation that values, respects and celebrates Aboriginal and Torres Strait Islander ways of knowing and being.

Find out more at: www.earlychildhoodaustralia.org.au

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Acknowledgement of Country

Early Childhood Australia acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land and community. We pay our respect to them and their cultures, and to the Elders both past and present.



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Executive Summary

Early Childhood Australia (ECA) has long championed the importance of early childhood education and care (ECEC) and the early childhood profession. The profound impact of high quality, play-based early learning on young children's learning, development and wellbeing does not occur without the highly specialised knowledge, skills and expertise of early childhood professionals.

The role of the early childhood teacher in early childhood settings is important; they hold knowledge of theory, pedagogy and practice. Early childhood teachers lead and co-lead other early childhood colleagues in education teams in various early childhood settings, and exercise professional judgement in their everyday practice.

Across jurisdictions, different arrangements exist for teacher registration. ECA has called for better recognition for the status of early childhood professionals, parity in pay and conditions with teaching professionals working in the school sector, and career pathways that attract and retain a highly qualified and experienced early childhood workforce.. ECA strongly supports the proposed move to expand mandatory teacher registration in Queensland to include early childhood teachers who work in prior to school settings.

We support the main design elements of the proposed policy approach, specifically: expanding the current teacher register to include early childhood teachers in early childhood education and care (ECEC) settings (i.e. a single register); commencing with teachers employed as the early childhood teacher (ECT) under the National Quality Framework (NQF) in centre-based ECEC settings; and recognising all ACECQA-approved qualifications for the purpose of teacher registration.

We are cognisant of the complexities in expanding mandatory registration to include teachers in ECEC, most particularly with different qualification pathways, policy, funding and regulatory arrangements that see differences in supports for pre- and in-service early childhood teachers. That said, we believe that working through these complexities is important and worthwhile. Mandatory teacher registration will strengthen the profession and recognises the critical role that early childhood teachers play in the lives of young children and their families. Clearly defining and understanding the different entry points and subsequent career pathways for Queensland's early childhood sector is important, so too acknowledging the professionalism of our early childhood teachers, regardless of the age of children or education setting in which they work. This work would then inform an understanding of a holistic view of the varied career pathways and progression of early childhood teachers.

We are pleased to provide feedback on the proposal to expand mandatory teacher registration to include teachers in ECEC settings in Queensland. Our submission is informed by an online professional conversation on 26 November 2026 that involved a diverse group of 22 ECA Queensland members.



Response to Feedback Questions

1. Do you support the move to mandatory ECT registration, as proposed?

ECA strongly supports the move to expand mandatory teacher registration to early childhood teachers working in early childhood education and care (ECEC) settings in Queensland. We believe this is a positive step forward that will strengthen the professional identity, status and career pathways of teachers choosing to teach in ECEC settings. Aligning to the National Workforce Strategy (2021), we are optimistic that this will contribute to increased attraction and retention of teachers in ECEC and ultimately “a sustainable, high-quality workforce... that is highly respected and valued by the broader community” (ACECQA, 2021, p.6).

During our consultation with ECA Queensland members, we considered the key features of the proposed policy framework as outlined in the Consultation Paper. We address each of these in turn.

- **Single or separate register.** We strongly support a single register for all teachers in Queensland, leveraging the current Queensland teacher registration framework. Reflective of the AITSL Review of Teacher Registration (2018), we advocate for One Teaching Profession.
- **Proposed scope of mandatory teacher registration in ECEC.** We endorse an initial focus on teachers employed as “the ECT” under the National Quality Framework in approved centre-based services as a manageable first step in a staged approach towards mandatory teacher registration for all teachers in education and care settings. We are mindful that the majority of teachers employed as the ECT are working with the kindergarten age group in Queensland. While recognising that additional teachers within centres and other education and care settings can apply for voluntary registration, we advocate for future review and expansion of mandatory teacher registration to include all early childhood teachers regardless of their employment setting (AITSL, 2018).
- **Acceptance of ACECQA-approved qualifications.** There was robust debate amongst members regarding the acceptance of all ACECQA-approved qualifications for teacher registration. There is broad support for recognition of 3- and 4-year Birth to 5-year degrees for teacher registration, however, members expressed concern about the quality and graduate outcomes of some highly accelerated graduate programs (ASQA & TEQSA Sector Alert, November 2025). We also note differences in the recognition of 1-year Graduate Certificates and Diplomas across jurisdictions (i.e., SA and NSW). We advocate for a nationally consistent approach to the recognition of qualifications for teacher registration, reflective of the Framework for Teacher Registration in Australia (AITSL, 2024). This must be supported by a strong and transparent national accreditation framework for Birth to 5 programs, that is comparable to the AITSL Accreditation of Initial Teacher Education programs in Australia (AITSL, 2022). We believe this is vital to realise the benefits of teacher registration, in particular, well-prepared beginning teachers, enhanced professional recognition, increased community confidence in ECEC and improved mobility and career pathways for teachers in ECEC.



- **Registration with condition.** We endorse the proposed approach to enable early childhood teachers to apply for provisional registration showing they meet the APST at Graduate level, and to move to full registration following demonstration of proficiency against the APST. We believe it is appropriate to include a condition linked to the scope of qualification (i.e., a teacher with a birth to 5 years degree has undertaken study to teach younger children in prior-to-school ECEC settings). Terminology is important here. Our strong preference is to present this as teacher registration (with a condition), as opposed to conditional registration.

ECA makes the following recommendations to support the effective expansion of mandatory teacher registration.

Recommendation 1: That the current register in Queensland be expanded to include teachers in ECEC settings, with recognition of all ACECQA-approved qualifications, and application of a condition linked to the scope of the initial teacher education program (i.e., graduates of Birth to 5 programs would be limited to teach in ECEC settings).

Recommendation 2: That ACECQA undertake a review of the current accreditation process for Birth to 5 programs with a view to increasing stakeholder engagement in the accreditation process and ensuring a strong and rigorous national accreditation framework comparable to the accreditation of other initial teacher education programs in Australia.

2. What are the anticipated costs associated with implementing mandatory ECT registration?

Recognising shared benefit, we believe that all stakeholders have a role to play, and interlinking responsibilities, in advancing the goal of expanding mandatory teacher registration in Queensland. It is understood that associated costs will be evident to early childhood teachers, services, providers, and the Government through QCT and ECRA. Understanding the quantum of investment at all tiers is important if teacher registration is to be well supported by the early childhood sector, families of young children, the public and Government.

Initial and ongoing registration costs of early childhood teachers, particularly those who do not have wage parity with schooling counterparts, could present some difficulty. We do though of course see early childhood teachers from other jurisdictions register to work as early childhood teachers – to this point, we would recommend seeking guidance of fellow regulatory authorities around supports and/or measures to address need amongst cohorts of early childhood teachers. ECA's reach through our Queensland members and wider networks, sees us well-positioned to undertake and/or support consultation. We would be happy to work with the Department to invite respondents to give feedback specific to cost and perceived burden which could further assist to prioritise and optimise implementation support.

Access to affordable evidence-informed professional learning, to maintain registration status and/or to move from provisional to full teacher registration, can be unevenly available to early childhood teachers dependent on employer, location and cost, and appropriateness and availability of relevant professional learning. We understand the new Queensland Workforce Institute will play an important role in this context, and welcome future opportunity to discuss ways that ECA can work with the Institute to increase access to high-quality transformational professional learning programs and resources across Queensland.



Presently governments and early childhood services are rightly focussed on work associated with the strengthening of child safety and safeguarding. The Department remaining cognisant of this will be important to secure the goodwill and support of the sector. While recognising the important contribution of teacher registration to strengthening child safety, we strongly encourage the Queensland Government to take this opportunity to broaden the narrative to promote the multiple benefits of teacher registration for individuals, early childhood services, families and the community and the profession.

Additional resourcing for QCT and the ECRA should be provided to ensure that they are adequately resourced to be responsive and proactive while this change is rolled out – it is likely that careful and methodical work will be required over and beyond the change process to work through with individuals and organisations.

Recommendation 3: That modelling is undertaken to clearly determine the quantum of investment required by individuals, services, providers and Government – and staging the implementation of the reform accordingly with a view to resourcing transitional arrangements.

3. Are there any additional impacts, on whom?

Careful guidance is required to ensure that an equitable and collegial approach is undertaken within the sector. This includes promoting and assuring the quality of different qualification and career pathways to become an early childhood teacher (e.g., undergraduate, post-graduate, vocational education and training pathways). ECA is concerned that an ‘othering’ may occur if the discourse is clumsy around the value and robustness of various qualification profiles.

Recommendation 4: That learnings from other states, in particular ACT, NSW and SA, to expand teacher registration to include early childhood teachers in prior-to-school settings are gleaned and used to inform the proposed policy reform in Queensland – most particularly around ‘pain points’ and lessons learned.

4. What support will need to be provided to ECTs to facilitate their progress to registration?

The cost of teacher registration is a varied professional cost that is borne by early childhood teachers of other jurisdictions in their application for, or maintenance of, teacher registration.

When we spoke with Queensland ECA members, there was a view that the requirement to pay for teacher registration demonstrated value in the registered status and professional recognition of the registered teacher. However, the cost of gaining and maintaining teacher registration for early childhood teachers, many of whom do not have wage parity with peers employed in primary and secondary schooling contexts, should not be prohibitive. This should also not further compound cost of living pressure on the early childhood workforce. Transitional arrangements could also include a lower entry cost for the first registration period, or similar.

There are different ways in which this is mitigated to reduce the burden to registrants. In South Australia, while a 5 year registration term now exists, teachers may apply for the full registration term, but then seek to pay for a 1, 2, 3, 4 or 5 year term; teachers must remain financial to maintain their registration status and the ability to work as a registered teacher in South Australia.

Queensland ECA members highlight the need for clear and accessible information for teachers and approved providers to build awareness of the policy intent and a shared understanding of the registration process and implementation timeframe. Members suggest the importance of consistent language and terminology to build



shared understanding of the registration process. This includes guidance around diverse contexts and circumstances, recognising different qualification pathways to become an early childhood teacher, different teaching and employment contexts. The need for practical examples and ways of working to support the transition process is also emphasised by members.

There is also a need to promote access to affordable, high-quality, evidence-informed professional learning programs and resources to support teachers to move from provisional to full registration, and to meet the annual requirement for ongoing professional learning. As noted, we anticipate the new Queensland Workforce Institute will play an important role here.

Recommendation 5: That resourcing to support implementation include:

- **Clear, accessible and user-friendly information for providers and teachers;**
- **Access to affordable evidence-based professional learning;**
- **Targeted programs to build leadership and mentoring capacity within the sector;**
- **Time during work hours for teachers and mentors to work together, and for early childhood teachers to gather evidence to demonstrate their proficiency.**

5. Is a two-year transitional period for mandatory teacher registration sufficient time?

ECA is strongly supportive of this move to mandatory registration of teachers in ECEC settings and acknowledges the work and progress by the Queensland Government, and its engagement with the sector to inform the design of this important policy reform. As is well-documented the early childhood workforce is diverse and varied, so too the contexts in which early childhood teachers are employed, from provider and service types, to varied geographies across Queensland. Successfully addressing this variance will take careful planning and well-executed implementation.

ECA believes that the proposed two-year transitional period provides sufficient time for teachers and approved providers to engage with the registration process.

Recommendation 6: That there is a two-year transitional period to stage and support the implementation of mandatory teacher registration for early childhood teachers in ECEC in Queensland.

6. What are the key challenges that need to be addressed?

A basic tenet is that mandatory teacher registration needs to deliver for early childhood teachers- it needs to be viewed favourably and deliver a return in professional identity and recognition. The associated communications plan will be important here - comms need to 'speak to' ECTs employed in different parts of the early childhood sector.

It will also be important to educate the broader early childhood workforce. This should include encouraging teachers employed in other positions in centre-based ECEC and other education and care settings not subject to mandatory teacher registration to apply for voluntary registration. It could also include assuring VET qualified early childhood educators that teacher registration supports the professionalisation of the workforce which is of benefit to all. Applying learnings from this process to the progression of the National Educator Register would also be beneficial – i.e. ECA has advocated for, additional to the adoption of the National Register, to strengthen child safety and safeguarding, that the Register additionally has application that is for the educator.



Variance in qualifications as previously mentioned, creates challenge – in the consideration of minimum requirements for teacher registration – this may see some prospective registrants effectively shut out or excluded from registration.

Ensuring statewide access to trained mentors with the knowledge and skills to support early childhood teachers to move from provisional to full teacher registration is seen to be the most significant challenge for Queensland. We see this as a shared responsibility, requiring commitment from early childhood teachers, approved providers and government. Here we acknowledge the current commitment and investment by large Queensland providers in mentoring and support programs for beginning teachers, and note the need for more targeted support for early childhood teachers employed in standalone centres, rural and remote communities and Aboriginal and Torres Strait Islander communities. Targeted programs and resources will also be important to train and support Aboriginal and Torres Strait Islander mentor teachers to assist beginning Aboriginal and Torres Strait Islander teachers to transition from provisional to full registration and beyond. Recognising the current shortfall of trained mentors, particularly in rural and remote areas, we suggest there may be opportunity to leverage some existing support programs (e.g., Qualifications Pathways Program, Leadership and Management Programs) and/or academic staff within universities across Queensland. While this would require additional funding support, this is an immediate solution with cost efficiencies through a coordinated state-wide approach.

Recommendation 7: That the Queensland Government establish a sector working group to investigate short-medium term options to establish a statewide alliance of trained and skilled Indigenous and non-Indigenous mentors to support early childhood teachers to move from provisional to full teacher registration.

Recommendation 8: That the working group interrogate the intended and unintended consequences for all stakeholders and identify strategies that will ensure registration supports the recruitment and retention of early childhood teachers.

7. Are there any other issues that should be considered?

This is an opportunity to champion the principled and ethical early childhood workforce who are professional and dedicated across the varied early childhood settings. Mandatory registration of teachers in ECEC provides a unique opportunity to back in early childhood teachers and the profession, to speak to the professional qualifications, status and importance of a highly qualified, skilled and experienced early childhood workforce. It provides an opportunity beyond those who work in and with the sector, and the families who choose ECEC, and Government, to the general public. In light of the devastating stories of child harm, maltreatment and child sexual abuse in some early childhood services, unhelpful narratives have made their way into legacy and social media.

While Australian governments, their agencies and the early childhood sector continue to work towards a strengthened, vigilant and durable system of child safety, safeguarding and quality that privileges children's rights and best interests, these problematic narratives work against the recruitment of new teachers and educators, and the retention, and feelings of efficacy and wellbeing of those currently practising, who it could be argued we most need to keep in sector.

Recommendation 9: That mandatory teacher registration is used as a vehicle to renew the narrative around the professional work of early childhood teachers and educators – and their value as education professionals in the lives of young children and their families.



Recommendation 10: That the Queensland Government commits to a light-touch review of the expanded teacher registration system at the end of five years to ensure the policy settings are right and to consider further expansion to include teachers in other roles in ECEC centres and teachers in other ECEC settings.

Conclusion

Early Childhood Australia has long advocated for recognition of our professional workforce through nationally consistent teacher registration. We believe that teacher registration is an important step in acknowledging the profession, and demonstrating esteem for the important work of educating and caring for our youngest Queenslanders. The expansion of teacher registration to include teachers in ECEC also formally recognises that ECEC is the foundation of our education system. We are keen to support the work of the Queensland Government in this endeavour. Early Childhood Australia as a national organisation, and our dynamic and innovative ECA Queensland Committee is very well-placed to support engagement with the sector, and to provide expert advice to support the best possible outcomes for all concerned.

We are thrilled that early childhood teachers in ECEC settings in Queensland will receive the professional recognition they so deserve. We advocate for equal standing for teachers in ECEC settings with their primary and secondary school counterparts, but with implementation support as this transition occurs.

Where there is complexity in working through the different qualification types, duration and programs of study that have qualified Queensland's early childhood teachers, we do not wish to see early childhood colleagues who have studied and qualified, become effectively a separate class of teacher. Where issues are identified, we would recommend that these learnings inform a scoping and review of early childhood qualifications – looking to a fix upstream instead of penalising those who are already downstream – that equity and fairness must be considered along with the robustness of degree programs to be working with and for young children. ECA would be happy to speak to our capability in undertaking such a piece of work – thorough, innovative and solutions-focused.

We would as always be happy to elaborate on our comments, and/or meet to discuss in depth. To organise a time to meet please contact **Jason de Bakker** (Chair, ECA QLD Committee), email qld.chair@earlychildhood.org.au and **Samantha Page** (CEO, ECA) email spage@earlychildhood.org.au . We thank the Department for this opportunity to respond. Please see below for a summary of ECA's recommendations.

Summary of recommendations

Recommendation 1: That the current register in Queensland be expanded to include teachers in ECEC settings, with recognition of all ACECQA-approved qualifications, and application of a condition linked to the scope of the initial teacher education program (i.e., graduates of Birth to 5 programs would be limited to teach in ECEC settings).

Recommendation 2: That ACECQA undertake a review of the current accreditation process for Birth to 5 programs with a view to increasing stakeholder engagement in the accreditation process and ensuring comparability to the accreditation of other initial teacher education programs in Australia.



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Recommendation 5: That resourcing to support implementation include:

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- Time during work hours for teachers and mentors to work together, and for early childhood teachers to gather evidence to demonstrate their proficiency.

Recommendation 6: That there is a two-year transitional period to stage and support the implementation of mandatory teacher registration for early childhood teachers in ECEC in Queensland.

Recommendation 7: That the Queensland Government establish a sector working group to investigate short-medium term options to establish a statewide alliance of trained and skilled Indigenous and non-Indigenous mentors to support early childhood teachers to move from provisional to full teacher registration.

Recommendation 8: That the working group interrogate the intended and unintended consequences for all stakeholders and identify strategies that will ensure registration supports the recruitment and retention of early childhood teachers.

Recommendation 9: That mandatory teacher registration is used as a vehicle to renew the narrative around the professional work of early childhood teachers and educators – and their value as education professionals in the lives of young children and their families.

Recommendation 10: That the Queensland Government commits to a light-touch review of the expanded teacher registration system at the end of five years to ensure the policy settings are right and to consider further expansion to include teachers in other roles in ECEC centres and teachers in other ECEC settings.



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