



Deregulation Taskforce
Department of the Prime Minister and Cabinet
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ACECQA submission to the Consultation on Automatic Mutual Recognition

Thank you for the opportunity to provide a submission to the Department of the Prime Minister and Cabinet consultation on automatic mutual recognition for teachers and other occupations.

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 national system for regulating children's education and care services, including long day care, outside school hours' care and family day care services, as well as most preschools and kindergartens.

The [children's education and care sector](#) is large and diverse, with more than 7,000 providers approved to operate more than 16,000 services under the NQF. Over 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.

Around 1.5 million children attend education and care services across Australia, with individual children attending anywhere from a few irregular hours to more than 50 hours every week. Research shows quality education and care early in life leads to better health, education and employment outcomes. The early years are critical for establishing self-esteem, resilience, healthy growth and development, and a capacity for ongoing learning.

As such, children's education and care is an integral part of Australia's education system and sets the foundations for lifelong learning and development. It is also an area of significant government investment, as well as an essential contributor to the broader national economy.

A fundamental feature of the NQF is the requirement for service providers to retain a highly skilled workforce through mandatory standards for formal qualifications. Most long day care services, and preschools and kindergartens must employ at least one degree qualified early childhood teacher.

Consultations with the children's education and care sector have identified that there are persistent and increasingly pressing workforce issues, in particular relating to the attraction, supply and retention of early childhood teachers.

Recent projections published by the [National Skills Commission](#) indicate that in the region of 7,000 additional early childhood teachers will be required by 2024 (a 16% increase over five years). It should be noted that these projections do not take account of the impact of COVID-19 and may not reflect current labour market conditions, but they are indicative of employment growth expectations prior to the global pandemic. Combined with [declining enrolments](#) in early childhood teaching qualifications and a parallel focus on improving the supply of primary school teachers, the children's education and care sector faces significant and increasingly urgent workforce challenges.

Despite [ample evidence](#) for the importance of a nationally consistent teacher regulatory system, inclusive of all teachers, current jurisdictional arrangements for the registration of early childhood teachers are variable and inconsistent.

Over 25,000 early childhood teachers are registered across four states – South Australia, Western Australia, Victoria and New South Wales (with registration called 'accreditation' in the latter). Given that more than three quarters of children's education and care services are located in these four states, most of Australia's early childhood teachers are required to be registered.

The requirements and process for early childhood teachers to obtain registration in these jurisdictions vary. For example, while New South Wales and Victoria align with ACECQA's qualification requirements under the NQF, South Australia and Western Australia set different qualification requirements for early childhood teachers. The remaining four jurisdictions (Australian Capital Territory, Northern Territory, Queensland and Tasmania) only require registration for early childhood teachers if they are working in early childhood services in schools.

These different approaches create unnecessary cost, complexity and burden for employers, particularly those who operate services in multiple jurisdictions or those located in cross-border areas. The variability in requirements also acts as a barrier to workforce mobility, exacerbating existing workforce challenges (for example, early childhood teachers registered in Victoria may not be able to achieve registration in South Australia, despite being approved by ACECQA to work in any NQF approved service in the country. Early childhood teachers may also be subject to differing requirements in terms of maintaining registration between states).

The landscape becomes even more complex for overseas trained teachers seeking to work in children's education and care services. These individuals may well be required to undergo three separate assessment and approval processes (for example, an assessment by [ACECQA](#) to be approved to work in an NQF service, an assessment by [AITSL](#) to be approved for skilled migration, and an assessment by the [Teacher Registration Board of Western Australia](#) to be approved to work as a teacher).

While the relevant bodies have made progress in more closely aligning their respective qualification assessment processes, differences remain between the requirements for skilled migration, teacher registration and NQF approval.

We strongly support the development of a nationally consistent, efficient and effective approach to teacher registration. While acknowledging the different roles and responsibilities, we remain committed to pursuing opportunities to streamline and align the respective assessment approval processes, with the goal being to ensure a sustainable pool of suitably qualified early childhood teachers.

Benefits include increased opportunities for early childhood teachers to work across the country, improved cooperation between state and territory teacher regulatory authorities, and certainty for teachers moving between jurisdictions and for employers with services in multiple jurisdictions and cross-border areas.

I look forward to the progress of the automatic mutual recognition initiative over the coming months and offer our support for this and the broader deregulation agenda.

If you would like to discuss our response to this consultation, or would like further information about ACECQA, please feel free to contact me or Michael Petrie, General Manager of Strategy, Communications and Consistency (michael.petrie@acecqa.gov.au).

Yours sincerely

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