

Consultation Paper

Expanding mandatory teacher registration to require all early childhood teachers employed in approved centre-based services as the ECT under the National Quality Framework (NQF) in Queensland to be registered

October 2025

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1. Acknowledgement of Country

The Queensland Department of Education (the department) acknowledges the Traditional Owners of the lands, seas, skies and waterways from across Queensland. We pay our respect to the Elders, past, present and emerging, for they hold the memories, traditions, the culture and hopes of Aboriginal peoples and Torres Strait Islander peoples.

A better understanding and respect for Aboriginal and Torres Strait Islander cultures develops an enriched appreciation of Australia's cultural heritage and can lead to reconciliation. This is essential to the maturity of Australia as a nation and fundamental to the development of an Australian identity.

2. Foreword

This targeted Consultation Paper is for the purposes of targeted consultation only and does not commit the government to a particular policy direction for future action.

3. Introduction

The Queensland Government is committed to ensuring the safety and wellbeing of children in early childhood education and care services.

Over the past decade, the need to; lift the professional status of all early childhood teachers (ECTs), improve national consistency in ECT registration requirements, enhance child safety provisions, increase workforce mobility and career pathways, and improve teaching quality have been recognised as key issues for the early childhood education and care (ECEC) sector in national reviews¹.

These reviews have recommended teacher registration categories be expanded to include early childhood teachers with qualifications approved by the Australian Children's Education and Care Quality Authority (ACECQA).

ACECQA assesses early childhood teaching qualifications against the [Requirements for early childhood teaching program assessments](#) including: qualification level, age focus, supervised professional experience, program evaluation, and qualification curriculum content.

Teacher registration is not a mandatory requirement for ECTs under the NQF in Queensland. New South Wales, Victoria, South Australia and Western Australia have mandatory teacher registration for ECTs².

All jurisdictions have committed to introducing ECT registration through endorsement of the national [Shaping our Future, National Children's Education and Care Workforce Strategy 2022-2031](#).

The national strategy highlights the need to implement ECT registration in every state and territory to enable the registration of all ECTs, including those in non-school settings.

This action was supported by the Queensland ECEC sector throughout consultations supporting the development of the [Queensland Early Childhood Workforce Strategy 2025-2028](#). The need to develop a teacher registration pathway for ECTs was recognised as key to supporting increased professional recognition.

The purpose of this Consultation Paper is to seek feedback on the regulatory impact and implementation considerations of mandatory registration by the Queensland College of Teachers (QCT) of ECTs in centre-based services approved under the National Quality Framework (NQF).

¹ Appendix 2 sets out a range of reviews and policy positions.

² Tasmania and the Northern Territory are also progressing mandatory teacher registrations, and the Australian Capital Territory has recently implemented voluntary ECT registration.

4. Context

4.1 Revised national Framework for Teacher Registration in Australia

In August 2024, Education Ministers agreed to a revised national [Framework for Teacher Registration in Australia \(FTRA\)](#).

The revised FTRA sets out uniform principles for the registration of teachers in education settings across Australia identifying eight principles that describe benchmarks for entry and continuing membership of the teaching profession.

These principles outline requirements for minimum qualifications, English language proficiency, suitability to teach, mutual recognition, alternative authorisation to teach, initial and full registration, renewal of registration, and sanctions and withdrawal of teacher registration³.

Most significantly for the ECEC sector, the revised FTRA recognises ‘early childhood settings’ as part of its definition of an ‘education setting’ and teacher education qualifications approved by ACECQA as meeting the minimum qualification requirements for provisional and full teacher registration across Australia.

Specifically, the FTRA states the qualifications required for registration are:

- at least four years of higher education study (full-time or equivalent) study, including in an initial teacher education (ITE) program accredited in Australia, using the [Accreditation of Initial Teacher education programs in Australia: Standards and Procedures](#); or
- [a teacher education qualification approved by the ACECQA](#); and/or
- an overseas or historic qualification assessed as equivalent⁴.

Given this change, it is timely for Queensland to review its teacher registration legislation to ensure it aligns with the new FTRA and removes barriers to registration for cohorts of ECTs in Queensland.

4.2 Current requirements for ECTs in approved centre-based services

Approved centre-based ECEC services under the [NQF](#) (approved ECEC services) must meet requirements for the [engagement of ECTs](#). An approved centre-based service under the NQF refers to long day care, kindergarten and preschools in most states and territories, including Queensland. It does **NOT** include outside school hours care services or family day care.

To be considered an ECT for the purposes of the NQF, the teacher must (generally) hold an early childhood teaching qualification approved by ACECQA. There are a number of other examples of qualifications that are acceptable ([refer Appendix 1](#)). ACECQA is also responsible for maintaining the [list of all ACECQA approved qualifications under the NQF](#), including all approved early childhood teaching qualifications.

4.3 Teacher registration requirements for ECTs

In Queensland, teacher registration for ECTs employed in approved ECEC services is not required under the [Education \(Queensland College of Teachers \(QCT\) Act 2005](#) and [Education \(QCT\) Regulations 2016](#) (QCT legislation). However, some employers require ECTs to be registered as a condition of employment.

ECTs can voluntarily apply for registration in Queensland. The [QCT’s Teacher Registration Eligibility Requirements Policy](#) details the requirements for teacher registration, including the requirement for a prescribed qualification under

³ AITSL (2024), [Framework for Teacher Registration in Australia](#) p.5

⁴ Ibid, p.8

QCT legislation and to meet other requirements - professional standards, experience, English language proficiency, and suitability to teach.

ECTs who hold an ACECQA-approved early childhood teaching qualification that has been approved or accredited by the QCT, meet the qualification requirement for registration. These qualifications are listed on the QCT's [Approved or accredited initial teacher education programs list](#). At present, only ACECQA-approved Birth to eight and Birth to 12 qualifications have been approved or accredited by the QCT as they include a component of early childhood and primary school teaching (e.g. *Bachelor of Education (Early Childhood and Primary)*).

ECTs who hold an ACECQA-approved Birth to five, or 3-year full-time equivalent early childhood teaching qualification currently do **NOT** meet the qualification requirement for registration as these qualifications are not approved or accredited by the QCT.

This issue is a major barrier to registration for a cohort of qualified ECTs in Queensland who wish to specialise in birth to five early childhood teaching roles.

4.4 Registered ECTs in approved services in Queensland

Data from the [2024 Queensland ECEC Services Census⁵](#), indicates that 3,207 individuals were employed in 'ECT' or 'ECT/Director' positions in an approved centre-based service in Queensland (i.e. kindergartens and long day care services). Of these, 2,251 (70.2%) were reported as being registered teachers.

Data also indicated that an additional 200 other ECTs (approx.) working with children (but not in the above roles) were reported as being a registered teacher.

Of the 943 individuals in 'ECT' or 'ECT/Director' roles reported as not holding teacher registration with the QCT:

- 210 had a 3-year Bachelor degree (unknown type);
- 12 had a 3-year Diploma (prior to 1995 which was the equivalent of a 3-year degree);
- 417 had a 4-year Bachelor degree (unknown type);
- 51 had a Bachelor degree (honours);
- 178 had a Graduate diploma or graduate certificate level; and
- 75 had a Postgraduate degree.

From this data, it is assumed that 222 ECTs or ECTs/Directors are not eligible for teacher registration in Queensland as their qualification does not meet current prescribed qualification requirements.

It is not clear from the data, how many of the 417 individuals who hold an 'unknown type' of 4-year Bachelor degree, are eligible for teacher registration, but are not registered.

5. Scope and purpose of discussion paper

The scope of this Consultation Paper includes expanding mandatory teacher registration to include:

- all individuals who hold an ACECQA-approved early childhood teaching qualification, or a qualification that ACECQA has determined to be an equivalent early childhood teaching qualification; and
- who are employed in approved centre-based service as 'the ECT' to meet NQF requirements.

For the purpose of this Consultation Paper, an approved centre-based service under the NQF refers to long day care, kindergarten and preschools in most states and territories, including Queensland. It does **NOT** include outside school hours care services or family day care.

⁵ The EC Census is conducted annually by the Department of Education.

Individuals who hold an ACECQA-approved early childhood teaching qualification but are **NOT** employed as ‘the ECT’ to meet NQF requirements in an approved centre-based service, are **NOT** ‘in scope’ for mandatory teacher registration. These individuals may voluntarily seek registration.

Mandatory teacher registration requirements for teachers in school settings (Prep to Year 12) in Queensland are **NOT** being considered as part of this review and consultation process and as such remain unchanged.

A summary of the key features, proposed advantages (‘pros’) and disadvantages (‘cons’) is provided in Section 6.

6. Key issues for discussion

Feedback is being sought from the early childhood sector and key stakeholders on the preferred implementation approach for ECT registration in Queensland.

6.1 ECT registration in Queensland

The following table outlines the proposal’s key features, focusing on eligibility requirements, along with proposed pros and cons. Discussion questions follow to seek feedback.

Expand mandatory teacher registration – with conditional registration for ACECQA-approved qualifications of less than four years duration
Key features: - The QCT legislation would be amended to: - expand mandatory teacher registration to require all persons employed in an approved centre-based service as ‘the ECT’ under the NQF in Queensland to be registered - allow all ACECQA-approved teacher education qualifications to meet the minimum qualification requirement for registration - include the definition of ECTs and approved centre-based services (e.g., <i>relevant teacher and employing authority</i>) - include ACECQA, State and Territory early childhood regulatory authorities as a relevant bodies for information sharing on matters relating to determining suitability to teach, reporting of disciplinary action, dismissals and withdrawals of teacher registration. - All persons who hold a teacher education qualification approved by ACECQA, or an overseas or historic qualification assessed as equivalent, would meet the minimum qualification requirement for provisional registration in Queensland (including all 3-year or 4-year Birth to 5 qualifications; 4-year Birth to 8; and 4-year Birth to 12 ACECQA approved qualifications). - Any ACECQA-approved teacher education qualification that does not meet the qualification requirement for registration to teach in a school setting (e.g. Birth – 5 degrees and three-year qualifications) would result in a condition being placed on the registration limiting the ECT to teach only in an early childhood setting. - Provisional registration will be granted to persons who meet the eligibility requirements for registration as set out in the national FTRA and amended QCT legislation. - ECTs who hold provisional registration can transition to full registration if they meet the requirements for full registration set out in the national FTRA and amended QCT legislation, which include completing one year (i.e. 200 days) of professional experience teaching children against the Australian Professional Standards for Teachers (APST) and an approved learning program (including the QKLG and the EYLF). Crucially, all persons registered through this process, and who did not have a condition on their registration limiting them to teach only in an early childhood setting, would be permitted to teach in

any setting, including early childhood and schooling. It would be up to employers to determine a person's suitability for a given position as is currently the case with school teachers.

- The current legislation around persons who are not eligible for registration being able to obtain "permission to teach" would be extended to the early childhood cohort. The special conditions under which this may be granted are to address workforce shortages and to provide a pathway to registration. This means persons in regional and remote areas or who are working towards a teaching qualification within a specified period of time may be granted authority to teach (and hold 'the ECT' position) without being registered.

Pros	Cons
• All ECTs who hold an ACECQA-approved qualification meet the qualification requirements for registration in Queensland, aligning to the FTRA. • Child safety is improved as approved centre-based services are recognised as <i>employing authorities</i> and are required to notify the QCT about allegations of harm to a child and certain dismissals of a registered ECT. • ECTs with an early childhood only condition can have the condition removed by completing a fourth year of qualification. • Employers will continue to make recruitment decisions regarding the settings ECTs are suitable for employment in. • Conditional status ensures 3-year qualified ECTs remain eligible to be employed in approved centre-based services in Queensland to address workforce shortages. • The benefits of expanding registration to include ECTs are addressed, particularly to increase child safety provisions, encourage professional development and mentoring opportunities. • The professional status of ECTs employed in approved centre-based services is consistent with primary and secondary teachers in schools, as registration status is equivalent (i.e. provisional and full registration). • Information sharing arrangements are enhanced as ACECQA and State and Territory early childhood regulatory authorities are recognised as relevant bodies under the QCT legislation. • The benefits of on-going professional development and mentoring arrangements to support ECTs is highlighted as more ECTs become eligible for teacher registration.	• Introducing the conditional registration (for Birth –3 and 3-year qualifications) does not fully align with the national FTRA which does not make distinctions within registration based on qualifications. • Conditional registration is not directly consistent with NSW, WA, SA, VIC which recognise all ACECQA-approved early childhood teacher education qualifications and either: – have a single teacher register for all teachers, and grant '<i>approvals to teach</i>' or conditions to ECTs who hold a Birth to five ACECQA approved qualification which limits them to teach in non-school nationally approved settings <u>or</u> – have a separate register for ECTs who hold a Birth to five ACECQA-approved qualification which limits them to teaching in non-school settings (i.e. VIC only). • ECTs with an early childhood only condition cannot progress to full registration until they complete a fourth year of higher education study equivalent to a 4-year ITE qualification, regardless of the teaching experience and skills they acquire. • The benefits of teacher registration in improving the professional standing and status of ECTs is diminished by limiting conditional registrants for Birth – 3 and 3-year qualifications to early childhood settings only. • Additional administrative, costs and reporting burdens placed on approved centre-based services who employ registered ECTs. • The QCT and Early Childhood Regulatory Authority (ECRA) will require system changes.

• The benefits arising from teacher registration in improving teaching quality are extended to all ECTs employed in approved centre-based services. • Continuing Professional Development requirements will ensure ECTs meet contemporary knowledge expectations.	• ECT registrants will have the additional expenses of registration, annual renewal and continuing professional development.
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6.2 Further considerations for consultation

“Suitably qualified persons” and ECT waivers

Under the Early Childhood National Law and Regulations, centre-based childcare services are required to meet varying ECT access requirements depending on the number of pre-school age children attending the service (Regulation ss129 – 135).

When the numbers of pre-school age children reach a certain level, a “second ECT or suitably qualified person” can meet the requirement. A “suitably qualified person” is defined as a person who has:

- (a) a qualification for the education and care of children generally or children of a specified age that is approved by the National Authority and included in the list of approved qualifications for suitably qualified persons published under regulation 137; or
- (b) a qualification approved by the National Authority as a higher qualification for suitably qualified persons and included in the list of approved qualifications for suitably qualified persons published under regulation 137.

The approved qualifications on the regulation 137 list are at the Diploma level (or actively working towards a Diploma), or a primary/secondary teacher with an early childhood Diploma.

It is likely that most of these second ECTs would fall into the Diploma or working towards Diploma categories and would not meet the qualification requirements for registration.

At present, centre-based services may seek a service waiver for their ECT obligations under ss130 – 134, meaning the persons filling the role of second ECT do not meet the requirements to be an ECT or a suitably qualified person. These persons would likely also not meet the qualification requirements for registration.

Consideration will need to be given as to how to treat these suitably qualified persons and ECT waivers for the purposes of ECT registration.

As at September 2025, there ~350 ECT waivers.

Potential solutions include:

- Requiring persons to whom a waiver applies to obtain a ‘permission to teach’ from the QCT, effectively granting them a temporary exemption from mandatory registration
- QCT delegating authority for permission to teach decisions in early childhood to the Early Childhood Regulatory Authority (ECRA) to reduce red tape and allow the process to run in conjunction with the waiver process.

6.3 Additional implications of ECT registration

For Approved Providers

Expansion of mandatory registration to ECTs will have implications for other parties within the early childhood sector and the regulators. While the specific details will be subject to further development, it is likely Approved Providers under the NQF will have the obligations of an “employing authority” under the QCT legislation. These include:

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- only employing permitted persons to be ECTs
- making notifications to regulatory authorities about particular allegations and outcomes of these allegations, and dismissals from employment
- carrying out particular investigations
- participating in the permission to teach process.

These obligations are additional to Approved Provider requirements under the NQF and may come at an additional cost.

For Regulators

The ECT reforms will also have an impact on the two regulators in Queensland – the Queensland College of Teachers (QCT) and the ECRA. The QCT will need to amend its systems and processes to deal with an initial additional ~200+ teachers seeking registration, ~150 new registrants each year, and ~1,200 additional employing bodies from non-school settings.

Intersections of responsibility and information sharing between the ECRA and QCT (and interstate teacher and early childhood regulatory authorities) will need to be determined.

6.4 Transitional and support arrangements

With amendments to legislation, particularly of a regulatory nature, a transition period is often applied to enable those to whom the amendments apply to adjust before compliance becomes mandatory.

To support the introduction of mandatory registration for ECTs employed in approved centre-based services as “the ECT” under the NQF in Queensland, it is proposed that a two-year transition period be implemented. This allows sufficient time for ECTs who are “actively working towards their qualifications” to progress in their course to become eligible for teacher registration or to seek a form of exemption. Existing support provided to those working in the early childhood sector is included in the [Queensland Early Childhood Workforce Strategy 2025-2028](#).

A two-year transition period also provides early childhood services, Approved Providers, and the regulatory authorities with sufficient time to adjust their systems and processes.

The extent and types of support that the sector and regulatory authorities may require to smoothly transition to the new arrangements is being further considered.

7. Feedback questions

Your views are sought on the following questions:

1. Do you support the move to mandatory ECT registration, as proposed? Please provide further information as to the reasons for your answer.
2. What are the anticipated costs associated with implementing mandatory ECT registration:
 - on ECTs – for example initial and ongoing registration costs, ongoing professional development, time/costs to move from provisional to full registration
 - on early childhood services – including the obligations attached with becoming an “employing authority”, such as notifying regulatory authorities of certain matters related to the ECT, conducting certain investigations etc
 - on Government through the QCT and the ECRA?
3. Are there any additional impacts, on whom?
4. What support, if any, do you think will need to be provided to ECTs to facilitate their progress to registration? Consider:
 - the cost of registration application/renewal fees
 - access to professional development requirements to maintain registration
 - support to complete relevant qualifications.
5. Is a two-year transitional period for mandatory teacher registration sufficient time to allow ECTs to progress in their qualifications and engage with the registration process? Please provide further information as to the reasons for your answer.
6. What are the key challenges that need to be addressed when transitioning to mandatory registration and how should they be addressed?
7. Are there any other issues that should be considered in introducing mandatory registration and how should they be addressed? Do the benefits outweigh the costs?

8. Providing your response

This Consultation Paper has been prepared by the Queensland Department of Education, Early Childhood Division for comment through the department’s Early Childhood Education and Care website.

Individuals can provide feedback by completing the online survey, which should take 5 – 10 minutes to complete.

Organisations, peak bodies and associations are invited to provide feedback via a written submission to review.registration@ged.qld.gov.au or by mail to Department of Education, Early Childhood Division, PO Box 15033, City East QLD 4002.

Consultation closes on 5 January 2026.

Submissions will be treated as public documents unless marked as “confidential”.

Appendix 1: Requirements for early childhood teaching program assessments

ACECQA assesses early childhood teaching qualifications against the [Requirements for early childhood teaching program assessments](#) including:

- *Qualification level* - Bachelor's degree level or equivalent that meets the level 7 qualification description in the [Australian Qualification Framework \(AQF\)](#).
- *Age focus* – must include curriculum and professional experience that covers the age range from birth to five years. Where qualifications span Birth to eight or Birth to 12 years, a significant number of units and time must be devoted to early childhood.
- *Supervised professional experience* – specific requirements for time spent in professional experience in early childhood settings with children birth to 35 months, children aged 3 until before they start school, with the balance with school aged children.
- *Program evaluation* – re-approval of qualifications must evaluate the previously approved early childhood qualification.

Curriculum content of qualification – covers child development and care, teaching pedagogies, education and curriculum studies, family and community contexts, history and philosophy of early childhood, and early childhood professional practice⁶.

⁶ ACECQA, [Requirements for early childhood teaching program assessments](#) (2024)

Appendix 2: Reviews and recommendations for ECT registration

One Teaching Profession, Teacher Registration in Australia

In September 2018, the Australian Institute for Teaching and School Leadership (AITSL) released an independent expert panel's review report - *National Review of Teacher Registration*⁷.

This review made recommendations designed to improve teacher quality, strengthen child safety and streamline registration processes across Australia. The final report, *One Teaching Profession: Teacher Registration in Australia*, stated that:

*'registration is one of the most important mechanisms to ensure the safety, competency and quality of a profession. Its design is underpinned by a clear intent to set and uphold high standards of professional practice.'*⁸

ECT registration was not previously considered when the original 2011 *National Framework for Teacher Registration* was developed.

The review report highlighted that ECTs are included in teacher registration arrangements in some jurisdictions. It found that different models were being implemented across jurisdictions which in turn impacted ECT mobility to work across Australia⁹.

The final report recommended that all ECTs in Australia, regardless of their employment setting, be registered by teacher registration authorities under a consistent national approach. It also recommended that the Australian Professional Standards for Teachers (APST) be amended to ensure their relevance and applicability to ECTs¹⁰.

Shaping our Future, National Children's Education and Care Workforce Strategy 2022-2031

In October 2021, Education Ministers approved the publication of the [Shaping our future, National Children's Education and Care Workforce Strategy 2022-2031](#). The strategy outlines six Focus Areas and 21 Actions to support the recruitment, retention, sustainability and quality of the early childhood education and care workforce¹¹.

Focus Area 1 - Professional recognition highlights the important role teacher registration plays in lifting the professional identity of ECTs. *Action FA1.2* identified the need to implement ECT registration in every State and Territory, and acknowledged that supporting frameworks are not inclusive of all aspects of early childhood teaching practices, particularly those in non-school settings.

With the release of the [Shaping Our Future Implementation and Evaluation Plan](#) in August 2022, Queensland, along with the Australian Capital Territory (ACT), Northern Territory and Tasmania committed to review jurisdictional specific requirements to enable the registration of all ECTs, including those working in non-school settings.

Queensland Early Childhood Workforce Strategy 2025-2028

In December 2023, the department released the [Queensland Early Childhood Workforce Strategy 2025-2028](#) highlighting four key strategic areas to support the supply and retention of the early childhood education and care workforce. The strategy identifies the need to recognise and promote the dedication and expertise of our early childhood professionals to lift their professional status.

⁷ AITSL (2018), [National Review of Teacher Registration](#)

⁸ AITSL (2018), [One Teaching Profession: Teacher Registration in Australia](#), p.ii

⁹ Ibid, p iv

¹⁰ AITSL (2018), [One Teaching Profession: Teacher Registration in Australia](#) (2018), p.viii

¹¹ ACECQA (2022), *Shaping our future: National Children's Education and Care Workforce Strategy 2022-2031*

Review of Child Safety Arrangements under the NQF

Released in December 2023, the [ACECQA Review of Child Safety Arrangements under the NQF](#) (Child Safety Review) highlighted a range of systemic safeguards required to assist approved providers to better protect children from harm, abuse and neglect¹².

The report highlighted concerns regarding the shortage of appropriately qualified ECTs and educators in the ECEC sector. It found the workforce shortage resulted in increased reliance on casual and agency relief staff to fill positions. This presented further challenges for employers in undertaking appropriate pre-employment checks. Teacher registration/accreditation schemes were recognised as an important tool to ensure qualified and *suitable* individuals only, were employed in roles responsible for the safety and development needs of children.

The review recommended consideration be given to accelerating *Action FA1.2 Shaping Our Future 2022-2031*¹³ where possible, to enable mandatory registration of all ECTs, including those working in non-school settings, in Queensland, Australian Capital Territory (ACT), Tasmania and Northern Territory to ensure safeguards provided by teacher registration/accreditation schemes apply to all teachers regardless of workplace setting or personal accountability¹⁴.

A Path to Universal Early Childhood Education and Care - Inquiry Report

In September 2024, the Productivity Commission's Report, [A path to universal early childhood education and care \(ECEC\) – Inquiry Report](#) was released. It outlined the key features that a universal ECEC system should include, and the reforms required to achieve it¹⁵.

The Inquiry found that workforce constraints were a major issue. Differences in teacher registration requirements across the jurisdictions were found to create workforce barriers which impacted the ability of ECTs to work in other jurisdictions. This impacted the number of ECTs that were available for employment in ECEC services.

The Inquiry recommended registration arrangements for ECTs needed to improve. Specifically, it recommended State and Territory governments should ensure:

- ECTs working in NQF-approved ECEC settings are required to be registered with the teacher registration body in their jurisdiction
- any ECT- level qualification that has been approved by the ACECQA for recognition under the NQF should be automatically recognised as meeting qualification requirements associated with teacher registration
- there are accessible pathways for ECTs with an ACECQA-approved qualification to teach in primary school (after they undertake additional study focussing on teaching in primary school settings)¹⁶.

¹² ACECQA, (2023), [Review of Child Safety Arrangements under the NQF](#)

¹³ ACECQA (2021), [Shaping Our Future – 2022-2031](#)

¹⁴ ACECQA, (2023), [Review of Child Safety Arrangements under the NQF](#)

¹⁵ Australian Government, Productivity Commission (2024), *A path to universal early childhood education and care*

¹⁶ Ibid, p. 69