

Early Childhood Teacher Registration

Goodstart Early Learning Submission

January 2026

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INTRODUCTION

Goodstart Early Learning welcomes the opportunity to provide feedback on the proposed introduction of mandatory registration for Early Childhood Teachers (ECTs) through the Queensland College of Teachers (QCT).

As a large, national not-for-profit provider operating across 195 centres in Queensland and employing over 539 staff in teacher positions (including 147 currently completing their initial studies), Goodstart strongly supports reforms that uplift quality, strengthen professional identity, and improve outcomes for children. Drawing on our experience operating across all Australian states and territories, including jurisdictions where mandatory ECT registration is already established, Goodstart is well placed to provide practical insights into the design and implementation considerations necessary to ensure this reform is successful in Queensland.

One of the most significant challenges we continue to experience is the loss of qualified ECTs to the school sector once they complete their studies. In addition to comparatively stronger pay and conditions, reflections from our Queensland State Managers and Lead Practice Partners consistently highlight that this is driven, in part, by perceptions of professional status and recognition. Reforms that elevate the standing of teachers in the Birth-to-Five context, and clearly recognise the expertise of Birth-to-Five teachers, are therefore warmly welcomed and seen as an important lever for workforce retention.

In preparing this submission, Goodstart has identified a number of critical implementation issues that will each require careful consideration and staging:

- 1. Graduate Diploma qualification pathways** - There are emerging concerns regarding the number of educators currently enrolled in Graduate Diploma pathways, particularly given recent moves in other jurisdictions to no longer recognise these qualifications as degree-equivalent for registration purposes.
- 2. Access to backfill for professional learning** - Queensland's Free Kindy program requires that when an ECT is released from the floor to access professional learning, they must be backfilled by another qualified ECT - or some families arbitrarily lose access to their subsidies. Even as one of the largest providers in Queensland, Goodstart struggles to source ECT backfill, with the downstream effect that existing ECTs in LDC kindy programs experience limited access to ongoing professional learning.
- 3. Concurrent and overlapping reform demands** - The introduction of mandatory registration is occurring alongside unprecedented reform activity across the sector, including the phased establishment of a National ECEC Workforce Register, new mandatory safeguarding training requirements beyond initial teacher qualifications, reviews of staffing ratios and the introduction of the Reportable Conduct Scheme for Queensland services from 1 July 2026.
- 4. Material cost pressures** - Providers are facing significant cost pressures associated with mandatory registration, alongside the costs of implementing national safety and safeguarding reforms. For Goodstart alone, the cost of delivering new national safeguarding training is estimated at approximately \$8 million. These costs are being absorbed at a time when services are operating within tight financial constraints due to the Commonwealth's Worker Retention Payment (WRP) fee cap, which significantly limits the capacity of providers to offset rising workforce and compliance costs.
- 5. Regional and remote workforce shortages** - These are significantly more acute across regional Queensland, including Goodstart services in Cairns, Townsville, Mackay and Mount Isa. In some locations, services have already been required to discontinue kindergarten programs due to sustained difficulties in attracting and retaining qualified ECTs. Mandatory registration is likely to place further strain on employees and services in these communities and risks exacerbating existing inequities in access to kindergarten programs.
- 6. Workforce data visibility** - at present, Goodstart has reliable data on staff employed in teacher roles who are currently completing their teacher qualification. These qualifications,

while meeting ACECQA recognised early childhood teacher qualification(s), may not align with QCT teacher registration requirements. Goodstart does not have sufficiently reliable data on those staff members not employed in a teacher role but currently studying ECT qualifications.

Taken together, the cumulative impact of these factors on services, centre leadership and educators reinforces the need for a realistic, well-staged and adequately supported implementation timeline for this important reform. To this end, Goodstart would welcome the opportunity to provide further data and workforce analysis to support implementation planning, should this be helpful.

Recommendations

Recommendation 1: Formal recognition of Birth-to-Five teaching qualifications

Mandatory registration must explicitly recognise all ACECQA-approved early childhood teaching qualifications, including Birth-to-Five degrees, and we welcome this intention as outlined in the Discussion Paper. Goodstart considers this recognition is a foundational requirement for successful implementation, as it supports professional identity, strengthens ECEC workforce retention, and avoids unintended workforce losses to the school sector.

Recommendation 2: Fast-track the integration of mandatory safeguarding training into Initial Teacher Education (ITE)

The new national mandatory safeguarding training requirements should be embedded into ITE as a matter of priority. This will avoid the inefficiency of newly qualified teachers entering the sector and requiring immediate upskilling. Safeguarding children should be treated as foundational professional knowledge for all teachers, not an add-on requirement post-qualification.

Recommendation 3: Extend the transition period to a minimum of three years

The proposed two-year transition period should be extended to at least three years to appropriately address concerns regarding graduate diploma pathways, support teachers currently studying, allow providers to address workforce data gaps, and account for the impacts of concurrent and interrelated national reforms aimed at improving child safety and safeguarding.

Recommendation 4: Provide targeted financial and mentoring support during transition

Government funding should be made available to support teachers and providers during the transition period. Drawing on recent experience in Victoria, this should include:

- Funding to providers to support provisionally registered teachers to move to full registration to cover paid release time for the teacher and their mentor, employing a casual teacher to backfill and to undertake professional learning;
- a dedicated mentoring fund that enables large providers to employ mentors in-house; and
- access to equivalent external mentoring support for ECTs employed by smaller providers.

Recommendation 5: Amend Free Kindy requirements to allow 20hrs of professional development each year to support Registration requirements without compromising fee relief for families

Queensland's Free Kindy funding rules are unintentionally limiting ECT access to PD in LDC kindy programs, which can operate 5 days a week across the year, because accessing PD without another ECT to backfill can arbitrarily cut fee relief for some families. While the allowance in the 2026 Free Kindy rules for 2hrs per week of PD to support Kindy Uplift is welcome, this may not adequately support full-day PD offerings. Consideration should be given to allowing up to 20 hours of professional development per year to be backfilled by a diploma qualified educator to ensure registration requirements can be met without disrupting families' access to fee relief.

Recommendation 6: Reform QCT governance to include early childhood representation

The Queensland College of Teachers should be restructured to include formal representation of early childhood teachers, unions and providers on its Board. This will ensure that registration policy, systems and supports reflect the professional context of early childhood education, rather than being predominantly school-centric.

Recommendation 7: Deliver sector-wide communication and capability-building

Government and regulatory authorities should implement sector-wide communication and education campaigns to build understanding of the purpose and value of ECT registration. Targeted guidance and resources should be developed for Centre Directors and Nominated Supervisors to enable them to effectively support teacher compliance and professional growth.

Recommendation 8: Additional time and support packages are needed for regional locations

Goodstart supports the extension of “permission to teach” arrangements to early childhood, as outlined in the Discussion Paper, as a necessary response to regional workforce shortages. However, to be effective, these arrangements must be complemented with additional and flexible funding to cover mentoring, travel allowances and access to high-quality online PD to support pathways to full registration. Taking a staged approach to implementation, regional locations may also require more than the minimum 3 years outlined in Recommendation 3 to minimise unintended impacts and ensure access to kindy programs in hard-to-staff locations.

Recommendation 9: Automatic registration for experienced Early Childhood Teachers

Following the approach of NSW and other states, experienced teachers who hold an approved early childhood teaching qualification and can demonstrate an agreed minimum length of employment in an early childhood teaching role prior to the commencement of mandatory registration should be automatically deemed fully registered. This approach recognises professional expertise gained through long-term practice, reduces unnecessary implementation burden, and will support workforce retention during the transition to mandatory registration.

FOR MORE INFORMATION ABOUT THIS SUBMISSION

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RESPONSE TO CONSULTATION QUESTIONS

1. Do you support the move to mandatory ECT registration, as proposed? Please provide further information as to the reasons for your answer.

Goodstart strongly supports the introduction of mandatory ECT registration and considers that, if well designed and adequately supported with appropriate resourcing and time, the benefits will outweigh the costs. In particular, we welcome:

- Recognition of Birth-to-Five teaching qualifications
- Enhanced Professional recognition and teacher identity
- Ongoing quality teaching uplift through professional development
- Improved national consistency in teacher registration arrangements

From Goodstart's national experience operating in jurisdictions where ECT registration is already in place, mandatory registration can be a positive lever for quality and professional recognition when there is appropriate support for the workforce and employers.

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

- a. on ECTs – for example initial and ongoing registration costs, ongoing professional development, time/costs to move from provisional to full registration
- b. 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
- c. on Government through the QCT and the ECRA?

Early childhood services will bear a substantial share of implementation costs. Goodstart currently provides nationally consistent paid professional development backfill per teacher, per year across all states which supports registration requirements.

However, additional costs will arise from supporting teachers to transition from provisional to full registration. These include mentoring, supervision, and support to gather and submit evidence, often over a multi-year period.

Mandatory registration in Queensland will also create new administrative and operational demands for employers, including:

- expanded data management and reporting;
- compliance monitoring and notifications as an employing authority;
- communication with regulatory bodies; and
- supporting centre leadership teams to understand and implement new requirements.

Goodstart's national Thriving Teachers supports teachers to achieve full teacher registration and to undertake the professional development necessary to maintain it. Currently, we employ one teacher mentor in Queensland; however, to meet the additional obligations effectively in Queensland, we estimate that we will need to employ approximately three additional full-time equivalent staff during the initial transition period. Over time, this demand is expected to settle to a lower, more sustainable level once the initial cohort has transitioned.

While Goodstart and other large providers can employ their own mentors, we are aware that smaller providers will not have this capacity. Access to funded, external mentoring support will therefore be critical. An initial, time-limited program to fund and coordinate teacher mentors through suitable sector organisations will be essential to support equitable and successful implementation across the sector.

3. Are there any additional impacts, on whom?

NA

- 4. What support, if any, do you think will need to be provided to ECTs to facilitate their progress to registration? Consider:**
- a. the cost of registration application/renewal fees**
 - b. access to professional development requirements to maintain registration**
 - c. support to complete relevant qualifications**

Targeted, practical supports will be critical to ensure successful implementation and to avoid unintended workforce impacts. In particular, support will be required across costs, professional development, qualification pathways, and the transition from provisional to full registration.

a. Cost of registration application and renewal fees

Registration and ongoing renewal fees may present a barrier for some ECTs, particularly in early career, working part-time, or still completing qualifications. Consideration should be given to:

- targeted financial support or fee relief during the transition period¹; and
- practical assistance from the Queensland College of Teachers to support ECTs to navigate application and renewal processes efficiently.

Clear guidance, streamlined processes, and accessible support will be important to minimise administrative burden on both teachers and employers.

b. Access to professional development to maintain registration

Goodstart welcomes the Free Kindy program's allowance for up to 2hrs of non-contact time per week where professional learning relates specifically to Kindergarten Uplift in LDC kindy programs. However, this does not adequately support access to longer professional development offerings for teacher registration requirements which may require a teacher to attend for full day(s).

In LDC kindergarten programs, releasing an ECT for professional learning requires backfilling by another qualified ECT to maintain children's access to Free Kindy fee relief. While Free Kindy funds 600 hours over 40 weeks, LDC programs must accommodate diverse attendance patterns and, in some cases, operate across the full calendar year to ensure all eligible children receive their funded entitlement. This contrasts with sessional kindergarten models, where delivery across four terms more readily allows professional development to occur during non-operational periods.

In the context of ongoing ECT shortages – which are predicted to continue for at least 5 years - this requirement significantly constrains the capacity of services to release ECTs for professional learning, as doing so can arbitrarily cut much needed fee relief for some families. The practical effect is that ECTs may be unable to take up available professional development opportunities, despite investment by Government and employers to support quality uplift and registration requirements.

To address this, Goodstart supports introducing limited flexibility within the Free Kindy funding rules to allow Diploma-qualified educators to backfill ECTs for up to 20 hours per ECT, per year where this is needed to support families' access to fee relief. This would meaningfully alleviate staffing pressures and support registration requirements, while maintaining program integrity and child safety. Where a provider utilises this provision, they could report how PD was managed to minimise impact on children's access to ECT-led kindy to the Free Kindy team.

Importantly, this approach also presents an efficiency gain for Government – the value-add of accommodating professional development for ECTs in LDC programs would improve overall program quality and ECT retention, and outweigh any risks associated with Diploma qualified coverage for less than 3 days each year.

c. Support to complete relevant qualifications

Support to complete or supplement qualifications will be critical, particularly given current data limitations across the sector. As of 31 October 2025, Goodstart employs in Queensland:

- 147 staff in teacher roles who are still undertaking their studies; and

¹ For example, Victoria provides one-off funding of \$2,872 per teacher to support them to move to full registration.

- 215 staff who have completed early childhood teaching qualifications, but for whom it is currently unclear whether additional study will be required to meet registration requirements.

Clear advice on qualification recognition, bridging requirements, and transition pathways will be essential and pivotal in understanding the full organisational impacts. Employers will also require time and support to clean and maintain workforce data to understand which teachers meet requirements and what additional study may be needed.

ECTs transitioning from provisional to full registration will require sustained, structured support over an extended period. This includes:

- access to mentors and experienced reviewers;
- assistance to gather and prepare the required evidence; and
- opportunities to draw on peer support from other registered ECTs to ensure advice is consistent and high quality.

Without adequate mentoring and guidance, there is a risk that capable teachers may struggle to progress or disengage from the process.

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.

Goodstart does not consider that a two-year transition period will be sufficient.

Given existing data limitations, current backfill constraints, and the time required for teachers to complete qualifications, mentoring, and evidence requirements, a longer transition period is likely to be necessary to avoid unintended workforce disruption.

Our 'graduate teachers' are fully employed and activities to obtain registration will be on top of both their normal activities, and significant new national safety and safeguarding reforms. Extending the transition period will reduce pressure on early-career teachers and support retention.

6. What are the key challenges that need to be addressed when transitioning to mandatory registration and how should they be addressed?

Key challenges

- managing the interaction between mandatory registration, ECT waivers and suitably qualified persons;
- persistent shortages of ECTs, particularly in regional areas;
- provider readiness during a period of significant concurrent reform;
- supporting ECTs unfamiliar with registration processes; and
- ensuring the QCT is equipped to support early childhood professionals.

Addressing these challenges

In addition to our previous responses and recommendations, Goodstart supports:

The use of "permission to teach" arrangements in regional and remote areas

The discussion paper also notes that persons 'working towards' a qualification in regional and remote areas can be granted 'permission to teach' to address workforce shortages and to provide a pathway to registration. Such permissions should be complemented with funded mentoring and program support to progress towards registration (See Recommendation 8).

Conditional registration and workforce retention

Goodstart strongly supports registration limited to early childhood settings for teachers who meet Birth-to-Five qualification requirements. This is a critical workforce retention measure that:

- recognises the distinct professional identity of early childhood teachers;
- values Birth-to-Five qualifications as fit-for-purpose for early learning settings; and
- helps mitigate ongoing workforce leakage to the school sector by providing appropriate professional recognition.

Reforming the QCT to support early childhood teachers

The QCT has historically been structured around school-based teaching. To support mandatory ECT registration effectively, governance reform is required to ensure early childhood expertise is embedded in decision-making. Goodstart recommends expanding the QCT Board to include representation from early childhood providers; early childhood teachers; and relevant unions.

Goodstart also recommends consideration of a separate early childhood registration stream, drawing on the Victorian model, and would welcome the opportunity to support government and the QCT with insights from our national experience.

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?

Alignment with national safety reforms and system interoperability

The implementation of mandatory ECT registration should be aligned to the fullest possible extent with existing and forthcoming child safety and regulatory frameworks to avoid duplication, fragmentation and unnecessary compliance burden. This includes the National ECEC Workforce Register being developed by ACECQA as well as child protection, reportable conduct, and working with children checks (WWCC).

Experience in other jurisdictions demonstrates that teacher misconduct matters can trigger multiple parallel reporting obligations across regulators, often involving the same information being reported, re-requested and assessed separately. Without deliberate design, mandatory registration risks adding another reporting layer, rather than strengthening child safety outcomes. As mandatory registration is introduced, it will be critical for Government to:

- clearly map how registration-related reporting interacts with existing Queensland pathways (including the ECEC regulator, Child Safety, Police, Blue Card Services and the Reportable Conduct Scheme commencing 1 July 2026); and
- ensure that reporting obligations are clear and do not require providers to act as the sole conduit between multiple statutory bodies.

Goodstart strongly supports the development of formal regulator-to-regulator information sharing arrangements, including memoranda of understanding where required, so that relevant agencies can notify each other directly of misconduct and risk issues. This approach reduces duplication for services, supports timely risk mitigation (particularly where educators or ECTs may move or work across multiple services), and establishes clearer lines of accountability.

Finally, consideration should be given to streamlining WWCC and registration interactions for early childhood teachers. Current arrangements across jurisdictions are inconsistent, including differences in how teacher registration interacts with working with children checks. Clear, nationally consistent settings would reduce confusion for teachers and providers while also ensuring that information is reported to the agencies that need it and minimise the risk of matters falling between gaps.

Capability and support for centre leadership

Centre Directors and Nominated Supervisors will play a critical role in supporting ECTs to meet registration requirements, including allocating time for professional development, mentoring, and evidence preparation. However, many will require additional guidance to understand:

- the practical implications of registration for their service;
- their role in supporting compliance and professional growth; and
- how registration requirements interact with existing regulatory and quality obligations.

Targeted guidance, training and sector-wide communication will be essential to ensure centre leadership teams are equipped to support ECTs effectively.

