



June 2026

Department for Education, Children and Young People
Tasmanian Government
Hobart TAS 7001
Email: legislation@decyp.tas.gov.au

Dear Department for Education, Children and Young People,

Re Draft Teachers Registration Bill 2026 public consultation

Goodstart Early Learning (Goodstart) welcomes the opportunity to provide feedback on the Draft Teachers Registration Bill 2026. As a large, national not-for-profit provider operating nine centres in Tasmania, Goodstart strongly supports reforms that uplift quality, strengthen the professional identity of early childhood education and care professionals, and improve outcomes for children.

Drawing on our experience operating across all Australian states and territories, including jurisdictions where mandatory Early Childhood Teacher (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 Tasmania.

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. While more favourable pay and conditions play some role in this shift, our teams in Tasmania consistently note that perceptions of professional status and recognition are also important factors. 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 we congratulate the Tasmanian Government on taking this move.

We strongly support mandatory registration which recognises all ACECQA-approved early childhood teaching qualifications, including Birth-to-Five degrees, as it supports professional identity, strengthens ECEC workforce retention, and avoids unintended workforce losses to the school sector. We welcome ongoing quality teaching uplift through professional development and improved national consistency in teacher registration arrangements. From Goodstart's national experience operating in jurisdictions where ECT registration is already established, mandatory registration can be a positive lever for quality improvement and professional recognition when supported by appropriate implementation settings. In particular, introducing ECT registration requires an adequate transition period, targeted financial and mentoring supports, recognition of prior teaching experience, and sector-wide communication and capability-building. Further detail is provided in the recommendations below.

Recommendation 1: The Bill is amended to include a transition period of, at minimum, three years.

A transition period of at least three years is necessary to: 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. Given the time required for teachers to complete qualifications, mentoring, and evidence requirements; existing data limitations where providers do not have reliable data on staff members not employed in a teacher role but currently studying an ECT qualification; and current constraints to accessing backfill for professional learning due to ongoing ECT shortages, an adequate transition period is necessary to avoid unintended workforce disruption.

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Activities to obtain registration will need to be completed in addition to teachers' normal activities, which, at present, also includes new requirements associated with child safety reforms. Ensuring an adequate transition period will provide time for registration requirements to be met without impacting on essential teaching and planning and will also reduce pressure on early-career teachers. A reasonable transition time will also support retention and ensure the uplift is attainable for time-poor teachers.

There are also emerging concerns regarding the number of educators currently enrolled in Graduate Diploma pathways, particularly given recent moves in some jurisdictions to no longer recognise these qualifications as degree-equivalent for registration purposes. A transition period of at least three years is required to address these concerns.

Recommendation 2: Targeted financial and mentoring support. 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 quality providers to employ mentors in-house; and
- access to equivalent external mentoring support for ECTs employed by smaller providers.

Early childhood services will bear significant implementation costs. Goodstart already provides nationally consistent paid professional development backfill per teacher, supporting registration requirements. However, additional costs will arise in supporting teachers to move from provisional to full registration, including mentoring, supervision, and assistance to gather and submit evidence. 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. For instance, delivering new national child safety training is estimated to cost approximately \$8 million for Goodstart alone.

Registration and renewal fees may be a barrier for some ECTs, especially those early in their careers, working part-time, or completing qualifications. Targeted financial support or fee relief during the transition period should be considered, alongside practical assistance from the Teachers Registration Board of Tasmania to help ECTs navigate application and renewal processes. Clear guidance, streamlined processes, and accessible support will be important to minimise administrative burden on both teachers and employers.

Recommendation 3: Amend the Bill to include automatic registration for experienced Early Childhood Teachers at no cost. Tasmania has many skilled and dedicated teachers that have several years' experience working in ECEC settings. We recommend that 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. It has also been successful in other states, such as NSW.

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Recommendation 4: 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. 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.

We would be happy to discuss any of these recommendations in further detail. Please contact Charlotte Casey, Policy and Research Officer, at ccasey2@goodstart.org.au or on 0457 032 339.

Kind regards,

A handwritten signature in black ink, appearing to be "Jessica Siddle", with a horizontal line extending to the right.

Jessica Siddle
Tasmania State Manager
Goodstart Early Learning

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