

Goodstart Early Learning: Response to Mandatory Early Childhood Teacher Registration for the ACT Teacher Quality Institute Discussion Paper

August 2026



About Goodstart

We are for children, not profit

Goodstart Early Learning (Goodstart) is Australia's largest not-for-profit social enterprise and Australia's largest provider of early childhood education and care, with over 670 centres located across every state and territory, including six centres in the ACT. Each year in the ACT we support 600 children and 515 families.

As a not-for-profit social enterprise, our purpose is to ensure all Australia's children have the learning, development, and wellbeing outcomes they need for school and life. It is our view that all children should be supported to participate in quality early learning and care, regardless of where they live in Australia, their family circumstances, their inclusion support needs, or their early learning setting. We believe the best way to do this is to ensure all children have access to high quality, inclusive early learning and care, no matter their location or life circumstances.

Executive Summary

Goodstart welcomes the opportunity to respond to the Teacher Quality Institute's discussion paper on Mandatory Early Childhood Teacher Registration for the ACT. 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 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 the ACT.

We strongly support mandatory teacher registration as it uplifts teaching quality, supports professional identity, and strengthens ECEC workforce retention. 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. We provide specific recommendations below and further detail is provided in our response to discussion questions which follow.

Recommendations

Recommendation 1: Adopt a single registration pathway for all early childhood teachers, with teachers who do not yet meet the four-year qualification requirement granted provisional registration with a condition which requires completion of approved additional study within a defined timeframe.

Recommendation 2: Provide government-funded upskilling pathways and study support to enable teachers with ACECQA-approved three-year qualifications or graduate diplomas to meet the proposed qualification requirements without adverse workforce impacts.

Recommendation 3: Award full registration through transitional arrangements to teachers with 10 or more years of teaching experience who meet the qualification requirements, and remove the requirement for a Centre Director referee statement confirming proficiency against the Australian Professional Standards for Teachers.

Recommendation 4: Implement a minimum three-year transition period before mandatory registration requirements take full effect. This must be supported by a sector-wide communication and capability-building strategy to improve awareness of registration requirements, benefits, timelines and available supports led by the ACT Government and TQI.

Recommendation 5: Provide dedicated government funding to support implementation, including mentoring, professional development, evidence collection, registration processes and backfilling of staff to minimise workforce pressures.

If you would like any further information about the contents of this submission, please contact:

Dr Charlotte Casey

Policy and Research Officer

Email: ccasey2@goodstart.org.au

Early Childhood Teachers work within the Early Childhood Education and Care (ECEC) sector, which supports children in the years before school and includes a range of service types, such as long day care and sessional preschool. Employment conditions for ECEC teachers can differ significantly from those of school-based teachers. For example, many ECEC teachers receive four weeks of annual leave and may work in settings where they are one of only two qualified teachers within their centre. These and other sector-specific conditions should be considered throughout the decision-making process to ensure decisions are informed by the teacher's professional context and any potential unintended consequences are minimised.

Response to Discussion Questions

1. Do you think the proposed qualification requirements, expanding the provisional registration category, are appropriate?

Goodstart supports the intent of the proposed qualification requirements and commends the ACT Government's commitment to maintaining teacher quality by aligning provisional registration with the qualification requirements that apply to school teachers. Defining a teacher as someone who has completed a four-year teaching qualification, or equivalent, has the potential to strengthen quality outcomes for children. However, we are concerned that the proposed model may inadvertently create a two-tiered system by establishing a separate ECT registration category for teachers who hold ACECQA-approved three-year qualifications. Instead, a single registration pathway should be implemented whereby teachers who do not yet meet the four-year qualification requirement are granted provisional registration with a condition requiring the completion of additional approved study within a defined timeframe. This approach would maintain the quality objective while avoiding the complexity and administrative burden associated with multiple categories of registration. It would also provide a clear and achievable pathway for teachers to attain the qualification standard required for provisional registration.

Many educators enrolled in ACECQA-approved three-year or graduate diploma qualifications without any indication that these pathways may later limit their registration opportunities. Government-funded upskilling pathways and study support should therefore be implemented to enable existing teachers to undertake the additional study required. This is particularly important for graduate diploma-qualified teachers who entered the workforce during periods of significant workforce shortage and may now find themselves disadvantaged despite meeting previous regulatory requirements.

The practical implications of the proposed qualification requirements for workforce supply and mobility must also be carefully considered. The ACT has a highly interconnected workforce with New South Wales, where

teachers holding three-year early childhood qualifications may be recognised differently. Clear arrangements will be needed to address interstate mobility and ensure teachers understand how their registration status will be affected when moving between jurisdictions. In addition, consideration should be given to the impact on higher education providers and prospective students, particularly where ACT universities continue to offer ACECQA-approved three-year qualifications that may not lead to the same registration outcomes. Strong communication between TQI, ACECQA and tertiary institutions will be essential so that students are fully informed of registration requirements before commencing their studies.

Ultimately, Goodstart supports a quality-focused approach that incentivises teachers to obtain four-year qualifications and continue their professional development. However, this objective should be pursued through pathways that encourage and support existing educators to upskill via a condition requiring the completion of additional approved study, rather than through arrangements that risk creating separate classes of teachers within the profession. The focus should remain on quality uplift across the workforce while ensuring experienced educators are supported to meet evolving professional expectations.

2. What could a transitioning from provisional to full registration process look like in an ECEC context?

The transition process from provisional to full registration must be designed with the realities of early childhood education and care settings in mind and supported by clear, consistent guidance for both teachers and providers. The process will need to carefully consider the evidence requirements associated with demonstrating the Australian Professional Standards for Teachers. Unlike some jurisdictions that assess teachers against the seven overarching standards, the ACT requires evidence against all 37 Standard Descriptors. This represents a significant undertaking for provisionally registered teachers and for those responsible for supporting and reviewing applications. Clear communication and guidance materials will be essential to ensure teachers and providers understand expectations and can engage with the process confidently and consistently.

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.

Additional costs will also arise for providers to support teachers to transition from provisional to full registration. These include costs related to mentoring, supervision, and support to gather and submit evidence, often over a multi-year period. To support successful implementation, Government funding is needed for providers to cover paid release time for provisionally registered teachers and their mentors, employ casual educators to backfill those roles, and enable participation in relevant professional learning. Appropriate resourcing will help ensure that the registration process supports professional growth and teacher quality uplift, rather than creating an additional workforce burden for services already operating under significant workforce pressure.

3. What could a certification process look like in an ECEC context?

Goodstart supports opportunities for Early Childhood Teachers to pursue Highly Accomplished and Lead Teacher (HALT) certification. Any national approach should recognise the unique context of the ECEC sector while aligning with existing certification frameworks wherever possible. In particular, the certification process should be designed to reflect the diverse settings in which ECEC teachers work, including long day care and sessional preschool services, and acknowledge that teachers may have limited access to peers, mentors, or other certified colleagues within their local context.

The existing New South Wales early childhood certification pathway provides a useful model of what is possible for the sector. Building on established approaches such as this can support consistency, reduce duplication, and provide a clear and credible pathway for ECEC teachers seeking recognition of Highly Accomplished and Lead practice. Any future certification process should ensure that evidence requirements, assessment approaches, and support mechanisms are appropriately tailored to ECEC settings, enabling teachers to demonstrate their impact in ways that are relevant to their professional context.

4. Are the transitional arrangements as proposed appropriate?

Goodstart supports the intent of the proposed transitional arrangements to recognise the experience and capability of long-serving early childhood teachers. Provisional arrangements can reduce the implementation burden while supporting workforce retention. Goodstart does not support the requirement for a Centre Director referee statement confirming that a teacher has met the Proficient Level of the Australian Professional Standards for Teachers (APST). This requirement introduces unnecessary complexity, workforce burden, and implementation risk. Many Centre Directors are not registered teachers and may not possess the qualifications, training, or professional expertise required to assess practice against the APST. As a result, the proposal places a significant responsibility on service leaders to make professional judgements about teacher practice that may sit outside their role and capability.

The proposed referee requirement also creates risks for consistency, fairness, and quality assurance. Different providers, and even different Centre Directors within the same organisation, may interpret and apply the APST in different ways, potentially leading to inequitable outcomes for teachers with comparable experience and capability. Requiring Centre Directors to make high-stakes judgements about professional proficiency could also create disputes and unintended workforce consequences, particularly where experienced teachers are unable to obtain a referee statement despite extensive evidence of effective practice.

Goodstart recommends that the ACT adopt a transition period of at least three years. A three-year transition period would provide sufficient time for teachers, providers and the TQI to prepare for mandatory registration while minimising unintended workforce disruption. For providers, sufficient time to audit qualification data and determine which teachers may require additional study or support to meet registration requirements will be required.

A minimum three-year transition period would account for:

- existing workforce shortages;
- the time required for teachers to complete any additional study or registration requirements;
- provider readiness and workforce data challenges;
- the cumulative impact of other concurrent sector reforms, including child safety and safeguarding reforms; and
- the need to support teachers who are unfamiliar with teacher registration processes.

To ensure successful implementation, Goodstart further recommends targeted government investment during the transition period, including funding for mentoring, professional development and release time for teachers and mentors. Where evidence or assessment requirements apply, providers should be supported to backfill staff and provide the structured mentoring necessary to enable teachers to progress through registration requirements without exacerbating workforce pressures.

5. Do you have any additional feedback or thoughts to provide on the proposed models or mandatory early childhood teacher registration in the ACT more broadly?

While the discussion paper outlines proposed qualification pathways and transition arrangements, it does not address what will be required for teachers to maintain registration over time. Greater clarity is needed regarding annual renewal requirements including professional development expectations. This information is essential for both teachers and providers to understand the practical implications of a mandatory registration scheme.

Goodstart supports high quality professional development and recognises its importance in maintaining and uplifting teacher quality and improving outcomes for children. Where professional development is provided or accredited through TQI, it should be designed with the ECEC context in mind. Historically, some professional development opportunities have been more heavily focused on primary school contexts. To achieve the intended quality improvements, high quality professional learning that is directly relevant to ECEC teachers practice and professional standards is essential.

The practical and financial impacts of professional learning requirements must also be carefully considered, particularly for ECEC providers. Unlike schools, ECEC services do not have pupil-free days that can be used for teacher learning and development. Teachers attending professional development must generally be backfilled to maintain regulatory ratios. For providers this creates a significant financial burden. While Goodstart supports its teachers by providing paid professional development and funding backfill arrangements, the associated costs are substantial, and other providers choose not to, or are not able to, fund this. Mandatory professional learning requirements should therefore be accompanied by funding from the ACT Government to ensure ECEC providers are able to support teachers to meet these obligations.

Goodstart also encourages a flexible approach to recognising quality professional development. Jurisdictions that recognise a broader range of high quality professional learning enable providers to deliver training while still meeting regulatory requirements. Prescriptive requirements that restrict the recognition of high quality professional development may inadvertently limit providers' ability to deliver relevant learning opportunities and create unnecessary administrative burden. Rather than narrowing professional learning options, TQI could play an important role in providing clear guidance to the sector about what constitutes high quality professional development and how it can be demonstrated for registration purposes.

Clear communication and sector engagement will also be critical as mandatory registration is introduced. While voluntary ECT registration has been available in the ACT since 2024, awareness of the registration pathway and its benefits remains varied across the sector. More information should be provided regarding the benefits of registration for individual teachers, providers, children and the broader ECEC profession. Clear guidance on registration requirements, maintenance obligations, professional learning expectations, and available supports will be important to ensure successful implementation and to maximise the intended benefits for workforce quality and professional recognition. Centre Directors and service leaders will also need targeted guidance and training to understand registration requirements and effectively support teachers through registration processes.