

TRB

**TEACHER REGISTRATION BOARD
of the Northern Territory**

Teacher Registration Board of the Northern Territory

SUBMISSION REGARDING EARLY CHILDHOOD TEACHER
REGISTRATION IN THE NORTHERN TERRITORY: RESPONSE TO
DISCUSSION PAPER.

March 2024

1. Introduction

The Teacher Registration Board of the Northern Territory (the Board) welcomes the opportunity to make a submission to the Early Childhood Teacher Registration in the Northern Territory consultation by responding to the Discussion Paper published on the <https://haveyoursay.nt.gov.au/> website. The Board has a strong interest in ensuring teachers in the Northern Territory (NT) can work safely and appropriately with children and delivers quality teaching practice.

The Board is very supportive of a registration scheme that includes all Early Childhood Teachers (ECTs) in the NT. The Board believes that ECTs, the early childhood sector and children in early childhood education and care (ECEC) settings will benefit from the professional recognition, professional standing, career progression and ongoing consistency in regulation offered by a teacher registration scheme.

1.1. The school teaching profession in Australia

Education contributes to positive health and wellbeing outcomes for children in Australia, by enabling children to develop necessary life skills in learning and educational attainment, as well as social skills such as friendship building, teamwork, communication, and healthy self-esteemⁱ. Educational attainment equips people to achieve stable and secure employment, live in adequate housing and to make informed health choices for themselves and their familyⁱⁱ and it remains one of the most prominent social determinants of health for Aboriginal and Torres Strait Islander peopleⁱⁱⁱ.

In Australia, school education is mandatory for all children, however the commencement age for school education differs across jurisdictions. Mainstream schools can be broadly categorised into three sectors:

- Government schools, managed by state and territory governments;
- Independent public schools; and
- Non-government schools, including faith-based schools.

There are many factors that contribute to a student's success in completing school and contributing positively to society^{iv}. It is widely acknowledged that teachers are one of the most important contributors to a child's educational growth, progress, and achievement, with positive educational outcomes achieved when teachers work in partnership with families and others in the community^v.

1.2. Teacher registration in Australia

In every Australian state and territory, only teachers who are registered or authorised may be employed to teach in schools. Each state and territory have established an authority or agency with responsibility for the registration of teachers, known as teacher regulatory authorities (TRAs). TRAs make decisions about registration in accordance with their respective legislation and with reference to the Framework for Teacher Registration in Australia (the Framework)^{vi}, which contains nationally consistent registration standards and processes for teachers to achieve full registration. TRAs consistently regulate the teaching profession, to improve mobility of teachers within Australia in a consistent and safe way, and to ensure that teacher registration is part of a wider framework for career progression and professional learning guided by the Australian Professional Standards for Teachers (the APSTs).

The APSTs provide the foundation for achievement and improvement in practice at every stage in a teacher's career. There are seven standards which apply to teachers across four career stages (graduate, proficient, highly accomplished and lead teachers) and cover three domains of teaching (professional knowledge, professional practice, and professional engagement).

The Framework underwent national review in 2018, with the findings and recommendations published in a report entitled *One Teaching Profession: Teacher Registration in Australia*^{vii} (One Teaching Profession report). This review assessed the ongoing effectiveness of the current teacher regulatory system including the extent to which there is consistency within and between jurisdictions in the way that the Framework is applied. The review made recommendations to improve consistency within the teaching profession, including for ECTs to be registered under teacher registration schemes.

Nationally, since the One Teaching Profession report, there has been significant work undertaken by TRAs to ensure cohesion in registration processes and considerations, including the collaborative development of national standards of practice and a framework on child safety and wellbeing.

1.3. The Teacher Registration Board of the Northern Territory

The Board is an independent statutory body established under the *Teacher Registration (Northern Territory) Act 2004* (the Act). The Act currently provides for the registration of all teachers in schools in the NT and establishes the Board to ensure that only persons who are fit and proper, appropriately qualified, and competent to teach, are employed as teachers in NT schools.

The Board is established to administer the scheme for teacher registration and facilitate the continuing competence of teachers in the NT. The Board drives the quality, professionalism, and status of the teaching profession in the NT. This includes supporting, promoting, and embedding quality teaching and educational leadership in the teaching profession.

Members of the Board hold their responsibilities in high regard and are committed to affording the public every opportunity to understand the process by which the Board arrives at its decisions. The Board acts independently of political and bureaucratic influence to make decisions regarding the registration of teachers in the NT in the best interests of the community, including students, parents, and the teaching profession.

1.4. Teacher registration in the NT

A teacher may be registered in the NT if they meet the eligibility criteria for registration under the Act; that is, that they are appropriately qualified, fit, and proper and competent to teach. When a person makes an application to be registered as a teacher in the NT, the Board assesses that person against the eligibility criteria for registration in accordance with the Act. Registration may be granted as either provisional registration or full registration, determined by the person's professional experience and currency of practice; or alternatively, registration may be refused on the grounds that the person is not eligible for registration.

TRAs across Australia have varying tests and thresholds for assessing a person's suitability to teach, known in the NT as a teacher's fitness and propriety. These tests include the requirement to undertake a criminal history check and to obtain a working with children clearance prior to being considered fit and proper to teach. The Board has a particularly broad remit in what it may consider when deciding a person's fitness and propriety to teach.

As of June 2023, there were 5527 teachers registered with the Board in the NT^{viii}. Of the new applicants for registration in the 2022-23 financial year, the majority applied under the principle of mutual recognition and the relevant provisions in the *Mutual Recognition Act 1992* (Cth) (the MR Act). The largest cohort of applicants applying under the mutual recognition principle held registration with the Victorian Institute of Teaching.

Authorisation to employ an unregistered person as a teacher.

In recognition of the geographical and cultural diversity of the NT, and the challenges this can pose, the Board has provisions within its' Act that enable employers to seek the services of unregistered persons to work as classroom teachers. This need is often driven by difficulties experienced in securing registered teachers for certain teacher roles, particularly where the role is remotely located and/or requires specific skills or experience in an area of specialised curriculum, such as specialty subject areas or knowledge of the Indigenous Languages and Cultures curriculum^{ix}.

The Board requires that employers utilise registered teachers where possible, however in recognition of the need for all children in the NT have access to a quality education, the Board has implemented this mechanism for employers to engage unregistered persons as teachers in certain circumstances. These persons are typically already NT residents who work under an authorisation to teach, which is approved and monitored by the Board following a robust application and assessment process.

The Board is committed to ensuring that all people employed as a teacher in the NT can work safely and appropriately with children and are able to deliver positive educational outcomes for children. The Board therefore only enables those who have the relevant skills and qualifications, and who are deemed to be fit and proper and competent, to be authorised to teach. These teachers are then subject to the provisions within the Act, and the Board may act on their authorisation where there are professional conduct concerns. This option would continue to be available in the NT following this legislative amendment.

Child Safety and Best Interests of the Child

The Board regulates the teaching profession so that children can receive a safe and quality education. Child safety is the primary consideration in all Board decisions. The Board is dedicated to ensuring that only people who can work safely and appropriately with children are registered, authorised, and employed as teachers in the NT. Due to the responsibility teachers have for children, the community needs to trust that children are safe in schools and are engaged in their learning.

The Board understands that children in the NT come from a diverse range of backgrounds. there is a highly diverse mix of children who come from a wide variety of backgrounds. These children not only have varied learning needs, but they also have different cultural and life experiences. This means that the Board considers the interests of children both broadly, and on a case-by-case basis, depending on the matter.

For Board decisions to be made in the best interests of children, the Board considers the behaviour and teaching practice of teachers regarding how well they can:

- Keep children safe from harm.
- Uphold the rights of children.
- Meet children's cultural needs.
- Be good role models for children.
- Support a child to learn to their full potential.
- Teach children in accordance with the APSTs.

1.5. Early Childhood Teachers

Early Childhood Teachers (ECTs) are those possessing a qualification that allows them to teach children aged 0-5 years old. Some ECTs also hold qualifications that allow them to teach primary aged children (see section 2.8). ECT qualifications are regulated by the Australian Children's Education and Care Authority (ACECQA). ACECQA is the independent national authority that assists governments in administering the National Quality Framework (NQF) for children's education and care.

The Board understands that ACECQA approves a qualification as an ECT qualification against the NQF requirements. This approval then governs whether a person is qualified to work as a teacher in an Australian ECEC setting with children preschool age and under. The NQF operates under an applied law system, comprising the *Education and Care Services National Law* (the National Law) and the *Education and Care Services National Regulations* (the National Regulations). In line with the National Law and National regulations, it is a requirement under the NQF for ECEC settings to have access to, attendance of, employ or engage an ECT in an ECEC service.

TRAs have different registration requirements currently across Australia for ECTs which is important to consider in the NT model because the NT model needs to accommodate the mobility of ECTs in and out of the NT.

1.6. Mutual Recognition and Automatic Mutual Recognition

Mutual Recognition (MR) is established under the MR Act and is adopted by all Australian state and territory governments. The MR Act is established to improve occupational mobility across Australia for those registered or licensed to work in a certain profession. Under the MR Act, registration for an occupation in the first state is sufficient grounds for obtaining registration in the second state, following notification to the second state. The teaching profession is one of the occupations subject to the provisions within the MR Act.

The MR scheme currently allows those registered in one state or territory to register in another state or territory in an equivalent occupation. In relation to teaching in the NT, this occurs where a teacher is registered in an equivalent category of registration in the NT, that being, full or provisional registration as a teacher in another state or territory.

Action FA1-2 of *“Shaping Our Future” A ten-year strategy to ensure a sustainable, high-quality children’s education and care workforce 2022–2031* (Shaping our Future) requires that the registration of ECTs will have regard to improving the occupational mobility of teachers in line with the Automatic Mutual Recognition (AMR) scheme. The AMR scheme proposes that a person registered in one state as a teacher, is automatically taken to be registered in another state or territory as a teacher, without the need for the teacher to become nominally registered in the second state.

Under AMR, teachers would practice in the second state under their home registration. The purpose of the AMR scheme is to assist in Australia’s economic recovery, with improvements anticipated in economic activity because of “savings to workers and businesses, productivity improvements and extra surge capacity in response to natural disasters”^x. AMR is designed to be used by those intending on temporarily becoming residents of the second state. The NT has an exemption from implementing the AMR scheme for the teaching profession until June 2027.

2. Models of Early Childhood Teacher Registration

The Models presented for discussion and which the Board is commenting on are:



The Board considers there is a significant risk to the educational outcomes of children in the NT should Model 1 or Model 2 apply to the teacher registration scheme in the NT.

The risk identified by the Board relates to the effects of Model 1 and 2 on child safety in educational facilities, the stability of the teaching profession and the quality of teaching in the NT. The Board believes it is beneficial to include ECTs in the registration scheme for teachers in the NT, however it is of the view that a registration scheme reflecting either Model 1 or Model 2 is not suitable, appropriate, or beneficial for the NT teaching profession, for reasons outlined in this section of the submission.

The Board therefore supports Model 3, with amendment to the model, as outlined in this submission.

Table 1 below provides a summary of the areas of concern and comments identified by the Board with each model. These are discussed in more detail in this section.

Issues / Risks	Model 1	Model 2	Model 3
Compliance			
2.1 Conditions			
2.2 Administrative burden			
2.3 Disciplinary proceedings			
2.4 Employer autonomy			
2.5 Equity			
Mobility			
2.6 MR and AMR			
2.7 Stability of the profession			
Quality Teaching			
2.8 Qualifications			
2.9 Curriculum			
2.10 Transition			
2.11 Career progression			
2.12 Categories			

Table 1: Areas of concern and comments across proposed models.

Compliance

2.1. Conditions

Relevant to	Model 1
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Responsibility for compliance with conditions sits wholly with the teacher, not the employer. ❖ The regulation of compliance is therefore inequitably applied.

The proposal in Model 1 to limit those holding ACECQA-approved birth-5 qualifications to working with specified ages and employment settings is supported by the Board, however, the Board does not support this limitation being managed through the imposition of a condition.

The Board may impose conditions on registration under section 36(3)(b) of the Act (for new registrations), section 39(4)(b) of the Act (for renewal of registration), section 40B of the Act (during registration), or because of disciplinary proceedings under Part 6 of the Act.

Conditions are imposed on the registration of a teacher, and therefore require the teacher to comply with the requirements stipulated in the condition. There is no requirement under the Act for an employer to comply with a condition imposed on a teacher's registration, and similarly, the Board is not able to place conditions on an employer or act against an employer where a teacher's condition has been breached.

If the Board believes a teacher has failed to comply with a condition, the Board may commence a preliminary investigation into the teacher. The outcome of the preliminary investigation determines the course of action taken by the Board against the teacher, including whether the teacher becomes the subject of an Inquiry by the Board.

The onus to comply with conditions is therefore solely placed on the teacher, with the only course of action available to the Board in situations of non-compliance, being action against the teacher. Because the employer would not be bound by the same limitation in where the teacher can work, the Board believes this would place unnecessary pressure on ECTs in circumstances where an employer directs that they perform work outside of the limitation in their condition, which could result in higher than usual cases of non-compliance with a condition.

The use of conditions to regulate who can be employed as a teacher and where they may work, is also different from the current legislative approach to place onus for compliance with the Act on both teachers and employers. The offence provisions in section 72 and 73 of the Act limits where a person is allowed to be employed as a teacher. Under the current regulatory scheme, employers and teachers are equally responsible for ensuring that only teachers registered or authorised by the Board are working as teachers in schools.

The Board does not consider it a fair or just approach to place responsibility solely on ECTs regarding compliance on where a person is allowed to be employed as an ECT. Currently, responsibility for compliance on where a person is allowed to be employed as a school teacher is placed on both school teachers and employers.

The Board supports that ECTs should be limited in employment settings, however, opposes the management of limitations on ECT employment settings through conditions, as the regulation of compliance is inequitably applied.

2.2. Administrative burden

Relevant to	Model 1
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Limiting a teacher's employment setting through a condition would create a greater administrative burden for both employers and teachers. ❖ Stakeholders previously opposed the publication of conditions on the register.

All teachers registered in the NT are published on the Register of teachers (the Register) which indicates the category under which the teacher is registered. The Register is accessible to employers and the public online. All registered teachers have a registration certificate which is accessible only to that teacher and to the Board. Conditions are printed on a teacher's registration certificate, however, are not permitted under the Act to be published on the Register. The matter of publishing a condition on the register was consulted on in previous legislative amendment processes and was opposed by stakeholders.

Limiting a teacher's employment setting through a condition would create a greater administrative burden for both employers and teachers. The employer would not be able to rely on the Register when employing a teacher and would also need to request, and refer to, every teacher's registration certificate to check whether the ECT condition applied to that teacher. It would not be immediately clear to employers where a registered teacher is able to teach. When there is turnover in the leadership roles in a school, or in the positions responsible for recruiting teachers, there is a greater risk of the misapplication of this process, which in turn, increases risk of non-compliance.

2.3. Disciplinary Proceedings

Relevant to	Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Challenges in the regulation of disciplinary and competence matters for teachers teaching year levels and curriculum they are not qualified to teach. ❖ Lack of trust by consumers in the profession ❖ Erosion of the role of the Board to date in ensuring the quality of the teaching profession by only registering teachers in the NT who are competent in their profession

The Board offers one of the only independent statutory avenues for recourse available to NT children, families, and schools when a teacher does not meet expectations of an employer, a child, or a family; or compromises the safety and/or learning outcomes of children. Additionally, this recourse is not limited to resolving the matter experienced by a child, family, or school that the teacher was directly involved with, but also acts as prevention for any issues for future children, families, and school communities that the teacher may become involved with. The Board may investigate or inquire into the registration or authorisation of a teacher following receipt of:

- an employer notification.
- a complaint made to the Board by any member of the community.
- a notification by another TRA
- a notification and/or direction by the NT Independent Commissioner Against Corruption,
- a notification by NT Police
- a notification made by NT Director of Public Prosecutions
- any other information that the Board receives which calls into question whether the person is eligible for registration.

Complaints and notifications that the Board receives for the teaching profession are typically related to the teacher demonstrating professional conduct that the notifier finds unacceptable, or the notifier's belief that the teacher is unable to teach competently. When considering competence, the Board considers the teacher's ability to teach in accordance with the APSTs.

Model 2 will create great difficulty for the Board in regulating the teaching profession and responding to complaints made by children, families, and employers, particularly related to the competence of teachers, due to the breadth of practice and employment settings applicable to ECTs. Additional challenges will arise in the regulation of disciplinary and competence matters, where teachers are teaching year levels and curriculum they are not qualified to teach. As such, the Board believes that Model 2 will create a lack of trust by consumers in the profession and erode the role of the Board in ensuring the quality of the teaching profession.

2.4. Employer Autonomy

Relevant to	Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Employer autonomy carries a high risk of variance in consistency of teaching quality across individual schools. ❖ The Object in the Act specifically refers to the employment of teachers, therefore the Board must maintain the ability to regulate where a teacher is able to be employed to achieve its Object. ❖ The Boards regulation should support employers of teachers to make sound employment decisions, rather than transfer the regulation of the profession to employers.

The Board wishes to make comment regarding the “Pro” listed against Model 2 which states that Model 2 “Offers greater workforce flexibility with schools and ECEC services having the authority to determine what qualifications are required for particular roles”.

It has been discussed in the information sessions that Model 2 is most like the registration model of NSW in relation to 0-5 qualified ECTs, whereby NSW does not have a legislative limitation on employment settings for teachers, but rather imposes a policy limitation on the employment of teachers, including on limiting 0-5 qualified ECTs to employment in ECEC settings.

It is important to note that the Board's understanding is that the NT employment model for teachers in government schools differs from the employment model for teachers in government schools in NSW. In NSW, government school teachers are centrally recruited by a dedicated team/service. In the NT, this is not the case, with recruitment responsibility lying with principals of individual schools.

The Act has limited regulatory powers relative to employers. While the Board does not regulate the employment of teachers, its Act and any teacher registration model must have regard to the employment of teachers, including how teachers are employed. This is because the Board's Object as set out in section 3(1) of the Act is based on who can be employed as a teacher and where they may be employed. Section 3(1) of the Act states:

“The object of this Act is to ensure that only persons who are fit and proper, appropriately qualified and competent to teach, are employed as teachers in the Territory”^{xi}.

The Board considers that to achieve the object of the Act, the Board must have regard to the methods and mechanisms of the employment of teachers in the NT, and to ensure that the gap between registration and employment is as minimal as possible.

By implementing the “self-regulation” design of Model 2, whereby the Board would hold no powers to limit or give direction to employers in relation to where a person is “*appropriately qualified*” to teach. With the school-based model of employment in the NT, particularly within government schools (as

opposed to a centralised model like in NSW government schools), the Board predicts a result of significant inconsistency from school to school regarding the levels and types of qualifications, teaching experience and knowledge of teachers. This will likely lead to a variance in educational outcomes for children, from school to school. This may also negatively affect teachers attempting to move from one school to another.

The Board considers that a statutory body, such as the Board, must have a strong legislative framework to rely on to make decisions about a person's registration that assists and supports employers to make appropriate and sound employment decisions, rather than transfer the regulation of the profession to employers. The purpose of teacher registration is to create consistent criteria and rules concerning who may be employed as a teacher. Self-regulation and self-determination at an individual employer level relative to qualifications will result in inconsistency in this regard.

The Board does not consider an absence of legislative provisions to be helpful in achieving the Object of the Act, nor is it a best-practice regulatory approach. The Board would recommend avoiding leaving the legislation open to relying on subjective policy positions which are subject to change and not enforceable across the NT teaching sector.

2.5. Equity

Relevant to	All Models
Key Issues/Risks	<ul style="list-style-type: none"> ❖ The Board disputes that there is a con to Model 1 and 3 in relation to inequity between ECTs and school teachers. ❖ The Board considers the limitation of 0-5 ECT qualified teachers to be equitable to the limitation imposed under the National Law and supports the intent of the National Law. ❖ The Board considers Model 2 to pose inequity as this model will limit school teachers, but not ECTs.

The Board wishes to make comment regarding the “cons” listed against Model 1 and Model 3 in the Discussion paper relating to “inequity” of those models. The specific cons listed for each model were:

- Model 1: “The condition on registration may be perceived as creating inequity as primary and secondary teachers are not subject to having a condition on their registration. Limitations on primary and secondary teachers’ ability to work in ECEC settings is instead embedded in the National Law.”
- Model 3: “May be perceived as divisive as primary and secondary teachers are not placed into specific teaching registration categories”.

The Board does not feel these “cons” are relevant to list against these models, as there is no inequity in these proposals. This is because both school teachers and 0-5 qualified ECTs are limited in their scope of practice. The only difference in the limitation is that it occurs under different legislation. Primary and Secondary teachers are limited to working in schools under the National Law, which requires that an ECEC must have an ECT qualified person employed as the teacher in an ECEC setting. The proposal under Model 1 and 3 is that NT law (i.e., the Act) would place a “like for like” limitation compared with the National Law, to limit 0-5 qualified ECTs to teaching only in an ECEC setting and not in a school.

Contrary to this, the Board finds that Model 2 does create an inequity between the specialisations. This is not listed as a “con” against this model in the Discussion Paper, however the Board’s assessment is that Model 2 is the only model where an inequity exists. This is because Model 2 would require primary and secondary qualified teachers to be limited to teaching in the school setting, by virtue of the limitation imposed for ECEC settings under the National Law; however, Model 2 would

impose no similar limitation in the Act on ECTs, allowing 0-5 qualified ECTs to teach any year level in any school or ECEC setting.

The Board believes the proposed limitations in Model 1 and Model 3 are in line with the intent of the National Law to preserve ECT specialisation and retain ECTs in the ECEC sector. The Board does not support the inequity that Model 2 creates between ECTs and school teachers.

Mobility

2.6. Mutual Recognition and Automatic Mutual Recognition

Relevant to	Model 1 Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Risk that the status quo continues, where the Board cannot accept ECT-registered persons from jurisdictions which separate registration categories. ❖ Risk that NT ECTs moving states/territories under MR or AMR will do so as a teacher, and not an ECT, thereby undermining jurisdictional registration schemes that separate ECTs from teachers. ❖ Additional cost and administrative burden for ECT-registered persons wanting to register in NT from interstate.

MR does not currently allow those registered in a specific ECT category or scheme in another state or territory to register under the MR Act in the NT. This is because the current NT teacher registration scheme applies to the occupation of “teacher” and not to the occupation of “early childhood teacher,” which the Board understands are not equivalent occupations in terms of the interpretation of the MR Act.

While the intent of Model 1 is to limit ECTs in where they can be employed through a condition, for the purpose of MR and AMR, Model 1 is a continuation of the same registration scheme that currently exists, whereby registration will be granted only for the occupation of “teacher”. Model 2 is also a continuation of the existing scheme, with no amendment, other than to the prescribed qualifications for eligibility for registration, and to the term “school” to include ECEC settings.

For ECT-registered persons entering the NT:

For teachers entering the NT from other jurisdictions, this will potentially mean the maintenance of the status quo in relation to ECTs, where the NT teacher registration scheme cannot accept a teacher for registration under MR (or AMR when it commences) that is registered under an Early Childhood category of registration in another jurisdiction.

Under Model 1 and Model 2, it is foreseen that, ECT registered persons from other states and territories who wish to move to the NT would need to apply for new registration in the NT, rather than being able to use MR and AMR, which is a more administratively burdensome and more expensive process for ECTs wanting to relocate to the NT. This would also require all ECTs to obtain nominal registration in the NT, which would not be required under AMR when the scheme commences in the NT.

The Board's view is that Model 1 and Model 2 would therefore not fulfil the intent of Action FA1-2 of Shaping our Future, which requires that Early Childhood registration schemes have regard to AMR to improve occupational mobility for ECTs between states and territories, because both models would facilitate the same barriers that currently exist for ECT registered persons entering the NT and may prevent ECT registered persons from being able to utilise AMR to work as a teacher in the NT.

For teachers who are 0-5 qualified leaving the NT:

For ECTs leaving the NT and using MR or AMR to teach in another jurisdiction, Model 1 and Model 2 create a risk that 0-5 qualified ECTs registered as a teacher in the NT, would then be eligible to register as a teacher in another state or territory, despite that state or territory having separate categories of registration for teachers and 0-5 qualified ECTs. This would mean that 0-5 qualified ECTs registered under Model 1 or Model 2, would theoretically be able to move to another jurisdiction using MR or AMR, and register and work as a teacher in that jurisdiction, teaching any age or year level, in any setting. This is a significant risk for the NT and for other TRAs and must be carefully considered in relation to these models.

2.7. Stability of the profession

Relevant to	Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Loosening the rigour and quality of the teacher registration scheme is not the solution to addressing teacher shortages in the NT. ❖ The generalization of the teaching profession will diminish the specialisation of Early Childhood teachers, which does not align with other national and territory strategies to bolster the ECEC sector. ❖ Risk of an unintended consequence of 0-5 ECTs moving to school settings to obtain more favourable pay and employment conditions.

Teacher shortages

The *Alice Springs (Mparntwe) Education declaration 2019* (the Declaration) is a national agreement made by Australian education ministers establishing Australia's educational goals and actions for 2019-2029. The declaration commits that "learning is built on and includes local, regional and national cultural knowledge and experience of Aboriginal and Torres Strait Islander peoples and work in partnership with local communities"^{xii}.

The NT is already subject to a significantly transient teaching population, including ECTs, with teacher attrition in the NT reported to be the highest in Australia in 2016^{xiii}. Teacher attrition has negative consequences, including fewer effective teachers, disruptions to school operations, reduced teacher relationships and collegiality, poorer student performance and higher costs^{xiv}. In the NT, retention of school teachers is a long-identified issue, particularly in relation to remote schools^{xv}. Building and maintaining relationships is the core business of teaching^{xvi}, and the quality of relationships with colleagues^{xvii}, students^{xviii}, and school leaders^{xix} were found to affect Australian teachers' decisions to commit to teaching roles.

The NT is particularly vulnerable to the negative effect of teacher shortages because shortages and a transient teacher population affect the ability for teachers in the NT to work with the Aboriginal and Torres Strait Islander community to close the gap that exists in educational outcomes. Engagement with Aboriginal communities, particularly those in a remote location, takes time and consistency on the part of teachers. For the teaching profession in the NT to succeed in contributing positively to the educational outcomes of Aboriginal and Torres Strait Islander children, teachers must be dedicated to a place and its' people, be culturally competent and able to build connections with Aboriginal and Torres Strait Islander children and their communities^{xx}.

Economic impact of teacher attrition

Teacher attrition is costly, both financially, and for the social and educational outcomes of children^{xxi}. High rates of teacher turnover contribute to teacher shortages and in turn, increase human resource costs associated with recruitment, relocation, and training of new staff. Costs are also associated with the registration and monitoring of teachers by the Board. Teacher attrition may also generate hidden costs, such as reducing the quality of education the school can offer, with resulting adverse impacts on outcomes for the school's students^{xxii}. Such costs are associated with a staff composition with less

than average experience and a cohort of teachers with limited experience working together toward the school's goals^{xxiii}. Teacher attrition also affects teacher quality, and the level of engagement and learning opportunities for children.

Addressing teacher shortages

There are many strategies in place, both on a national and state and territory level, to address teacher shortages, and to continue to improve the quality of teaching in the NT. These strategies include measures implemented under the National Teacher Workforce Action Plan^{xxiv}, implementation of actions under the Shaping our Future strategy and Commonwealth Government funding commitments under the national Community Childcare Fund to increase First Nations-led remote ECEC settings in the Barkly and Central Australia regions^{xxv}.

As a result of ECT shortages, in March 2023, the ACECQA Board's deliberations has a focus on *"achieving a balance between the ongoing goal of building a highly skilled workforce while recognising persistent and increasingly urgent issues with the attraction, supply and retention of early childhood teachers (particularly in regional and remote areas)"*^{xxvi}.

Model 2 removes the specialisation of ECTs, preferring instead to generalize the teaching profession which the Board believes will neither benefit children nor their community. The Board has concerns with the potential for increased transience in the ECEC sector as contributing to poorer levels of school readiness and social and emotional skills among preschool aged children, which would negate any identified benefit of flexibility in the workforce that Model 2 might provide from an employment perspective.

School settings offer more favourable employment conditions and pay than the ECEC sector currently offers. The Board considers that Model 2 will have an unintended consequence of promoting and encouraging 0-5 qualified ECTs to move out of ECEC settings and into school settings, thereby increasing the existing issue of transience in the NT teaching profession due to the incentives within the school sector. This could, in line with the research outlined in this paper, significantly compromise all efforts made by the educational profession in the NT to engage ECTs in ECEC settings, and to bolster and increase the availability of preschool programs within the ECEC settings.

The risks associated with this Model would affect the ability for the ECEC sector to improve children's educational outcomes in the critical early years, increase the quality of the teaching profession, create optimal ECEC centre functioning, and create partnerships with the community. The Board strongly advises that loosening the rigour and quality of the teacher registration scheme to allow "flexibility" is not the solution to addressing teacher shortages in the NT and will not enhance the quality of the NT teaching profession.

Quality Teaching

The Board places considerable emphasis on quality teaching, and quality teaching is included in several of the Board's functions in section 11 of the Act. Quality teachers achieve excellence in teaching and student outcomes by encouraging and motivating children and young people to achieve high educational outcomes, and modify their own professional practice based on continuous critical reflection. According to Hattie (2003), "The profession needs to be embracing the notions of what it is to be successful in teaching, helping all in a collaborative manner to attain this excellence, and recognising major effects when they are evident"^{xxvii}.

The Object of the Act^{xxviii} states that the Board is established to register persons as teachers in the Territory; and to facilitate the continuing competence of teachers, and quality teaching and educational leadership. The Board's quality teaching functions include facilitating the continued

professional development of teachers, the certification of Highly Accomplished and Lead Teachers and development of professional standards and ethics.

The Board's Quality Teaching Philosophy states that, the Board wants "...Territory children to thrive in schools and learn from quality teachers. We want our teachers to be an enriching part of Territory children's learning, while being supported by the profession to continuously develop their teaching practice"^{xxix}. The following sections of this Quality Teaching sub-section relate to elements of the Models that affect quality teaching outcomes.

2.8. Qualifications

Relevant to	Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Initial Teacher Education qualifications and ACECQA-approved 0-5 ECT qualifications differ significantly in course structure, content, and assessment requirements. ❖ The intent of 0-5 years ECT qualifications is for a person to teach in the ECEC sector, not in schools. ❖ These differences create risk for learning outcomes if 0-5 qualified ECTs can teach school-aged children under Model 2. ❖ "Suitably qualified" persons for the purpose of ACECQA's determinations and the National Regulations are not qualified to be registered as an ECT.

Initial Teacher Education (ITE) qualifications and ACECQA-approved 0-5 ECT qualifications differ significantly in course structure, content, and assessment requirements.

Initial Teacher Education Qualifications

ITEs are accredited by TRAs in accordance with the National Accreditation Standards and Procedures^{xxx}. Regulation 4 of the *Teacher Registration (Northern Territory) Regulations 2004* (the Regulations) prescribes that a person must have a total of at least four years of degree qualifications, including an ITE of a duration of at least one year full-time equivalent, to be eligible for registration. To be accredited, ITEs include (as a minimum):

- At least 45 days of practicum in a school environment.
- The Literacy and Numeracy Test for Initial Teacher Education (LANTITE).
- Teacher Performance Assessments.
- Content related to teaching pedagogy in schools.
- Core Content requirements of ITE courses.
- Assessment and mapping against the APSTs.

Early Childhood Teacher Qualifications

ACECQA is the body responsible for approving Early Childhood qualifications under the requirements of the NQF. This includes the approval of ECT qualifications.

ACECQA approves three types of Early Childhood Teacher qualifications:

- 0-5 years qualifications intended for children aged preschool and under.
- 0-8 years qualifications intended for children aged up to year 2.
- 0-12 years qualifications intended for children aged up to year 6.

The 0-8-years ECT qualification and 0-12 years ECT qualifications also meet the requirements of an ITE under the national Accreditation Standards and Procedures and are therefore dually accredited as ITE courses by TRAs. This enables holders of these qualifications to teach in either ECEC or school settings. The 0-5 years qualifications do not meet the requirements under the National Accreditation

Standards and Procedures and therefore are not accredited as ITE qualifications by TRAs and are therefore not currently accepted for registration by the Board.

Eligibility for Registration

Qualifications are an eligibility criterion under section 30(a) of the Act. Qualifications are prescribed for in regulation 4 of the Regulations. In addition to qualifications as an eligibility criterion for registration, the Board must also consider eligibility in relation to competence in accordance with section 30(c) of the Act and Regulation 5 of the Regulations. Regulation 5(1)(a) specifies that in deciding whether someone is competent to teach, the Board must consider whether the person is able to teach in accordance with the APSTs. The APSTs are organised into four career stages: Graduate, Proficient and Highly Accomplished, and Lead teachers.

The minimum career stage required to be met for the Board to be satisfied that a person meets the competence requirements for eligibility for registration in relation to the APSTs, is the Graduate career stage. In publishing how to understand and use the APSTs, the Australasian Institute of Teaching and School Leadership (AITSL) stipulates that *“Graduate teachers have completed a qualification that meets the requirements of a nationally accredited program of initial teacher education. The award of this qualification means that they have met the Graduate Standards”*^{xxxii}.

Suitably Qualified ECTs

In October 2018, ACECQA determined the following qualifications are accepted for a person to be considered 'suitably qualified' to work as an ECT in an ECEC setting in accordance with regulation 242 and/or for the purpose of regulations 133 and 134 of the National Regulations:

- An individual who is 'actively working towards' an approved early childhood teaching qualification AND has completed at least 50 per cent of the qualification or holds an approved early childhood education and care diploma; or
- An individual who is registered as a primary or secondary school teacher in Australia AND holds an ACECQA-approved ECEC diploma (or higher approved qualification).

These deliberations were made by ACECQA in the context of the NQF and the ECEC workforce, including the ongoing aim of “building a highly skilled ECEC workforce and sector workforce pressures and challenges, particularly in rural and remote areas”^{xxxii}.

In March 2023, the ACECQA Board extended these transitional measures until the end of 2024. The ACECQA Board may decide to cease the measures at the end of 2024. If this occurs, the measures will continue to apply to those utilising them prior to the cessation date, and anyone who is “suitably qualified” prior to the cessation date will continue to be equivalent to an ECT. This means that, at the time of legislative reform in the NT, there will be a cohort of people who are able to be employed as the second ECT in a centre-based service who are either actively working an approved ECT qualification, or who are deemed to be suitably qualified as an ECT by having an ITE and a certificate or diploma level early childhood qualification.

This has implications for any model of ECT registration implemented in the NT. The amended teacher registration scheme and the offence provisions of the Act would mean that a 'suitably qualified' person would need to be registered or authorised as a teacher to be employed as an ECT in any ECEC setting.

Analysis

The Board considers that the significant differences between the instruction and assessment contained in 0-5 ECT qualifications and ITE qualifications creates a risk for learning outcomes of

school aged children in a model such as Model 2, where 0-5 qualified ECTs would be enabled to teach school-aged children. The Board does not consider a person holding a 0-5 ECT qualification as “qualified” to teach in a school, given that the intent in the NQF for these qualifications is to qualify a person to teach children who are below school age.

This position was mirrored by the Royal Commission which determined that while the two types of qualifications were equally rigorous, the Royal Commission noted the significantly greater emphasis in dually accredited ECT and ITE courses on school-based teaching practice. As a result, the Royal Commission recommended that the South Australian teacher registration scheme be modelled accordingly, with a separation of categories between 0-5 ECT qualified teachers and ITE qualified teachers akin to the model implemented in Victoria^{xxxiii}. The Board agrees with the position of the Royal Commission in relation to qualifications and in relation to the Royal Commission’s assessment of Victoria holding the best-practice model in relation to ECT registration.

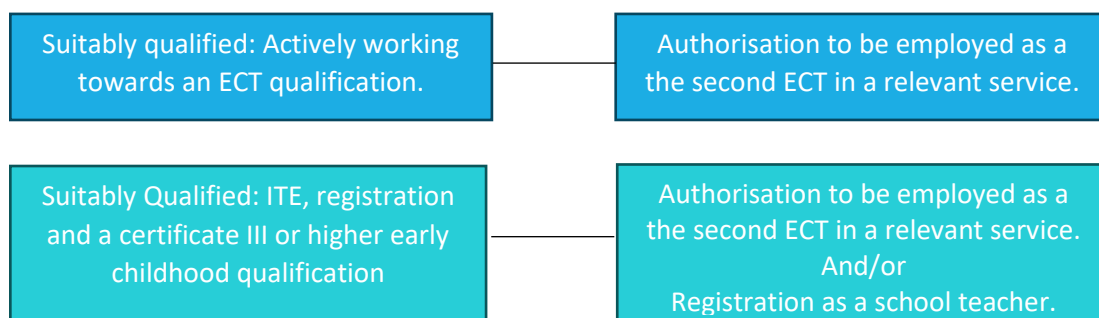
In addition, and in consideration of the eligibility criteria of competence for ITE qualified teachers, it is required by the APSTs that a person possess an ITE to be considered to meet the Graduate Standard. Even with an amendment to the APSTs to include ECTs, the Board considers that it would be difficult to apply the competence eligibility criterion for registration equally to 0-5 qualified ECTs and teachers without separating the registration categories.

The Board would not support a scheme that would deem a person “actively working towards ECT qualifications” (i.e., partial completion of an ECT qualification) as eligible for ECT or school teacher registration, despite ACECQA deeming a person with partial completion of an ECT qualification as equivalent to an ECT. The Board stands that a person must hold completed degree-level qualifications in an accredited or approved course to be eligible for registration. This is the same standard applied to school teachers for eligibility for registration.

The Board would also not support a scheme that would deem a person who was “suitably qualified” under ACECQA’s transitional measures (by virtue of them holding an ITE qualification, teacher registration and a certificate or diploma level early childhood qualification) to be eligible for ECT registration under an ECT category. These teachers would be eligible for teacher registration under a school teacher category.

The Board considers that an employer may instead apply for an authorisation to employ a suitably qualified person in accordance with ACECQA determinations and the National Regulations as an ECT, for the purpose of being the ‘second ECT’. The Board holds this position because in accordance with the National Regulations, this qualification combination only allows a person to be employed as a “second ECT” in a centre-based service, and not as the designated ECT.

This would reduce confusion for employers and clearly indicate the circumstances under which a “suitably qualified” person is able to work as an ECT. There will be no limitations on a “suitably qualified” person, excluding those “actively working towards” a qualification, in terms of their ability to be registered as a teacher and work as a school teacher, because their ITE would suffice. The figure below demonstrates the proposal for suitably qualified teachers.



2.9. Curriculum

Relevant to	Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Model 2 promotes teaching out-of-field, placing teachers at risk of burnout and disciplinary proceedings due to competence complaints. ❖ Contradicts the Alice Springs (Mparntwe) Education Declaration 2019 and the intent of the National law and regulations for ACECQA-approved qualifications for the “prior-to-school” sector. ❖ 0-5 ECT qualifications do not cover the Australian Curriculum which is relevant to school-aged children, including children in Transition.

The predominant curriculum taught in schools across Australia is the Australian Curriculum, as developed by the Australian Curriculum, Assessment and Regulatory Authority (ACARA)^{xxxiv}.

- ACARA Foundation (Transition) to Year 10 Curriculum (F-10), and
- ACARA Senior Secondary Curriculum (for students in years 11 and 12)

The Australian Curriculum sets the expectations for what all young Australians should be taught, regardless of their circumstances, the type of school that they attend, or the location of their school. For children in the NT, the Australian Curriculum, or other ACARA approved curricula, is taught in schools from Transition onwards.

The curriculum taught in ECEC settings is the Early Years Learning Framework for Australia (EYLF)^{xxxv}, which in the NT, applies to children from birth to the end of preschool.

The purpose of the National Law is to “regulate education and care services for children”. The definition of ECEC in the National Law is:

“...education and care service means any service providing or intended to provide education and care on a regular basis to children under 13 years of age other than— (a) a school providing full-time education to children, including children attending in the year before grade 1 but not including a preschool program delivered in a school or a preschool that is registered as a school...”

In addition, ACECQA is the body responsible for approving ECT qualifications”, as opposed to ITE qualifications which are approved or accredited by TRAs. According to ACECQA and the National Law, ‘early childhood’ qualifications relate to the delivery of education and care to children preschool age and under^{xxxvi}.

The National Law and ACECQA are therefore both very clear that an ECEC does not include the Transition year of school in the NT context, and an ECT qualification is approved by ACECQA to qualify someone to teach children in the prior to school sector. Some ECT qualifications are dually accredited by TRAs to allow a person to also teach in a primary school, however 0-5 ECT qualifications are not accredited by TRAs due to the specialisation of the qualification being for children aged below school age.

In relation to Early Childhood quality teaching, the Declaration^{xxxvii} states that:

- Early childhood education provides the foundation for learning throughout school and beyond.
- The importance of the early years has been recognised through collaborative national efforts and state and territory reforms to lift quality and improve participation and access.
- Education leaders are responsible for creating and sustaining high quality learning environments and conditions under which quality teaching and learning takes place.

- The important link between educators and quality early childhood education experiences is recognised through the NQF, including through professional qualification requirements and educator to child ratios.
- Increasing the capability of the early childhood education workforce remains a priority to build quality.

This emphasis on quality of teaching in the early years is not commensurate with the proposal that ECTs may teach any child or young person, at any year level. The Declaration clearly intends for early childhood teaching to remain a specialisation to grow the quality of early learning for children in the prior to school sector. The Board is committed to the Declaration and the intended outcomes for young children in the early years sector and does not support the intent of Model 2 to diminish the specialisation of ECTs.

In relation to the Australian Curriculum, the Declaration^{xxxviii} states that:

- The Australian Curriculum enables students to develop knowledge and understanding in the learning areas of English, Mathematics, Science, Humanities and Social Sciences, Health and Physical Education, Technologies, Languages, and the Arts.
- The learning areas in the curriculum support the development of deep knowledge within a discipline and allow for a depth of learning appropriate to students’ phases of development.
- These learning areas, along with general capabilities, are critical to equip students with the knowledge, skills, and confidence to actively contribute to society and Australia’s economic prosperity.
- Australian Governments commit to ensuring that all education sectors deliver world-class curriculum and assessment in Australian schools.

The emphasis in the Declaration on the critical importance of primary, middle, and secondary school students being taught, and understanding, the Australian curriculum is a very pertinent consideration for the NT teacher registration scheme model. Ensuring that teachers of school-aged children, including Transition aged children, are qualified and competent in teaching the Australian Curriculum is essential to realising the commitments made to education under the Declaration.

In theory, under Model 2, a teacher with a 0-5 years ECT qualification could be employed outside the area in which they are suitably qualified and trained and would therefore be required to have knowledge and understanding of not only the EYLF, but also the Australian Curriculum (F-10 and Senior Secondary curricula). It should also be noted that the practical methods and strategies educators use to engage with students and facilitate and promote children’s lifelong learning (pedagogical practices) in school and ECEC settings differ. Early childhood education focusses on areas including developing language, literacy, and social skills; whereas pedagogical practices for school-aged children are aligned to engaging students with the learning areas, cross-curriculum priorities and general capabilities outlined in the Australian Curriculum. This is cause for significant concern and may result in teachers being increasingly at risk of burnout and disciplinary proceedings due to competence complaints.

2.10. Transition

Relevant to	All Models
Key Issues/Risks	<ul style="list-style-type: none"> ❖ Transition is excluded, by definition, as an ECEC setting under the National Law. ❖ person teaching Transition in the NT would have to hold an ITE qualification accredited by a TRA to be “teaching in-field”.

Teaching at least one subject that a person is not qualified to teach is considered by AITSL to be “teaching out-of-field”^{xxxix}. According to the Australian Teacher Workforce Data report, teaching out-of-field remains a critical and prevalent issue in schools across Australia, and while it can be viewed as a temporary solution for teacher shortages in particular subject areas, it has long-term implications for student outcomes^{xl}.

In the NT, Transition grade is the “grade prior to grade 1” for the purpose of the definition in the National Law. It is therefore excluded, by definition, as an ECEC setting, despite the fact there may be some children in Transition who are aged 5 or under attending Transition. In retrospect, the compulsory age of schooling in the NT is 6 years old^{xli}, and therefore children may turn 6 during their Transition year. Anecdotally, Transition classes are often combined in a composite class with Year 1, where children may be aged up to 7 years of age.

As ACECQA does not have authority to approve qualifications for a person to teach beyond a preschool setting, a person teaching Transition in the NT would have to hold an ITE qualification accredited by a TRA to be “teaching in-field”. The inclusion of Transition in the scope of 0-5 qualified ECTs in a registration model in the NT is therefore not only a high-risk strategy, given that 0-5 qualifications are not approved for ages above preschool-age, but the Board also believes is a contravention of the intent of the National Law and ACECQA’s regulatory remit.

The proposal within all three Models to allow ECTs to teach Transition (or above) is therefore strongly opposed by the Board. The Board is supportive of Model 3, with amendment to limit 0-5 qualified ECTs to teaching up to and including preschool age in a preschool setting. The Board considers that it would be appropriate for this to include preschools located within a school, insofar as the preschool within those schools met the definition of an ECEC under the National Law.

2.11. Career Progression for ECTs in ECEC settings

Relevant to	Model 1 Model 2
Key Issues/Risks	❖ The pathway for progression from provisional to full registration could be contextualised to teachers in the ECEC setting if ECT registration was separated by category.

The Board does currently support ECTs working in ECEC settings to progress in their registration from provisional to full registration. In the past, this support has been provided on a case-by-case basis.

The Board considers that a dedicated career progression model for ECTs in the ECEC setting could be designed under Model 3 to cater specifically for progression from provisional to full registration that is like the national model, but more reflective of the ECEC setting and specificity. A dedicated pathway would not be feasible under Model 2 due to the registration scheme not reflecting any specialisation or difference between the settings. The Board’s perspective is that under Model 2, the current framework for provisional to full registration would apply.

The Board is committed to improving and maintaining the quality of teaching in the NT through the requirement for a teacher to comply with a Professional Development Framework (the PD Framework)^{xlii}. The PD Framework is implemented under the Act to facilitate the continuing competency and quality of the teaching profession. The PD Framework provides guidance for all NT teachers around working individually and collaboratively to improve the quality of their teaching practice, and empowers teachers to achieve professional growth, improve professional standing and progress within the teaching profession.

The PD Framework applies to all teachers who are registered or authorised to teach in the NT, irrespective of career stage, geographical location, or employment status. It is deliberately designed to be broad enough to cover the scope and diversity of the NT teaching profession, including ECTs in ECEC settings. The professional development condition would apply to all ECTs registered under any registration model in the NT. Compliance with the professional development condition is required for renewal of registration and aids and supports the process of transitioning from provisional registration to full registration.

2.12. Categories of Registration

Relevant to	Model 1 Model 2
Key Issues/Risks	<ul style="list-style-type: none"> ❖ All jurisdictions deemed compliant with early childhood teacher registration so far have intended on limiting 0-5 qualified ECTs to teaching in ECEC settings. ❖ The division of ECT qualifications from ITE in a register is supported by the Royal Commission into Early Childhood Education and Care in South Australia.

Of the jurisdictions deemed to be compliant (or soon to be compliant) with Action FA1-2 of Shaping our Future to implement registration for 0-5 qualified Early Childhood Teachers, all jurisdictions have done so with the intent of limiting the employment environment of 0-5 qualified ECTs to the prior to school sector. Four of these jurisdictions have or will have these limitations set out in legislation and separation includes separate registers, categories, or conditions applicable to 0-5 qualified ECTs; or in the case of South Australia, authorisation of 0-5 qualified ECTs instead of registration.

The recently concluded Royal Commission into Early Childhood Education and Care in South Australia (the Royal Commission) published its report in August 2023. Recommendation 24 a. of the Royal Commission report states:

“That the State Government promptly amends the Teachers Registration and Standards Regulations 2021 to allow teachers to be registered as early childhood teachers if they hold a degree certified by the Australian Children’s Education and Care Quality Authority (ACECQA).

That the registration of teachers holding an ACECQA accredited three-year birthto-5 degree will be held on a separate register from teachers holding a four-year Australian Institute for Teaching and School Leadership (AITSL) accredited qualification”^{xliii}.

The Royal Commission analysed the components of the ACECQA-approved ECT qualifications and AITSL-accredited ITE qualifications and the registration model adopted by Victoria in relation to ECTs and school teachers. In Victoria, a person holding an ACECQA-approved ECT qualification, including a 0–5 years ECT qualification, can register under the Early Childhood Teacher registration scheme. A person holding an ITE can register under the Teacher registration scheme. A person holding a qualification that is both an approved ECT qualification and an ITE (for example, those holding a 0-8 or 0-12 qualification) may be dually registered under both the Early Childhood Teacher registration scheme and the Teacher registration scheme. The Royal Commission noted that the Victorian model was “an appropriate model to adopt” for ECT registration.

3. Recommendations and Conclusion

3.1. Recommendations

The Board recommends that Model 3 be implemented as the best model for legislative amendment presented for the inclusion of 0-5 qualified ECTs into the NT teacher registration scheme, with amendment. The Board makes the following requests for amendment to Model 3 to ensure it reflects the specialisations of the teaching profession, is flexible and provides for supported career progression and development.

Transition

The Board strongly recommends the removal from any model to be implemented, the ability for 0-5 qualified ECTs to teach in Transition year or above in a school. The Board instead recommends that the registration model limit 0-5 qualified ECTs to teaching children aged preschool year or younger. The rationale behind this request is outlined in the 'Quality Teaching' section of this submission. This would still allow an extension of the current scope of employment for 0-5 qualified ECTs into preschool settings within schools, however, will offer protection for those teachers from teaching "out-of-field", preserve and respect the specialisation of early childhood teaching in early childhood settings and provide quality learning outcomes for children and young people by having appropriately qualified teachers in classrooms and ECEC settings.

Dual Category registration

The Board recommends that the legislation provide for the ability for "dual category" registration where a teacher wishes and is eligible to be registered as both an ECT and a teacher. This is like the model in place in Victoria and is in line with Recommendation 24 of the Royal Commission. This model would facilitate supported mobility between the two occupations for those holding 0-8 year and 0-12 years qualifications.

3.2. Conclusion

The Board is committed to ensuring NT children remain safe in schools, are engaged in positive educational environments, and learn to their full potential. To achieve this, the Board regulates the teaching profession in the NT to ensure that only people who are appropriately qualified, competent, and fit and proper are employed as teachers in the NT, and that registered teachers are supported to continuously develop their practice.

The Board upholds the current national agenda focused on improving teacher registration schemes to promote and ensure child safety, improve mobility of teachers across jurisdiction through the harmonisation of registration schemes. The Board's assessment is that Model 3 is most aligned with the current and future direction of most jurisdictions in relation to implementation of early childhood teacher registration.

The strategies in the Declaration to enhance the engagement of Aboriginal and Torres Strait Islander children in education and improve the quality of teaching, do not accord with the fundamental basis of Models 1 or 2 as proposed in the Discussion paper. The Board considers that, rather than enhancing the teacher registration scheme, these Models will undermine the significant effort invested by the Board, and by states and territories to stabilise, develop and improve the rigour of teacher registration schemes in Australia to produce quality teaching practice.

GLOSSARY OF TERMS

Abbreviation	Term
ACARA	Australian Curriculum, Assessment and Reporting Authority
ACECQA	Australian Children's Education & Care Quality Authority
AITSL	Australian Institute for Teaching and School Leadership
AMR	Automatic Mutual Recognition
APSTs	Australian Professional Standards for Teachers
ECEC	Early Education and Care Services.
ECT	Early Childhood Teacher
EYLF	Early Years Learning Framework
ITE	Initial Teacher Education
LANTITE	Literacy and Numeracy Test for Initial Teacher Education
MR	Mutual Recognition
National Law	<i>Education and Care Services National Law 2010</i>
National Regulations	<i>Education and Care Services National Regulations 2011</i>
NQF	National Quality Framework
NT	Northern Territory
PD Framework	Professional Development Framework
Register	Register of teachers in the NT
School teacher	A person working as a teacher in Transition grade or above in a school
Shaping our Future	Shaping Our Future" A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022-2031
the Act	<i>The Teacher Registration (Northern Territory) Act 2004</i>
the Board	The Teacher Registration Board of the Northern Territory
The Regulations	<i>The Teacher Registration (Northern Territory) Regulations 2004</i>
the Royal Commission	The Royal Commission into Early Childhood Education and Care
the Declaration	Alice Springs (Mparntwe) Education declaration
the Framework	Framework for Teacher Registration in Australia
TRA	Teacher Regulatory Authorities
Transition	The year of school in the NT that falls directly before grade 1

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