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Dear Ms Gillard,

Re: Royal Commission into Early Childhood Education and Care - submission of the Teachers Registration Board of South Australia

Thank you for the opportunity to provide a submission to the Royal Commission into Early Childhood Education and Care and to respond to the Royal Commission into Early Childhood Education and Care Interim Report of April 2023 ('the Interim Report').

In order to set out the complex multi-regulatory context in which early childhood educators and teachers work, I provide a Discussion Paper ('DP') at Attachment A, by reference to which this submission can be understood. Definitions used in the DP also apply to this submission.

The prescribed threshold qualification requirements for teacher registration in South Australia are set out at Attachment B to this submission ('the threshold qualification requirement'). Where reference to a four-year qualification is made herein, it does not preclude graduates completing programs in less time and through recognised prior learning.

A reflection of SA history and commitment to early childhood learning in a national context

The Teachers Registration Board of South Australia ('the Board') is currently celebrating its fiftieth year of operation in registering South Australian teachers, including early childhood teachers (ECTs). Only Queensland has been registering teachers longer. However, only South Australia truly evidences a long and proud history of commitment to the early childhood sector through registering all school-based ECTs since 1974 (effectively the four years of age to end-of-schooling group) and since 2014 including ECTs in long day care centres (the birth to end-of-schooling group). Many other states and territories are yet to commit to providing teacher regulation throughout the continuum of birth to end-of-schooling.

Currently, 36 500 teachers are registered in South Australia. Numbers working in the early childhood sector are not known with precision, because teachers move freely between settings, and sector employers determine employment selection based on teacher experience, and the main focus of initial study. The Board does not dictate teacher setting or scope of practice. With limited population growth and stabilised teacher registration numbers, South Australia is fortunate in having registration categories that are not limited by scope of practice, and hence does not hinder mobility of teacher between phases of learning.

In South Australia, the minimum four-year qualification applies to all teachers. Some TRAs operate under an alternate model, where three- and four-year qualifications are accepted.

History matters. The South Australian long-standing commitment of one standard of qualification for all teachers, provides a quality education for all children from birth. The merit discussions around birth to five and birth to eight teaching qualifications needs to be considered through this one standard of qualification.

There is currently room for both birth to five and birth to eight teaching qualifications to be accredited by the Board – but only after meeting the threshold qualification requirement, ie minimum of a four-year qualification equivalence (see Attachment B).

Some confusion exists in the early childhood sector, where agencies have assumed that birth to five conflates with a three-year qualification and birth to eight with a four-year qualification. Any such assumptions, if indeed held, arise because the Australian Children’s Education and Care Quality Authority (ACECQA) approves qualifications which are predominantly of three-year duration. ACECQA do not however, assess using the same national Initial Teacher Education (ITE) Accreditation Standards and Procedures which are directly linked to the Australian Professional Standards for Teachers (APST) and utilised by TRAs.

The Board has committed to the rigour of:

- applying nationally endorsed ITE accreditation Standards and Procedures to all ITE programs; and
- individual teacher demonstration of a commitment to a continuum of teacher practice over time, demonstrated by all teachers progressing from graduate to proficient status (reflected in registration status achieved) and then, ongoing professional learning [critically both are linked to the APST].

The Board is committed to quality teaching in all education sites. It recognises a continuum of practice and recognition of excellence without “dividing a profession” or lowering the quality of teaching delivery to very young children.

Background

The Board is created under the South Australian *Teachers Registration and Standards Act 2004*, (‘the Act’), being an independent statutory authority to regulate the teaching profession. The 14-member Board sets qualification and experience standards for teacher registration (see section 8(2)(a)(iii) of the Act). Significantly, the Board is one of few TRAs which in membership structure affords importance to early childhood registration¹ by ensuring that at all times², a **practising** teacher in pre-school education is appointed to the Board.

The object of the Act is to establish and maintain a teacher registration system and professional standards for all teachers to safeguard the public interest in there being a teaching profession whose members are competent, fit and proper persons to have the care of children.

Competency embodies proof of appropriate initial qualification, early career progression to proficiency (by which some standard to assess must be set³), and ongoing capacity to teach which necessarily embodies some reflection on performance in a setting. Mentoring and induction are key requirements to support early career teachers and career progression. All TRAs have noted the

¹ See section 9(1)(a)(i)(A) of the Act.

² To be re-appointed by the Minister shortly.

³ In SA assessed under the APST.

unacceptable attrition rate of early career teachers. Attrition must be dealt with in early childhood settings as well.

The Board accredits initial teacher education (ITE) programs of South Australia higher education providers and in this manner ensures that the threshold requirements completed by South Australian based preservice teachers, ensures teacher-ready graduates; whether they work with children in a long day care, pre-school, primary or secondary school. Under mutual recognition principles, South Australia must rely upon other TRAs to also impose qualification requirements that set appropriate benchmarks for teacher quality and set graduates for success. It is the Board's experience that alignment and commitment to the APST best ensures this.

Interim Report Findings and Recommendations

Our first response relates to findings and recommendation from the Interim Report:

"The SA Teacher's Registration Board will only accredit teachers holding a four-year degree that qualifies a teacher to teach children from birth to eight years old (referred to as a 'birth-8' degree)"⁴.

"The Teachers Registration Board of South Australia will only accredit early childhood teachers who hold a Birth to 8 qualification."⁵

"It is possible this will result in a recommendation for the Teachers Registration Board to accredit Birth to Five teaching degrees."⁶

Response:

The first two statements above, state identical information, however the following amendment is correct. *"The SA Teacher's Registration Board will register teachers holding a four-year degree, (as per Attachment B) that qualifies a teacher to teach children and young people of any age."*

The Board accredits ITE programs that cover all stages of learning - early childhood, primary and secondary phases of learning. The reason any 3-year qualification is not accredited is that it doesn't meet the minimum threshold requirement for registration.

If a South Australian higher education provider was to submit a birth to five, four-year Bachelor or a two-year Masters ITE qualification for accreditation, then the Board would assess it against the national ITE Accreditation Standards and Procedures (refer Key Terms of the DP), as per all other applications. In addition to graduation, the teacher must meet the minimum threshold requirement for registration.

Prior to the development of such programs by an ITE provider, considerations may include:

- ongoing commercial viability of such programs in an employment sector where previous emphasis has been on teacher capacity to teach in a broad range of settings and thus maximise employment opportunity;
- preservice teacher attraction to such qualifications over the longer term, where school-based employers may be seen as providing greater structure, support, mentoring and professional learning opportunities;
- understanding that the one category of registration that exists in South Australia does not acknowledge teacher expertise in any specific setting, including early childhood settings;

⁴ Royal Commission into Early Childhood Education and Care, Interim Report, April 2023, Page 50

⁵ Royal Commission into Early Childhood Education and Care, Interim Report, April 2023, Page 54

⁶ Royal Commission into Early Childhood Education and Care, Interim Report, April 2023, Page 55

- the supply demand for a particular cohort of teachers – currently focussed on meeting a demand for more early childhood teachers in a relatively short period.

It should be recognised that ECTs who complete a minimum four-year birth to eight ITE qualification and are granted registration, have greater flexibility with where they can work, the age groups of children they can teach and often better pay and conditions, because they can teach in early childhood long day care settings, preschools and in junior primary schools. ECTs employed in schools can access school holidays and, as quoted in the Interim Report, are often provided with greater collegial support, access to professional learning and leadership opportunities. It must be noted that with an ITE qualification, ECTs must pass the Literacy and Numeracy Test for Initial Teacher Education (LANTITE) and have appropriate levels of English language proficiency, including spoken and written skills.

ACEQCA approved qualifications of three years duration

ACEQCA approves qualifications for early childhood settings, predominantly bachelor, diploma and Certificate III (see section 8.1 of the DP).

ACEQCA approved three-year qualifications do not provide graduates with the same levels of understanding of Australian curriculum, learner development or teacher development and leadership as provided under the APST focus, within ITE accredited programs. ACEQCA also, do not require a pass of LANTITE as part of their assessment of programs.

In consideration of the above, these differences are related to an arguably more rigorous tested ITE accredited program delivery. Further, the ITE accredited programs include the provision of a final practicum placement that assesses current, and promotes future preservice teacher performance, against moderated, nationally-aligned assessments (see section 10.2 and Table 4 on use of TPAs for higher education providers to assess whether graduates are “ready” at end of ITE accredited programs).

Throughout many of the submissions to the Commission, there has been a conflation of three-year programs offered in early childhood and as assessed by ACEQCA, with being the same as a birth to five-year program. As explained above, a birth to five, minimum four-year ITE program presented for accreditation will and must be assessed by the Board – refusal can only occur where it fails to meet the ITE Accreditation Standards and Procedures for assessing those programs.

It is the proper regulatory function of the Board to accredit all programs for all learner settings (regardless of whether early childhood services, pre-school, primary or secondary focussed), where market forces have determined need. The Board continues to be a supporter of high-quality education delivery for birth to end-of-schooling learners.

It is the role of the Board to set a threshold qualification requirement (Attachment B), suitable for registration. In South Australia it is proof of completion of a minimum four-year ITE program (with PEx), or a three-year non-education degree followed by a further one-year ITE program (with PEx).

It is this promotion of the higher standard (ITE Accreditation Standards and Procedures which incorporate a passing grade in both TPA and LANTITE) that can be undertaken within an additional year of study, that is required for registration in South Australia. When only three-year qualifications are held, some early childhood stakeholders’ object. A birth to five focussed qualification in itself, does not address that difference in rigour of study and preparation for teaching.

By necessary implication and under usual mutual recognition principles applied under Commonwealth law with which the Board complies, the registration threshold to hold a four-year equivalent

qualification necessarily results in some interstate early childhood teachers not being registered here. These numbers are small and limited as to where first registered. (see section 7 of the DP). In reality, there is no huge movement of early childhood teachers seeking registration in South Australia.

Importance of English language provision, especially in speaking and writing

Teachers who have studied teaching overseas and seek registration are required to provide proficiency in the following two tests, to demonstrate their English language proficiency and gain teacher registration:

- International English Language Testing System (IELTS) Academic Test
- International Second Language Proficiency Rating (ISLPR)

An applicant for registration will have met the English language requirements if they have completed four years of higher education study (including a recognised pre-service teacher education program) in an exempt country ie Australia, Canada, the Republic of Ireland, New Zealand, the United States of America or the United Kingdom, or have successfully completed one of the above tests within two years of applying for registration.

Where an applicant has completed a test, Board data shows that the most challenging areas for international students are writing and speaking.

2023 Federal Budget

A five-year investment is to be delivered from the 2023 federal budget, to create more highly skilled childcare services and help workers leverage training to progress their careers. The skills package will be designed to help with staff retention and includes funding for centres to 'back fill' roles while early childhood educators, teachers and centre directors undertake professional development opportunities, as well as help existing educators to upskill by providing financial support to help complete on-the-job teaching placements (PEx) required by ITE programs. These additional funds are welcomed by the Board as they can support early childhood educators to become ECTs and register in South Australia.

Recommendations

- Retain one category of teacher registration, not limited by scope of practice or setting, to facilitate movement of teachers between settings, and to achieve consistent standards of education delivery in all education settings, including birth to five;
- Recognise quality education and care of children and young people is best reflected by a regulation model which does not separate educators and teachers, and create separate layers which do not align and do not promote curriculum access (as appropriate) for learner transition between settings;
 - Proposed "push down" of curriculum from primary settings to early childhood education and care settings need not be the promoted goal. Teacher curriculum understanding promotes learner transition to primary settings and importantly, from a regulator perspective, increases teacher understanding of child developmental needs.
- Consider evidence-based alternative employment pathways to address teacher supply in early childhood education and care settings, whilst upholding threshold registration requirements;
- Promote existing alternative authorisation pathways into early childhood teaching through use of alternative Special Authority to Teach (SAT) authorisations to transition educators progressing to teachers – see 1.3 of the DP;

- Support stability in early childhood education and care settings by acknowledging the role that improved conditions, and importantly, increased support and mentoring play in reducing attrition rates for early career teachers, including ECTs;
- Support relevant PEx placements in early childhood service settings to ensure graduates of ITE programs (whether birth to 5 or birth to 8), are truly suitable to teach in early childhood education and care settings;
- Acknowledge the importance of English language proficiency for the early childhood education and care sector, and the independent undertaking of tests to demonstrate proficiency in all four required areas, of reading, writing, speaking and writing; and
- If required, the Teachers Registration Board of South Australia could propose to develop a model to transition early childhood educators to a regulatory (registration) framework, without diminishing teacher registration requirements in the longer term.

The Presiding Member, Dr Jane Lomax-Smith looks forward to meeting with you at the Royal Commission hearing on 23 May 2023, where she will provide further understanding of these complex issues.

For further information, please contact me at any time.

Yours sincerely



Leonie Paulson

REGISTRAR

Attachment A: Teachers Registration Board of South Australia, "Registration of Early Childhood Teachers in South Australia Discussion Paper, May 2023"

Attachment B: excerpt from the South Australian Teachers Registration and Standards Regulations, 2021

Registration of Early Childhood Teachers in South Australia

A Discussion Paper



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Executive Summary

This paper provides an overview of the challenges and risks faced in regulating the early childhood teaching profession. It seeks to address the challenge of ensuring quality teachers in all learning environments, as well as the need to acknowledge the variations in the early childhood landscape across Australia.

In the first five years of life, children's brains are wired to learn quickly. Quality early childhood education and care (ECEC) helps to amplify children's natural skills and abilities. When considering the constructs of child development and consistency and continuity of experiences for young children, the early years can be best defined as from birth to eight years of age. The early years of education and care are critical for lifelong learning and wellbeing.

Qualified early childhood teachers and educators facilitate, plan, and extend play-based experiences to maximise learning through exploration, inquiry and problem-solving. Teachers and educators' partner with families in understanding and supporting their child's learning, wellbeing and development.

In South Australia, the Board has two important functions in facilitating ECEC. The first is to register competent teachers, where currently one teacher registration status exists, regardless of a teachers' scope of practise, phase of schooling taught, subject specialisation, job title, or sector in which they are employed.

The second is to accredit Initial Teacher Education (ITE) programs when delivered in South Australia regardless of content focus. Since 1 July 2021, legislative amendments to the *Teachers Registration and Standards Act 2004* (the Act) has meant that accreditation of ITE programs is now on sure legal footing. The Board, consistent with all other Australian states and territories, has aligned itself with the Australian Professional Standards for Teachers (APST) as evidence of the four stages of teacher development (graduate, proficient, Highly Accomplished and Lead) and critically, as the approved standards in accrediting South Australian ITE programs.

Since 1976, the Board has recognised early childhood teachers employed in preschools and kindergartens, being one of the first jurisdictions to do so. Even to date, not all other states and territories have matched the priority emphasis given by South Australia to register early childhood teachers working within children from birth to eight years of age. Further, there are many disparities in the registration process for teachers. [Table 1 \(page 14\)](#) outlines the specific requirements for registration in each jurisdiction.

A minimum of four-year higher education study including at least one year of ITE is prescribed in South Australia, regardless of where initially completed and against which all applications for registration are assessed. This simple reality means that when a teacher from another Australian jurisdiction applies for registration based upon attaining a three-year degree elsewhere, the outcome will be determined by whether:

- they apply as a new applicant under local laws (the three-year qualification not being accepted); or
- under mutual recognition principles, applied under Commonwealth law, South Australia will assess what is an 'equivalent activity' – a matter very different from comparing categories of

registration as against one another. [Part 7, page 15](#) of this paper addresses this important issue, as it has special application to the early childhood sector.

Since 2014, the divided early childhood register of Victoria has not been recognised in South Australia as applicable for registration under mutual recognition principles. Since 2018, a limited number (less than 20), of three-year qualifications have been recognised from New South Wales under an anomalous outcome of applying mutual recognition principles. In all other mutual recognition applications to South Australia, only four-year qualifications are accepted for registration. Early childhood teachers are not required to be registered in the Australian Capital Territory, Northern Territory, Queensland or Tasmania unless they work in a school setting.

Recent emphasis across the eastern seaboard to achieve urgent improvements in early childhood teaching delivery has now placed emphasis on national teacher supply in ECEC, where three-year qualifications have been accepted by other TRAs (see [Table 1, page 14](#)).

There is no impediment to a South Australian university proposing a birth-five ITE qualification for accreditation as long as it meets the requirements of the national ITE Accreditation Standards and Procedures. The Act however would require a minimum of four-year higher education study for graduates to gain registration.

The 2011 introduction of the Education and Care Services National Law Act resulted in registration and regulation of early childhood teachers working in long day care centres in South Australia from 2014. This move was aimed at ensuring that all children, regardless of the type of ECEC setting they attend, receive high quality education and care from qualified and competent teachers. Staff ratios apply to the numbers of registered teachers which must be present (see [Table 2, page 20](#)).

The early childhood sector is multi-regulated by national and state-based agencies which results in duplication and overlap of regulation requirements (see [Table 6, page 28](#)). What is clear is that maintaining and improving high standards for early childhood teachers is best enabled by understanding the complex environment in which teachers are registered and courses accredited. Pressures imposed by teacher supply demands elsewhere should not be the determining factor for setting thresholds of quality education for the birth to eight age group or any division of that.

Key Terms

The **Accreditation of initial teacher education programs in Australia: Standards and Procedures (Accredited S&Ps)** is the national guidelines, provided by AITSL, that all Teacher Regulatory Authorities use to accredit programs. This has been adopted by the Teachers' Registration Board of South Australia under Regulation 5 of the TR and S Regulations 2021.

Association of Independent Schools of South Australia (AISSA) is the association of South Australian Independent schools, who employ teachers.

Australian Children's Education and Care Quality Authority (ACECQA) is the independent national authority that assists governments in administering the National Quality Framework within early years education and care settings. It administers qualification requirements for the early childhood sector, including for degree-qualified early childhood teachers, approved qualifications for other educator roles and competencies for teachers and educators.

Australian Institute for Teaching and School Leadership (AITSL) provides resources and support for the Australian Professional Standards for Teachers and work with states and territories to ensure all accredited Initial Teachers Education (ITE) programs align with nationally agreed standards.

Automatic Mutual Recognition (AMR) enables teachers registered in one Australian state or territory to work in another state or territory using their home state registration. The AMR scheme is set out in the Mutual Recognition Act 1992 of the Commonwealth.

Australian Professional Standards for Teachers (APST or Teacher Standards) are a public statement that describe the professional knowledge, practise and engagement required of teachers at four career stages. The four stages reflect a continuum of expertise. Graduate standards underpin the accreditation of ITE programs. Graduates from accredited programs qualify for registration in South Australia. Proficient standards underpin processes for full registration across all states and territories. HALT career stages inform voluntary certification.

Catholic Education South Australia (CESA) employ a significant number of teachers across both the Archdiocese of Adelaide and the Diocese of Port Pirie. Some Catholic schools are independent and employ their own staff.

Certification is the process of recognising teachers at the Highly Accomplished and Lead Teacher (HALT) career stages of the APST.

Director/manager of early childhood centre is responsible for the overall planning of staff, administration, marketing, and resourcing of a centre, and ensuring government requirements are met. In South Australia, the Director/manager is not required to hold registration.

Department for Education (DfE) is the largest employer of teachers (and early childhood teachers) within South Australia.

Early childhood is the period of a child's life from birth to eight years of age.

Early childhood education refers to the component of early childhood education and care that is focused on brain development and cognitive growth. It involves qualified teachers and educators who plan experiences that will help children to learn while they are playing.

Early childhood education and care (ECEC) refers to the holistic development of a child's social, emotional, cognitive, and physical abilities in a way that meets each child's needs, to build a solid and broad foundation for lifelong learning and wellbeing.

Early childhood sector includes a range of early childhood education and care services such as long day care, kindergarten, preschool, family day care, in-home care, mobile services, occasional care and outside school hours care.

Early childhood teacher (ECT) is a person who holds an approved early childhood teaching qualification. All education and care services (preschools, kindergartens, and long day care (not family day care, in-home care, mobile services, occasional care and outside school hours care) must employ one or more ECTs (depending on the number of enrolled children).

The **Early Years Learning Framework (EYLF)** supports early childhood providers, teachers and educators to extend and enrich children's learning from birth to 5 years and through the transition to school.

Education sector heads are leaders of Department for Education, Catholic Education South Australia, and the Association of Independent Schools South Australia.

Education Standards Board SA (ES Board) is the South Australian statutory regulatory authority responsible for the approval, monitoring and quality assessment of education services.

Educator is a person qualified to work in the field of early childhood and who provides education and care to children. They do not hold registration with the Board however may hold a qualification of:

- Certificate III in Early Childhood Education and Care level qualification
- Diploma of Early Childhood Education and Care level qualification
- Or an unaccredited Bachelor (ie Bachelor of Teaching Studies)

Educator ratios are the number of educators working directly with children, based on the ages and number of children in a service, as applied under the NQF.

Expert Advisory Group (EAG) is managed by AITSL and provides advice to teacher regulatory authorities on all TPAs being implemented in ITE programs against the Standards and Procedures.

Higher Education Institution (HEI) is a tertiary institution leading to the award of an academic degree. In South Australia there are four HEI that deliver ITE – Flinders University, Tabor College, University of Adelaide and University of South Australia.

Highly Accomplished and Lead Teacher (HALT) are teacher standards on the APST continuum above graduate and proficient. Teachers apply to be assessed against the Teacher Standards and are offered compensation from employers in some sectors/jurisdictions to perform at that level.

Initial Teacher Education (ITE) Providers are higher education institutions that deliver accredited teacher education programs to facilitate graduates to gain teacher registration in Australia.

LANTITE is the literacy and numeracy test for initial teacher education students. All students enrolled in an ITE program in South Australia (either undergraduate or postgraduate) will be expected to sit and meet the test standard prior to graduation (SA Minister decision in 2019).

Mutual Recognition Act 1992 of the Commonwealth (MR Act) applies in each state and territory by a referral of power to the Commonwealth. Only Queensland, has chosen not to refer power to the Commonwealth currently, for Automatic Mutual Recognition (however has done so for usual Mutual Recognition). The MR Act is focused upon both free movement of services (ie occupations) and goods. Free movement of services is regulated by Part 3 (Mutual Recognition) and Part 3A (Automatic Mutual Recognition) of the Act.

National Law is the Education and Care Services National Law Act 2010 under which the NQF operates, comprising the Education and Care Services Act and Regulations. The purpose of the National Law is to set a national standard for children’s education and care across Australia. The same law is applied in each state and territory, but with some variations.

National Teacher Workforce Action Plan (NTWAP) was developed in 2022 to address the national issue of teacher workforce shortages.

New South Wales Education Standards Authority (NESA) is an independent statutory authority who accredit (register) teachers in all sectors in NSW. As an authority they deliver the best possible outcomes for children and young people through high-quality syllabuses, assessment, teaching standards and school environments.

The **National Quality Framework (NQF)** provides a national approach to regulation, assessment, and quality improvement for ECEC services.

The **National Quality Standards (NQS)** sets a national benchmark for the quality of education and care services and includes seven quality areas that are important to outcomes for children.

One Teaching Profession: Teacher Registration in Australia was a review of national registration focussing on the 2011 Framework for Teacher registration as a driver for teacher quality.

Preservice Teacher is a person studying an ITE accredited program to enable graduation as a teacher.

Professional experience placements (PEx) are undertaken by preservice teachers as part of their ITE studies.

Queensland College of Teachers (QCT) registers teachers for Queensland schools and accredits the state’s preservice teacher education programs. The QCT is the regulatory body for the teaching profession in Queensland. It works in the best interests of the public and the profession to ensure approved teachers are qualified, current in their practice and suitable to teach students.

Registration is the process of regulating the teaching profession in each state and territory (known as accreditation in NSW) to ensure members maintain their registration, professional standards and are competent, fit and proper persons to have the education and care of children.

South Australian Teacher Certifying Committee (SATCC) is the professional body, formed through the three Education sector heads, that oversees HAIT certification. SATCC participates in national moderation to ensure the quality of assessments.

Special Authority to Teach (SAT) is an authorisation that enables an unregistered person to teach in South Australia. A SAT is revokable at will.

Standards and Procedures see *The Accreditation of initial teacher education programs in Australia: Standards and Procedures*

Statement of Service is a statement signed and dated by an employing authority, detailing dates of a named teachers' employment at a service delivery site.

Teacher is a person who helps children and young people to acquire knowledge, competence, or virtue, via the practise of teaching. They hold either provisional or (full) registration in each state or territory.

Teacher Education Expert Panel (TEEP) Discussion Paper was released in 2023 in response to the National Teacher Workforce Action Plan (NTWAP).

Teacher Education Ministerial Advisory Group (TEMAG) was established in 2014 to advise the Government on how teacher education programs could better prepare preservice teachers.

Tertiary Education Quality and Standards Agency (TEQSA) is responsible for regulating and assuring the quality of all providers of higher education in Australia, including providing provision to provide international comparisons and student experiences.

Teaching Performance Assessment (TPA) is a tool used to assess the practical skills and knowledge of pre-service teachers completing an ITE qualification. Pre-service teachers collect evidence of practise to complete a TPA in the final year of their ITE program. This is assessed by ITE providers and is a requirement for graduation.

Teachers Registration and Standards Act 2004 (TR&S Act) is the Act to regulate the teaching profession of South Australia.

Teachers Registration and Standards Regulations 2021 (TR&SR 2021) are the prescribed regulations under the Act.

Teacher Regulatory Authorities (TRAs) have a duty to register teachers in the interests of the public and the profession, and in so doing, are accountable to the public and profession for maintaining standards and ensuring that teachers are suitable/fit to teach.

Teacher Standards see APST.

Victorian Institute of Teaching (VIT) is the Victorian independent statutory authority for the teaching profession whose primary function is to regulate members for the teaching profession, ensure quality teaching and provide for the safety and wellbeing of children. VIT has a divided register – sub-Register 3 and sub-Register 3A.

1. Early Childhood Teachers in South Australia

Background

In 1976, South Australia became the first state to register early childhood teachers (ECTs) employed in preschools and kindergartens.

Despite Queensland and South Australia being early regulating bodies of 50 plus years duration, South Australia is the only state to demonstrate a long-term commitment to legislate all ECTs.

The Teachers Registration and Standards Act 2004 (TR&S Act) is one concerned with both registration and professional standards for teachers. Registered teachers in South Australia can teach children or young people from birth to the end of their formal schooling in an education setting.

1.1 One category of registration

The South Australian legislation provides for one category of registration, that is not limited by scope of practice. At a national level, the discussion of teachers practising outside of their trained qualification and/or experience continues, however in South Australia, teacher scope of practice (subjects and age of students taught) is controlled by employers.

1.2 Four-year qualifications

In South Australia, the minimum qualifications accepted for registration are mandated to be of four years of higher education study with a minimum of one year of initial teacher education (ITE) (as per the Teachers Registration and Standards Regulations 2021 (TR&SR 2021)).

Emphasis is not placed on the duration of study, rather the quality of completing the equivalent of four years of higher education study (even if completed in less time through acceleration, or longer time on a part time basis). Four-year ITE qualifications are accepted from any teacher seeking registration from Australia (where mutual recognition applies between all Australian states and territories) or New Zealand (Trans-Tasman recognition applies). Qualification assessments are conducted for teachers seeking registration from overseas countries (TR&SR 2021 regulation 7 prescribes four-year qualifications).

1.3 Promoting educators to be registered in South Australia

A limited exception exists in the early childhood sector. Unregistered persons can apply for a *SAT for an Unregistered Person to teach as an Early Childhood Teacher in Long Day Care Centres*. This authorisation is granted to applicants to teach for a set period, subject to conditions specified by the Teachers Registration Board of South Australia (the Board). The person must be offered employment as an ECT under the National Quality Framework (NQF) and be working towards the successful completion of an early childhood ITE accredited qualification.

2. Movement between early childhood and school sectors

The four-year early childhood ITE qualifications offered by South Australian Higher Education Institutions (HEI) cover birth to eight years of age and provide an option for teachers to move between early childhood settings and schools. Past evidence shows that teachers in South Australia are likely to move from teaching in an early childhood long day care settings to preschools and schooling sector, seeking better employment conditions and pay.

2.1 Educators and Teachers in South Australia

The role of educators holding an ACECQA approved three-year qualification is also important. However, the role for three-year and four-year qualified persons should not be conflated with permissible accredited ITE program content, whether a birth to five, or birth to eight years of age qualification.

3. Birth to 5 vs Birth to 8 early childhood qualifications

Some long day care providers are seeking a birth to five years of age ITE qualification and will continue to pursue this option, however this is not always supported by other professionals working in early childhood settings or employer groups.

Some South Australian higher education providers have considered developing ITE programs from birth to five years of age, however, this has not eventuated and no programs to date have been lodged, thereby gaining accreditation.

Providers may need to weigh up the cost of developing such a program, the uptake by potential students and demand in the community. It must be noted, if such a degree is three years in length, then this qualification would not meet South Australian registration requirements.

4. Registration of teachers in South Australia, including early childhood teachers

In South Australia teachers are registered without any specific designation regarding the age group they are qualified to teach. However, there are certain requirements that teachers must meet to be registered in the state.

To be registered as a teacher in South Australia, qualifications accepted for registration are mandated to be of four-years of higher education study with a minimum of one year of ITE (as per the TR&SR 2021). The Board does not recognise higher education qualifications less than four years in duration and does not maintain a register for holders of such qualifications.

5. Australian Professional Standards for Teachers (Teacher Standards)

It is important to note that once a teacher is granted provisional registration, it is valid for a term of up to five years. During this period, the teacher is expected to transition to (full) registration and provide evidence of their expertise aligned to the proficient career stage of the Teacher Standards. This registration process ensures that all teachers in South Australia meet the required standards for teaching and provide high-quality education to students across the state.

The Teacher Standards are written for all teachers.

The Teacher Standards unpack teaching expertise and practice across four career stages:

- Graduate
- Proficient
- Highly Accomplished
- Lead

The Board recognises teacher progression from graduate to proficient levels, against the Teacher Standards, through the collection of evidence to support transition from provisional to (full) registration. The evidence of continuum of practice is not attached to scope of practice or a conditional registration, rather, it relates to standards of improvement expected of all teachers as they progress and broaden their experience in the first five years of their professional life. The move to a five-year period of registration by the Board in July 2021 has assisted in promoting an expectation of a five-year progression to proficient standard, regardless of actual alignment.

In 2018, the release of *One Teaching Profession: Teacher Registration in Australia* had a recommendation that the APST should be amended for applicability to ECTs. The Board employed an independent facilitator to explore the work of ECTs and the Teacher Standards. A report *Recognising and Acknowledging Complexity of Early Childhood* supported the addition of inclusive language in the Teacher Standards at a minimum. Recent national discussions show a lack of enthusiasm for rewriting the Teacher Standards to make them more specific to early childhood education.

As a response, AITSL established working groups and created targeted resources, including a brief glossary, to support ECTs in applying the Teacher Standards to their practice. This was done in recognition that the Teacher Standards are relevant to all teachers and are widely used by the profession.

5.1 Achieving proficient standard and hence (full) registration and challenges for early childhood teachers

Moving from provisional to (full) registration requires a teacher to apply to the Board and share evidence of their practice aligned with the Teacher Standards. This evidence includes teaching observations which are signed off by the teacher, an evaluator (who holds full registration) and sometimes a Principal/Director. The Board then assesses and approves the application and awards (full) registration (proficient status).

However, the process of achieving (full) registration can be challenging for some ECTs, especially those who are the only registered teacher at their site in long day care settings. To support these teachers in gaining a quality independent review, an adaptive process has been adopted, where larger early childhood employer groups may employ a teacher leader to assist ECTs in meeting this registration requirement.

ECTs implement the EYLF and NQS on a daily basis. Teachers may find it difficult to demonstrate proficiency of the Teaching Standards due to the interpretation of the language. To support movement to proficiency, ECTs may obtain a statement of service to provide the necessary evidence of employment as a teacher for 200 required days. The statement of service must state that the teacher is employed as a teacher, and not an educator, director or in another role.

Teachers who hold the role of Director/Centre Manager in early childhood settings have difficulty progressing from provisional to (full) registration. This can be frustrating for these teacher/Directors, who compare their role to that of a principal or deputy in a school setting.

Conversations with ECTs reveal that holding registration can be an important matter of identity, where they are keen to identify and relate to the teaching profession. The lack of suitable fully registered evaluators can impact ECTs progressing from graduate to proficient status.

5.2 Recognition of HALT certification for early childhood teachers in South Australia

Ensuring recognition for all teachers, including ECTs to promote opportunities for ongoing learning, support and reflection of teaching practice is important.

a. Recognising ECT achievement

New powers in the TR&S Act (section 31C) provide a role for the Board to recognise attainment by teachers to reflect their accomplishments. This recognition need not merely be regarding the higher level of performance under the APST (Highly Accomplished or Lead teacher). How section 31C could be used for ECTs to achieve appropriate recognition could be further explored.

b. ECT – HALT status as an achievement

There is a nationally consistent process to certify HALT achievements for all teachers. In SA, certification at the HALT career stages of the Teacher Standards is a voluntary process that recognises quality teaching and expertise. The SATCC oversees a state-based nationally consistent certification process of HALT, being a non-Ministerial committee comprising the three Education sector heads (DfE, CESA, AISSA).

Once a teacher is certified at one of the higher career stages, SATCC notifies the Board, and the Public Register of teachers is updated. The teacher is then issued with a new registration certificate reflecting this annotation and achievement.

ECTs who do not work for DfE, AISSA member schools or CESA are unable to demonstrate their expertise at the higher career stages of the Teacher Standards through attaining HALT, because of the formation structure of SATCC. Three private ECT employer groups are exploring a process to enable their teachers to be assessed as HALTs.

6. Interstate registration of early childhood teachers and educators

The mobility of ECTs across jurisdictions is impacted by each TRAs approach to recognition of qualifications. This important cohort of the teaching profession is currently inconsistently recognised. Refer to [Table 1](#) below for a summary of registration/accreditation equivalence in each Australian state and territory and New Zealand.

In Australian Capital Territory and Northern Territory, ECTs are currently required to be registered only if they work in a service attached to a school.

In Tasmania, it is similar, as kindergarten teachers are required to hold teacher registration (they teach in a school setting) although registration is not required for ECTs in early childhood services, such as long day care.

In New South Wales ECTs must hold registration (accreditation) as in South Australia.

In Queensland ECTs in early childhood services, are not required to have registration, however, can choose to do so, if eligible. Some employers require teacher registration as a condition of employment.

In Victoria, ECTs and school teachers must be registered (on a divided register). Registered teachers can only teach in either early childhood services or primary and secondary schools, unless they have Dual Registration (can teach in all settings). All ECTs employed or engaged in the role of an ECT in an

early childhood setting must be registered. The divided register exists due to the recognition of length of teaching program and experience. Victoria accepts ACECQA assessment of early childhood programs on the early childhood register (Register 3A), but not the register of teachers (Register 3) unless the teacher has a dual early childhood and primary school qualification/s.

Table 1 Categories of registration by state or territory

State/Territory	Categories of Registration	Registration/accreditation equivalence	Teacher background
ACT – Teacher Quality Institute	<ul style="list-style-type: none"> Provisional/Full 	ACT teachers can deliver education services in a school; no scope of practice limitation and no connection to a site.	<p>Preschool – Year 12 (ages 4 – 17)</p> <p>No registration requirements for Early Childhood Teacher (ECTs) in early childhood services that are not attached to an ACT school.</p> <p>TQI is exploring teacher registration options for birth – 5 qualifications</p>
NSW Education Standards Authority	<ul style="list-style-type: none"> Provisional/Proficient Conditional Non-Practising <p>Only state where registration is known as accreditation</p>	NSW accredited teachers can teach in a NSW school or early childhood service; no scope of practice limitation; no restriction to site. Non-practising teachers cannot teach in any NSW school or service. Conditional accreditation is granted to teachers who are still studying and have an offer of employment as a teacher.	<p>Early childhood – Year 12 (birth – 17)</p> <p>ECTs working in approved early childhood services must be accredited.</p>
Teacher Registration Board of Northern Territory	<ul style="list-style-type: none"> Provisional/Full 	Two categories of teacher registration in Northern Territory. Teachers can teach in primary or secondary schools.	<p>Preschool – Year 12 (ages 4 – 17)</p> <p>Only preschools attached to schools and as such require registration as a condition of employment.</p>
Queensland College of Teachers	<ul style="list-style-type: none"> Provisional/Full 	There is no scope of practice limitation or site requirement. Teachers can teach at primary or secondary schools.	<p>Kindergarten – Year 12 (ages 4-17)</p> <p>ECTs in early childhood services are not required to have registration but can choose to do so. Some employers require teacher registration as a condition of employment.</p>
Teachers Registration Board of South Australia	<ul style="list-style-type: none"> Provisional/Full 	SA teachers can teach anywhere; there is no scope of practice limitation. Registered teachers can be employed in early childhood, primary or secondary settings.	<p>Early childhood – Year 12 (birth – 17)</p> <p>All teachers must be registered.</p>
State/Territory	Categories of Registration	Registration/accreditation equivalence	Teacher background

Teachers Registration Board of Tasmania	<ul style="list-style-type: none"> Provisional/Full Specialist Vocational Education and Training Dual 	Tasmanian teachers can teach in primary or secondary schools or colleges. Teachers can be Vocational Education and Training (VET) lecturers. Scope of practise is reserved for Specialist VET Registration category.	Kindergarten – Year 12 inc VET (ages 4-18) Kindergarten teachers are required to hold teacher registration (when employed in a school). Registration is not required for ECTs in early childhood services.
Victorian Institute of Teaching	<ul style="list-style-type: none"> Provisional/Full <ul style="list-style-type: none"> Teacher (sub-register 3) Early childhood teacher (sub-register 3A) Dual Non-practising 	VIT registers early childhood teachers and schoolteachers (on a divided register). Registered teachers can only teach in either Early Childhood services <u>or</u> primary and secondary schools unless they have Dual Registration (can teach in all services). Non-practising registrations are not permitted to teach.	Early childhood – Year 12 (birth – 17) All ECTs employed or engaged in the role of an ECT in an early childhood setting must be registered.
Teachers Registration Board of Western Australia	<ul style="list-style-type: none"> Provisional/Full Non-Practising Limited 	Teachers can teach in Early Childhood services, primary and secondary schools. There is no scope of practice limitation, except for Limited Registration, which is sought from an educational site or sites and is site and teacher specific.	Early childhood – Year 12 (birth – 18) All ECTs must be registered.
Teaching Council of Aotearoa New Zealand	<ul style="list-style-type: none"> Provisional practising/Full practising (known as Category One and Two) Returning to Teaching 	Early childhood teachers or primary teachers can teach in an early childhood setting in New Zealand. They must have a current practising certificate.	Early childhood - Year 12 (birth – 16)

7. Mutual Recognition – recognising ‘equivalent activity’

The MR Act applies in each state and territory. For all usual mutual recognition applications made by teachers under part 3 of the MR Act, there is a simple process for recognising interstate qualifications in the second state (see 7.1 below) by an act of deeming registration (see 7.3 below) and then issuance of a new certificate as proof of registration in the second state. All local laws then apply as to how interstate teachers must conduct themselves in the second state.

A recent development is Automatic Mutual Recognition (AMR), due to commence in South Australia on 1 July 2027. Only Queensland has chosen not to refer power to the Commonwealth for commencement of AMR. In summary, and when fully commenced nationally, this will result in free movement of teachers across Australian borders relying upon registration status in the first state as evidence of capacity to teach in a second notified state or territory, absent any ongoing disciplinary matter. No South Australian registration certificate will be issued to teachers applying under AMR.

Progress towards AMR implementation in South Australia has further focused the collective Board experience as to the need to recognise only ‘equivalent activities’ for teacher registration; as this is the test under both parts 3 and 3A of the MR Act principles binding the Board.

7.1 What is mutual recognition of the occupation of teaching?

The MR Act is focused upon both free movement of services (ie occupations) and goods. It is not teacher focused or with application to professional obligations. Free movement of services is regulated by both parts 3 and 3A of the MR Act, the latter yet to commence.

Section 20 of the MR Act requires teachers who apply to be registered in South Australia after first being registered elsewhere, to be given registration in South Australia (upon meeting some basic satisfaction requirements and by giving written notice of intent to South Australia). Those satisfaction requirements are dominated by the need to ensure interstate applicants:

1. lodge a written notice and pay an application fee;
2. make certain declarations (mostly that listed events haven't happened); and
3. prove existing interstate registration status (usually by production of a current certificate).

A South Australian teacher registration certificate is then issued to the applicant and local laws apply – but only after a maximum permissible one calendar month to check the above three requirements.

7.2 Prohibition on imposing additional burden or 'conditions' on interstate teachers

The Board is not permitted to impose additional conditions on a mutual recognition applicant's South Australian registration, either by preference, or because they are first registered elsewhere where lesser requirements for suitability or competency to teach apply.

However, it is possible to do so when the purpose of a condition is to achieve 'equivalence of occupation'. An equivalence check necessarily follows an initial assessment that an activity as conducted in the first state is 'equivalent' to that in the second state – it is not a comparison of registration categories which occurs under mutual recognition principles.

- Historically, South Australia has only imposed conditions upon Queensland mutual recognition applicants, being one identical to that already imposed on returning to practice teachers in that state.

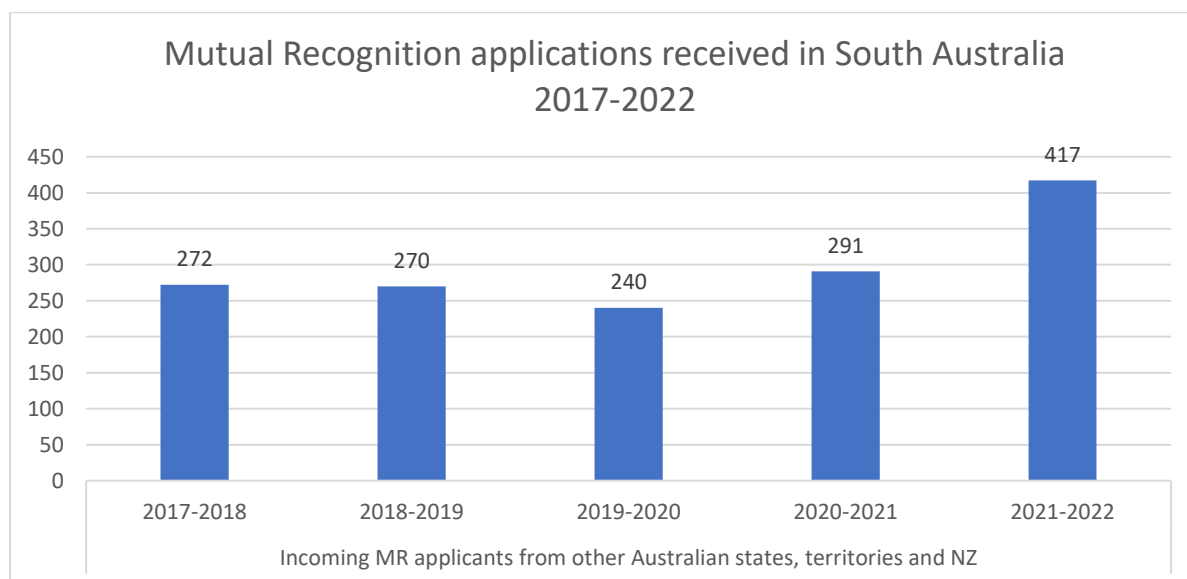
7.3 Deeming registration in South Australia

The Board initially prima facie, accepts an interstate-issued registration by a process known as 'deemed MR' for one calendar month, if assured compared 'activities' are equivalent. The Board then grants South Australian registration status upon confirmation of certain matters (see 7.1) within that one calendar month, absent of any reason to refuse (being limited). Without further action within that one calendar month, registration in South Australia must be granted.

Understanding what comprises an equivalent 'activity' (under mutual recognition principles) capable of SA issue has therefore been well considered since the 1990s. Graph 1 below provides actioned numbers of Mutual Recognition applications received from other jurisdictions between 2017-2022.

Graph 1 Mutual Recognition Applications 2017 – 2022

The graph below shows the number of usual Mutual Recognition applications received in South Australia from all states and territories between 2017 to 2022:



7.4 Interstate-based early childhood teachers

The single important example of where deemed registration is not granted in South Australia is where an ECT registered in Victoria on the VIT divided early childhood register (known as Register 3A) applies.

(a) Victoria

Historically, VIT chose to register ECTs with three-year qualifications and hence chose to separate their register to accommodate a restricted category of registration where a teacher can teach in an early childhood setting but not in any Victorian school setting. Notably, four-year qualified Victorian ECTs can elect as to whether they hold unlimited registration or choose to hold sub-Register 3A status, which limits them to working in early childhood settings. As South Australia registers teachers regardless of scope or site of practice, the VIT sub-Register 3A is not equivalent in occupation or 'activity' occurring.

(b) New South Wales

New South Wales accredited (ie registered) ECTs who have completed a birth to five, three-year ITE qualification in NSW, are granted registered status in South Australia under deemed mutual recognition. This is due to an anomalous outcome and since January 2018, nineteen early childhood three-year qualified teachers from New South Wales have applied and been granted registration in South Australia, through mutual recognition¹. This has occurred through the comparison of registered 'activities' of teachers in both New South Wales and South Australia, who can teach in any

¹This has only been possible to discern as Board staff have reviewed every NSW MR application since January 2018 to end April 2023 to determine if early childhood qualifications have been relied upon to gain SA registration under mutual recognition principles – an examination not permissible at time of application review under the Cth MR Act.

setting, in an unlimited scope of practice. In reality, movement of ECTs from eastern seaboard locations to South Australia is rare, noting the Board currently has 36,500 registered teachers.

7.5 Determining an ‘equivalent occupation’ – a focus upon what constitutes an equivalent activity

When reviewing a mutual recognition application in South Australia, the Board determines not if the applicant is registered elsewhere², but whether it is an ‘equivalent occupation’ under the MR Act.

To determine whether it is an equivalent occupation, section 29 sets out applicable principles; being threefold:

1. Are the ‘activities’ authorised by the granting of registration/accreditation substantially the same (regardless of what the authorisation is called)?
2. If not, would a condition make these two ‘activities’ substantially the same? If so, a condition should be imposed to achieve recognised similarity in ‘activities’ and equivalence is thereby achieved; and
3. If the Administrative Appeals Tribunal has declared through any process, that two occupational ‘activities’ are equivalent, then this must be given effect (to date, this has not been applicable in South Australia by individual application or by Ministerial declaration).

Whilst this legal analysis seems simple, it is not. Federal Court cases have set out how this applies in operation. The ‘take home’ understanding is that the MR Act applies because participating jurisdictions have agreed these mutual recognition principles should apply federally – not that there will be the same outcomes in each state or territory. The latter not being an outcome imperative of mutual recognition.

Whilst not seeking to oversimplify, cases have held due to consideration of:

- (a) Does the registration statute in the first state authorise the ‘activities’ of the profession in the second state?;
- (b) What is the occupation for which the person is registered in the first state? Does a like right exist elsewhere? Persons may hold qualifications from a variety of sources, but will it allow for registration in the second state for that ‘activity’; and
- (c) It is unlikely that registration schemes will set out all activities associated with that profession, it may be that ‘evidence gathering’ is required to test what are substantially same ‘activities’ between states.

In this manner, it may be understood this requires a practical examination of ‘activities’ undertaken in two places and not merely an exercise in comparing two pieces of legislation; where seeking to achieve equivalence in the statutory powers or authority that can be exercised by persons is not the goal.

8. Regulators in South Australia

The early childhood sector is subject to a complex web of regulations enforced by state and national bodies. Each agency has varying requirements that aim to ensure quality education and care for young children.

² Although holding substantive registration must first be demonstrated

Diagram 1 below, provides a pictorial representation of the multi-faceted regulation of this sector.

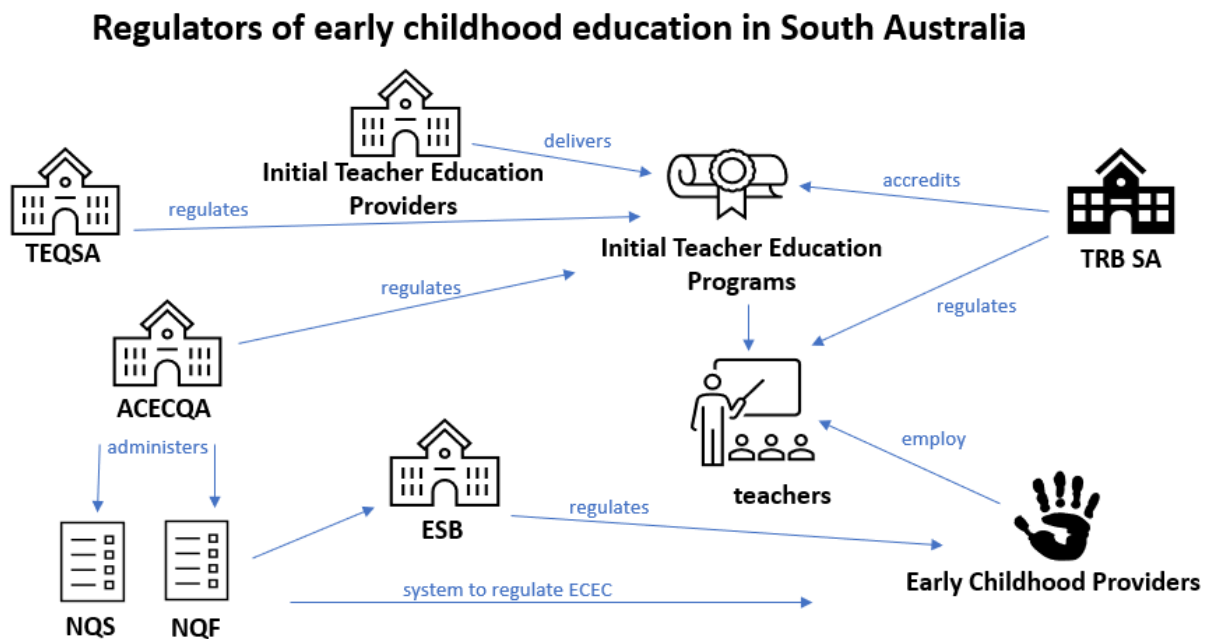


Diagram 1 Regulators of early childhood education in South Australia

- Tertiary Education Quality and Standards Agency (TEQSA)
TEQSA is responsible for regulating and assuring **the quality of all providers of higher education** in Australia, including those seeking approval to deliver an Initial Teacher Education (ITE) program.
- Teachers Registration Board of South Australia
As the state regulator, the Board oversees **the registration of teachers** in South Australia and ensures that teachers meet high standards of professional conduct and competence. The Board is also responsible for accrediting South Australian delivered ITE programs (under s19A of the Act), as per prescribed national compliant accreditation Standards and Procedures.
- Education Standards Board South Australia (ES Board)
ES Board **regulates the early childhood sector and schools** in South Australia. Their primary role is to ensure all education and care services comply with the National Law (NQF and NQS).
- Australian Institute of Teaching and School Leadership (AITSL)
AITSL is an independent national body that provides leadership and support for the teaching profession of Australia. AITSL works closely with teachers, teacher regulatory authorities and other stakeholders in the education sector to **promote the APST**. It also provides a range of resources, guidance and materials for teaching and **ITE program accreditation**.
- The Australian Children's Education & Care Quality Authority (ACECQA)
ACECQA is a national body with the primary role to **oversee the implementation of the NQF** across the country, working closely with state regulatory authorities. Another key role is **to assess and approve ITE early childhood programs**.

Refer to [Table 6 \(page 28\)](#) for an outline of the role of each agency and note the duplication and overlap between them.

8.1 Approval vs accreditation of early childhood teacher qualifications

A clear distinction needs to be made between approving and accrediting programs. TRAs **accredit early childhood programs** against the national Standards and Procedures. ACECQA **approves early childhood programs** against their 'Requirements for early childhood teaching program assessments'.

The Standards and Procedures provide the detailed process of accreditation ([Part 10](#) provides further information and [Appendix A](#) of the AITSL accreditation process). HEI provide their full documentation to TEQSA and ACECQA (if an early childhood program) for initial assessment. The documentation forms part of the submission sent to TRAs who then form a panel of experienced, trained educators to assess against the Standards and Procedures. National moderation processes are in place. Accreditation is provided for a five-year period with a stage 2 requirement to monitor the program following five years of teaching.

ACECQA assessment of qualifications is undertaken against the approved educator qualifications under the NQF. The four key areas of assessment include: academic level, age focus or specialisation, supervised professional experience of work placement and curriculum content. ACECQA assess and approve bachelor, diploma, and certificate qualifications.

9. Addressing staff shortages in early childhood teachers

To ensure the care and best outcomes for children, regulated teacher to child ratios exist in early childhood services.

Ratios of teachers and educators to children in early childhood settings are regulated in South Australia by the ES Board. The NQF sets out the minimum educator/teacher to child ratios.

A waiver is in force to support approved education and care services to comply with staffing arrangements as per the national regulations and NQS. The waiver is regulated by the ES Board under the NQF to address staff shortages at all early childhood educator qualification levels (ie Certificate III and Diploma). The requirement to transition to full ratios under the National Law is due to occur by 31 December 2023, however a further extension is expected due to ongoing reported teacher shortages.

Refer to [Table 2](#) below for the ratios for teachers/educators to children in early childhood settings in South Australia.

Table 2 Ratios for teachers/educators to children in early childhood settings in South Australia

Age of Children	Educator/Teacher to child ratio
Birth to 24 months	1:4
Over 24 months and less than 36 months	1:5
36 months or over (not including children over school age)	1:11
Over preschool age	1:15

Table 3 provides details on the staffing requirement of ECTs in long day care centres.

Table 3 A summary of the ECT requirements for long day care – taken from the ACECQA website

Number of children in attendance at any one time	Early childhood teacher requirement
Fewer than 25 children	The service needs to have access to an early childhood teacher for at least 20 per cent of the time the service is operating. This may be achieved through an information communication technology solution.
25 – 59 children	The service must employ or engage a full-time or full time equivalent early childhood teacher, or have an early childhood teacher in attendance for: <ul style="list-style-type: none"> • 6 hours per day, when operating for 50 hours or more per week OR • 60% of the time, when operating for less than 50 hours per week
60 – 80 children	The service must employ or engage a full-time or full time equivalent early childhood teacher or have an early childhood teacher in attendance for: <ul style="list-style-type: none"> • 6 hours per day, when operating for 50 hours or more per week OR • 60% of the time, when operating for less than 50 hours per week. <p>Additionally from 2020, the service must employ a second early childhood teacher or suitably qualified person in attendance for:</p> <ul style="list-style-type: none"> • 3 hours per day, when operating for 50 hours or more per week <p>OR</p> <ul style="list-style-type: none"> • 30% of the time, when operating for less than 50 hours per week <p>These requirements do not apply if the service has 60 to 80 approved places, and employs or engages a full time or full time equivalent early childhood teacher at the service, and employs or engages a second early childhood teacher or suitably qualified person for half the hours or full time equivalent hours at the service.</p>
More than 80 children	The service must employ or engage a full-time or full time equivalent early childhood teacher or have an early childhood teacher in attendance for: <ul style="list-style-type: none"> • 6 hours per day, when operating for 50 hours or more per week OR • 60% of the time, when operating for less than 50 hours per week. <p>Additionally from 2020, the service must employ a second early childhood teacher or suitably qualified person in attendance for:</p> <ul style="list-style-type: none"> • 6 hours per day, when operating for 50 hours or more per week <p>OR</p> <ul style="list-style-type: none"> • 60% of the time, when operating for less than 50 hours per week <p>These requirements do not apply if the service has more than 80 approved places, and employs or engages a full time or full time equivalent early childhood teacher at the service, and employs or engages a second full time or full time equivalent early childhood teacher or suitably qualified person at the service.</p>
Table 3 continued:	

Suitably Qualified Person - Additional staffing requirement from 1 January 2020

From 1 January 2020, approved providers of long day care services and preschools/kindergartens must have a second ECT or, alternatively, a 'suitably qualified person' when 60 or more children preschool age or under are being educated and cared for.

A 'suitably qualified person' can be:

- An individual who is 'actively working towards' an approved early childhood teaching qualification AND has completed at least 50% of the qualification or holds an approved diploma level qualification.

OR

- An individual who is registered (accredited in New South Wales) as a primary or secondary school teacher in Australia AND holds an ACECQA approved diploma level qualification (or higher).

ECTs (pre-primary school) and childcare centre director/managers are listed on the medium and long-term strategic skills list of the Migration Instrument 2019, which enable qualified overseas skilled workers to apply for a visa to live and work in Australia. This is another way that the Australian government is encouraging employment in a skill shortage area.

10. Additional challenges for early childhood teachers

Challenges exist in the multi-regulatory assessment of ECT ITE qualifications by TEQSA, ACECQA and the local TRA. Challenges may also be perceived in the TPA and PEx requirements of a pre-service ECT. These perceived challenges are explained below.

10.1 Early Childhood ITE program accreditation

National accreditation of ITE programs has resulted from the 2015 TEMAGs report *Action Now: Classroom Ready Teachers*. Pursuant to Part 3A of the Act, the Board has a function to accredit a program of ITE in accordance with regulation 5 of the *TR&SR 2021*.

The AITSL Standards and Procedures underpin all accredited ITE programs in Australia. The Standards and Procedures have undergone numerous reviews (in 2016, 2018, 2019 and 2020), which create additional pressure on providers. Most recently, ITE has been a focus of the Quality Initial Teacher Education (QITE) Review and the Teacher Education Expert Panel (TEEP), and TEEP discussion paper released on 23 March 2023.

All early childhood four-year ITE qualifications, accredited in South Australia, cover the education of children from birth to eight years of age, in long day care, early childhood centres, preschools, kindergartens and primary schools.

It is a requirement that all providers have sought TEQSA approval prior to being accredited by the TRA in the state or territory in which the program will be delivered. If the program has an early childhood component, then it must also have met ACECQA's approval.

South Australia, along with most other states and territories, require early childhood qualifications or combined early childhood/primary qualifications to be accredited against the Standards and Procedures.

VIT does not currently accredit early childhood programs. VIT accepts the ACECQA assessment endorsement. If the program is a combined program (ie birth to 8) then only the primary teaching section of the program is accredited by VIT and the birth to 5 component is accepted after ACECQA approval. This differs from the more rigorous position adopted by other states and territories.

Early childhood/primary initial teacher education programs designed to qualify graduates to teach in NSW schools as well as early childhood services are assessed in line with arrangements made between NESA, AITSL, TEQSA and ACECQA.

10.2 Teaching Performance Assessments

In South Australia four ITE providers deliver a range of programs across all stages of schooling – early childhood, primary and secondary.

A TPA is a required tool used to assess the practical skills and knowledge of all preservice teachers under accredited ITE programs, as imposed by the Standards and Procedures. Preservice teachers collect evidence in their final practicum placement to demonstrate they are working at the graduate career stage of the Teacher Standards, vital for ensuring workplace familiarisation and entry. Each preservice teacher completed TPA is assessed by their ITE provider. This is a requirement for graduation and necessarily to attain teacher registration. The AITSL EAG provided expert advice to the Board who has endorsed the four TPAs operating in South Australia. [Table 4](#) refers to the four accredited TPAs.

Table 4 Teaching Performance Assessments (TPAs) in South Australia

Provider	Programs offered	Teaching Performance Assessment (TPA) adopted
Adelaide University	Secondary	Assessment for Graduate Teaching (AfGT) Teaching Performance Assessment
Flinders University	Early childhood (B-8), primary and secondary	Flinders University Teaching Performance Assessment (FU_TPA)
Tabor College	Primary and Secondary	Tabor College Teaching Performance Assessment (TTPA)
University of South Australia	Early childhood (B-8), primary and secondary	Graduate Teaching Performance Assessment (GTPA)

To support TPAs in early childhood settings, AITSL provides resources for ITE providers, supervising teachers and students. TPAs can take place at early childhood sites, however, ITE providers in South Australia have yet to explore this option. QCT has a policy that requires final placements to occur only in schools. This then limits an ECTs opportunity to complete their TPA in an early childhood setting, as part of the final practicum. This issue could be addressed further in South Australia.

10.3 Early Childhood professional experience and placements

PEx provides preservice teachers enrolled in ITE early childhood, primary and secondary programs with:

- genuine opportunities to connect the knowledge attained in their coursework through the provision of practical placement;
- vital opportunities to undertake a range of duties and develop new skills in workplaces across early childhood settings and schools;
- apply theories learned during study are put into practice.

PEx regulation is required for ITE accreditation as per the Standards and Procedures, and for ACECQA approval (as shown in [Table 5](#)). This provides another example of overlap or regulatory burden on ITE providers, and the comparable difference in the expectation requirements of PEx.

Table 5 Professional experience – National ITE and ACECQA requirements

Standards and Procedures	
Summary of Program Standard 5 - Professional Experience (PEX)	
Program Standard 5.1	Formal partnerships, agreed in writing, are developed and used by providers and schools/sites/systems to facilitate the delivery of programs, particularly professional experience for pre-service teachers. Formal partnerships exist for every professional experience school/site and clearly specify components of placements and planned experiences, identified roles and responsibilities for both parties and responsible contacts for day-to-day administration of the arrangement.
Program Standard 5.1	The professional experience components of programs are relevant to a classroom environment and: <ol style="list-style-type: none"> include no fewer than 80 days in undergraduate and double-degree teacher education programs and no fewer than 60 days in graduate-entry programs consist of supervised and assessed teaching practise undertaken over a substantial and sustained period that is mostly in Australia and mostly in a recognised school setting are as diverse as practicable provide opportunities for pre-service teachers to observe and participate purposefully in a school/ site as early as practicable in a program.
Program Standard 5.1	For every professional experience placement, regardless of delivery mode, there are clear mechanisms to communicate between the initial teacher education provider and the school the knowledge, skills and experiences pre-service teachers have already developed in a program and the expected learning outcomes of that placement.
Program Standard 5.1	Providers work with their placement school(s)/systems to achieve a rigorous approach to the assessment of pre-service teachers' achievements against the Graduate Teacher Standards including: <ol style="list-style-type: none"> identification of the Standards to be assessed provision of assessment tools, protocols, practises, and guidelines clarification of expectations and roles in assessment, particularly designated roles for supervising teachers in practical assessment of pre-service teachers timely identification of pre-service teachers at risk of not satisfactorily completing the formal teaching practise, ensuring appropriate support for improvement mandating a satisfactory formal assessment of pre-service teachers against the Graduate Teacher Standards as a requirement for graduating from the program.
ACECQA	
<ul style="list-style-type: none"> Undergraduate ECT programs must include at least 30 days of supervised professional experience in early childhood services, including a minimum of 10 days with children aged birth to under 3 years old (0 – 35 months). Postgraduate ECT programs must include at least 20 days of supervised professional experience in early childhood services, including a minimum of 10 days with children aged birth to under 3 years old (0 – 35 months). 	
<p>Table 5 continued</p> <p>Please note that pre-service ECTs must still fulfil all required program outcomes, including any state and territory teacher regulatory authority and skilled migration requirements relating to supervised professional experience days.</p> <p>https://www.acecqa.gov.au/covid-19/modifications-supervised-professional-experience-requirements</p>	

10.4 Multi-jurisdictional delivery of an ITE program

South Australian ITE HEI have chosen to deliver accredited programs that focus on identified learner ages as dictated by South Australian employer market demands. Accordingly, the only other delivery

of ITE programs to South Australian based PSTs, is firstly, through online access to interstate programs and secondly, by multi-jurisdictional delivery.

Multi-jurisdictional ITE delivery occurs where the provider is intending to or is teaching the program across two or more jurisdictions. The provider must nominate a 'lead' authority, which is the jurisdiction in which the provider is formally established, governed, recognised, or has the largest enrolment where the application will be lodged. The lead authority will share information with the other jurisdictional teaching authorities.

In 2022, the Board was notified by two interstate HEI providers and the relevant teaching regulatory authorities (specifically VIT and NESAs) of the intention for programs to be delivered in South Australia.

Provider A's accreditation process is underway to seek approval for a Master of Teaching (Primary/Secondary). This process has stalled after the accreditation panel required considerable finessing of the application, including further work with TEQSA. Provider A has notified NESAs that they expect to apply later this year to seek accreditation for a Bachelor of Education.

Provider B has submitted a Bachelor of Education (Early Childhood and Primary) to VIT and has made its intention known to apply for a Master of Teaching (Early Childhood/Primary) program. This process has halted as VIT has requested that all approvals from TEQSA are first met. Considerable re-work is necessary, and the provider requires training with AITSL to fully understand the ITE accreditation process. To further complicate matters, VIT do not accredit early childhood degrees, therefore they would only be accrediting the primary portion of the submission.

For accreditation of these programs, the Board has provided and will continue to provide experienced panellists to AITSL, the lead ITE accreditation authority.

Currently, there is one multi-jurisdictional program on offer in South Australia. This program is delivered by Australian Catholic University and is known as '*Teach for Australia*'. The preservice teachers in this program are currently covered under the *SAT – for an unregistered Person to Teach in an Employment Based Accredited ITE Pathway in a DfE School (pilot study)*.

10.5 Annual reporting

Another requirement of the Standards and Procedures is for all ITE providers to report annually to the Board on their accredited programs. This allows any trends or issues to be identified, investigated, and addressed. This supports re-accreditation at stage two ([Appendix A](#) refers). Data collection for the Board does not occur for ACECQA approved programs.

11. Royal Commission into Early Childhood Education and Care

The Royal Commission was established in October 2022 to explore further options to support South Australian families and their children in the early years. The Commission is being led by the Honourable Julia Gillard. It is expected to run until mid-to-late 2023.

The Commission will speak with educators, experts, unions, and early childhood providers to develop policy options to make a strong foundation for all children, particularly the extent to which families are supported in the first one thousand days of a child's life. The Commission will also investigate how universal quality preschool programs for three and four-year-olds can be delivered

in South Australia, with consideration for affordability, access, quality and universality for both age cohorts. Similarly, out of school hours care at both preschool and primary school ages will be investigated.

ITE providers are the experts in designing programs for all teachers, however the Board has no ability to design, co-ordinate content or enrolment in all programs (including early childhood) or encourage providers to develop programs. A birth-five program will stop the mobility of teachers moving into the schooling sector.

The Board is the accrediting authority for presented ITE programs which SA ITE providers consider commercially viable and meet sector needs. Whether any presented program sufficiently addresses quality of graduate delivery is addressed by a Board accreditation process which aligns with nationally endorsed Standards and Procedures and the Teacher Standards (APST). The Board cannot arbitrarily impose another standard (or indeed direct market need to support an ITE accredited program over another) – to do so would be to fail to adhere to proper process and regulatory function.

Separately, what comprises the threshold test for ITE program presentation for accreditation is the ability of graduates to meet qualification requirements; only after which the evaluation of the program against national Standards and Procedures, aligning with the APST applies. Other states have not held to this same level of rigour.

Useful Links

1. Action Now: Classroom Ready Teachers (TEMAG), 2014
<https://www.education.gov.au/teaching-and-school-leadership/resources/action-now-classroom-ready-teachers-report-0>
2. Australian Professional Standards for Teachers, AITSL, 2018
<https://www.aitsl.edu.au/docs/default-source/national-policy-framework/australian-professional-standards-for-teachers.pdf>
3. The Accreditation of initial teacher education programs in Australia: Standards and Procedures (Standards and Procedures), AITSL, 2022
https://www.aitsl.edu.au/docs/default-source/national-policy-framework/accreditation-of-initial-teacher-education-programs-in-australia.pdf?sfvrsn=e87cff3c_48
4. The Teacher Education Expert Panel (TEEP) Discussion Paper, 2023
<https://www.education.gov.au/quality-initial-teacher-education-review/consultations/teacher-education-expert-panel-discussion-paper-submissions>
5. Recognising and Acknowledging Complexity: Informing the inclusion of early years educators' work in the Australian Professional Standards for Teachers, Dr Gerry Mulhearn, 2018
<https://www.trb.sa.edu.au/Reports-Education>
6. One Teaching Profession: Teacher Registration in Australia, Education Services Australia, 2018
<https://www.aitsl.edu.au/docs/default-source/national-review-of-teacher-registration/report/one-teaching-profession---teacher-registration-in-australia.pdf>

Tables

Table 6 Multi-agency regulators of early childhood education

Regulator	Purpose	Law under which it operates
Tertiary Education Quality and Standards Agency (TEQSA)	<p>Regulates public and private universities, colleges, institutes, and Australian branches of overseas universities.</p> <ul style="list-style-type: none"> • monitors a baseline for operational quality and integrity for higher education providers. • provides international comparisons. • guides expectations for students through the Higher Education Standards Framework. <p><i>The overlap with the Board's work - TEQSA determines if a provider can teach a program, employ the right teaching staff, and have access to infrastructure resources.</i></p>	<ul style="list-style-type: none"> • <i>Tertiary Education Quality and Standards Agency Act 2011</i> (TEQSA Act) • <i>Higher Education Standards Framework, including the Higher Education Standards Framework (Threshold Standards) 2021</i> (Threshold Standards) • <i>Education Services for Overseas Students Act 2000</i> (ESOS Act) and associated instruments (ESOS Framework).
Australian Children's Education & Care Quality Authority (ACECQA)	<p>ACECQA: hosts the National Quality IT system, publishes support materials and resources, determines if a qualification is equivalent to approved education qualifications under the National Quality Framework (NQF). Program providers can apply to ACECQA to have their education programs assessed and added to ACECQA published list of approved qualifications. ACECQA approves all three types of early childhood qualifications:</p> <ul style="list-style-type: none"> • Early childhood teacher (bachelor degree) • Diploma level educator • Certificate III level educator <p>The application process involves submitting supporting documentation to the Board, including curriculum mapping documents, evidence of TEQSA registration, evidence of accreditation from ES Board, program outlines, handbooks, assessment documents, experience of key staff, and supporting documentation.</p> <p><i>The duplication with the Teachers Registration Board (SA) occurs with accreditation of 4-year early childhood programs</i></p>	<ul style="list-style-type: none"> • <i>Education and Care Services National Law Act 2010</i> • <i>Education and Care Services National Regulations 2011</i> • <i>Education and Early Childhood Services (Registrations and Standards) Act 2011</i> • <i>Education and Early Childhood Services (Registrations and Standards) Regulations 2011</i>
Education Standards Board (ES Board) South Australia	<p>ES Board monitor, respond, and investigate education and care service providers and operates under three distinct frameworks:</p> <ol style="list-style-type: none"> 1. Early Childhood education and care 2. School service registration 3. International education <p><i>ES Board regulates a range of early childhood services under the NQF, including long day care, family day care, preschools, and outside school hours care. Services that do not fall within the scope of the NQF are known as residual services and are also subject to regulation. These include in-home care, mobile care and occasional care services.</i></p> <p><i>In relation to the work of the Board, ES Board review staffing levels, qualifications, and provide waivers under National Law.</i></p>	<ul style="list-style-type: none"> • <i>Education and Care Services National Law Act 2010</i> • <i>Education and Care Services National Regulations 2011</i> • <i>Education and Early Childhood Services (Registrations and Standards) Act 2011</i> • <i>Education and Early Childhood Services (Registrations and Standards) Regulations 2011</i> • <i>NQF</i>

Regulator	Purpose	Law under which it operates
<p>Australian Institute of Teaching and School Leadership (AITSL)</p>	<p>AITSL provides national leadership for all states and territories to promote the teaching profession.</p> <p>AITSL delivers a program of work in accordance with directions received from:</p> <ul style="list-style-type: none"> • The Commonwealth Minister for Education • Other Federal ministers and national governance bodies • The AITSL Board of Directors <p><i>AITSL and the Teacher Registration Authorities have a working relationship to discuss national matters. AITSL support teachers with resources to align practice to APST.</i></p>	<p>AITSL is a wholly owned Commonwealth company. The Australian Government is the sole company member and is represented by the Commonwealth Minister for Education.</p>

References

- ACT Teacher Quality Institute (ACT TQI): <https://www.tqi.act.edu.au/>
- Australian Children's Education and Care Quality Authority (ACECQA): <https://www.acecqa.gov.au/>
- Australian Institute for Teaching and School Leadership (AITSL): <https://www.aitsl.edu.au/>
- Education Standards Board (ES Board) South Australia: <https://www.esb.sa.edu.au/>
- New South Wales Education Standards Authority (NESA): <https://educationstandards.nsw.edu.au/>
- Queensland College of Teachers (QCT): <https://www.qct.edu.au/>
- Royal Commission into Early Childhood and Care <https://www.royalcommissionecec.sa.gov.au/>
- Teacher Registration Board of the Northern Territory (TRB NT): <https://www.trb.nt.gov.au/>
- Teacher Registration Board of Western Australian (TRB WA): <https://www.watrainingproviders.com.au/teacher-registration-board>
- Teachers Registration Board of Tasmania (TRB TAS): <https://www.trb.tas.gov.au/>
- Teaching Council of New Zealand: <https://www.teachingcouncil.nz/>
- Tertiary Education Quality and Standards Agency (Tertiary Education Quality and Standards Agency (TEQSA): <https://www.teqsa.gov.au/>
- Victorian Institute of Teaching (VIT): <https://www.vit.vic.edu.au/>

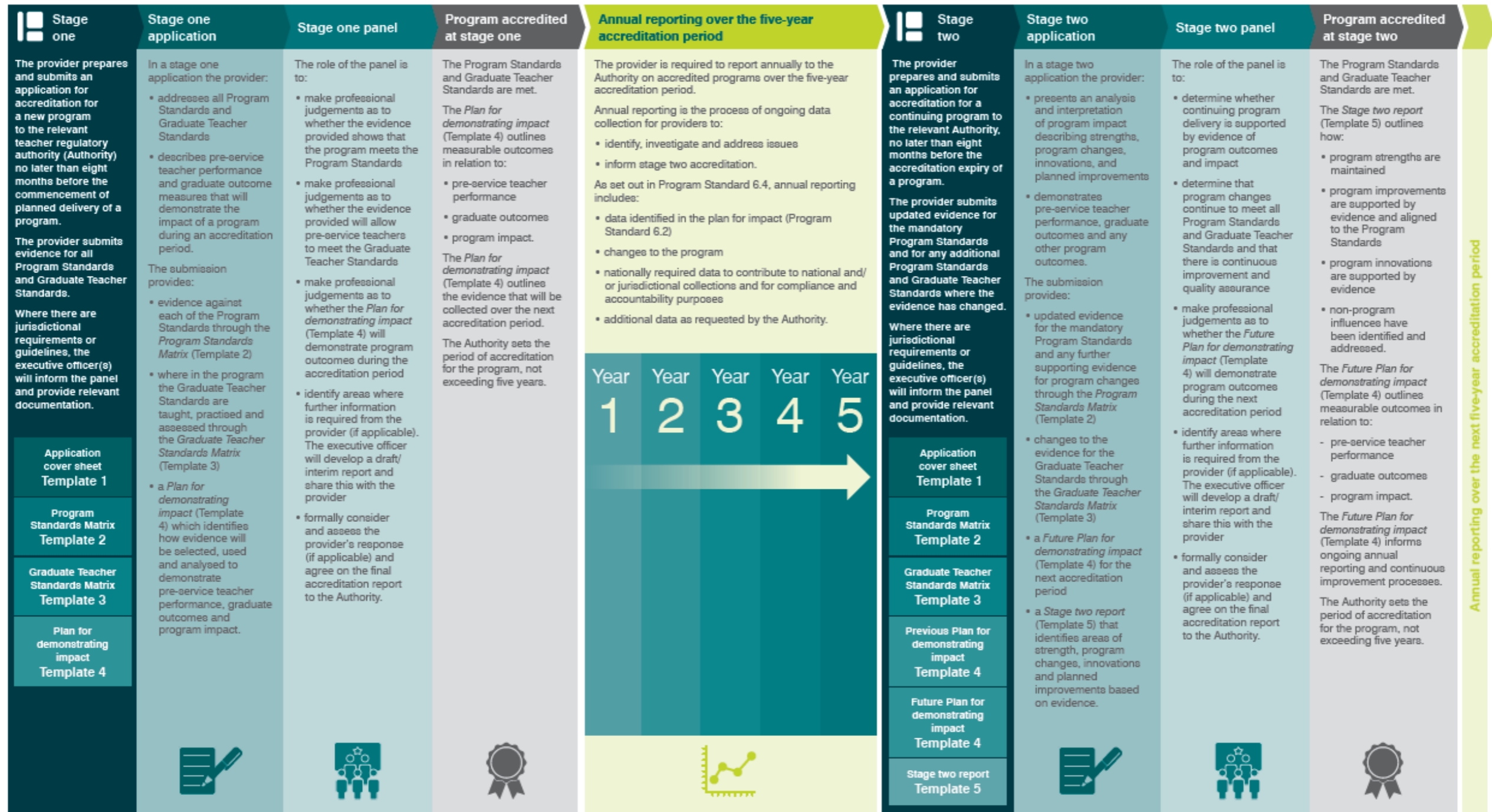
Overview of the national accreditation process

Stage one

Stage one accreditation applies to new initial teacher education (ITE) programs entering the accreditation system. The ITE provider presents evidence to show how a program will meet each of the Program Standards, prepare pre-service teachers to meet the Graduate Teacher Standards, and provides an outline of how evidence will be collected over the accreditation period.

Stage two

Stage two accreditation applies to existing ITE programs. The ITE provider presents a report of the previous accreditation period via an analysis and evaluation of program outcomes. Strengths are identified and areas for improvement are highlighted.





Attachment B

Threshold qualification requirement

Regulation 7 of the South Australian Teachers Registration and Standards Regulation 2021 states that qualifications for registration as a teacher in South Australia are as follows:

- a) an approved teacher education degree, diploma or other qualification awarded on satisfactory completion of a higher education course of pre-service teacher education in pre-school, primary or secondary education that –
 - i. is of a least four years' full-time duration or part-time equivalent duration; and
 - ii. includes a practical student teaching component undertaken at a school or prescribed service.
- b)
 - i. an approved non-teacher education degree, diploma or other qualification awarded on satisfactory completion of a higher education course that is of at least 3 years' full-time duration or part-time equivalent duration; and
 - ii. an approved postgraduate degree, diploma or other qualification awarded on satisfactory completion of a higher education course of pre-service teacher education in pre-school, primary or secondary education that –
 - (A) is of at least 1 year's full-time duration or part-time equivalent duration; and
 - (B) includes a practical student teaching component undertaken at a school or prescribed service.



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