

Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026

INDEPENDENT SCHOOLS QUEENSLAND SUBMISSION



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About Independent Schools Queensland

Independent Schools Queensland (ISQ) is the peak body representing Queensland's independent schooling sector. ISQ represents the interests of its member schools, supports choice and diversity in education, and provides services and support to member schools. ISQ is a not-for-profit organisation and membership is voluntary.

The provision of early childhood education and care is an important part of educational delivery across the independent sector. ISQ member schools support the operation of approximately 249 education and care services across, Queensland, including 44 sessional kindergarten services, 86 long day care services and 119 outside school hours care services.

Many independent schools operate education and care services alongside school education, supporting children's learning, development and wellbeing across the birth-to-eight continuum. This provides opportunities for continuity of learning, strong partnerships with families and communities, and positive transitions through the early years and into school.

Independent school governing bodies that operate approved education and care services have direct responsibility for the governance and oversight of those services. ISQ therefore has a strong interest in policy, funding and regulatory settings that support the delivery of accessible, sustainable and high-quality early childhood education and care.

ISQ also performs Central Governing Body (CGB) functions for affiliated kindergarten services under the Queensland Kindergarten Funding model. In this capacity, ISQ undertakes funding administration and supports member kindergarten services through professional support, capability building, governance and assurance activities.

Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026

Independent Schools Queensland (ISQ) supports the intent and direction of the *Education Legislation (Registration of Early Childhood Teachers) Amendment Bill 2026* (the Bill) and welcomes reforms that strengthen child safety while recognising early childhood teachers as part of Queensland's teaching profession.

ISQ has welcomed the opportunity for ongoing engagement with the Department of Education during the development of the reforms. ISQ particularly supports the staged implementation approach, including the transition period to 1 July 2028, which will allow affected early childhood teachers and approved providers to progressively prepare for mandatory registration and update relevant workforce, recruitment and compliance systems.

Effective implementation will require clear regulatory boundaries, preservation of existing workforce flexibility, and careful alignment with existing child safety, workforce and regulatory requirements.

Scope of mandatory registration and workforce flexibility

The Bill links mandatory registration to employment as an Early Childhood Teacher (ECT) in an education and care service. The registration requirement is therefore directed to a person's employment as an ECT, rather than simply holding an ECT qualification.

ISQ supports the continuation of existing workforce flexibility arrangements, including applicable waivers under the National Law. Implementation guidance should clearly explain how mandatory registration interacts with National Law staffing requirements, waivers, suitably qualified person arrangements and Queensland Kindergarten Funding Exceptional Circumstances arrangements, including arrangements for educators working towards an approved ECT qualification.

This clarity will be particularly important for services experiencing workforce shortages and those in regional, rural and remote communities. Providers need to be able to confidently determine when registration is required and when an existing workforce flexibility arrangement may continue to be relied upon.

The Government should monitor the effect of mandatory registration on workforce supply throughout the transition period and following commencement. Implementation should support existing qualification pathways and workforce development initiatives while maintaining service continuity.

Supervision and assessment of ECT under proposed section 83A(3)

Proposed section 83A(3) prohibits an unregistered teacher from supervising or assessing the work of a teacher or student teacher at an Education and Care Service (ECS).

ISQ recommends that the intended scope of "supervise" be clarified before commencement. ECS's operate under organisational and workforce structures that differ from schools. Service directors, nominated supervisors, educational leaders and other managers may hold responsibility for the day-to-day management and oversight of a service without necessarily being registered teachers.

The legislation or supporting implementation guidance should make clear that the restriction relates to professional supervision and assessment of teaching practice for teacher registration purposes, and does not inadvertently extend to ordinary operational supervision, line management or responsibilities arising under the National Quality Framework.

This distinction would be consistent with existing QCT arrangements for early childhood teachers progressing to full registration, which recognise that where a fully registered teacher is not available within a service, an appropriate reviewer may be sourced externally, including from another service or school.

Clear guidance will be particularly important for smaller services and those in regional, rural and remote communities. An interpretation that unnecessarily requires broader management or supervisory functions to be undertaken by a registered teacher could constrain existing workforce arrangements without advancing the professional standards or child safety objectives of the reform.

ECS conditions and school-operated services

An ECT who is eligible for registration on the basis of an early childhood teaching qualification but does not hold a qualification that permits ordinary QCT registration, may be registered to teach in an ECS only (i.e. not a school), subject to an ECS condition.

For governing bodies operating both schools and education and care services, the ECS condition should be clearly identifiable through QCT registration verification processes. Clear guidance should also be provided to employers on the scope and practical effect of the condition, including the settings in which an ECT subject to an ECS condition may and may not teach.

This approach would support employers to meet their existing registration verification obligations without introducing additional or duplicative administrative processes.

Reporting obligations and regulatory duplication

A number of ECTs are already registered with QCT under existing voluntary arrangements, and employing authorities that currently employ registered teachers will already be familiar with the associated notification requirements. The move to mandatory registration will, however, extend the practical application of these requirements across all ECS employing authorities, including in relation to specified allegations, investigation outcomes and dismissals.

These obligations will operate alongside existing reporting and notification requirements under child safety and early childhood regulatory frameworks. As the reforms are implemented, ISQ recommends that QCT and relevant regulators provide clear, coordinated guidance on these intersecting obligations and identify opportunities to streamline reporting and information sharing, particularly where the same incident or regulatory action gives rise to multiple notification requirements.

This will be important to ensure the reforms strengthen information sharing and regulatory oversight without requiring education and care services to report substantially the same incident, investigation or outcome through multiple separate processes.

Registration, professional development and evidence of practice

Mandatory registration will bring ECTs within QCT requirements for registration, renewal and continuing professional development (CPD). In implementing these requirements, it will be important to recognise the distinct professional and operational context of early childhood education and care.

ISQ recommends that, before commencement, QCT review its registration requirements, policies, guidance and processes to ensure they are fit for purpose for ECTs practising in education and care services. This should include consideration of registration and renewal processes, CPD, evidence of professional practice, and reviewer, mentor and professional support arrangements.

Existing QCT frameworks provide flexibility to recognise different professional contexts. Implementation should build on this flexibility so that professional learning and evidence generated through ordinary ECT practice can satisfy relevant QCT requirements where appropriate, without creating unnecessary duplication or imposing processes designed primarily for school settings.

This work should be informed by contemporary early childhood expertise and consultation with ECTs and approved providers to support a practical and consistent transition to mandatory registration.

Teacher registration and the blue card framework

The introduction of mandatory QCT registration for ECTs highlights the complex intersection between teacher registration and Queensland's Working with Children Check (WWCC) framework. Registered teachers are exempt from holding a blue card when undertaking their teaching role in a school but may require an exemption card when undertaking other child-related work, including in an ECS.

This distinction will become increasingly relevant as ECT registration becomes mandatory. ECTs will be subject to QCT's professional registration and suitability framework and the requirement of an exemption card, while other educators working alongside them in the same ECS will continue to be subject to blue card screening requirements. The different requirements according to a worker's professional status and work setting, risk creating complexity for individuals and employers, particularly organisations operating across both school and early childhood environments.

ISQ has previously advocated for greater alignment between teacher registration and the Working with Children Check framework, including consideration of universal child-related employment screening through the blue card framework, with QCT retaining responsibility for professional registration, standards, conduct and competency. The extension of mandatory teacher registration to ECTs reinforces the value of reconsidering this approach.

ISQ recommends that implementation of mandatory ECT registration be used as an opportunity to review the interaction between QCT registration and the blue card framework, with a view to establishing clearer and more consistent child-related employment screening arrangements across school and early childhood settings.

Conclusion

Independent Schools Queensland (ISQ) supports the intent of the Bill and its objectives of strengthening child safety and recognising Early Childhood Teachers as members of Queensland's teaching profession.

ISQ welcomes the staged implementation of the reforms and transition period to 1 July 2028. Successful implementation will require clear guidance and practical support for ECTs, approved providers and employing authorities, particularly in relation to workforce flexibility, supervision arrangements, registration requirements and regulatory interfaces.

Importantly, extending teacher registration into early childhood ECS's requires the registration framework to reflect the distinct professional, regulatory and operational context in which ECTs practise. QCT requirements relating to professional development, evidence of practice and progression should be informed by contemporary early childhood expertise and developed in meaningful consultation with the sector.

Implementation should also seek to minimise regulatory duplication, strengthen coordination and information sharing between regulators, and maintain workforce sustainability and service continuity.

ISQ looks forward to working with the Queensland Government, QCT and sector stakeholders to support effective implementation of the reforms and positive outcomes for children, families, teachers and services across Queensland.

Further information

ISQ welcomes the opportunity to provide further information if required or to participate in future consultation in this work.

Please contact Director, Education & School Services, Yvonne Ries via YRies@isq.qld.edu.au or Early Childhood Advisor, Fran Myers-Baird via fmyersbaird@isq.qld.edu.au. You may also call us on 07 3228 1515.

