

National Competition Policy Analysis 2025

Response to the Productivity Commission

June 2025



AITSL acknowledges the Traditional Custodians of the lands, sea countries and waterways from across Australia.

We pay our respect to Aboriginal and Torres Strait Islander histories and living cultures, and to Elders past and present.

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Introduction

The Australian Institute for Teaching and School Leadership Limited (AITSL) is pleased to respond to the call for submissions for the *National Competition Policy Analysis 2025* inquiry being undertaken by the Productivity Commission.

About AITSL

The Australian Institute for Teaching and School Leadership (AITSL) is Australia's centre of excellence for teaching and school leadership. Established as a Commonwealth company in 2010, we exist to maximise learning for all children and young people by supporting teachers and school leaders to thrive.

AITSL fulfils this role by providing national leadership for the Commonwealth, state and territory governments in promoting excellence in the profession of teaching and school leadership, including by setting the national standards for quality teaching and school leadership; championing the vital role of educators in shaping Australia's future; and providing the support, insights, and foresight needed to drive continuous improvement in teaching and leadership across Australia.

Research shows that teachers are the single greatest in-school influence on student outcomes. Accordingly, our work spans four main areas of focus:

- **Initial teacher education:** We provide support, resources, and tools to help ensure that every pre-service teacher is classroom ready upon graduation.
- **Quality teaching:** We help teachers be the best they can be and provide tools and resources to maximise their impact on student learning.
- **Educational leadership:** We help leaders become highly effective by giving them the tools, resources, policies, and practices needed to succeed in their important role.
- **Data and evidence:** We use evidence to develop policies, tools and resources that will have maximum impact in improving the quality of teaching and leadership. AITSL has also been trusted to develop the first national, longitudinal dataset on the Australian teaching workforce.

On behalf of Education Ministers, AITSL has developed 11 national standards and frameworks that are foundational pillars for teaching and leadership in the Australian education landscape. We have also built a significant library of evidence-based tools and resources to support the implementation of these national standards and frameworks, and to promote reflective practice and continuous learning within the profession.

Context of this response

AITSL understands that the Productivity Commission is seeking information from stakeholders in relation to a number of identified reform areas as part of this inquiry, including occupational licensing. This response reflects on occupational licensing matters related to the teaching profession in Australia, in the context of **Information Request 1** of the Commission's [call for submissions](#).

This response is provided in the context of AITSL's responsibility for overseeing national frameworks in policy areas where state and territory governments hold responsibility, as the custodian of these frameworks on behalf of Education Ministers and the teaching profession.

These national frameworks include several key policy documents which underpin teacher registration (occupational licensing) in Australia, including the:

- [*Australian Professional Standards for Teachers*](#) (Teacher Standards);
- [*Framework for Teacher Registration in Australia*](#) (Registration Framework); and
- [*Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures*](#) (Accreditation Standards and Procedures).

AITSL is not a regulator and has no powers to uphold or enforce its national standards and frameworks at the system, sector, school or individual level. As such, AITSL takes a consultative and partnership-based approach to our work, collaborating across the education sector to ensure that relevant standards and frameworks are implemented within jurisdictional contexts.

Background

Australian teachers are members of a registered profession. Registration is a public mark of recognition for the unique academic, personal and ethical benchmarks that individuals must meet to qualify and continue to practise as teachers.

Teachers play a central role in keeping children safe in education settings. Registration requires teachers to meet suitability requirements at entry to the profession and throughout their career. Meeting suitability requirements provides assurance to the community, parents/carers and teachers themselves that child safety is a paramount consideration in the registration of teachers.

Australian Professional Standards for Teachers

The *Australian Professional Standards for Teachers* (Teacher Standards) are a key pillar underpinning teacher registration in Australia. Agreed by Education Ministers in 2010, the Teacher Standards make explicit the skills, knowledge and practice required to be an effective teacher.

The application of the Teacher Standards underpins decisions about:

- the content and level of qualifications required for entry into the profession;
- the process to become a fully registered member of the teaching profession; and
- teachers' ongoing proficiency and continued registration.

The Teacher Standards describe teachers' practice at four career stages: Graduate, Proficient, Highly Accomplished and Lead. The Graduate and Proficient career stages are directly related to teacher registration in Australia, while Highly Accomplished and Lead teachers (HALTs) are recognised through a voluntary certification process.

The role of teacher regulatory authorities

Teacher registration is managed and administered by teacher regulatory authorities (TRAs) in each state and territory of Australia. Local policy contexts influence each jurisdiction's current approach to teacher registration, along with legislative and regulatory differences that drive operational and administrative arrangements.

All TRAs have practices and processes that contribute in various ways to the professionalism, quality and safety of teachers. As a result of the evolution of teacher registration across jurisdictions, there has historically been variation in each TRA's level of focus on these elements.

Since 2011, the registration of teachers by each TRA has operated within the *Framework for Teacher Registration in Australia* (the Registration Framework), which is detailed further in the relevant section of this response. Over the last 15 years, TRAs have worked collaboratively with one another, and with AITSL, to drive greater consistency in teacher registration practices across Australia.

Together with the [Australasian Teacher Regulatory Authorities \(ATRA\)](#), AITSL convenes the Teacher Quality and Regulation Forum which supports collaboration between TRAs and other stakeholders to:

- promote professional standards and suitability to teach to maximise impact on the student learning of children and young people in all Australian early childhood, primary, and secondary contexts
- discuss and make decisions on areas of mutual work including areas agreed by Education Ministers, initial teacher education (ITE) accreditation, teacher registration, teacher migration and mobility, professional learning, and data collection.

The Forum comprises representatives from AITSL, state and territory TRAs, the Australian Government, and the Australian Children's Education and Care Quality Authority (ACECQA).

AITSL encourages the Productivity Commission to engage with the Teacher Quality and Regulation Forum as part of the work of this inquiry, should the Commission intend to make recommendations regarding occupational licensing for the teaching profession in Australia.

Framework for Teacher Registration in Australia

As outlined previously, teacher registration is granted and managed by teacher regulatory authorities (TRAs) in each Australian state and territory under the *Framework for Teacher Registration in Australia* (Registration Framework). This Framework has guided the direction of TRAs since 2011 and sets out uniform principles for the registration¹ of teachers in education settings² across Australia.

The Registration Framework outlines a nationally consistent approach to the registration of teachers, where applicable, across the states and territories. It is used by TRAs to drive consistent and sound regulatory outcomes, in the best interests of children and young people in education settings. This Framework also embeds a consistent approach to child safety, ensuring that only suitable people can become and remain registered as teachers.

Elements of the Registration Framework

The Registration Framework is arranged under eight key elements that describe the benchmarks for entry and continuing membership of the teaching profession across Australia. The eight key elements of the Registration Framework (revised in August 2024) are outlined below.

Elements	
1	Qualifications
There is a minimum qualification, including a teacher education qualification, for registration.	
2	English language proficiency
Registration requires achievement of a level of professional proficiency in English suitable for a teacher working in Australian education settings.	
3	Suitability
Registration requires applicants to be suitable to work with children and young people and be a teacher, based on an assessment of their fitness, character, conduct and criminal history. Registered teachers must continue to meet suitability requirements to maintain their registration.	
4	Mutual recognition
A person holding a specified registration, in the profession of teaching or for an activity covered by that occupation, is entitled to hold registration in a second jurisdiction for an equivalent activity, subject to the requirements of mutual recognition legislation.	

¹ Note: NSW uses the term 'accreditation' rather than registration.

² Note: The term 'education setting' is used inclusively to refer to Australian primary and secondary schools, early childhood settings and other educational settings where teacher registration applies.

Elements	
5	Alternative authorisation to teach
	There is provision, in clearly defined circumstances and under specified conditions, for persons who are not eligible for provisional or full teacher registration to be entitled to teach.
6	Initial and full registration
	A teacher has an initial period of registration before meeting the requirements for full registration. The initial period allows them to be employed as a teacher and undertake workplace learning and development that equips them to meet requirements for becoming fully registered.
7	Renewal of registration
	Fully registered teachers are required to renew their registration by demonstrating ongoing proficiency against the Teacher Standards, recency of practice, continued professional learning, ongoing suitability to teach and any other requirements set by teacher regulatory authorities.
8	Sanctions or withdrawal of teacher registration
	A teacher regulatory authority can impose sanctions or withdraw a teacher's registration if they fail to meet the required standards of personal and professional behaviour or professional performance. Teachers who have engaged in conduct that poses an unacceptable risk to child safety and wellbeing will have conditions or exclusions from registration imposed, commensurate with the risk posed.

Previous reviews and reforms

Since it was first agreed by Education Ministers in 2011, the Registration Framework has been subject to two key reviews, which led to reforms that further strengthened consistency of teacher registration across all states and territories.

National Review of Teacher Registration

The terms of reference for a National Review of Teacher Registration (the Review) were agreed by Education Ministers in September 2017, and the Review commenced in February 2018 with the purpose of assessing the ongoing effectiveness of the current regulatory system including the extent to which there is consistency within and between jurisdictions in the way that the Registration Framework is applied. AITSL was tasked with progressing the Review.

The Review considered how the Registration Framework was operating at that time, including all elements of the Framework as they relate to consistency and best practice, as well as challenges and barriers to successful implementation. The extent to which the Teacher Standards are used within regulatory arrangements to drive teacher quality was also explored.

The report of this Review, [One Teaching Profession: Teacher Registration in Australia](#) (One Teaching Profession) made 17 recommendations designed to improve teacher registration across Australia across three key areas.

Improving and reinforcing teacher quality

The Review found that the Teacher Standards are well embedded in teacher registration across Australia, and that further opportunities existed to strengthen registration across a teacher's career life cycle, as well as to extend registration to early childhood teachers.

Strengthening children's safety

The Review found that the teaching profession is strongly committed to advocating for child safety and protecting children from harm, and that it was in the interest of teachers to ensure that sufficient measures are taken to ensure only people who are safe, suitable, fit and proper are allowed to enter the profession.

Streamlining registration processes

The Review found that interpretation and administration of registration requirements varied across jurisdictions, and work was needed to streamline and enhance existing processes to improve teacher mobility across the nation, ensure rigour and consistency in judgements, and allow individuals who are qualified to deliver vocational education and training (VET) to teach.

In response to One Teaching Profession, AITSL worked collaboratively with TRAs to give effect to recommendations endorsed by Education Ministers for implementation. In particular, significant work was undertaken to strengthen child safety through teacher registration. However, this Review did not lead to changes being made to the Registration Framework.

National Teacher Workforce Action Plan

On 15 December 2022, Education Ministers agreed to the [National Teacher Workforce Action Plan](#) (NTWAP) to address teacher workforce shortages. Under Action 5 of NTWAP, Ministers agreed to “facilitate more efficient national teacher mobility and streamline registration for prospective teachers such as teachers from overseas, retired teachers and alternative authorisation for initial teacher education students to teach while maintaining standards”.

AITSL and TRAs were issued with Statements of Expectations by their respective Ministers to update policies and processes, including the Registration Framework, to reflect these expectations as required. As part of Action 5, AITSL was required to work collaboratively with TRAs to explore a coordinated national approach to teacher registration, and report to EMM on any changes that should be made to the Framework.

AITSL undertook consultation with relevant stakeholders in 2023 and early-2024 and developed a revised Registration Framework in partnership with TRAs. The revised Framework is significantly clearer and better reflects current practice across jurisdictions.

The changes reflect the collaborative work to support consistency over the past 13 years, including strengthened child protection arrangements, consistent definition of teacher suitability, clear options for English language requirements, a coherent explanation of the requirements to move from provisional to full registration, and language that is inclusive of both schools and early childhood settings. All Education Ministers agreed to the revised Registration Framework in August 2024.

Ongoing issues and opportunities for further reform

Registration of early childhood teachers

In 2019, the National Review of Teacher Registration recommended that all early childhood teachers in Australia, regardless of their employment setting, be required to be registered by TRAs, under a consistent national approach (One Teaching Profession, Recommendation 5). The Review noted that including all early childhood teachers in registration arrangements would support the continued professionalisation of the early childhood teacher workforce, particularly through engagement with the Teacher Standards, and support the idea of 'one teaching profession'.

Since then, numerous reviews have continued to recommend that early childhood teachers be registered across all states and territories, and Education Ministers have committed to enabling early childhood teacher registration as part of [Shaping Our Future: National Children's Education and Care Workforce Strategy 2022–2031](#).

The registration of early childhood teachers is central to the protection of children; providing a mechanism by which early childhood teachers are effectively screened and monitored to ensure their ongoing suitability to teach, and for information regarding relevant disciplinary action to be recorded and shared across jurisdictions.

However, as of 2025, not all jurisdictions register their early childhood teachers; Queensland, the Northern Territory, Tasmania and the Australian Capital Territory do not register all early childhood teachers (regardless of the type of setting they work in) at this stage. This restricts the capacity of TRAs to share information about all early childhood teachers across jurisdictions.

AITSL encourages the Productivity Commission to recommend that state and territory governments should accelerate their efforts to enable and require early childhood teachers to be registered, regardless of the type of educational setting they are working in.

Alternative authorisation to teach and conditional registration

Alternative authorisation to teacher (AAT) enables people who do not have an approved qualification for the purposes of teacher registration to fill specific teaching roles when needed. Each jurisdiction has different nomenclature, purposes, and applications of AAT. In most jurisdictions, employers apply to their TRA for permission to use AAT to employ an individual. In some cases, universities can apply for AAT to support pre-service teachers to enter employment as a teacher before they have completed their initial teacher education (ITE) program.

However, in many cases AAT is not a pathway to registration. A pathway to registration means that a person has the capacity to meet the requirements for provisional or full registration when they have completed their ITE program. A different approach is used in some jurisdictions, including Western Australia and New South Wales, which have forms of registration that are limited or conditional.

Under Action 5 of the NTWAP, AITSL was instructed to consider whether AAT arrangements could be improved while still upholding acceptable standards of quality and child safety. This included an expectation that AAT arrangements for ITE students should be conditional upon the ITE student continuing to progress towards registration as a fully qualified teacher.

Options for a uniform approach could include implementing 'conditional registration' as an alternative form of teacher registration; for example, the approach utilised in NSW whereby pre-service teachers can apply for Conditional accreditation³ if they have:

- completed a substantial part of an accredited undergraduate or graduate entry ITE program; or
- been awarded a non-teaching Bachelor degree and have an offer of employment to teach the relevant discipline in a school.

Individuals who are granted Conditional accreditation must then go on to complete a nationally accredited ITE program within a fixed timeframe, in order to progress to Proficient accreditation (full registration) as a teacher.

Another option for introducing a nationally consistent form of AAT would be to enable authorisations to be attached to an individual and include set conditions, rather than attaching the authorisation to a specific role in an education setting. For example, a qualified VET trainer delivering VET programs in secondary schools could apply for authorisation and then work across multiple schools, rather than each school being required to apply to the relevant TRA for authorisation to engage an individual who is not a registered teacher in these roles.

AITSL would support a recommendation by the Productivity Commission which seeks to progress national harmonisation of approaches to conditional teacher registration and/or alternative authorisation to teach.

Reviewing the Teacher Standards

The Teacher Standards are foundational to the professional registration of teachers, as well as providing a shared understanding of effective teaching practices that underpin teacher education, ongoing professional learning, and career progression. Noting the Teacher Standards have not been comprehensively reviewed or revised since they were first agreed by Education Ministers in 2010, and to ensure that teacher registration requirements align with current educational needs and evidence, it would be timely to undertake a national review of the Teacher Standards.

A review would ensure the standards against which teachers are registered remain aligned with the latest research and evidence-based practices, and could also consider other trends impacting the teaching profession, such as:

- Professionalisation of the early childhood teaching workforce, with several reviews (including One Teaching Profession) finding that it is difficult for early childhood teachers to see themselves and their practice reflected in the current Teacher Standards.
- Increasing expectations for support of students with a disability, with the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability* recommending changes to the Teacher Standards.

³ Note: NSW uses the term 'accreditation' rather than registration.

- Rapid technological change, including the recent introduction of generative artificial intelligence (AI) into classrooms.
- Recent inclusion of mandatory core content in ITE programs, and how this content may be appropriately reflected in the Teacher Standards.

By aligning the Teacher Standards with contemporary teaching challenges and evidence-based approaches, TRAs across Australia can continue to support the teaching profession enhance the quality of teaching, ultimately benefiting students and ensuring that the education system supports their success.

AITSL would welcome a recommendation by the Productivity Commission that Education Ministers commission and resource AITSL to undertake a review of the Teacher Standards, with a view to ensuring that updated Teacher Standards form the basis for professional registration as a teacher in Australia across all states and territories.

Further harmonisation efforts

Consistent with the findings and recommendations of [*Improving Outcomes for All: The Report of the Independent Expert Panel's Review to Inform a Better and Fairer Education System*](#), which was commissioned by Education Ministers, AITSL supports the view that jurisdictions should work together to drive the harmonisation of teacher registration across Australia, encourage teacher mobility, and allow for greater data sharing.

Through its work to support the development and implementation of the Registration Framework, the Teacher Standards and the Accreditation Standards and Procedures on behalf of Education Ministers, AITSL is able to offer a number of insights into further opportunities to support increased harmonisation of teacher registration processes across states and territories, including:

- Information sharing between TRAs and other government departments and agencies, including through Working with Children and/or Working with Vulnerable People Check schemes
- Teacher mobility and the current operation of mutual recognition arrangements for the teaching profession across and between states and territories
- Registration requirements for teachers who have migrated to Australia, including English language proficiency and qualification requirements.

Should the Productivity Commission intend to make recommendations specific to the teaching profession as part of its National Competition Policy Analysis 2025 inquiry, AITSL would welcome an opportunity to discuss these matters and how they relate to previous efforts to drive greater consistency and harmonisation across jurisdictions with the Commissioners for the inquiry, in support of the development of their draft report.

Given the complexity of teacher registration across Australia, AITSL invites the Productivity Commission to contact AITSL for a discussion regarding ongoing issues and opportunities for reform of occupational licensing for the teaching profession.



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