

# A Path to Universal Early Childhood Education and Care

Response to the Productivity Commission Draft Report  
Australian Institute for Teaching and School Leadership (AITSL)

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

We honour and pay our respects to their Elders past, present and future.

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# Introduction

**The Australian Institute for Teaching and School Leadership Limited (AITSL) is pleased to respond to the Draft Report of the Productivity Commission inquiry into early childhood education and care, *A path to universal early childhood education and care*.**

AITSL is a Commonwealth company that provides national leadership for the Commonwealth, state, and territory governments in promoting excellence in the profession of teaching and educational leadership. Our vision is that Australia has a high-quality education system in which teachers and leaders have the greatest impact on the educational growth and achievement of every learner.

## Context of AITSL's response

AITSL is well placed to comment on important aspects of the Productivity Commission's inquiry into the early childhood education and care sector in Australia, as a Commonwealth company responsible for developing national frameworks in policy areas that are implemented by state and territory governments. AITSL's work spans three 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.

AITSL's work is designed to be relevant to all registered teachers, as well as pre-service teachers, in Australia. This includes the majority of early childhood teachers.

## Focus of this submission

All teachers, regardless of the setting they work in, are entitled to high-quality support throughout their careers. AITSL acknowledges that while the support required for early childhood teachers will sometimes look different to what occurs in schools, it should attract the same level of priority and be equally as effective.

AITSL's response to the Draft Report focuses on:

- approval of early childhood programs by the Australian Children's Education & Care Quality Authority and the accreditation of initial teacher education programs under the *Accreditation of initial teacher education programs in Australia: Standards and Procedures*
- upskilling of early childhood educators to become teachers
- nationally consistent teacher registration
- certification for early childhood teachers
- specific issues related to mentoring for early childhood teachers
- accessing professional learning for early childhood teachers.

# Response to Draft Report

## The role of ACECQA and AITSL in the approval and accreditation of programs

All teacher regulatory authorities (TRAs) accredit initial teacher education (ITE) programs in line with the [Accreditation of initial teacher education programs in Australia: Standards and Procedures](#) (Accreditation Standards and Procedures), developed by AITSL and agreed by all Education Ministers. These accredited ITE programs prepare individuals to become registered teachers and to teach in Australian schools. Currently, 46 of these programs also prepare teachers to work in early childhood settings. Examples of these are Birth to Age 8 or Birth to Age 12 programs, such as a Bachelor of Education (Early Childhood and Primary). These programs are attractive to pre-service teachers as they provide them with more future employment options.

The Accreditation Standards and Procedures only consider the components of ITE programs that relate to preparation to teach in a school. The component of the program that relates to early childhood settings is separately approved by the Australian Children's Education & Care Quality Authority (ACECQA).

While there are a number of differences between the Accreditation Standards and Procedures and the ACECQA program approval process, all related stakeholders (including AITSL, ACECQA, TRAs and ITE providers) have sought to create greater alignment and remove duplication where possible.

## Upskilling of early childhood educators to become teachers

AITSL notes the Productivity Commission's *Draft recommendation 3.1: Reduce barriers to educator upskilling*, which recommends governments "work with universities and the early childhood education and care (ECEC) sector to develop and promote accelerated degree programs for upskilling diploma-qualified educators to early childhood teachers (ECTs)."

AITSL has previously developed advice for employers and ITE providers on ways to accelerate delivery of ITE programs to minimise any time and/or financial disincentives while studying, and there have been increasing numbers of employment-based ITE programs implemented for primary and secondary teaching qualifications. These models may be applicable and support similar efforts in the ECEC sector.

AITSL also notes that in response to workforce shortages, Education Ministers agreed to a [National Teacher Workforce Action Plan](#) (NTWAP) in December 2022, with Action 9 of the NTWAP focused on improving recognition of prior learning (RPL) processes for those with previous study, work experience and skills that may be transferable to teaching. This work, being led by the Australian Government and the Australian Council of Deans of Education, may also assist in fast-tracking the upskilling of early childhood educators.

Under Action 8 of the NTWAP, AITSL is developing guidelines to support the delivery of quality professional experience placements in ITE. The guidelines will cover all professional experience placements, including placements in early childhood settings for combined ITE programs. The Productivity Commission could recommend that higher education providers which deliver ECT qualifications and employers adopt the professional experience guidelines (with adaptations as

relevant to the ECEC sector) to ensure the delivery of high-quality professional experience placements in all early childhood settings, even where the availability of supervisory support for placements is limited.

## Nationally consistent teacher registration

AITSL endorses the Productivity Commission's *Draft recommendation 3.3: Improve registration arrangements for early childhood teachers*.

Teacher registration is a requirement for all Australian school teachers and a majority of ECTs. Generally, teachers are eligible for provisional registration once they have completed an accredited ITE program – and therefore demonstrated they have met the Graduate career stage of the [Australian Professional Standards for Teachers](#) (Teacher Standards) – and have been assessed for suitability to be a teacher by a TRA, allowing them to commence teaching. The next career stage of the Teacher Standards is 'Proficient'. The Proficient career stage is aligned to the requirements for full registration, which is required of teachers within five years of receiving provisional registration.

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 Education Ministers commissioned to inform the development of the next National School Reform Agreement, 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. These arrangements should extend to ECTs as well as teachers in schools, with consistency where possible across sectors and across jurisdictions.

The Commission should note that AITSL is updating the [Framework for Teacher Registration in Australia](#) (the Framework) as part of Action 5 of the NTWAP. AITSL, in consultation with TRAs and key stakeholders, has undertaken work to consider changes to the Framework, with proposed updates to include language changes that are inclusive of early childhood settings, noting that ECTs in most states and territories are registered with their relevant TRA, and the remaining jurisdictions are planning to introduce ECT registration.

To ensure teacher registration has broad acceptance in the ECEC sector and acts as a credible process to increase the status of the profession, AITSL would support an additional recommendation by the Productivity Commission that Education Ministers task AITSL to review the Teacher Standards to increase alignment between them and the skills and knowledge required of ECTs. AITSL advises that any commissioning of a review of the Teacher Standards should also include a wider scope of focus than relevance to ECTs to maximise efficiencies and ensure successful implementation.

A significant challenge in the registration of ECTs is the lack of a supervisory infrastructure in some early childhood settings, particularly in long day care. Each jurisdiction has designed different solutions to provide appropriate support for ECTs moving from provisional to full registration. The review of the Framework may provide an opportunity to drive national consistency and to agree to a common approach to the full registration of ECTs.

It is important to note that registration of ECTs is dependent on all jurisdictions having the ability to do so, which may require legislative changes. However, under the [National Children's Education and Care Workforce Strategy \(2022–2031\)](#), all Education Ministers have committed to implement ECT registration in every state and territory.

## Certification for early childhood teachers

Relevant to *Draft recommendation 3.3: Improve registration arrangements for early childhood teachers*, in 2022-23 AITSL conducted a review of processes associated with national certification of Highly Accomplished and Lead teachers (HALTs) as part of Action 17 of the NTWAP.

AITSL subsequently developed the [Framework for the Certification of Highly Accomplished and Lead Teachers](#) (HALT Framework), which was approved by Education Ministers in July 2023. The HALT Framework aims to help streamline assessment processes and broaden the applicability of national HALT certification for relevant teachers.

To be eligible for HALT certification, applicants must hold current and full teacher registration, and they must be employed in a school or early childhood setting that is represented by a certifying authority. Certifying authorities can be TRAs, employers, education systems, peak bodies, member-based associations, or other appropriate organisations.

At present, certifying authorities comprise TRAs and state-based education systems and employer organisations from the government, Catholic and independent sectors. This means in some jurisdictions, ECTs are only able to apply for HALT certification if they are employed in early childhood settings that are government-operated and/or attached to schools. Many ECTs who may be demonstrating teaching expertise and practise at the Highly Accomplished or Lead career stages are unable to apply for HALT certification, including those employed in local government or non-government organisations, as they are not represented by a certifying authority.

AITSL supports the Productivity Commission's draft recommendation 3.3 for state and territory governments to act on opportunities to make HALT certification more accessible for ECTs, and suggests that further to its draft recommendation, the Commission recommends that Education Ministers establish or identify and resource a certifying authority or authorities for eligible ECTs who are not currently able to apply. This function could be undertaken by a new authority or an existing national or jurisdictional association or agency, or by ECT employers (either individually or collectively). AITSL also recommends that HALT certification is more universally tied to appropriate reward and recognition arrangements, including additional remuneration within industrial agreements and specialised roles that best leverage their expertise.

## Specific issues related to mentoring for early childhood teachers

AITSL supports the Productivity Commission's *Draft recommendation 3.4: Lift support and mentoring for new early childhood teachers*. AITSL commissioned an [Environmental Scan of Mentoring Programs](#) in 2022 seeking to inform the development of teaching practice through a scan of international and Australian mentoring programs. This evidence-based report should be considered in conjunction with findings from work by the Australian Education Research Organisation (AERO) on the effectiveness of existing support programs in designing supports for new ECTs. In 2024, AITSL will develop mentoring standards; these standards will describe the knowledge and skills required for high-quality mentoring.

In line with Action 14 of the NTWAP, AITSL has recently developed [Guidelines for the Induction of Early Career Teachers in Australia](#) and [Guidelines for the Induction of New School Leaders in Australia](#). The Guidelines have regard to the needs of specific groups, including inclusive practice for supporting students with diverse learning needs, Aboriginal and Torres Strait Islander teachers, and teachers in regional and remote areas.

AITSL proposes that similar, evidence-based guidelines with a focus on ECEC be developed that address the specific needs of new teachers in early childhood settings. In line with previous recommendations in this submission, the Productivity Commission should also give consideration to targeted support for ECTs working in long day care settings without supervisory infrastructure, particularly in relation to implementing professional experience placements, provisional to full registration, and HALT certification.

## Access to professional learning for early childhood teachers

AITSL supports the Productivity Commission's *Draft recommendation 3.6: Contribute to professional development for the ECEC workforce*, which recommends that governments support the ECEC workforce to undertake professional development activities.

In line with this recommendation, and as part of AITSL's commissioned work to support continuous improvement in the teaching profession through the [High Quality Professional Learning](#) project from 2018 to 2022, AITSL developed resources on improving the accessibility of high-quality professional learning for ECTs.

This work included a [quick guide](#) published in June 2022 aimed at connecting ECTs and leaders in early childhood settings to high-quality professional learning by drawing upon common barriers and highlighting potential considerations to increase professional learning opportunities relevant to the ECEC context.

There is an opportunity to address common barriers for the ECT workforce in accessing high-quality professional learning such as meeting registration requirements (e.g. minimum hours and degree of alignment to the Teacher Standards) and difficulty sourcing professional learning relevant to the context and/or needs of early childhood settings.

# Summary of Recommendations

Below is a summary of recommendations for the Productivity Commission to consider in its final report. These recommendations reinforce and complement actions under the *National Children's Education and Care Workforce Strategy*. AITSL is willing to discuss or elaborate on any recommendations at the Commission's convenience.

## Upskilling of early childhood educators to become teachers

1. Higher education providers that deliver ECT programs and ECT employers consider existing and emerging examples of fast-tracking ITE programs and how they might apply to upskilling early childhood educators to become qualified teachers.
2. Higher education providers that deliver ECT programs and ECT employers adapt and apply the professional experience guidelines being developed by AITSL for use in the ECEC sector.

## Nationally consistent teacher registration

3. Education Ministers task AITSL to review the Teacher Standards and collaborate with ACECQA to increase alignment between the Teacher Standards and the practice of ECTs.

## Certification of early childhood teachers

4. Education Ministers identify or establish and resource a certifying authority (or certifying authorities) for eligible ECTs who are not otherwise able to apply for HALT certification.
5. ECT employers consider greater embedding of HALT certification within industrial agreements, identifying appropriate reward and recognition arrangements, including additional remuneration within industrial agreements and specialised roles within their settings.

## Mentoring early childhood teachers

6. ECT employers, TRAs and higher education providers ensure targeted support is provided for ECTs working in long day care settings without supervisory infrastructure, particularly in relation to implementing professional experience placements, provisional to full registration and HALT certification.

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