

# IEUA-QNT SUBMISSION

24 October 2025

## Submission: Teacher Registration (Northern Territory) Legislation Amendment Bill 2025

The Independent Education Union – Queensland and Northern Territory Branch (IEUA-QNT) welcomes the opportunity to make a submission to the Northern Territory Legislative Scrutiny Committee in relation to the Teacher Registration (Northern Territory) Legislation Amendment Bill 2025 [1].

We note the short timeframe for provision of responses and, with limited capacity to consult with our members, indicate that our responses are general in nature and our position/s may undergone further refinement as the Bill progresses.

### About IEUA-QNT

IEUA-QNT represents ~16,000 teachers, support staff and ancillary staff in non-government education institutions in Queensland and the Northern Territory and consistently engages in industrial and education debate at both state and national levels through its Education and Industrial Committees and through its national counterpart, the Independent Education Union of Australia, which receives input from teachers in all States and Territories.

Our members work in kindergartens, schools and post-secondary institutions and work with students from a wide variety of backgrounds, in a wide variety of sociocultural contexts.

### Feedback in relation to specific amendments

#### Amendments pertaining to information sharing

1. Our union is broadly supportive of improving information sharing as this is consistent with better child safety.
2. Similarly, we are supportive of the concept of Early Childhood Teacher registration as conducive to greater child safety, but have concerns regarding weakening of registration requirements (see below).

#### Amendments pertaining to registration requirements: Eligibility for full registration

3. As noted above, our union has some concerns that proposed changes to registration requirements represent a diminution of registration requirements that is not in the interests of teachers, schools or students.
4. We note that the suggested amendment to Regulation 4 is presented, in the Explanatory Statement [2], as improving national consistency.
5. Our concern however, is that replacing the words ‘the prescribed qualifications for registration’ with ‘a qualification prescribed by the regulations’ [1], opens up the possibility of recognising qualifications that do not meet national (Australian Institute for Teaching and School Leadership) requirements for accreditation of ITE programs [3, 4].

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6. This concern is highlighted by the recent introduction of a one-year Graduate Diploma program in Western Australia that has been opposed by Teacher Registration Authorities in other jurisdictions.

### **Amendments pertaining to registration requirements: Authority to Teach**

7. We have some concern that the Bill introduces complications around use of authority to employ unregistered persons.

8. While we unequivocally support recognition that Aboriginal languages are a special context and many of those with the necessary language skills will not be eligible for registration, we are currently engaged – via our Yubbah Action Group (First Nations advisory committee) - in discussions regarding options for regulation of First Nations Language teaching in a culturally responsive manner.

9. Key requirements of any regulatory framework are:

- Recognition that First Nations Language work is inextricably connected to local cultures and peoples and requires connection to local communities and country.
- Recognition of First Nations Language work as a professional undertaking that requires significant knowledge, skills and experience.
- Recognition that there are few, if any, formal qualifications in First Nations languages in most jurisdictions and, even where these exist, local individuals and communities may not view these as prerequisites to teach language and culture in schools.

10. It is our position that use of alternative authority/permission to teach (ATT) provisions is not adequate nor appropriate as a long-term solution to meeting needs.

11. We note explanatory statement [2] refers to both First Nations Languages and VET as the most likely (target) contexts for the intended use of ATT provisions, but would suggest that any proposed changes should be considered in light on ongoing, national conversation about alternative categories of registration that meet child safety standards and uphold, rather than diminish, the integrity of the teaching profession.

12. Were the Board able to register different categories of education worker, without diminishing the inherent requirements for status as a registered teacher, this would be preferable.

13. We suggest that alternative categories of registration could be administered in such a way that recognises the professional skills, knowledge and competencies of VET and First Nations Language teachers, without exposing the teaching profession to erosion of extant and fundamental standards.

14. We also note that provisions related to VET and First Nations Language teachers also have relevance in the context of Early Childhood qualifications that do not meet current registration requirements.

15. As per our 2024 submission in response to the Discussion Paper regarding Early Childhood Teacher Registration in the Northern Territory [5], we would indicate that

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conditional/alternative registration is a better way to meet the needs of schools and other education settings without undermining the integrity of the teacher registration system.

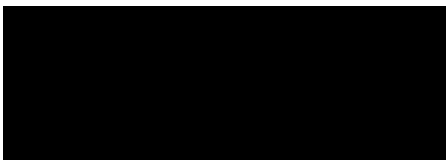
16. We would welcome the opportunity to discuss alternative approaches to registration of different categories of education workers.

### Concluding Comments

IEUA-QNT thanks the Legislative Scrutiny Committee for the opportunity to provide feedback regarding the regarding the Teacher Registration (Northern Territory) Legislation Amendment Bill 2025.

We note the short timeframe for provision of responses and would welcome the opportunity to provide further feedback as the Bill is progressed.

Kind regards,



**Terry Burke**  
**Branch Secretary**  
**Independent Education Union of Australia - Queensland and Northern Territory Branch**  
**Friday 24 October 2025**

### References

1. *Serial 41 Teacher Registration (Northern Territory) Legislation Amendment Bill 2025.* 2025.
2. *Explanatory Statement Teacher Registration (Northern Territory) Legislation Amendment Bill 2025 SERIAL NO. 41.* 2025.
3. Australian\_Institute\_for\_Teaching\_and\_School\_Leadership, *Guidelines for the accreditation of initial teacher education programs in Australia.* 2021, AITSL: Melbourne.
4. Australian\_Institute\_for\_Teaching\_and\_School\_Leadership, *Addendum Accreditation of initial teacher education programs in Australia: Standards and Procedures.* 2024, AITSL: Melbourne.
5. Independent\_Educaiton\_Union\_Qld\_and\_NT\_Branch, *Submission: Early Childhood Teacher Registration in the Northern Territory Discussion Paper.* 2024, IEU-QNT: Brisbane.