

The Chair,
Legislation Scrutiny Committee
Northern Territory Legislative Assembly
GPO Box 3721
Darwin NT 0801

NT Christian Schools' Submission – Serial 41 Teacher Registration (Northern Territory) Legislation Amendment Bill 2025

Dear Ms Carlson,

Northern Territory Christian Schools welcomes the opportunity to provide a submission to the Legislation Scrutiny Committee regarding the *Teacher Registration (Northern Territory) Legislation Amendment Bill 2025* (the Bill).

General Position:

NT Christian Schools supports the majority of the proposed reforms in the Bill and commends the Northern Territory Government for its commitment to strengthening child safety, workforce flexibility, and professional standards across the teaching sector.

We recommend that the Legislative Assembly pass the Bill with amendments to strengthen governance, independence and uphold teaching quality.

Areas of Support:

1. Strengthening Child Safety

NT Christian Schools supports amendments enabling the proactive sharing of information between jurisdictions and regulatory authorities where it may prevent harm to a child. This measure is vital for the protection of children, the integrity of the teaching profession, Department of Education and Training and education and care services across the Northern Territory.

2. Early Childhood Teacher Registration

We welcome the introduction of mandatory registration for early childhood teachers by the end of 2026, ensuring consistent professional competency and recognition; and oversight across the education settings. This would align the Northern Territory with the recommendations made by the Australian Institute for Teaching and School Leadership (AITSL) in the 2018 review 'One Teaching Profession: Teacher Registration in Australia'.

3. Workforce Mobility

Reforms that facilitate mobility of teachers between jurisdictions and enable sharing arrangements across schools and early childhood services are essential to addressing national teacher shortages, especially in remote NT communities.

4. Recognition of Aboriginal Languages

NT Christian Schools commends the inclusion of Aboriginal languages as a specialist subject for registration. This will strengthen pathways for Aboriginal educators and support culturally responsive education, particularly at our Gawa Christian School and within our Indigenous Family Group Home Boarding Program at Marrara Christian College.

5. Administrative Efficiencies

We welcome efforts to reduce administrative burden and improve efficiencies, including changes that align registration periods with a date determined by the Board and not exceeding the current maximum durations set in the legislation.

Key Areas of Concern:

1. Governance and Independence of the Teacher Registration Board

Relevant Clauses: Section 4 (Definitions), Clause 6 (section 14 Amended - Director)

The Bill defines the *regulatory authority* as the Chief Executive Officer of the Department of Education and Training and clarifies that the Director of the Teacher Registration Board (TRB) is a public sector employee within the Agency.

NT Christian Schools is concerned that this structure may compromise the independence of the TRB and does not sufficiently separate regulation from departmental operations, particularly for non-government schools.

- **Recommendation 1:**

Establish the TRB as an independent statutory authority, structurally and operationally distinct from the Department of Education and Training.

- **Recommendation 2:**

Clarify the Director's reporting and accountability arrangements to ensure impartiality between the Board's statutory functions and departmental employment management.

2. English Language Proficiency Requirements

Relevant Clause: Clause 23 – Regulation 5 (Competence to Teach)

While NT Christian Schools supports flexibility in assessing English proficiency, we are concerned that broadening the criteria may impact the quality of the teaching profession, lower standards and impact literacy outcomes for students in the Northern Territory. Teaching experience or study in an English-speaking country does not always equate to classroom-ready proficiency or the communication demands of the teaching profession.

- **Recommendation 3:**

Retain clear, evidence-based benchmarks for English proficiency aligned with AITSL national framework, supported by transparent guidelines on acceptable forms of evidence.

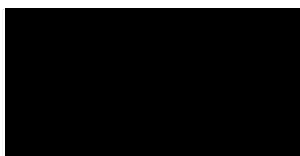
3. Consideration of Rights, Liberties, and Parliamentary Integrity

NT Christian Schools believes the Bill has appropriate regard for the rights and liberties of individuals, especially in balancing privacy with child safety obligations.

However, to preserve public confidence and institutional integrity, the governance and operation of the TRB should be clearly independent of departmental influence.

- **Recommendation 4:**
Establish an independent Teacher Registration Board, separate from the Department of Education and Training.
- **Recommendation 5:**
Clarify the Director's accountability to ensure impartial governance.
- **Recommendation 6:**
Maintain clear and nationally consistent English proficiency standards.
- **Recommendation 7:**
Align legislative implementation with the broader governance review of the Teacher Registration Board, NT Board of Studies (NTBoS) and Quality Education and Care Northern Territory (QECNT) to ensure coherent reform across education quality bodies.

Yours sincerely,



Mrs Alice Mustin
CEO Northern Territory Christian Schools

24 OCTOBER 2025