

President  
Northern Territory Principals' Association  
25/10/25

The Chair  
Legislative Scrutiny Committee  
Northern Territory Legislative Assembly

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

The Northern Territory Principals' Association (NTPA) thanks the Committee for the opportunity to make a submission on the Teacher Registration (Northern Territory) Legislation Amendment Bill 2025. NTPA represents principals and school leaders across the Territory and has consulted members and early years leaders in preparing this submission.

### **Key issues and recommendations**

#### **1. Create an Early Childhood Specialist Registration category**

**Issue:** The Bill mandates registration for early childhood teachers but the current qualification pathways and national lists are narrow; they can exclude highly relevant postgraduate and specialist qualifications (e.g. Play Therapy, Child Development, Early Intervention, Master of Child & Family Studies) and limit cross-sector mobility.

**Recommendations:** Introduce a distinct "Early Childhood Specialist Registration" category that:

- Recognises a wider range of qualifications (including relevant postgraduate and specialist qualifications) assessed as substantially equivalent by the Board; Issue: The current drafting risks excluding educators with complementary specialist qualifications despite relevant expertise.
- Enables teachers to work flexibly across early childhood education, health, wellbeing and early intervention settings.
- Retains alignment with national accreditation standards while allowing local NT responsiveness (including recognition of practice in remote/First Nations contexts).
- Amend regulation/guide wording to ensure postgraduate specialist qualifications can be assessed as equivalent; expressly include play-based, therapeutic and early intervention postgraduate credentials as likely candidates for equivalency assessment.
- Change the phrase suggested in stakeholder feedback from "prior relevant" to "recent relevant" (or similar) in the historic-qualification clause to better reflect current currency of practice expectations.

#### **2. Transitional arrangements and realistic timeframe**

**Issue:** The Bill's commencement and the one-year transition for existing early childhood teachers (to 1 September 2026 if delayed) may be insufficient for many educators and employers in the NT, particularly in remote and Aboriginal community contexts.



### **Recommendations:**

- Extend or make flexible the transition period where justified (for example, allow targeted extensions for remote staff and for teachers undergoing equivalency/bridging pathways).
- Require the Board and Government to publish a clear, resourced implementation plan with milestones (equivalency assessment pathways, bridging/upskilling programs, outreach for remote communities).

### **3. Workforce capacity, administrative resourcing and assessment processes**

**Issues:** Mandatory registration will increase application volumes and require complex equivalency assessments.

### **Recommendations:**

- Provide resourcing and funding to the Teacher Registration Board (TRB) to scale staff, digital systems and assessment capacity before full implementation.
- Publish clear equivalency assessment criteria and an expedited process for applicants with substantial NT experience or recognised comparable qualifications.
- Ensure employers (particularly early childhood services in remote areas) have guidance and supports to recruit and retain registered teachers.

### **4. Information sharing and child safety provisions**

**Support:** NTPA supports new powers enabling the Board to share register information with other registration and regulatory authorities and to share proactively where harm may be prevented (sections 66F/66G). These measures align with child-safety recommendations and national practice.

- Safeguard recommendation: Ensure published guidance on how the Board will exercise these powers, including privacy protections and notification practices where appropriate.

### **5. Ministerial directions and Board independence**

**Issue:** Ambiguity of the relationship between the Board, the Department and the Minister, creating uncertainty about roles and responsibilities, particularly who manages the Director and Office of the Board staff and how policy, performance and accountability expectations are set and monitored.

**Support:** NTPA supports

- Confirming the Minister's power to set policy, performance and accountability expectations for the Board.
- Establishing the Department's responsibility to provide appropriate resourcing to the Board and to manage the Director as a public sector employee; and
- Preserving the Board's independence from the Minister and the Director's independence from the Agency in respect of the Board's and Director's statutory powers to regulate the teaching profession under the Act.



## 6. Other supportive measures in the Bill

**NTPA supports:** The reform of streamlining registration processes and create greater flexibility for employers to seek an authority to employ individuals teaching specialist subjects, such as VET trainers, who may not hold the necessary teaching qualification required for registration.

### **Recommendation:**

- Clarify what classes of specialist subjects and circumstances are eligible for authorisation (beyond VET) and publish fee and length (e.g., 1 year / 2 year authorisations) and decision criteria.

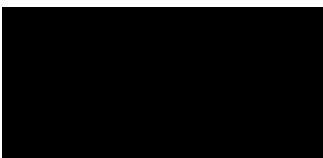
**Support:** NTPA supports alignment to national accreditation standards, the updated English-language proficiency flexibility, recognition of early childhood service as a defined setting and the move to anniversary based registration terms (which should reduce end-of-year renewal bottlenecks).

### **Recommendations:**

- Confirm administrative safeguards for anniversary-based renewals (automated reminders, clear payment options and grace periods) to avoid unintended lapses.
- Commit to TRB digitalisation and interoperability with other jurisdictions and the National Quality Framework (noting this is an administrative rather than legislative change). Ensure secure data flows to support section 66F/66G information sharing while protecting privacy and procedural fairness.

NTPA supports the Bill's child-safety and national alignment objectives. To succeed in the NT context the reform must recognise specialist early childhood qualifications, provide realistic transition pathways, adequately resource the TRB and digital systems and safeguard Board independence and procedural transparency. The recommended Early Childhood Specialist Registration category and the implementation safeguards above will help achieve the policy goals without compromising service capacity across the Territory.

Yours sincerely,



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Northern Territory Principals' Association