

# Occupational Mobility Consultation - Automatic Mutual Recognition Scheme

February 2020

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## Introduction

The Queensland Catholic Education Commission (QCEC) provides this submission on the proposed Automatic Mutual Recognition (AMR) scheme, to inform the introduction of a uniform scheme for the automatic mutual recognition of occupational registrations, including teachers.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic school authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 309 Catholic schools that educate more than 149,000 students in Queensland.

## Background

QCEC welcomes the opportunity to make this submission on behalf of Catholic School Authorities (CSAs) about the proposed AMR scheme for persons who hold registration for an occupation in one State to be taken to be registered to undertake, in another State, the activities covered by the occupation registration the person holds. The approach is complementary to the mutual recognition principle but different because it provides persons with an entitlement to *Automatic Deemed Registration* which enables a person to commence work without obtaining a new or complementary registration or permit.

QCEC recognises the importance of supporting labour mobility across jurisdictions by enabling displaced and under employed registered workers to take up new job opportunities in locations other than their “home state” in response to changing workforce demands, the effects of pandemics and natural disasters.

QCEC advises that this submission pertains solely to the teaching profession.

## Response

QCEC acknowledges the value of having a consistent approach to the mutual recognition of occupational registrations, however QCEC and Catholic School Authorities recommend the teaching profession be excluded from the proposed AMR scheme.

The Queensland teacher registration authority – the Queensland College of Teachers (QCT) – currently supports the process for a teacher registered in another jurisdiction to apply for mutual recognition of that registration in Queensland. The process encompasses granting deemed registration to enable

teachers to commence teaching in Queensland while the QCT assesses applications for mutual recognition and in the majority of applications the arrangements work well. If the QCT requires a longer timeframe than normal to assess an application for mutual recognition the QCT extends the applicant's deemed registration. Once the QCT has granted deemed registration the QCT has one month to decide whether to grant, postpone or refuse to grant substantive registration. This process ensures interstate registered teachers can teach in Queensland without a QCT registration.

Catholic school employing authorities have confidence employing teachers who have applied for mutual recognition of their teacher registration because of the checking processes and assessments that take place through the existing mutual recognition process. QCEC has concerns that the proposed scheme may have unintended consequences of making it more difficult for teachers from other states and territories to gain employment in Queensland because the cost and burden of checking the validity of teacher registration, ensuring that the person seeking employment as a teacher has no disciplinary matters of concern in another jurisdiction and that they meet any other conditions such as 'suitability to teach' would rest solely on the employing authority. Currently, there is a high degree of comfort in employing teachers from other jurisdictions as the employing authorities are assured that the individual has been vetted by the QCT (which can more efficiently share and receive information from other jurisdictions) and meets the required threshold to teach in Queensland. The proposed scheme removes that comfort and check and balance for Catholic school employing authorities and shifts the risk, cost and burden onto the school employing authorities with respect to validating registration documentation and obtaining reliable evidence of police checks and investigating any allegations of misconduct or dismissal with interstate regulatory authorities.

In addition, school employing authorities are likely to incur additional costs and resource burdens to skill staff to have knowledge of full teacher registration conditions/requirements of other jurisdictions in order to adequately consider applications for employment from teachers holding registration from other jurisdictions. All employing authorities would incur these costs and there does not appear to be any evidence that the number of teachers from other jurisdictions applying for teaching positions warrants this additional cost burden. School employing authorities would have a significant increase in administrative burden to undertake the necessary checks. QCEC considers the proposed scheme will impose significant cost to multiple school employing authorities and any potential saving would be minimal and only accrue to an individual teacher.

QCEC supports the recommendations of the report *One Teaching Profession: Teacher Registration in Australia (One Teaching Profession)* to streamline and enhance existing processes to improve teacher mobility across the nation, to ensure rigor and consistency in judgements, and allow Vocational Education and Training (VET) qualified people to teach. The *One Teaching Profession* Review Panel indicated in its report that it regarded the National Teacher Registration Framework and the current institutional arrangements for teacher registration, as the right foundation for further strengthening teacher registration in Australia.

A key priority of the *One Teaching Profession* recommendations is children's safety in response to the recommendation of the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission) to strengthen children's safety. The Royal Commission specifically recommended that the Council of Australian Governments should consider strengthening teacher registration requirements to better protect children from sexual abuse in schools and increase vigilance. QCEC advocates the proposed scheme represents a step backward from the recommendations as the automatic deeming would enable teachers to operate in any jurisdiction without being required to even notify the relevant regulatory authority. To enable automatic deemed recognition, in the absence of nationally consistent registration requirements, represents a backward step from the progress that has been made to date in implementing the recommendations of the Royal Commission and weakens the integrity of the teacher registration system.

Catholic school employing authorities have confidence in knowing that the QCT receives daily updates from the Queensland Police regarding national criminal history checks for QCT registered teachers. QCEC considers that enabling a person to commence teaching without obtaining a complementary registration or being required to notify the QCT is not in the interests of public safety with respect to children and carries significant risk – a key reason for an occupation to be excluded from the scheme. On balance, QCEC considers the potential cost saving to an individual does not outweigh the significant increase and cost the proposed scheme would place on employing authorities, nor does it outweigh the increased risk to children.

Education as an industry does not operate in the same way as other industries. Schools operate for 40 weeks a year; term dates are set a year in advance and therefore the need for mobility in the teaching workforce has different characteristics to industries which may support occupations that need to respond to rapid change for short to mid-length periods of time. In addition, jurisdictions continue to have different thresholds regarding the minimum criteria to meet for teacher registration and QCEC has concerns around a scheme that would enable automatic deemed recognition of teacher registration gained outside of Queensland.

### **Conclusion**

In summary, QCEC does not support the inclusion of teachers in the proposed AMR scheme and strongly recommends teachers be excluded from the scheme nationally. This will also help ensure momentum continues with the work to implement a nationally consistent teacher registration criteria, minimize costs for employers and make it simpler for teachers seeking employment and further support the progress that has been made in relation to child safe organisations.

Should you wish to discuss any aspect of this submission, please contact Emily Wilson, Senior Education Officer at [emilyw@qcec.catholic.edu.au](mailto:emilyw@qcec.catholic.edu.au).

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