

27 May 2026

Ginna Webster
Secretary
Department for Education, Children and Young People
Attention: Government Relations and Strategic Legislation
GPO Box 169
HOBART TAS 7001
By email to: legislation@decyp.tas.gov.au

Dear Secretary,

Teachers Registration Bill 2026 Consultation

Thank you for the opportunity to provide feedback on the *Teachers Registration Bill 2026* (the Bill).

I welcome the Department for Education, Children and Young People's (DECYP) work to modernise the *Teachers Registration Act 2000* and implement recommendations arising from the *Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings*. These reforms represent an important step in strengthening the safety, wellbeing and rights of children and young people in Tasmania's educational settings, while supporting high-quality teaching.

Firstly, I am pleased to see that university-qualified teachers working in early childhood education and care settings will now be recognised through teacher registration. Extending registration to these teachers appropriately acknowledges their critical role in children's early learning and development; and supports greater consistency in professional standards and child safety across educational settings.

The remainder of this letter focuses on the new 'Principles for performing functions and exercising powers under this Act' in section 9 (the Principles) and on how DECYP can most effectively uphold the right of students to participate in decisions that affect them.

Role of the Commissioner for Children and Young People

As the Interim Commissioner for Children and Young People, it is my role under the *Commissioner for Children and Young People Act 2016*¹ to provide independent, child-centred feedback and advice on law reform relevant to Tasmanian children and young people, and to assist in ensuring Tasmania satisfies its national and international child rights obligations.²

In performing these functions, I am required to:

- adhere to the principle that the wellbeing and best interests of children and young people is paramount;

¹ This current Act will be repealed on proclamation of relevant provisions of the *Commission for Children and Young People Act 2025*.

² *Commission for Children and Young People Act 2025*, s8.



- observe any relevant provisions of the *United Nations Convention on the Rights of the Child* (UNCRC);³ and
- give special regard to the needs of children and young people who are vulnerable or disadvantaged.⁴

Accordingly, the work of the Office of the Commissioner for Children and Young People is fundamentally grounded in children's human rights, which takes into account the rights of children under the UNCRC and protections under other binding human rights instruments.

Comments on the *Teachers Registration Bill 2026*

Recognition of children's rights in the principles

I strongly support the inclusion of the standalone Principles section in the Bill. This is a significant and positive development, which brings the legislation into closer alignment with Tasmania's obligations under the UNCRC.

The Principles recognise that:

- the safety, welfare and best interests of students are paramount;
- when determining what is in the best interests of students, a person performing a function or exercising a power under the Bill should seek and consider students' views, having regard to their age and understanding; and
- students have the right to participate in decisions that affect them.

These Principles reflect 'core' rights under the UNCRC, including the right of children and young people to have their best interests taken into account as a primary consideration in all actions and decisions that affect them (Article 3); and the right to have a say in all matters affecting them and for their views to be taken into account (Article 12).

The *Teachers Registration Act Review: Steering Committee Report* notes that these principles will set the expectation as to how functions and powers under the legislation will be exercised. It is therefore critical that they are supported by practical mechanisms for implementation. As former Commissioner for Children and Young People Leanne McLean observed, a modern education regulatory framework capable of delivering positive outcomes must include processes through which the voices of children and young people are heard. These processes should enable their perspectives to influence the system's continuous improvement.⁵

In this context, I encourage consideration of how the Principles will be operationalised, including through:

- accessible and child-friendly mechanisms for providing genuine input into decisions made by the Teachers Registration Board;
- opportunities for ongoing and influential engagement, such as advisory groups or consultation forums;

³ *United Nations Convention on the Rights of the Child*, opened for signature 20 November 1989, (entered into force 2 September 1990).

⁴ *Commission for Children and Young People Act 2025*, s 3.

⁵ Commissioner for Children and Young People, 'Review of Education Regulation', <https://www.childcomm.tas.gov.au/wp-content/uploads/2020-10-01-Submission-Review-of-Education-Regulation.pdf>; Commissioner for Children and Young People, 'Consultation on the Education Legislation Amendments (Education Regulation) Bill', <https://childcomm.tas.gov.au/uploads/2022/07/2021-08-23-Submission-Education-Regulation-Bill.pdf>.



- clear, accessible and child-friendly complaints and feedback processes, enabling children and young people to raise concerns about teacher conduct or system issues; and
- transparency about how children and young people's views are considered and influence outcomes.

Without such mechanisms, there is a risk that the Principles will remain aspirational rather than realised. A genuine understanding of students' best interests cannot be achieved without enabling students to participate meaningfully in decisions that affect them.

Language matters

On 23 February 2026 and 2 March 2026, my Office supported DECYP to facilitate workshops focussed on the Principles. During these workshops, the young people participating highlighted the importance of language choices in legislation and policy. In this context, I note the necessity of providing accessible and child-centred implementation materials to the Bill, alongside accessible and child-friendly complaints and feedback processes. For many children and young people, legislation and regulatory frameworks can feel distant, complex, and difficult to understand. If the rights and expectations set out in the Bill are to have practical impact, they must be translated into forms that are meaningful, clear and accessible to children and young people.

Ensuring that implementation materials and complaints processes are child-friendly is consistent with Article 12 (the right to be heard) and Article 13 (freedom of expression) of the UNCRC, as well as the Child and Youth Safe Organisations Framework Standards 2 and 6.⁶ This should include developing materials that explain, in clear and age-appropriate language, the standards expected of teachers, what children and young people can expect in relation to safety and professional conduct, and what their rights are if those expectations are not met.⁷

Providing this information directly to children and young people empowers them to recognise appropriate and inappropriate behaviour, supports help-seeking, and reinforces their role as active participants in the education system. Complaints processes should be easy to access, safe, confidential and responsive, with multiple reporting pathways and clear information about what will happen after a concern is raised.⁸ This reflects feedback provided to me by children and young people.⁹ Importantly, both implementation materials and complaints processes should be co-designed with children and young people.

Strengthening professional learning

I support the requirement for ongoing professional learning in the Bill, including mandatory child safety training. This is an important safeguard and implements a recommendation of the Commission of Inquiry.¹⁰ While I note that the requirement for 100 hours of professional learning over a five-year period aligns Tasmania with approaches in other jurisdictions, its impact would be strengthened if it

⁶ Standard 2 is that children and young people are informed of their rights, participate in decisions affecting them and are taken seriously. Standard 6 is that there are processes to respond to complaints and concerns are child focussed.

⁷ The Voices for Tasmanian Youth developed a checklist resource to assist government to communicate more effectively with children and young people and is included in the Tasmanian Government's Communications Toolkit. Please see Voices for Tasmanian Youth, 'Communicate with us, not at us! A checklist for more effective communication with children and young people', < [VTY-Communicate-with-us-not-at-us.pdf](#) >.

⁸ The Commissioner's Consultative Council has recently provided feedback that not all children and young people feel comfortable making a complaint in person and that they don't necessarily always feel comfortable talking to school staff about concerns they have.

⁹ Including the Commissioner's new Consultative Council, Chance for Change, and the previous Council Voices for Tasmanian Youth.

¹⁰ *Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings*, Rec 6.15.



were more clearly linked to an approved professional development plan. This would help ensure that professional learning is purposeful, structured and responsive to the needs and experiences of students.

The young people who participated in the Teachers Registration Act Principles Workshops also expressed a desire to have greater input into what continuous learning means for teachers, including the content and focus of professional learning. The implementation of this suggestion would present an opportunity to embed student perspectives into the design and evaluation of professional learning. Incorporating student voice in this way would reinforce the right to participate in section 9 of the Bill and Article 12 of the UNCRC, and support the broader objective of improving educational outcomes. It would also help ensure that professional learning reflects issues that matter most to students themselves.

Conclusion

Overall, I consider the Bill to be a positive reform that strengthens the legislative framework for teacher registration in Tasmania. To further strengthen the Bill and its implementation, I recommend:

- ensuring practical mechanisms are established to give effect to children and young people's right to participate;
- focussing on accessible, respectful and empowering language in implementation materials;
- linking professional learning requirements to an approved professional development planning approach;
- embedding student voice in the development and content of teachers' continuous professional learning; and
- ensuring accessible, child-friendly complaints and feedback processes are in place.

These steps will help ensure that the legislation not only keeps children and young people safe, but also recognises and supports their role as active participants in their education system.

Thank you for the opportunity to comment on the Bill. I would welcome the opportunity to engage further on how children and young people's participation can be supported in the implementation of the Bill.

Yours sincerely,

Ros Cornish AM

Interim Commissioner for Children and Young People

cc: The Hon Jo Palmer MLC, Minister for Children and Youth