

Our Ref: RK:CR0049:2018/22829

Ms Analena Gilhome  
Economic Regulation Authority  
PO Box 8469  
PERTH BC WA 6849

Via email: [public.submissions@erawa.com.au](mailto:public.submissions@erawa.com.au)

Dear Ms Gilhome

**FEEDBACK - INQUIRY INTO REFORM OF BUSINESS LICENSING IN WESTERN AUSTRALIA DRAFT REPORT**

Thank you for the opportunity to provide feedback to the draft report of the *Inquiry into reform of business licensing in Western Australia* undertaken by the Economic Regulation Authority (Authority) and for allowing us a short extension to the deadline.

The Teacher Registration Board of Western Australian (Board) is supportive of the principles of licensing reform that seek to reduce regulatory burden and promote a culture of continuous improvement.

Established by the *Teacher Registration Act 2012* (TR Act), the Board is the body responsible for the registration of all teachers in Western Australia, entitling them to teach in Western Australian educational venues. The Board operates within a national context and each State and Territory has a similar body responsible for teacher registration. In fulfilling its role, the Board's paramount consideration is the best interests of children in Western Australia.

The Board administers the scheme of teacher registration in Western Australia under the provisions of the TR Act, its subsidiary legislation and within its own Policy Framework.

It is in this context, feedback is provided in relation to those recommendations (2, 6 and 7) that relate to review and reporting annually (retrospectively and prospectively) on licensing scheme improvements. While the Board is, in-principle, supportive of the recommendations, the Board would like to highlight to the Authority that it already reports on such activities as part of its annual reporting obligation.

In terms of review, the TR Act requires that the Minister must carry out a review of its operations and effectiveness as soon as is practicable after the expiration of four years from the commencement date. To this end, the TR Act is currently under review and the outcomes are with the Minister for consideration.

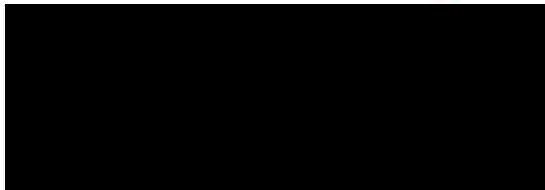
Additionally, the Board is required to submit an annual report, ultimately to the Parliament, on its activities, performance and any other matters arising from the Board's functions that are in the opinion of the Board, of significance to require reporting. The legislation contemplates support arrangements for Board operations being supplied by the Department of Education and the Board's annual report is published as part of the Department's annual report.

The Board operates within a culture of continuous improvement and as such has not only recommended a number of amendments to the TR Act to reduce regulatory burden on teachers, but has effected change through amendments to the Regulations and to its policy settings. The Board reports these matters in its Annual Reports as key achievements or significant issues as is relevant to the status of such matters at the time of reporting.

The Board therefore requests, in the spirit of reducing regulatory burden that the Authority gives consideration to the mechanisms that are already in place and how these can be utilised to achieve the recommended outcomes. In the context of the comprehensive accountability framework in which the scheme of teacher registration operates in Western Australia, the additional layer of reporting that appears to be contemplated would seem to go against the intended objectives of the ERA review.

Should you have any questions in relation to any matter raised, you are welcome to contact Mr Richard Miles, Director Teacher Registration (telephone: 9223 9106; or email: [richard.b.miles@education.wa.edu.au](mailto:richard.b.miles@education.wa.edu.au)).

Yours sincerely

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**MARGARET COLLINS**  
**CHAIRPERSON**

6 December 2018