

Relevant elements for review	Question	Response
Permission to Teach		
1 (i, ii, iii)	<p>Do you consider the PTT policy is fit for purpose?</p> <ul style="list-style-type: none"> are the categories of PTT clear and appropriate? are there any opportunities consolidate categories of PTT? could the PTT policy be revised to improve the clarity and readability of the policy so that it is accessible and clear to stakeholders? 	<p><u>General</u></p> <p>The Permission to Teach Policy is an essential document to ensure that the profession and prospective members of the profession clearly understand the requirements and obligations of applying for and being granted PTT.</p> <p>There are opportunities to make the policy clearer and ensure compliance to maintain the high standards of the profession.</p> <p>Whilst the categories of PTT are clear some categories include exemptions, and there are multiple types of exemption. The policy is currently laid out to deal with each type of exemption separately. Consideration should be given to collecting information in a table (such as the example provided below) which shows the category name, the requirements and timeframes of those requirements and then listed exemptions.</p>

category	requirements	exemption/s	Language	Suitability	Length of grant	Support	Professional Learning
HES	Required to maintain safe learning environment, use a range of strategies to teach, demonstrating content knowledge,	and from moving towards teacher qualification, ELC, Workforce	Exempt	applicants for PTT must be suitable to teach.	XX years	The school confirms it will support the teacher in understanding workplace policies,	Must be undertaken in relation to Child Safe standards, Mandatory Reporting, Code of conduct etc

The types of PTT granted are numerous because they are for specific purposes, so while there is opportunity for consolidation e.g. the Japan School, and VCASS, HESS and Exchange could be consolidated under a new moniker, it would not be appropriate to do so. Consolidation would be sought to make the policy more easily accessible, yet if a different format was used, such as the table suggested above, this may alleviate any reason for consolidation.

There may be usefulness in providing additional clarity about who may apply for particular categories of PTT, for example, a person who has taught overseas and is seeking to teach in Victoria, but who may not have met the requirements for Provisional Registration in Victoria.

Other aspects within the policy may be able to be removed, such as 'COVID catch up'.

One category was specifically included in response to a government initiative, the Tutor Learning Initiative. The policy must be able to be altered in response to these programs. When additional categories are made, or substantive changes are made, appropriate consultation should occur with relevant stakeholders.

Instrumental music programs

The policy currently has a significant gap in that it provides for that a 'a teacher must deliver an approved curriculum'. This has resulted in the unacceptable scenario where delivering instrumental music sessions does not require a teacher to be registered, previously these positions were covered by a Permission to Teach requirement.

Instrumental music programs involve designing and delivering a sequence of music instruction as part of a coherent program. They all involve assessing student progress in that program. These

programs all involve listening, composing and responding to music, which are facets of the Victorian Curriculum, and certainly of the VCE VET Music and VCE Music curricula.

Because Victoria does not have a detailed syllabus of music instruction, instrumental music teachers use resources such as Queensland's instrumental music curriculum, or the one developed by the Australian Music Examinations Board. As with every teacher in every other classroom in Victoria, these teachers use, adapt and alter the curriculum to suit the needs of their students. At many schools, an instrumental music teacher also has the responsibility of reporting to parents/carers, both in person and in writing about student progress in the educational program.

There are numerous examples of non-registered teachers, employed as Education Support in government schools, delivering ensemble, band, and orchestra programs where large groups of students are not directly supervised by a teacher. Often these sessions occur prior to the commencement of the ordinary timetable or at its conclusion in the afternoon.

In 2018 VIT published a Principals Advisory document, which provided advice to schools about when teacher registration was required. While this document has not, to our knowledge, been formally withdrawn, it is no longer available on the VIT website. This document clearly outlined that when a person was delivering music instruction to a group of students, this was a duty that was required to be done by a person with registration or PTT. It appears that the VIT did not attempt to enforce the arrangements outlined in the advisory. This may have meant that unregistered persons have, and may continue to, undertake the duties of a teacher.

This could provide for a risk to affected students, as the employees would have no formal introduction to the Code of Conduct and Ethics, are not required to maintain practice or annual professional learning and are not moving towards an ITE qualification. This is clearly not in the interest of children and young people nor the public interest more broadly, particularly when the community at large views such an employee undertaking these duties as if they are a registered teacher or practicing with PTT.

		<p>The primary reason the issue outlined above arises is because of misalignment of the Education and Training Reform Act 2006 definitions of 'teacher', and the definition of 'duties of a teacher', 'educational program' and 'approved curriculum' in the PTT policy.</p> <p>The Act defines a teacher as a person who, in a school, undertakes duties that include the delivery of an educational program or the assessment of student participation in an educational program; and includes a person employed as the principal or the head of a school whether or not that person undertakes the duties of a teacher if the person has been employed as a teacher in any school, whether the school was within or outside of Australia, prior to being employed as the principal or the head of a school; and does not include a teacher's aide, an assistant teacher or a student teacher.</p> <p>The PTT policy provides for PTT to apply only to positions where the duties to be undertaken are those of a teacher delivering an educational program in a school. The policy defines educational program as a school-based, planned program of learning and assessment that delivers an approved curriculum and reports formally to parents about student progress. The definition continues and provides for schools to have flexibility in the design of their educational program to ensure sequencing of knowledge and skills across the years of schooling to support a progression of learning such that students of all achievement levels are able to progress.</p> <p>Further that an approved curriculum is an educational program delivering:</p> <ul style="list-style-type: none"> • the Victorian Curriculum • the Australian National Curriculum • the Victorian Certificate of Education (VCE) • the Victorian Certificate of Applied Learning (VCAL) • Vocational Education and Training (VET) • School Based Apprenticeships and Traineeships (SBAT) • any other curriculum or program approved by the Victorian Curriculum Assessment Authority (VCAA) or Australian Curriculum, Assessment and Reporting Authority (ACARA), which is to be delivered in Victorian schools • the International Baccalaureate (IB) authorised by the International Baccalaureate Organisation
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- any element, in a non-government school, approved as the compulsory educational program that is not otherwise included by points one to eight above; or
- an overseas curriculum delivered at a school registered with the VRQA as a 'Specific Purpose' school.

Limiting the definition of education program in a way that misapplies the intention of the Act creates a circumstance whereby a person employed by a school to teach an instrumental music program is for all intents and purposes delivering an education program as conceived of by the Act but does so without registration or PTT.

A revision of PTT policy should make it clear that the provision of an instrumental music program reflects the learning covered by the Victorian Curriculum (Music) strand, from Foundation to Level 9 and 10 and the VCE and as such should require a registered teacher or a person with PTT, and that syllabuses which put such curriculum into an ordered sequence of learning should be approved.

Early Childhood and VET programs

There is no permission to teach arrangement for those seeking to be Early Childhood teachers. Such arrangements, while requiring legislative change, are important to put in place to ensure that suitability checks for not yet qualified teachers in the EC sector have occurred.

The registration of teachers delivering VET programs to school age children at non-school locations also needs to be considered.

The level of IELTS required to meet the English Language criteria for permanent residency is set higher than the LANTITE requirements, and has resulted in teachers who have undertaken tertiary studies in Australia and successfully completed these courses, being denied access to teaching because they do not meet the IELTS minimum requirements

Some language needs updating, e.g. VCAL has been replaced by the Vocational Major and the Victorian Pathways Certificate

1(iv, v)	<p>To what extent do you consider the Institute could improve its consistency of assessments of applications for PTT? Are there are an example(s) that you are aware of where consistency of decision making has been an identified issue.</p>	<p>Consistency in decision making, even when individual circumstances are different, is essential to the creation of trust in the system. Increasing supply of teachers may be achieved by providing fair, timely and useable feedback on the reasons why an application was unsuccessful.</p> <p>For example, applicants undertaking the IELTS are not told how they could improve. Instead, a numeric score is provided only. Recent changes have meant an applicant need not repeat the entire IELTS if a score in one section was inadequate, however we know of at least one member who has undertaken IELTS numerous times and has not met the standard in different components in each of the assessments, but across multiple assessments have achieved the standard at least once. This member has undertaken numerous attempts, at great personal expense, over a period of 2 years.</p>
1(iv, v)	<p>To what extent are conditions on Permission to Teach understood? For example</p> <ul style="list-style-type: none"> • restrictions on the duties of a teacher that a PTT holder can undertake (including subject areas) • the requirement to progress towards teacher registration • the requirements for supervision and mentoring from the employer. 	<p>It is appropriate to place conditions on PTT, so that the teacher understands fully what is required of them, as well as ensuring the school understands the obligations it has to the PTT holder, and clarity about the limitations in duties a PTT holder is subject to.</p> <p>This could be achieved with:</p> <ul style="list-style-type: none"> • Clarity around the duties that can be performed. A typical question we receive is whether the teacher can undertake yard duty. Similarly, we often field questions about what supervision means, and what supervision looks like for a teacher with PTT compared to a provisional or fully registered teacher. • Clarity around the obligations applying to the school, i.e. that when a PTT is employed, the school is expected to provide a mentor, and regularly supervise the PTT holder to ensure they are fulfilling the duties of a teacher effectively, but also to support their wellbeing. • Grants of PTT should not being for a full allotment of teaching, as the expectation is that a holder of PTT is moving towards a teacher qualification which requires time allocated to study. Where movement to full qualifications requirement is exempt, this unallocated time should be put towards professional learning and mentoring. • VIT auditing schools and PTT holders to ensure the conditions are being met. It is our understanding that VIT does not actively assess whether the conditions are being met in a proactive manner. Our particular concern is the lack of provision of a mentor, or if provided

		the lack of that mentor having time with the PTT holder to effectively perform the mentoring role.
1(vi)	<p>Are there any areas where the Institute could improve communications with unsuccessful applicants and their employers on the way decisions are made and provide them with clear information on</p> <ul style="list-style-type: none"> any conditions imposed on a grant of PTT under section 2.6.14(2) of the Act and why those conditions have been imposed; and in the case of unsuccessful applicants: <ul style="list-style-type: none"> why their application was unsuccessful ; and what is required in order for the applicant to 	<p>The AEU supports the proposed communication with explanations as to why an applicant was unsuccessful, and how they may in future meet that requirement. Additionally, as described above, clear information about the requirements and obligations in relation to conditions or limitations is needed.</p> <p>Poor communication throughout the PTT process has been raised by our members on numerous occasions. Our members report having to call VIT weekly, to 'chase up' their application. One member discovered that their delay was due to VIT waiting upon the Commission for Children and Young People to communicate an outcome. This would have remained unknown, but for their principal ringing up repeatedly given the delay.</p> <p>Another member reported that they were informed by their principal's communication with VIT that the Institute had requested a further document from the applicant. This was never communicated with the applicant personally. More communication regarding timeframes around PTT, and in particular where delay occurs are necessary. For examples informing an applicant promptly of a revised timeframe would be beneficial.</p> <p>The use of language that is more easily understood is another area where communications from VIT could be improved. The AEU recognises the need to be specific and that communications need to align with the Act, but the use of common language, particularly about what is needed, would make the process easier to navigate, and make future applications easier for VIT to assess and for applicants to make. In particular this relates to the specific reason for an application not being granted.</p> <p>The AEU recognises that at times delays in responding is caused by waiting on third parties to provide documentation/confirmation/reports. However, we have had several members who have suffered difficulties and delays as a result of VIT taking this long to assess applications:</p> <ul style="list-style-type: none"> One member had their employment offer withdrawn at the final stage of the PTT by the school because VIT had taken so long to assess the application.

	<p>be eligible for a grant of PTT.</p>	<ul style="list-style-type: none">• Another member spent 6 months unemployed, because VIT had not finalised their PTT application. <p>The AEU understands that the typical time for PTT application to determined is approximately 6-8 weeks and that the bulk of this relates to National Criminal History Checks, yet in terms of responding to the current teacher shortage this is too long.</p>
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Please provide a summary of no more than 500 words for your responses to the above questions

The AEU considers that the responses provided above are sufficient for any summary purpose.