

# Review of the Victorian Institute of Teaching's Permission to Teach policy and processes

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## Background

On 18 December 2024, the Victorian Institute of Teaching (the Institute) received a Direction from the Minister for Education to undertake a review of

- a. the Institute's approach to assessing applications for registration as a teacher from applicants who have completed overseas teaching qualifications and taught overseas (**Report 1**); and
- b. the Institute's approach to granting permission to teach, its permission to teach policy and the application of that policy (**Report 2**).

Report 1 was submitted to the Minister on 28 February 2025 and Report 2 is due to 30 April 2025.

The Institute will undertake further targeted consultation on any supported recommendations arising from the reports.

## Written submissions

Written submissions responding to the elements related to Permission to Teach are invited from key stakeholders. Respondents are welcome to address all questions or only those of particular relevance or interest.

Respondents are also invited to share any additional feedback that is not encompassed in their responses to these questions.

Respondents can share their feedback by e-mailing responses in the attached form to [Hannah.Galloway@vit.vic.edu.au](mailto:Hannah.Galloway@vit.vic.edu.au) by **COB 21 March 2025**.

# Elements for review

The review related to PTT is to address the following

1. the Institute's approach to granting PTT, its PTT policy and the application of that policy, including by having regard to
  - a. whether the PTT policy is fit for purpose and whether the requirements for a grant of each category of PTT are clear and appropriate
  - b. opportunities to streamline the PTT policy and whether any categories of PTT could be consolidated
  - c. possible options for improving the PTT policy, including improving the clarity and readability of the policy so that it is accessible and clear to stakeholders
  - d. possible options to improve consistency in the Institute's assessment of applications for PTT and the outcomes of these assessments
  - e. the Institute's approach to imposing conditions under section 2.6.14(2) of the Act when granting PTT, in particular
    - i. whether conditions are imposed consistently
    - ii. whether conditions are imposed and designed having regard to the individual circumstances of the applicant; and
    - iii. the Institute's approach to determining what subjects or subject areas an applicant is permitted to teach, including evidentiary requirements; and
  - f. possible options to improve the way decisions on applications for PTT are communicated to applicants and provide them with clear reasons and information on
    - i. 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
    - ii. in the case of unsuccessful applicants
      1. why their application was unsuccessful; and
      2. what is required in order for the applicant to be eligible for a grant of PTT.

# Background and context

## 1. Permission to Teach

Division 4 of the *Education and Training Reform Act 2005* outlines the requirements for an applicant to apply for, and the Institute to grant, Permission to Teach (PTT).

To teach in Victoria, a person must be appropriately qualified and suitable to teach and hold registration with the Victorian Institute of Teaching (VIT).

PTT is an alternative authorisation to teach that exists primarily to address a workforce shortage within Victorian schools.

PTT enables an individual who does not meet the qualification requirements for registration to undertake the duties of a teacher in a limited capacity based on their skills and experience.

### Permission to Teach policy

The requirements of PTT are articulated in [VIT's Permission to Teach Policy](#), last approved by the Minister for Education on 31 October 2022.

There are 10 categories of PTT in the policy.

PTT category	Intent of category of PTT
PTT (General)	This is a general category of PTT and applies to individuals seeking permission to teach a particular subject (or subjects) at a particular school.
PTT (Internship)	This category applies to applicants undertaking an accredited employment-based Internship to teacher registration such as the Teach for Australia (TFA) program or the Master of Teaching (Internship) at the University of Melbourne. This category only applies to Initial Teacher Education (ITE) programs accredited by the Institute as an Internship ITE program. PTT (Internship) cannot be granted to an individual for two or more schools concurrently. PTT (Internship) is granted for the duration of the ITE program up to the maximum permissible 3 year grant period. PTT (Internship) applies to a particular subject/s (or subject areas) at a particular school.
PTT (VET)	This category applies to applicants seeking permission to teach a Vocational Education and Training (VET) subject/s in a school. Holders of PTT (VET) are able to teach a particular subject/s in any Victorian school.
PTT (Exchange)	This category applies to the Victorian International Teaching Fellowship (VITF) coordinated by the Department of Education and Training. Holders of this category cannot be granted PTT to teach a specific subject as the teachers engaged through the VITF have exchanged roles with Victorian registered teachers. PTT (Exchange) is granted only for a maximum period of 12 months. Individuals holding PTT (Exchange) who wish to continue to teach beyond the 12-month grant are required to make an application for registration or PTT. Future exchange programs will be considered on a case by case basis.
PTT (JSM)	This category of PTT applies only to those teachers appointed by the Japanese Government to teach the Japanese curriculum at the Japanese School of Melbourne (JSM). Holders of this category cannot be granted PTT to

	teach a specific subject as the teachers are engaged as generalist teachers within the school. The JSM is registered as a 'specific purpose' school by the Victorian Registration and Qualifications Authority (VRQA) to deliver an overseas curriculum. Future 'specific purpose' schools registered by the VRQA to deliver an overseas curriculum will be considered on a case by case basis.
PTT (VCASS)	This category of PTT applies only to individuals seeking permission to teach dance and music at the Victorian College of the Arts Secondary School (VCASS).
PTT (Deemed)	This category only applies to applicants who were deemed to hold PTT when the VIT was established in 2002 and who have maintained this status ever since. Individuals holding this category of PTT are required to make an annual declaration in order to continue to hold this category of PTT.
PTT (Teacher tutor)	This category of PTT is granted to individuals to support students in catching up with any learning they may have missed due to the coronavirus (COVID-19) pandemic. Holders of PTT (Teacher Tutor) are able to tutor in one or more subject areas / key learning areas in any Victorian school, under the Victorian Government's Tutor Learning Initiative.
PTT (Aboriginal languages)	This category of PTT is granted to applicants delivering an Aboriginal language program in any Victorian school.
PTT (Higher Education Studies)	This category of PTT is granted to applicants seeking permission to teach one or more higher education studies subjects to school aged learners in a Victorian school setting. This category only applies to currently practising academic staff from Victorian higher education providers employed in an approved school setting such as the Centre for Higher Education Studies (CHES).

Each category of PTT was designed for a specific purpose and has minor differences in eligibility requirements and the conditions that apply.

### Eligibility requirements

To be eligible for a grant of PTT, an applicant will generally need to provide the following

1. evidence of appropriate content knowledge of the subject area/s that they will be teaching
2. evidence of their skills and experience to build positive relationships with students
3. evidence of their ability to maintain safe learning environments
4. evidence of their ability use a range of teaching practices and resources to engage students in effective learning
5. evidence of English language competency
6. evidence of their suitability to be registered as a teacher.

An employer may also be required to demonstrate proven teacher workforce shortage prior to commencing an application for PTT.

### Conditions

The Institute is able to apply any condition on a grant of PTT under section 2.6.14(2) of the Act, with the most common being

- the grant is limited to teach specific subjects or subject areas at a particular school, and therefore cannot be used to undertake casual relief teaching

- the PTT holder is expected to [progress toward teacher registration](#), which most commonly means completing an accredited ITE program.
- professional learning activities.

Additional conditions may vary depending on the individual circumstance of the applicant, these may include

- requirement to improve English language skills if below requisite standard
- specified professional learning activities
- suitability conditions.

## Written submission form

Relevant elements for review	Question	Response from Bilingual Executive
<b>Permission to Teach</b>		
1 (i, ii, iii)	<p>Do you consider the PTT policy is fit for purpose?</p> <ul style="list-style-type: none"> <li>are the categories of PTT clear and appropriate?</li> <li>are there any opportunities consolidate categories of PTT?</li> <li>could the PTT policy be revised to improve the clarity and readability of the policy so that it is accessible and clear to stakeholders?</li> </ul>	<p><b>Is the PTT Policy Fit for Purpose?</b></p> <p>We acknowledge that the PTT policy is a critical part of ensuring high quality education standards in Victorian schools. However, we agree that there are aspects of the policy that <u>are not</u> fit for purpose. Further improvements are required to ensure the policy meets the needs of all stakeholders as we feel strongly that it is not inclusive of bilingual schools, particularly in the context of overseas qualified language teachers required for Bilingual schools. Furthermore, we suggest waiving the 45 days of supervised practice teaching requirement for teachers who already have several years of experience, as part of their ITE qualification.</p> <p><b>Are the Categories of PTT Clear and Appropriate?</b></p> <p>While the current categories of PTT have been established with the intent of addressing various teaching qualifications and experience, there is a clear need to include “bilingual schools” as a category in itself. The Department of Education recognises and funds 14 schools as Designated Bilingual Schools, yet the VIT does not have a category nor identifies Bilingual schools as a specialisation. It is critical to understand that we are different to a LOTE category. Without multiple language teachers in our schools (usually half our staff) we cannot effectively fulfill our obligation to our school communities as Designated Bilingual Schools. Often 50 % of recruitment in Bilingual schools is for language teachers as half of our staff are language teachers. The need for more specific categories, such as a dedicated “Teaching of Languages” category and a “Bilingual” Schools Category is certainly required for schools. This would address the increasing demand for teachers with expertise in specific languages for schools in general and bilingual education for Bilingual schools.</p>

		<p><b>Are There Opportunities to Consolidate Categories of PTT?</b>  Upon further reflection, we agree that there may be an opportunity to streamline certain categories of PTT. Some categories could be consolidated where there is significant overlap in qualifications or roles. For example, a category specifically for languages and we are wondering why VSL is not mentioned at all.</p> <p><b>Could the PTT Policy be Revised for Clarity and Readability?</b>  Absolutely. Stakeholders, including principals, school leaders, applicants, and the broader educational community, would benefit from a clearer and more concise explanation of the PTT process in clear steps so we all know what is expected to be able to speed up the process. Prospective teachers abroad could also benefit with more detail and clarity before they travel to Victoria with the hope to teach in our state. It's not clear.</p> <p>Improving the policy's structure and providing clearer guidance on how decisions are made would help all parties understand the basis for different PTT outcomes. A review of the policy could help ensure that it is user friendly, especially for overseas qualified teachers who may not be familiar with local practices and requirements. Furthermore, it would be beneficial to clarify the steps in the application process, including specific requirements for overseas trained teachers, as well as making these resources easily accessible online. This would promote transparency and fairness in how decisions are made, the process and expected time frame for outcomes enhancing the overall experience for applicants.</p> <p><b>Special Category for Teaching of Languages</b>  The need for a distinct category for the "Teaching of Languages," especially for bilingual schools, is another critical area for improvement. As the global demand for bilingual education grows, a specialised category would provide the necessary structure to ensure that language teachers are assessed appropriately for their unique skill set. This would help schools identify the most qualified candidates for <u>language only</u> teaching roles and provide teachers with the recognition and validation of their qualifications in a way that is clearly defined by the policy.</p> <p>In summary, while the current PTT policy provides a framework for granting permission to teach, there are areas where it can be refined for greater clarity, consistency, and accessibility. The introduction of additional categories, such as a distinct "Teaching of Languages" category to address the specific needs of schools that require teachers with specialised skills, such as bilingual or language education.</p>
1(iv, v)	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	We certainly recognise the importance of consistency in the assessment of PTT applications and the confidence it instils in the education system and all the key stakeholders. The lack of consistency is a great concern. We would like to highlight areas where inconsistencies in the decision-making process have led to confusion and frustration.

	<p>where consistency of decision making has been an identified issue.</p>	<ol style="list-style-type: none"> <li>1. The varying lengths of PTT granted to language teachers from the same country, despite having the same qualifications, is one example of inconsistency that undermines trust in the process. When two teachers with identical credentials are given permissions of differing durations, one for six months and the other for 18 months. This not only creates uncertainty for the educators but also for the schools and the broader educational community, including the department of education. Such discrepancies do not promote confidence and can be seen as divisive culturally dependent on the languages, particularly for overseas trained teachers who are looking for clarity and fairness in the system. This is particularly problematic when they work in the same school and have different PTT outcomes.</li> <li>2. The inconsistency in further education requirements to gain a PTT. Some overseas trained teachers have been told they require one year of ITE whereas some have been requested to do a further 4 additional years ITE on top of the degree they have completed. This inconsistency can be particularly frustrating and financially crushing turning them away from the profession. Moving forward, we would like to see the decision-making processes to ensure that they are fair, transparent, and grounded in clear, consistent <b>criteria</b> that is clearly documented rather than various emails and lengthy explanations. The current variation in advice is not conducive to a streamlined process, and we acknowledge that this has led to confusion and frustration for applicants, principals and department staff. It does not create trust in the PTT process.</li> <li>3. English Language Proficiency Requirements. Another issue raised is the requirement for overseas trained language teachers to meet often unattainable English language proficiency standards, despite already possessing proficiency in English. We understand the challenge of balancing the need for language proficiency with the reality that many language teachers particularly those in bilingual education or specific language instruction teachers may already have high levels of fluency, even if their test scores do not fully reflect this.</li> </ol>
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1(iv, v)	<p>To what extent are conditions on Permission to Teach understood? For example</p> <ul style="list-style-type: none"> <li>• restrictions on the duties of a teacher that a PTT holder can undertake (including subject areas)</li> <li>• the requirement to progress towards teacher registration</li> <li>• the requirements for supervision and mentoring from the employer.</li> </ul>	<p><b>Understanding of Conditions on Permission to Teach (PTT)</b> We all agree and recognise that a clear understanding of the conditions attached to a PTT is critical for both teachers and employers. These conditions ensure that all PTT holders are fully aware of their responsibilities and the scope of their teaching role, while also safeguarding educational standards in Victorian schools. However, we acknowledge that some of these conditions may not always be clearly understood or communicated, which can lead to confusion for teachers, especially those who are new to the system.</p> <p><b>Restrictions on Duties of a PTT Holder (Including Subject Areas)</b> We acknowledge that it is essential for PTT holders to understand that there are limitations on the duties they can undertake, including the subject areas they are qualified to teach. We know the restrictions typically ensure that teachers are not placed in roles where they do not have the necessary qualifications or experience. This is a safeguard to ensure students are taught by educators with appropriate expertise and within policy. This is understood well.</p> <p><b>Progression Towards Teacher Registration</b> We understand that a key condition for PTT holders is the requirement to progress towards full teacher registration. This is a critical process in ensuring that all educators meet the necessary professional standards set by the VIT. However, we believe that there are huge expectations surrounding this progression and it can be challenging as they navigate working and learning in an ITE. This requires principal support and continuous tracking and monitoring to ensure the expectations are met. We believe providing more detailed information on the progression process, we can help PTT holders better understand their pathway to becoming fully registered teachers and what is expected of them at each stage.</p>

		<p><b>Supervision and Mentoring Requirements</b></p> <p>Supervision and mentoring from the employer are key components of the PTT framework. And we agree with what is currently in place. These requirements are designed to support PTT holders in gaining the experience and professional development they need to transition to full registration.</p> <p>To improve this, as bilingual schools we are always exploring ways to provide additional resources and guidance for employers on how to support PTT holders in their journey towards registration, including best practices for mentoring and supervision.</p>
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"> <li>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</li> <li>in the case of unsuccessful applicants: <ul style="list-style-type: none"> <li>why their application was unsuccessful; and</li> <li>what is required in order for the applicant to be eligible for a grant of PTT.</li> </ul> </li> </ul>	<p><b>Communication of Conditions Imposed on PTT</b></p> <p>We acknowledge that communication regarding the conditions imposed on a grant of PTT under section 2.6.14(2) of the Act is an area that urgently requires improvement. At present, some applicants, principals, and staff at the school setting have expressed confusion over the rationale behind certain conditions attached to the PTT, particularly when those conditions are not clearly explained or understood. These conditions are crucial for ensuring that the teacher's qualifications align with the requirements of the role they are taking on.</p> <p>To address this, we propose the following improvements:</p> <ol style="list-style-type: none"> <li><b>Clearer Explanation of Conditions:</b> We require all applicants who are granted PTT receive a detailed explanation of any conditions that apply, including why they have been imposed. This communication should explicitly outline the reasoning behind the conditions and how they align with the applicant's current qualifications and experience. By offering more transparent explanations, it would make it easier make it easier for applicants to understand the decision and how it applies to them.</li> <li><b>Guidance for Employers:</b> Employers need to be provided with clear documentation on any conditions attached to a PTT grant for their employee. This will help ensure that principals are fully informed about their responsibilities in relation to supervision, mentoring, and the professional development of the teacher. Clear and consistent guidance will promote better collaboration between VIT, applicants, and employers.</li> <li><b>Lack of Communication during the process:</b> Some applications that were started in August are still not finalised by February. There is no communication in between unless principals seek it by phone conversation to the VIT. Limited information is offered, and various case managers provide different information which does not add clarity, just more confusion. There is limited knowledge to us as principal leaders if the application has progressed at all and we are left in a recruiting standstill with great tension between the VIT, language teacher waiting approval and parent community with nothing to say.</li> </ol>

		<p><b>Communication for Unsuccessful Applicants</b></p> <p>The communication process for unsuccessful applicants can be a source of confusion, frustration and great stress. It also often results in much time wastage by principals and money spent in sponsorships that have amounted to nothing progressing. It is essential that we all understand the reasons for application refusal and the steps that can be taken to become eligible for PTT in the future. Often its just a standard email after months of waiting.</p> <p>To improve communication in this area, we propose the following:</p> <ol style="list-style-type: none"><li>1. <b>Clear Explanation of Reasons for Unsuccessful Applications:</b> Provide applicants with a detailed explanation of why their application was unsuccessful in a timely manner. This should include specific feedback on areas where qualifications or experience did not meet the required standards and will help applicants understand where they may need to further develop their skills or qualifications to meet the eligibility criteria. By providing specific and constructive feedback, we can support applicants better.</li><li>2. <b>Clear Pathways for Eligibility:</b> In addition to outlining the reasons for an unsuccessful application, it is important to clearly communicate what steps the applicant must take to become eligible for a grant of PTT. This will include outlining any additional qualifications, professional development, or assessments that may be required, as well as providing guidance on how to meet the necessary requirements. Ensuring that applicants understand the pathway to eligibility will help them take informed steps towards reapplying and improving their chances of success.</li></ol>
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Please provide a summary of no more than 500 words for your responses to the above questions

Bilingual schools face the unique challenges that come with the recruitment and recognition of language teachers, and we fully acknowledge the urgent need for qualified language instructors to meet the growing demand for quality language education in our bilingual schools across Victoria.

### **The Critical Need for Qualified Language Teachers**

There is a growing and pressing need for qualified language teachers in Victoria, especially to ensure the delivery of high quality language instruction in the bilingual setting. Language education is not only a mandate within the curriculum but is also vital for fostering global understanding, cultural exchange, and linguistic diversity in our students. Language teaching is a specialised field, and those who are qualified to teach languages possess unique skills that are crucial to the success of these programs.

Particularly in bilingual education, where teachers are often tasked with teaching in the target language for up to 50% of the week, the role of language teachers is complex and specialised. These teachers are not just teaching a subject; they teaching the Victorian Curriculum through another language, in an immersive environment. This requires highly skilled educators who can navigate both the language and cultural contexts of the subject matter.

### **Challenges in Finding Native-Speaking Language Teachers**

One of the key challenges facing our education system is the difficulty in finding qualified language teachers who can teach authentically and fluently. The demand for such teachers far outweighs the supply within the local workforce, and as such, overseas trained language teachers are often essential to filling this gap. Recognising the expertise that overseas qualified language teachers bring is crucial to ensuring that students have access to the best possible language instruction.

## **The Specialisation of Bilingual Education and the Political Complexity of Language Teaching**

Bilingual education is an incredibly specialised field. Teachers in bilingual programs are often teaching students in their first or second language for a significant portion of the week, which demands exceptional skill and understanding. This also requires teachers who are fluent in both languages and have a deep understanding of the cultural context in which they are teaching.

Moreover, language teaching often involves navigating political and community sensitivities. Languages, particularly those that are tied to specific countries or regions, can carry significant political weight. In a globalised world, teaching a language is not just about grammar and vocabulary—it's about engaging with the social, cultural, and political narratives that shape how that language is perceived and used. This is particularly sensitive when dealing with overseas qualified language teachers, who are often representing not only their own qualifications but also the countries from which they come.

The political context surrounding language education can be complex and at times tense. The treatment of overseas language teachers has broader implications that extend beyond the classroom. For example, the hiring and recognition of teachers from certain countries can have ramifications for international relations, with potential consequences for diplomatic ties, media representation, and community cohesion. In some cases, poor treatment of overseas teachers can lead to negative media coverage, damage the reputation of the VIT and the Department of Education, and even cause unrest within communities. Therefore, it is crucial that the VIT's policies towards the assessment and recognition of overseas language teachers are developed well, are inclusive and dealt with sensitively to mitigate to these political and social dynamics.