

Independent Schools Victorian Submission in

Response to Victoria Institute of Teaching's Review of Permission to Teach

The following is a summary of the in-person presentation from ISV to the Institute's Panel overseeing the Review of PTT processes on 12 March 2025.

Overview

ISV was inundated with concerns from our schools regarding PTT, in particular:

- the process,
- its requirements,
- its timeliness and
- the apparent lack of support for schools.

Schools are finding the PTT processes extremely difficult and feel that the Institute is not responsive to their needs, nor are the processes streamlined.

They also feel that school recommendations do not carry the weight they expect.

Principals want to be viewed as co-regulators, no Principal wants a sub-standard teacher in their school. Principals are very keen to have the best people possible teaching their students and should be partners with the Institute.

ISV schools are seeking a visible and practical re-setting of the Institute's PTT process, to ensure students in all schools have teachers who the Principals support as being the best teacher for their school.

Key Themes Arising from ISV Consultation

Schools' Overall Sentiment/Response to Permission to Teach

Some schools are extremely frustrated by their experience with PTT – even by using the Principals' Hotline they feel that there is a lack of responsiveness and are unable to talk with someone who knows the case as each time they ring, they get a different person and often receive different advice. Their experience is that there appears to be no one empowered to resolve matters.

Principals feel that the Institute does not understand the pressure, especially in faith-based schools, to find a suitable candidate.

There also appears to be inconsistencies as to the granting of PTT with one school providing several cases when one teacher was only granted six months PTT and required to demonstrate enrolment in an initial teacher education (ITE) course and two others in exactly the same circumstances given two years PTT immediately, with no explanation provided for the difference in VIT responses.

Understanding the Needs of ISV Member Schools

Many schools commented on the lack of timeliness of the PTT process; in some cases where the application required additional information, schools/applicants were

not made aware of this until 4 weeks after lodgement. Obtaining a statement of results from a tertiary institution is very time consuming- there should be a streamlined process developed.

The need for a teacher is an immediate need and PTT should be a timely process instead of the current 4 – 6 weeks or even 8 weeks. The timeliness for granting of both PTT and provisional registration is causing significant issues for a number of schools who are keen to have a teacher in place for their students. An application made last November has still not been granted for a 4th year student for one school. Schools appear to have to communicate a number of times with the Institute before getting help. Many applications for PTT arise late in the year, exacerbating the timing. Several schools observed that the Institute does not appreciate the school year – a PTT grant to August or October is not useful and need to be in terms of a school year.

It was reported that the WA registration body will give an immediate grant of PTT provided the documentation is lodged within a week, and the Principals are puzzled why The Institute cannot deliver the same response time.

The cost (time and money) of a PTT application is significant

It is not efficient in time or cost for schools to advertise when they know from recent previous advertisements that there is no suitably qualified person. The current requirements for advertising to seek a qualified teacher for a role before PTT may be applied for, is unrealistic in the current situation of a serious teacher shortage situation, especially in special and special assistance schools.

Justifying each individual unsuccessful applicant is also time consuming and this process should be streamlined to be an overview and principals trusted more as co-regulators. The detail required currently is onerous and delays the process- a summary should be sufficient. Principals commented that it's as if the school is not trusted. The Institute should understand that no principal wants a poorly performing teacher in their school.

The length of time of a PTT grant is unsuitable and insufficient for the teacher to undertake the ITE studies required.

Schools have mentioned the lack of an appeals process when the Institute fails to grant PTT and would value the opportunity to explain why this person is best for the role.

The maximum time fraction of PTT granted whilst the teacher is moving towards full registration is 0.6 EFT, yet this is not financially viable for the teacher. Schools are currently having to find a 0.4 educational support role for them to enable them to survive financially. The PTT teacher should be permitted to manage their own work/study load or if a load must be prescribed, one of 0.8EFT appears more reasonable.

An anomaly of the current system is that where a person does not have registration they cannot even teach under the supervision of another registered teacher, yet

someone who does not have their expertise, such as a student teacher, can. This is not in the best interest of students.

PTT is currently not renewable, and a totally fresh application needs to be made with all the attendant requirements. The initial grant of 3 years is insufficient time for the teacher to complete their studies and should be renewable for this period. Member schools have also reported cases where a second grant of PTT was not granted but not explained. Where a second grant of PTT is dependent on satisfactory progress in their M Teach, allowances should be made for life events such as maternity leave/divorce/domestic violence etc.

PTT should be able to be granted across schools or at least across a group of schools – this would enable schools to share teachers in situations of extreme teacher shortage. A number of schools would like PTT to be able to be shared across a group of schools and/or be transferrable.

For large schools, a principal's delegate such as Head of Campus should be able to sign off for a PTT request.

PTT and Overseas Trained Teachers

The registration/PTT for overseas trained teachers is a major issue – PTT needs to be available for those teachers, whose preservice education does not meet the equivalence requirements but where their experience and professional practice and appraisals indicate competency. Consideration should be given to counting their experience as the equivalence of the 45 days of supervised practicum. There really should be a pathway for a highly experienced teacher to become fully registered by some program of professional learning and mentoring/school experience:

- Schools again raised the issue of registration of overseas trained teachers, especially the UK where only the teacher's ITE was considered as opposed to her 20 years of excellent practice.
- This example was also raised in detail by another school who were very keen to employ a UK teacher with a GSDE qualification. The staff member was eventually granted 6 months PTT and has proven herself to be an exceptional teacher but the requirements she faces to become fully registered in Victoria are considered unreasonable by the school and teacher.
- Another example was of a USA senior teacher who the Institute advised to undertake an M Teach; the school considered her a highly accomplished teacher and see the requirement as superfluous, unnecessary and very expensive.

PTT should be able to be granted from overseas:

- Schools cannot bring the person here without the certainty that they will be granted PTT.

- There also appears to be a lack of consistency re individual cases of PTT from overseas
- Overseas teachers who are fully qualified within their own jurisdiction, such as GSE Qualified UK teachers, should be eligible to be given PTT for a longer period (as opposed to the six months only that appears to be the current experience).

Schools also questioned why an overseas graduate who has undertaken a post graduate education course here is still required to undertake an IELTS assessment.

Schools with Unique Circumstances, including Faith-based and Special/Special Assistance Schools

Islamic members have told us of their significant need to recruit overseas teachers with one school having 30-40% of their staff overseas trained. Another told us they currently have 3-4 staff sitting in their staffroom waiting for PTT; this school was told the Institute has a huge backlog so they will have to wait.

The grant of PTT is of particular concern in our Jewish Member schools with the increase in antisemitism. Consequently, Jewish schools need to recruit teachers with certain attributes, including cultural sensitivities and faith. The difficulties associated with the recruitment of overseas-trained teachers are of serious concern in the Jewish schools.

Special and Special Assistance Schools face particular challenges in recruiting teachers with the skills their students need. They usually have significant challenges in recruiting staff when no teacher shortage exists, but this is exacerbated in the current teacher shortage. They are particularly affected by the delays in granting PTT. The impact on students in these settings of not having the best possible teacher (with the PTT delays) is considerable.

The inability for those who have been granted PTT to have it extended or renewed is a special challenge for these schools, especially where they are considered fully qualified in another country (UK).

ISV now has a Member School operating an online school across state boundaries, with staff living in different states, yet the school is registered in Victoria. Apparently, this requires all the staff to be registered in Victoria yet they cannot be registered as they live in other states. Mutual recognition should be developed to assist with this.

Special Cases of PTT

The issue of specialist teachers for primary schools has again been raised with one of our Member Schools keen to employ a specialist Art teacher who is currently undertaking her ITE final year. Whilst she meets the requirements for PTT, it was not granted, presumably because she was not a generalist teacher. The school has sought reasons for the refusal but has yet to receive a reply.

Specialist areas such as trades e.g. food technology are a considerable issue:

- chefs have been given 1 year PTT and trained by their school yet the PTT was not able to be renewed and the school only notified in February.
- In a second instance another chef was given PTT until October – what were the students meant to do until the end of the school year? There does not appear to be an understanding of the school year and the impact on students.
- A trade person was teaching VET to senior secondary students and so is eligible for PTT VET but not if they are teaching middle secondary students – PTT VET should be appropriate for all trade subjects provided they maintain their trade and undertake professional learning.

Currently the Institute considers a grant of PTT registration as a stepping stone for the teacher to become fully qualified for registration in Victoria. There are some areas in which an ongoing grant of PTT, such as for Religious Education and LOTE, might be considered.

- This is particularly relevant for RE teachers as there is only one ITE course which teaches an RE method and this is only for Roman Catholics.
- There are also situations where the religious leader does not have a degree despite many years of religious study and cannot undertake a post graduate ITE course.
- They may also not have recognised methods for such study.
- There is also the anomaly of a school chaplain who does not teach and thus does not require registration (but must have a WWCC) but one who takes Religious Education classes who does require registration.
- Some schools have made the decision to run 'discussions groups' rather than classes to avoid the requirement for the religious leader to have teacher registration.
- Where a religious leader enrolls in an ITE course, if they do not have a degree, despite many years of study, they are required to undertake a full undergraduate course.
- All the major religions have been teaching their religion for thousands of years and feel that the requirement for registration is unnecessary, especially as it is not a part of the Australian Curriculum nor is it considered by the VRQA in their assessment of a school's registration.

Languages:

- For some languages, such as Arabic, Turkish, Yiddish and Hebrew, there is no recognised teaching method for their ITE qualification. Consequently, they are required to do their training in other fields with the outcome that they are often lost to the LOTE teaching.
- Many PTT LOTE teachers will never pass an IELTS assessment, but they are teaching in a full immersion program and should not be required to meet this benchmark. Similarly for fully qualified, except for IELTS, LOTE teachers.

Other issues which ISV would like to raise with the Institute (although not in the scope of this review):

There appears to be a lack of appropriate part time ITE courses.

In the current teacher shortage and the unavailability of casual relief teachers (CRT), it might be worth considering some changes to the registration requirements for teachers who have retired in the past 10 or so years:

- Currently to maintain one's registration a teacher needs to undertake at least 20 days of teaching practice (or equivalent) each year or 100 days within the past 5 years. Teachers who are long standing former staff of a school who have not maintained this currency would, in our professional experience still be brilliant CRTs in their former school in the current teacher shortage and maybe PTT is more appropriate than a return to registration pathway.
- In addition, at least one school has experienced a significant delay in reactivating a teacher's registration, which is marked as inactive on the register. In this teacher shortage, some staff who have retired recently have come out of retirement to assist but the timeliness of obtaining registration (having previously resigned) has been poor (4 – 6 weeks once all documentation has been provided).

Where teachers are returning to teaching after a significant gap but have had extensive experience in Australia, it appears unnecessary for them to retake an English language test as is being currently required. This is not required in other states (e.g. Qld):

- One teacher in this situation has applied for registration in Qld and then will use mutual recognition for registration in Victoria.
- Another school has raised a situation where a staff member who is highly qualified but has failed the English language test three times, even though she has an Australian Masters degree. They believe this person's functional English is sufficient as a teacher.

Other states appear to be still registering teachers with a post graduate certificate or diploma in teaching which Victoria will not register. This should be reconsidered in light of the current significant teacher shortage.

Re-registration of teachers who had let their registration lapse is a big issue – the timeliness of the process and the detail required is a disincentive. It is also an insult to put such teacher on probationary registration (where they have been out for > 5 years).

In the current teacher shortage, the Institute should reconsider accrediting a one year post graduate preservice education course which many current practising teachers hold. This would encourage more to undertake post graduate pre-service education studies as it is time and cost effective.

The Institute might also consider some flexibility with respect to early childhood trained teachers whose training was for children from 0 – 8 years of age. Where

these teachers have undertaken some of their supervised practicum in a primary school, the Institute might consider enabling them to teach Years Prep – 2. In an ideal world Early Childhood teachers would be granted registration to teach up to Years 1 or 2 but if not, a grant of PTT for three years with a provisional to full process should enable them to receive full registration without additional or minimal study.

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