

**REVIEW OF THE VICTORIAN INSTITUTE OF TEACHING'S  
PERMISSION TO TEACH POLICY AND PROCESSES**

**21 March 2025**

**Organisation:** Independent Education Union Victoria Tasmania

**Principal contact:** Kylie Busk

**Position:** Deputy General Secretary

**Phone:** 0408 899 544

**Email address:** [kbusk@ieuvictas.org.au](mailto:kbusk@ieuvictas.org.au)

**Address:** 120 Clarendon Street  
South Melbourne Vic 3205

**Submitted to:** Victorian Institute of Teaching

## Introductory Comments

The Independent Education Union Victoria Tasmania Branch (IEU) appreciates this opportunity to make a submission in relation to the Victorian Institute of Teaching (VIT) review of policy and process for Permission to Teach (PTT).

The IEU was created in 1994 through the amalgamation of associations representing staff in independent schools, Catholic schools and English Language Colleges in Victoria and Tasmania. We represent all staff who work in non-government education, and we have over 20,000 members across Victoria and Tasmania who we represent and dedicate our efforts to achieving the best outcomes for in the workplace.

The IEU is a key stakeholder on behalf of members in all issues impacting education provision and education workers. IEU members understand that their work within the Victorian education system is critical to the future of the State, playing an important role in supporting young people to gain the skills and knowledge they need to fully contribute to their communities, economic future and to lead their best lives.

This submission comes during a time of significant workload shortage and where there is increased demand for the use of PTT as a result. Our focus emphasizes the educational challenges faced, particularly within non-government schools, and acknowledges the vital roles played by teachers and PTT educators in meeting the demands in schools whilst also maintaining robust professional registration standards.

Effective policy and process in relation to PTT depends upon governments, statutory bodies and employers working consistently and transparently. This requires consultation with all stakeholders including educators and their union representation. We acknowledge the work of the VIT in ensuring this consultation with the IEU on behalf of members.

## Written submission on relevant elements

	Question	Response
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>The IEU has concerns that the current PTT policy is not fit for purpose.</p> <ul style="list-style-type: none"> <li>No we do not believe that the categories of PTT are as clear or appropriate as they need to be</li> <li>Yes we believe there are opportunities to consolidate categories of PTT</li> <li>Yes clarity, readability and accessibility continue to be a problem</li> </ul>
1(iv, v)	<p>To what extent do you consider the Institute could improve its consistency of assessments of applications for PTT?</p> <p>Are there are an example(s) that you are aware of where consistency of decision making has been an identified issue.</p>	<p>The IEU has concerns about the consistency of assessments of applications of PTT. A particular area of concern is whether there is a demonstrated proven teacher workforce shortage prior to commencing an application for PTT.</p>
1(iv, v)	<p>To what extent are conditions on Permission to Teach understood?</p> <p>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>We have concerns about the extend to which conditions on PTT are understood.</p> <p>At a school level we are concerned that many decision makers are often operating without the required information to be compliant with grant conditions which results in 'out of scope' practice.</p> <p>There seems to be a general lack of understanding about the requirement to progress to teacher registration especially in the area of PTT (VET) and PTT (General) related to a subject areas such as a religious study area.</p> <p>There seems in many cases to be an alarming lack of adequate supervision and mentoring from the employer and a lack of clarity about what an appropriate and consistent standard is in relation to this.</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</p>	<p>While it's not entirely clear to us the current breath of communications that occur our general experience is that there is always opportunity for review and enhanced practice and find ways to communicate more clearly.</p> <ul style="list-style-type: none"> <li>In relation to conditions there seems to be a lack of understanding of conditions such as</li> </ul>

	provide them with clear information on <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>	limitations on access to renewal for those holding a grant of PTT and their employer. The most common example of this that we see at the IEU is where PTT (VET) have initial grant and an extension but during that period have not undertaken ITE to be eligible to full registration <ul style="list-style-type: none"> <li>In the case of unsuccessful applicants and their employers, yes anything that provides more detail on why their application was unsuccessful; and what they would need to do order to be eligible for a grant of PTT would be useful</li> </ul>
--	---	---

**Please provide a summary** (of no more than 500 words for your responses to the above questions)

The IEU membership includes Principals and school leaders who are increasingly looking to use PTT educators to fill genuine workforce gaps with some regional secondary settings experiencing up to 100 hours of timetabled time per week without an available teacher. They raise with us concerns about how grants of PTT are determined as their experiences are often variable despite circumstance which on the surface would appear similar.

The IEU has been concerned about PTT educators being used in settings where it is our view that it would be highly unlikely that a genuine workforce shortage would exist eg. a high fee, higher than average salary, inner metro suburban independent school with PTT (General) for English subject area. This leads to concerns about whether evidence to support that teacher workforce shortage is being adequately sought.

As previously raised with the VIT the IEU has significant concerns about how supervision and mentoring are undertaken. There seems to be a lack of consistency and clear standards in relation to how these occur. When our members in schools are already faced with very demanding workload pressures, often exacerbated by staff shortage it is too easy for inadequate arrangements to occur which has the potential to significantly erodes the professional standards and present an unreasonable risk within school settings.

Although outside of the scope of feedback requested the IEU also wishes to raised concerns about schools that have multiple PTT educators at one time and how this impacts the environment that other registered teachers are undertake their practice. It is our view that there should be some limit in relation to the number of PTT educators who can work within a particular setting, or to put it another way a significant high percentage of fully registered teachers should be required.

We wish the VIT well in its consideration of these important matters and the development of recommendations to relating to PTT policy and process. We look forward to further engagement with the Institute on behalf of IEU members.