

# Permission To Teach Policy Review

Submission by Islamic Schools Association of Australia (Victoria)



This submission is in response to an invitation to provide written submissions in relation to a review of the Permission To Teach (PTT) policy being conducted by the Victorian Institute of Teaching (VIT) in 2025.

This submission is being made by the Islamic Schools Association of Australia – Victoria Branch (ISAAV). ISAAV advocates and represents the interests and needs of Islamic schools in Victoria. Islamic schools are a significant sector in Victoria, with over 17 schools and 29 campuses. From these schools, the following schools are part of this submission (including several multi-campus schools):

1. Al Iman College
2. Al Siraat College (2 campuses)
3. Al Taqwa College
4. Australian International Academy (4 campuses)
5. Australian Islamic Centre College
6. Darul Ulum College of Australia (2 campuses)
7. East Preston Islamic College
8. Fitra Community School
9. Ilim College (5 campuses)
10. Islamic College of Sport (3 campuses)
11. Minaret College (3 campuses)
12. Muhammadiyah Australia College

## CHALLENGES ARISING FROM THE CURRENT PTT POLICY

We are currently experiencing the following challenges resulting from the implementation of the current VIT PTT Policy:

1. Application of the policy in relation to educators.
2. In our view, a number of unreasonable grant conditions are being placed on PTT applications.
3. Insufficient recognition of schools and Principals as trusted co-regulators with VIT.

These challenges are discussed below, along with recommendations that we feel will be beneficial in the revised policy.

## RELIGIOUS EDUCATION

We contend that:

- Religious education has been taught for a long time – over thousands of years. It has its own temperament, methodology and teaching styles.

- The methodologies and style that has been used to teach religion throughout history has been effective, including school based education. Historically in Australian public schools, religion has also been taught under different names (including Scripture).
- Religious educators have generally not come from academic backgrounds, and have never been required to have academic degrees. In many religious traditions including Islam, the styles and focus of learning is very different to the secular approaches found in university based academic education.
- Religious educators come from a scholarly background, or are people who want to teach based on their love and passion for their faith. Given religious education in schools is not at a high scholarly level, the reasonable understanding and practice devoted religious people, especially those certified by religious institutions of school choice, form a solid foundation for teaching religious content.
- As schools, we do **not** want to have religious educators in front of students that are ineffective teachers.
- As co-regulators with VIT, we should be trusted and given autonomy to regulate the performance and effectiveness of our religious educators without them having to go through the onerous requirements of an academic Initial Teacher Education (ITE) program.
- Requiring religious educators to progress towards an ITE has many negative implications for schools and the teachers involved. Principals, as part of their responsibility, will ensure that relevant training and professional learning are provided to support staff in their roles, aligning with both Australian teacher code of conduct and the school's faith based mission.
- The majority of religious educators are a good cultural and values fit for the school, are devoted to their faith who want to teach and give back to the community. Requiring them to progress to an ITE has meant that many of these educators have left their school based teaching roles, as they are not interested in completing further studies. This further exacerbates the teacher shortage we are experiencing.
- The religious educators that do wish to progress to an ITE are discriminated against. Often, their scholarly and religious qualifications (even though they take many years to acquire) are not recognised by Australian universities. This means that they are required to do an additional qualification (such as Bachelor of Islamic studies) to 'tick the box' and provide the necessary pre-requisites to enrol in an ITE program. It also means that a significant amount of time and cost is needed to complete the ITE. This time is often noted and agreed with VIT, with delays resulted in grants of PTT being refused or being subject to conditions (please refer to cases mentioned in Attachment A).
- The requirement to progress to an ITE to continue to teach in a school environment can be quite demeaning for senior religious clerics and scholars, who have very high and well regarded qualifications in their field (although these are not recognised by universities).
- In most cases, religious based educators completing an ITE end up leaving the teaching the religious subjects in favour of the teaching method relevant to their ITE program. This also further exacerbates the teacher shortage of religious educators.

- To meet the requirement of having registered teachers teach religious subjects, schools are diverting teachers from their specialist subject areas to cover religion classes. This also further exacerbates the teacher shortage.
- After trying very hard to make the current policy work, some schools are now changing the nature of their religious studies subjects so that they no longer require a registered teacher undertaking the duties of a teacher. This is a real loss for these schools, having to shelve robust curriculum driven programs with (for example) discussion forum or other modes of learning as a direct result of the impact of the current PTT policy.
- Religious educators have a different style and methodology of teaching. These subjects are more 'heart' and values based, and do not require the same level of English as other subjects.
- In relation to Child Safety, schools have onerous requirements under the various Child Safety related requirements (including Ministerial Order 1389) to provide a safe teaching environment for students. These requirements apply regardless of whether an educator taking a class is a registered teacher or a non-registered educator.
- Religious education is not part of the curriculum that is audited by the school regulator in any of the states in Australia, including Victoria.
- The thoughts and approaches to religious education listed above have been understood by teaching regulators in all Australian states, which have exempted religious educators from the need to have teacher registration (excluding Victoria and South Australia).

## RELIGIOUS EDUCATION – OUR RECOMMENDATIONS

We request and recommend that:

1. Religious educators be exempt from needing to hold teacher registration. This could be facilitated through a number of means, including changing / clarifying the definition of a 'teacher' and 'educational program' in the appropriate legislative and policy documents. For example, religious education could be explicitly excluded from the definition of an 'educational program'. This will place the onus on schools to manage these teachers under their own organisational frameworks, and also simplifies matters for VIT by reducing the number of PTT applications.
2. Notwithstanding the outcome of Recommendation 1 - in any future policy that continues to require religious educators to hold teacher registration (although this is not our preferred position):
  - a. The registration category should be one that does **not** require religious educators to progress to an ITE.
  - b. The English requirement provisions in relation to religious educators should be removed completely.
3. VIT increase the trust in schools and principals. As schools and principals, we are co-regulators of the teaching profession. Allow us to play a more substantive role and maintain oversight responsibility and effectiveness of our religious educators. Trust us.

## PTT GRANT CONDITIONS

We contend that:

- VIT has recently been more stringent in applying their policy rules in relation to PTT grants. We have found that educators who have held a PTT grant for some time are being refused a renewal of their grant, or are having grant conditions placed which restrict their ability to work full time. In many cases, these grant conditions restrict an educator to a time fraction of 0.6 FTE.
- These grant conditions are an unreasonable attempt by VIT to dictate the 'work-study life' balance of PTT teachers (as the justification given is that these educators need time to complete their studies).
- These grant conditions do not take into account the reality that people need to work on a full-time basis to support their families, especially during this time in which there is a high cost of living.
- With educators finding these conditions unreasonable and leaving schools for alternate full time employment, we are depriving students of their established teachers. We note that these teachers have built their relationships with students and are teaching them effectively, all because VIT want to impose a 'work-study life' balance. The consequence of these conditions is counter-intuitive, in removing good educators from classes, further exacerbating the teacher shortage.
- It is not within the remit scope of the teacher regulator to dictate 'work-study life' balance. There are many alternative ways that educators with these grant conditions can obtain employment to earn the income they need, making these grant conditions simply ineffective in what they are trying to achieve.
- Placing grant conditions in relation to working hours creates significant complexities for the schools across recruitment and timetabling by unnecessarily introducing more part time staff.
- Further details of how schools have been impacted are explained in Attachment A. Please refer to the case studies in this attachment.

## PTT GRANT CONDITIONS - RECOMMENDATIONS

We recommend that:

1. A more understanding approach is taken to considering PTT grants.
2. A change in the requirements for religious educators to hold teacher registration will alleviate many of the issues being faced by Islamic schools in grant extension requests.
3. VIT **stop** placing grant conditions relating to FTE working hours on any PTT grant.

## PLACING TRUST IN SCHOOLS AS CO-REGULATORS

We contend that:

- The approach being taken by VIT in the matters mentioned above shows a lack of trust in schools taking responsibility in regulating the effectiveness of their teachers.
- Schools are already tasked with responsibility in relation to assigning VIT Mentors, and recommend teachers progress to 'proficient' status based on the evidence provided.

We recommend that the VIT allows schools to play a larger role (as they do with overseeing teacher progression) in overseeing PTT requirements, performance management and to regulate the effectiveness of its religious educators.

## ATTACHMENT A

Attachment A, which is a submission made to the Minister of Education detailing some of our challenges and providing case studies, is referred to in this submission and should be read as part of this submission.

## FURTHER INFORMATION

Please contact the following for further information in relation to this submission:

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