

# Victorian Institute of Teaching response to Ministerial Direction

Report 2 – Permission to Teach



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# Executive summary

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

1. 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
2. the Institute's approach to granting permission to teach (PTT), its PTT policy and the application of that policy (**Report 2**).

Report 1 was submitted to the Minister for Education on 28 February 2025.

In this Report (Report 2), the Institute has developed a number of proposed improvements to its PTT policy and processes that it considers proportionate to identified areas of need and maintains consistent expectations that schools should prioritise employing qualified and registered teachers wherever possible.

The Institute benefited from consultation with key stakeholders and other Australian Teacher Regulatory Authorities (TRAs). We also surveyed PTT holders. The recommendations address many of the [challenges identified by stakeholders](#). The full record of input and consultation can be found in [Appendix 1](#).

The Institute understands the importance of ensuring its policies and processes are fit for purpose, proportionate and responsive to the needs of the education system. The Institute also recognises the Victorian education system is facing challenges in relation to continued teacher workforce shortages and seeks to be an enabler for the teaching workforce through the operation of its PTT policy.

The recommendations in response to the Terms of Reference support the following:

- a more fit-for-purpose, flexible and streamlined policy position and approach (**Recommendations 1-8, TOR i-v**)
- reduced complexity for stakeholders (**Recommendations 1-8, TOR i-v**)
- clearer and more accessible communications and advice to PTT holders and their employers (**Recommendations 5, 6 & 8, TOR vi**)
- reduced regulatory burden on PTT applicants and their employers where feasible (**Recommendations 2, 6 & 7, TOR i-v**)
- a greater emphasis on a co-regulatory approach with employers, that is targeted and proportionate (**Recommendation 3, TOR i-v**)
- greater clarity on the conditions applied to each category of PTT (**Recommendation 6, TOR v**)

The recommendations, if supported, will require the Institute to undertake further targeted consultation to redesign its approach to PTT, to reduce complexity and improve flexibility and better support the needs of schools. Some of the recommendations can be implemented within existing resources, in the short term, while others may require legislative amendment(s) and additional and ongoing resourcing. This is detailed in Appendix 3.

**The Institute highlights the opportunity to consolidate and simplify PTT categories as well as rename the scheme (Please note, that 'PTT' will be used throughout the report, noting that VIT recommends the name be amended).** The streamlined approach is responsive to feedback from stakeholders and will provide greater clarity to applicants and employers on the application process, eligibility requirements and standard conditions. In addition, communications with applicants and employers will be revised to improve advice and clarify expectations.

The current PTT policy has 10 categories of PTT, a proposed approach is to consolidate into the following three categories

| Category of PTT               | Intent and operation   | Previous categories incorporated / areas covered   |
|-------------------------------|--|--|
| PTT (Qualifying)              | <p>For all applicants currently undertaking or expected to undertake an Initial Teacher Education (ITE) program.</p> <p>This category will relate to applications for pre-service teachers (PSTs) enrolled in an accredited Internship ITE program and PSTs being engaged by a school due to teacher workforce shortages.</p>  | <ul style="list-style-type: none"> <li>teacher workforce shortage</li> <li>internship for accredited ITE programs</li> </ul>   |
| PTT (Specialist – Instructor) | <p>For instructors in specific subject area(s) / school contexts that have been identified as having ongoing teacher workforce shortage issues and / requires a unique set of expertise.</p> <p>This category includes the delivery of community languages / small candidature languages that have a limited number of fluent speakers, to ensure the continued delivery and maintenance of these languages.</p> | <ul style="list-style-type: none"> <li>vocational education and training (VET)</li> <li>religious instruction</li> <li>Japanese School of Melbourne</li> <li>higher education studies</li> <li>Victorian College of the Arts Secondary School</li> <li>Victorian School of Languages</li> <li>Aboriginal languages</li> <li>small candidature languages</li> </ul> |
| PTT (Conditional)*            | <p>For overseas or historically qualified teachers whose qualifications have been assessed as partially equivalent to an ITE with minor deficits that can be rectified via additional study or work.</p> <p>For Australian ITE graduates who meet the qualification requirements but do not meet other (non-suitability) related registration requirements, such as ELC or LANTITE.</p>                          | <ul style="list-style-type: none"> <li>overseas qualified teachers with minor deficits in their qualifications</li> <li>historically / other trained teachers with minor deficits in their qualifications</li> <li>overseas trained teachers that are yet to meet the English Language Competency requirements</li> </ul>  |

*\*PTT (Conditional) is the new category recommended in Report 1 to enable overseas qualified teachers who were assessed to hold qualifications / experience that were partially equivalent to an accredited Australian ITE; enabling these PTT holders to work whilst they upskill to meet the qualification standard for registration.*

This approach will 'future proof' the PTT policy and enable additional schools / subject area(s) to be added or removed from the "Specialist – Instructor" category dependent on the workforce context of the time, without having to add additional categories or revise the policy.

**PTT is a critical regulatory tool to support the teaching profession during times of workforce shortages.** As a regulator, the Institute has both an obligation and the opportunity to reconsider how we can support the contemporary teaching workforce. No one player in the education system can achieve significant reform without a system-based approach. The Institute encourages continued investment and support to develop innovative employment-based ITE programs, particularly in Primary education, to ensure that Victoria can continue to tackle teacher workforce shortages whilst training quality teachers with targeted support, mentoring and induction.

# Summary of recommendations

A summary of each recommendation, rationale and the relevant TOR that it responds to is outlined below.

The Institute considers all recommendations should be supported and that work should commence immediately. The recommendations are interrelated and dependent on in principle support for most, **Recommendations 1, 2, 3, 6 & 7 are interrelated** and, if supported, will be actioned through the design of a revised LAT policy and related processes. **Recommendations 4, 5 and 8 can be actioned independently** of the policy design.

The Institute notes that it is self-funded through teacher registration fees and has limited resourcing and financial capacity to implement some of the recommendations. The financial considerations are outlined in [Appendix 3](#).

| Recommendation   | Rationale and additional considerations  | TOR                     | Action required  |
|--|--|-------------------------|--|
| <b>1. That the Institute seek a legislative amendment to change the name of Permission to Teach (PTT).</b> | <p>The Institute recommends consideration be given to renaming PTT. A change in nomenclature may be beneficial to more accurately reflect its intent and operation. A change of name could make it more evident that this category of registration is limited in its reach and does not confer the same level of authority as registration for a fully qualified teacher.</p> <p>This change would support the Institute's design of a new approach to PTT and assist in communicating the revised requirements, intent and operation to all relevant stakeholders, particularly prospective PTT holders and employers.</p> <p>The Institute notes that a change in nomenclature would require legislative amendments. However, it considers the benefits and alignment of language to other Australian jurisdictions warrant its consideration. The Institute is liaising with the Department of Education to determine the nature and extent of any legislative amendments that may be required if this recommendation is supported.</p> | B(i)<br>B(ii)<br>B(iii) | <ul style="list-style-type: none"> <li>legislative amendments</li> <li>policy revisions</li> </ul>           |
| <b>2. That the Institute redesign its PTT Policy to streamline categories, clarify eligibility</b>         | <p>The Institute recognises that the PTT policy is not fit for purpose, and it is not easily accessible due to its complexity. In addition, the high number of PTT categories leads to confusion by PTT holders and their employers regarding the</p>  | B(i)<br>B(ii)<br>B(iii) | <ul style="list-style-type: none"> <li>policy revisions</li> <li>further stakeholder consultation</li> </ul> |

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| <p><b>requirements and improve readability and accessibility.</b></p>  | <p>process for applying, the operation of PTT and the requirements for either holding / supporting a PTT holder.</p> <p>The PTT policy documentation requires a comprehensive review to ensure its readability and accessibility, and to consolidate and streamline categories of PTT.</p> <p>The revision of the policy is of high interest to stakeholders. There are varying views on how PTT should operate and when / where it should be available. In revising the policy, the Institute will need to undertake further targeted and considered consultation with key stakeholders to ensure the revised policy and proposed new categories of PTT meet the needs of the education sector.</p> <p>A proposed streamlined approach with a reduction from 10 categories to 3 (that addresses a number of common issues identified by stakeholders) has been explored within the report.</p> <p>If Recommendation 1 is supported, the Institute will continue this work with a new name.</p> <p>If Recommendation 1 is not supported, the Institute will continue this work under the current naming.</p> |   |   |
| <p><b>3. That the Institute enhance its co-regulatory approach to PTT by formalising the existing employer obligations owed to PTT holders, through:</b></p> <p><b>a. an agreement between employers / the Institute setting the requirements for employing a PTT holder</b></p> | <p>The Institute recognises that employers play a key co-regulatory role in supporting PTT holders and that many of the needs of PTT holders are better met through clear and targeted support from their employers.</p> <p>To strengthen and clarify the current requirements of employers and ensure consistency in the provision of support to PTT holders, the Institute should engage in formal agreements with employers of PTT holders.</p> <p>These agreements would provide clarity for both the employer on their obligations and the PTT holder on the level of support they should receive. A formal agreement would enable the Institute to appropriately monitor the provision of this support and take action if it is not being provided.</p>  | <p>B(i)<br/>B(ii)<br/>B(iii)<br/>B(v)<br/>B(vi)</p> | <ul style="list-style-type: none"> <li>communications review</li> <li>legislative amendments</li> </ul> |

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| <p><b>b. a legislative amendment, setting out employer obligations in relation to PTT</b></p> <p><b>c. establishing through legislative amendment, regulatory tools in relation to those obligations.</b></p> | <p>Whilst some work to strengthen agreements with employers can be undertaken within our current policies and processes, future legislative amendments would strengthen this approach.</p> <p>The Act, as it currently stands, does not adequately enable the Institute to intervene in relation to an agreement with an employer. To support this co-regulatory approach, the Institute would require legislative amendments. The Institute is liaising with the Department of Education to determine the nature and extent of any legislative amendments that may be required if this recommendation is supported.</p>   |       |   |
| <p><b>4. That the Institute review and refine internal process documentation for the assessment of PTT to support greater clarity for the Institute and applicants.</b></p>                                   | <p>Whilst the Institute does not consider there is any substantial issue with inconsistency of assessments, as each PTT application is assessed on its individual merits, an assessment may be perceived as different. There are a number of improvements that can be made to ensure consistency and to support stakeholders' understanding of the approach undertaken by the Institute.</p> <p>The revised PTT policy will provide further clarity regarding the criteria under which the Institute undertakes its assessments. In addition, the Institute will review and refine its internal process documentation to guide the assessment of PTT applications by relevant officers. This will support relevant officers to undertake consistent assessments in line with the Institute's policy.</p> | B(iv) | <ul style="list-style-type: none"> <li>• process review</li> </ul>                                  |
| <p><b>5. That the Institute develop and publish thresholds for the assessment of a PTT applicant's skills and experience to teach a subject / subject area(s).</b></p>  | <p>The Institute has received feedback from stakeholders that there is uncertainty about how the Institute undertakes assessments to determine the subject area(s) an applicant can teach.</p> <p>The Institute acknowledges that the nature of these assessments is not publicly available. The Institute will develop and publish a summary of a clear threshold for the required skills / experience to teach a particular subject area(s). This will improve transparency of decision making and provide greater clarity to PTT applicants and their prospective employers.</p>  | B(v)  | <ul style="list-style-type: none"> <li>• communications review</li> <li>• process review</li> </ul> |



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| <p><b>6. That the Institute take a responsive regulatory approach by</b></p> <ul style="list-style-type: none"> <li><b>a. establishing and publishing a clear summary of standard conditions for each PTT category</b></li> <li><b>b. enabling employers and PTT holders (rather than the Institute) to determine an appropriate time fraction for employment</b></li> <li><b>c. granting PTT for lengths reflective of the school year and where relevant, in line with the PTT holder's expected progression towards teacher registration.</b></li> </ul> | <p>The Institute recognises that as conditions vary depending on the category of PTT or the individual circumstances of the applicant, this may lead to some confusion amongst stakeholders.</p> <p>As part of the revision of the policy, developing a clear published summary of standard conditions for each category of PTT would be beneficial.</p> <p>Stakeholder feedback regarding the Institute imposing restrictions on the time fraction that a PTT holder can work has been varied. A recent survey of PTT holders indicated that 40% were required to find another non-teaching job to maintain financial stability due to time restrictions on their PTT grant.</p> <p>The Institute considers it best to discontinue the use of this condition and to leave this decision to the employer and the PTT holder. Workload discussions are best placed with the employer rather than the regulator.</p> <p>If Recommendation 3 were supported, stakeholder concerns regarding potential burn-out and the risk of some schools taking advantage of PTT holders would be mitigated by the development of a clear plan of support from the employing school.</p> <p>The Institute has received feedback that shorter lengths of grants of PTT have caused challenges in schools due to ongoing uncertainty about the ability of the PTT holder to continue working and the grants not reflecting the realities of the school year.</p> <p>The Institute acknowledges these challenges and so to ensure greater certainty for schools / PTT holders, it proposes to apply a grant that is generally reflective of the school year and / or in-line with their expected ITE graduation date (not exceeding 3 years).</p> <p>This approach would be dependent on proposed legislative amendments that are currently under consideration that would require PTT holders to renew their registration annually alongside all registered teachers. If this amendment is</p> | <p>B(v)<br/>B(vi)</p> | <ul style="list-style-type: none"> <li>• communications review</li> </ul> |
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|  | made, the Institute can monitor compliance with conditions during annual renewal in September and take action where the person has been unable to demonstrate compliance with any relevant conditions.  |  |  |
| <b>7. That the Institute</b><br><b>a. not require religious instructors to progress towards teacher registration (where appropriate)</b><br><b>b. undertake further consultation to determine circumstances when religious instructors would be required to progress towards teacher registration (e.g. as part of VCE).</b> | <p>The Institute recognises the unique role of religious leaders delivering religious instruction in schools and that progression towards teacher registration poses a barrier to the authentic delivery of religious instruction in some schools.</p> <p>It is recommended that the Institute explore, in its revision of the PTT policy, the inclusion of religious instruction in the category of PTT (Specialised - Instructor), which would require all religious instructors in schools to hold PTT, but not require them to progress towards teacher registration.</p>   | B(i)<br>B(ii)<br>B(iii)<br>B(i)<br>B(ii)<br>B(iii) | <ul style="list-style-type: none"> <li>• policy revisions</li> <li>• further stakeholder consultation</li> </ul> |
| <b>8. That the Institute refine and improve its communications with successful / unsuccessful applicants and their employers.</b>  | <p>The Institute acknowledges that the complexity of the current PTT policy and the high number of categories can lead to confusion.</p> <p>The Institute considers some improvements could be made to existing communications with applicants and their employers to:</p> <ul style="list-style-type: none"> <li>• improve clarity on the specific conditions that apply to a successful applicant</li> <li>• improve clarity on the exact duties that a PTT holder can undertake</li> <li>• improve clarity on the obligations of an employer of PTT</li> <li>• better articulate why an applicant was unsuccessful.</li> </ul> | B(v)<br>B(vi)                                      | <ul style="list-style-type: none"> <li>• communications review</li> </ul>  |

## Systemic impact of recommendations arising from Report 1 and Report 2

The recommendations, if implemented, from Report 1 and Report 2 are anticipated to have the following potential impact

- a small **increase in the number of overseas qualified teachers gaining registration** in Victoria due to a more flexible approach to assess equivalency of ITE programs (noting that the Institute's refusal rate is currently 3%)
- **greater certainty for overseas teachers and employers** when looking to relocate to Victoria to teach, with the potential to make Victoria a more attractive destination jurisdiction
- **reduced regulatory burden** on employers in relation to PTT arising from the following
  - reduced need to continue to reapply for PTT due to increased length of grants
  - reduced requirement to readvertise for positions and demonstrate teacher workforce shortage due to increased lengths of grants of PTT, noting that teacher workforce shortage must still be established
  - increased flexibility in the time-fraction that PTT holders can work
- **increased certainty of employment** for PTT holders and their employers due to increased lengths of grants
  - **increased co-regulatory approach** provides **greater flexibility and autonomy** for employers and LAT holders to determine their work / study loads
- **improved mentoring, support and induction** for overseas qualified teachers and PTT holders may
  - support a more positive experience for the teachers
  - reduce potential burn-out for PSTs
  - ensure students have teachers who are appropriately inducted into the Victorian classroom context
  - support retention within the teaching profession
- improved customer service experience for applicants and employers
- a flexible and future proof policy position that will enable the Institute to be responsive to the needs of the profession of the time.

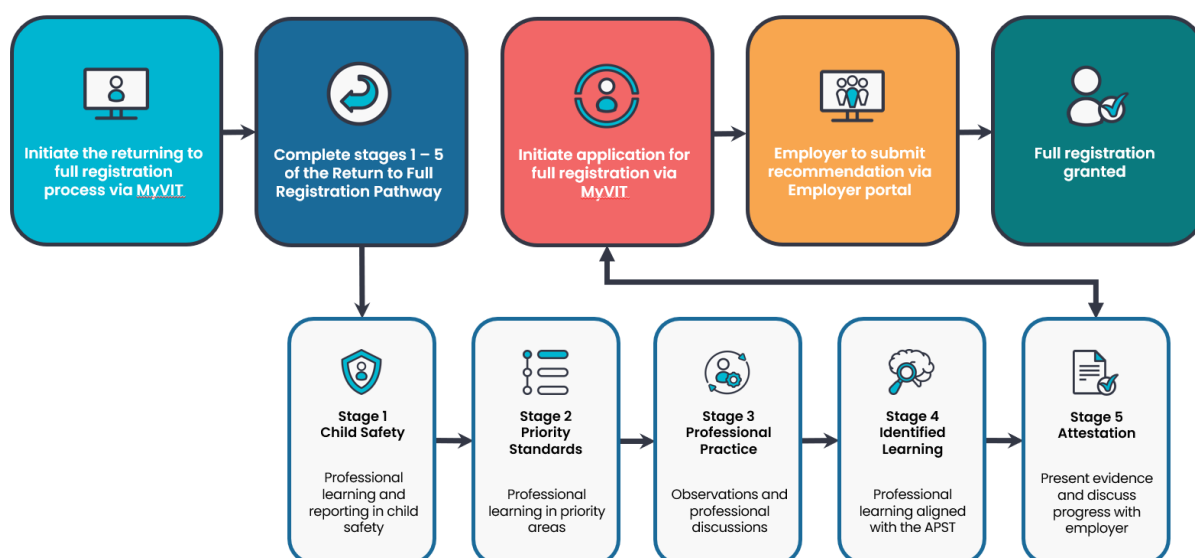
It is not anticipated that the proposed changes to PTT will see any substantial increase in the number of PTT holders as the numbers are inherently dependent on workforce shortages. The changes to PTT will enable schools to have greater flexibility and certainty in continuity of employment of a PTT holder.

## Other initiatives to support teacher workforce shortages

### Returning to full registration project

On 1 December 2023, VIT received funding from the Department of Education to establish a new Returning to Full registration pathway.

The Institute is committed to being a responsive regulator and meeting the needs of the profession. The Institute has received feedback that the use of the provisional to full registration process does not fairly recognise teachers with previous significant teaching experience. This new registration pathway will recognise the value of substantial previous teaching experience in Australia by improving and streamlining the process for experienced returning teachers to regain full registration.



### Employment-based ITE programs

The Institute has been working collaboratively with the Victorian Department of Education and Victorian Initial Teacher Education (ITE) providers to develop and deliver innovative and employment-based ITE programs. These employment-based programs allow pre-service teachers (PSTs) to *earn while they learn* and undertake all or part of their professional experience while employed under a PTT grant.

With increasing pressure on the education system due to teacher workforce shortages, there has been an increase in the use of PTT.

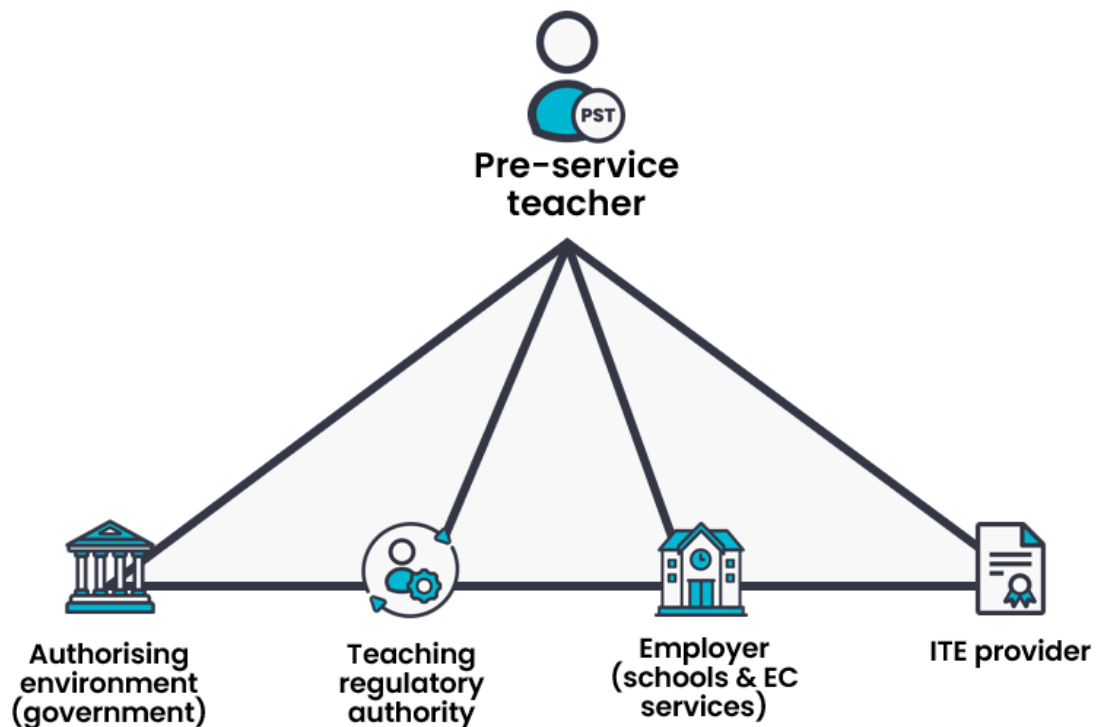
With the ever-increasing cost of living, employment-based ITE programs can support the next generation of teachers to undertake their studies and join the teaching profession without the significant pressures of undertaking full-time study without an income.

There are now 12 employment-based ITE programs in Victoria. This is a direct result of the collaborative work of the Victorian education sector, the innovation and design work of ITE providers, the funding from the Victorian and Federal Government and the regulatory work of VIT.

Whilst the first iterations of employment-based programs in Victoria were targeted towards post-graduate secondary programs, VIT has been supporting the implementation of employment-based streams into primary programs and undergraduate programs.

The Institute considers the continued development of employment-based ITE programs to be the preferable option to provide a long-term solution for teacher workforce shortages, whilst maintaining quality and ensuring adequate support and mentoring for PSTs. The development of employment-based ITE programs in Primary education is of particular importance as this is the second highest cohort of current PTT (General) holders.

In an employment-based ITE program, PSTs benefit from the use of PTT being integrated within their program and having a system of support behind them, including from the government if funding is received, the Institute, their employer and the ITE provider.



## Addressing identified challenges / feedback from stakeholders

The recommendations have been developed based on significant stakeholder feedback. A summary of the challenges facing stakeholders are summarised below along with how the proposed revisions will address these challenges.

| Issues raised by stakeholders   | Stakeholders  | Resolution   |
|---|---|--|
| Complexity of PTT policy  | Most  | Revision of PTT policy and process and reduction of categories from 10 to 3  |
| PTT process and requirements unclear  | Most  | Revised policy, advice and communications  |
| Requirement for religious instructors to complete an ITE program during their PTT grant | Faith-based schools<br>Independent Schools<br>Victoria (ISV)              | Potential development of new PTT (Specialist-instructor) category that would not require the completion of an ITE program for religious instructors  |
| Restriction of PTT grant to time-fraction for employment                                | ISV<br>Faith-based schools<br>Regional / remote and hard to staff schools | Restriction removed.<br>Alleviates need for many PTT holders to gain second jobs in order to meet cost of living pressures.  |
| Length of grants being too short and / or not reflective of the school year             | Most  | Grants of PTT to reflect the realities of the school year and, where relevant, in-line with expected ITE graduation date   |
| A need for greater emphasis on co-regulation with employing schools                     | ISV<br>Faith-based schools<br>Bilingual schools                           | Development of Agreement between the Institute and schools.  |
| Overseas qualifications with minor deficits not being accepted for registration         | Faith-based schools<br>ISV<br>Bilingual schools                           | More flexible approach to the assessment of overseas qualification(s) as highlighted in Report 1.<br>Development of new flexible category of PTT (Conditional) to enable overseas qualified teachers with minor deficits in their qualifications to upskill and meet requirements for registration |
| The need for greater flexibility with English Language Competency (ELC) requirements    | Faith-based schools<br>ISV<br>Bilingual schools                           | Provision for exemptions / flexibility in requirements for English Language Competency requirements where appropriate.<br>Clarifying policy position that an alternate ELC standard applies for PTT to teach, or to teach in, a language other than English.                                       |

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| Consistency of assessments   | Most  | Improved process documentation and training for VIT officers  |
| Unclear communications   | Most  | Revision of all communications with applicants and employers  |
| Customer service / inconsistent advice                             | Most  | Improved process documentation and training for VIT officers  |
| Improved mentoring and support for PTT / holders                   | All   | Development of Agreement between the Institute and schools to articulate clear plan of support and increased monitoring and compliance activities   |
| Managing expectation that qualified teachers are preferred         | Independent Education Union<br>Australian Education Union | Consistent policy intent that schools should prioritise employing qualified and registered teachers wherever possible. Requirement to demonstrate teacher workforce shortages to employ a PTT holder with some reasonable exceptions. |
| The need for reduced regulatory burden on schools / PTT applicants | Most  | Greater emphasis on co-regulatory approach.<br><br>Increased lengths of grants of PTT   |

## Considerations and background

The Institute has a legislated requirement to consider the safety and wellbeing of children and young people, including taking into account community expectations and to have regard to raising the quality of teaching.

The intent of PTT is primarily to support schools where they have been unable to source a suitably qualified and registered teacher or for pre-service teachers undertaking an employment-based ITE program.

Whilst the Institute seeks to support the Victorian education sector during times of teacher workforce shortage, it must also consider the impact of having unqualified persons teaching Victorian students, particularly where a school may have a significant number of PTT holders and / or recent graduates.

In addition, there have been concerns raised by stakeholders about the potential of some employers to take advantage of using PTT holders as they are paid at a lower rate than teachers. In addition, the prospect of future employment for PTT holders may put them at risk of agreeing to employment arrangements that may not be in their best interests for completing their teaching degree.

As a regulator, the Institute has both an obligation and the opportunity to reconsider how we can support the contemporary teaching workforce. No one player in the education system can achieve significant reform without a system-based approach. Continued investment and support to develop innovative employment-based ITE programs will ensure that Victoria can continue to tackle teacher workforce shortages whilst training quality teachers with targeted support, mentoring and induction.

### **Early childhood PTT registration – Opportunity for further exploration**

Under the Education and Training Reform Act 2005 (the Act), PTT cannot be granted to Early Childhood Teachers (ECTs). An alternative approach is provided in Division 15A, whereby a temporary approval from the Secretary can be granted for a pre-service ITE student to lead a kindergarten program, under limited circumstances and with specific conditions.

Whilst outside the Terms of Reference of this review, the issue of whether legislative amendments should be made to incorporate ECTs into the current PTT arrangements was raised by some key stakeholders including the Australian Education Union. This would require legislative change, and the feedback has been provided to the Department of Education.

It is noted that the government has announced the establishment of a new regulator and registration arrangements for all staff working within early childhood settings. The VIT will work with the independent early childhood regulator to support a consistent and streamlined approach to the regulation of pre-service ITE students and their smooth progression to registration as early childhood teachers, undertaken by VIT.



## Section 1: Current legislative and policy framework

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 Institute.

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 as a teacher to undertake the duties of a teacher in a limited capacity based on their skills and experience.

### **2.6.14 Permission to teach**

1. The Institute may grant an applicant permission to teach if—
  - a. the applicant has the appropriate skills and experience to teach and satisfies the requirements of section 2.6.8(a)(ii); and
  - b. there are no grounds under section 2.6.9(1A) or (2) under which the Institute must or may refuse to grant registration to the applicant; and
  - c. the applicant has provided any information or material required under section 2.6.13; and
  - d. the applicant has paid the fee fixed by the Minister.
2. The Institute may impose any condition, limitation or restriction it thinks appropriate on the permission to teach including—
  - a. the period for which the permission remains in force, which may not exceed 3 years from the date of the grant of the permission;
  - b. any subject that the person is permitted to teach;
  - c. the school where the person is permitted to be employed or engaged at and teach;
  - d. that the teacher provide information about criminal records within the period specified by the Institute.
3. The Institute may, on application by a person granted permission to teach, amend, vary or revoke any condition, limitation or restriction imposed under subsection (2).
4. The Institute may, from time to time, conduct a State police record check on a person granted permission to teach during the period that the permission to teach remains in force.
5. Permission to teach does not permit a person to be employed by or engaged in an early childhood service as an early childhood teacher.

## 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.   |

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|--------------------------------|---|
| 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). |

### Eligibility requirements

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

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

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

The specific eligibility requirements vary depending on the category of PTT, a summary of these can be found in [Table 1](#).

### Conditions and exemptions

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.

The standard conditions are outlined in [Table 1](#) for each category of registration.

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.

The Institute considers the individual circumstances of an applicant when considering any conditions. An example is provided below.

## Case study 1

Applicant A sought PTT (General) for an Islamic school.

The applicant was booked in to undertake an English Language Competency (ELC) test on 28 January 2025 but would not receive results prior to the commencement of term 1.

A temporary exemption was granted to the ELC requirement until evidence could be provided since the applicant has undertaken higher education study in English.

The applicant does not have an approved criminal record check from Palestine, however due to the ongoing war applying for a check is not possible.

In lieu of a check, the applicant provided a correctly witnessed statutory declaration confirming that during their residence in Palestine they were not charged nor convicted of any criminal offences.

### Approach to determining subject area(s) that a PTT holder can teach

The Institute undertakes an assessment of an applicant's skills and experience to determine if they are suitably qualified to teach a particular subject area.

The assessment for a secondary school applicant generally considers the following

- if enrolled in an ITE program, the secondary teaching areas they are currently studying OR
- if an overseas trained teacher, the subject(s) they taught overseas OR
- their academic background, generally a major study in the relevant curriculum area (e.g. 6 units in History in their Bachelor of Arts) OR
- other relevant skills and experience, for example:
  - fluent language speaker for an applicant seeking to teach that language
  - a Rabbi seeking to teach Jewish studies
  - an apprenticeship / work experience in a VET related subject

The assessment for a primary school applicant generally considers the following

- if enrolled in an ITE program, whether they have had exposure to most key learning areas

### Timing for assessment of applications

The Institute advises that an application for PTT may take 4–6 weeks for assessment and decision, noting it may take longer if additional documentation / information is required.

In 2024, a PTT application took on average 21.9 days for decision, with 89% approved within 6 weeks, 71% approved within 4 weeks, and 44% approved within 2 weeks.

An application may take longer for decision / approval if the applicant is sourcing documentation to support their application, such as overseas criminal record checks, identification documents, academic transcripts or evidence of English language proficiency.

**Table 1: Current eligibility requirements and standard conditions on PTT**

| PTT categories                      | Eligibility requirements                  |   |   |                             |                    | Standard conditions                   |                       |                               |   |
|-------------------------------------|---|---|---|-----------------------------|--------------------|---------------------------------------|-----------------------|-------------------------------|---|
|                                     | Skills and experience – content knowledge | Skills and experience – teaching skills | Skills and experience – VET RTO standards | English language competence | Workforce shortage | Progress towards teacher registration | Professional learning | Limited to specific school(s) | Limited to specific subject / subject area(s) |
| General                             | Yes                                       | Yes                                     | No  | Yes                         | Yes                | Yes                                   | Yes                   | Yes                           | Yes   |
| General – VSL / community languages | Yes                                       | Yes                                     | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |
| General – Deemed                    | No  | No                                      | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |
| General – Religious Education       | Yes                                       | Yes                                     | No  | Yes                         | No                 | Yes                                   | Yes                   | Yes                           | Yes   |
| Internship                          | Yes                                       | No                                      | No  | Yes                         | No                 | Yes                                   | Yes                   | Yes                           | Yes   |
| VET                                 | Yes                                       | Yes                                     | Yes                                       | Yes                         | No                 | No                                    | Yes                   | No                            | Yes   |
| Exchange                            | No  | No                                      | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |
| JSM                                 | No  | No                                      | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |
| VCASS                               | Yes                                       | Yes                                     | No  | Yes                         | Yes                | No                                    | Yes                   | Yes                           | Yes   |
| Teacher Tutor                       | No  | Yes                                     | No  | No                          | No                 | No                                    | Yes                   | No                            | Yes   |
| Aboriginal Languages                | Yes                                       | Yes (alternative)                       | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |
| HES                                 | No  | Yes                                     | No  | No                          | No                 | No                                    | Yes                   | Yes                           | Yes   |

## PTT data

Since 2021, there has been an increase in the number of PTT holders due to teacher workforce shortages and the growth of employment-based Internship ITE programs.

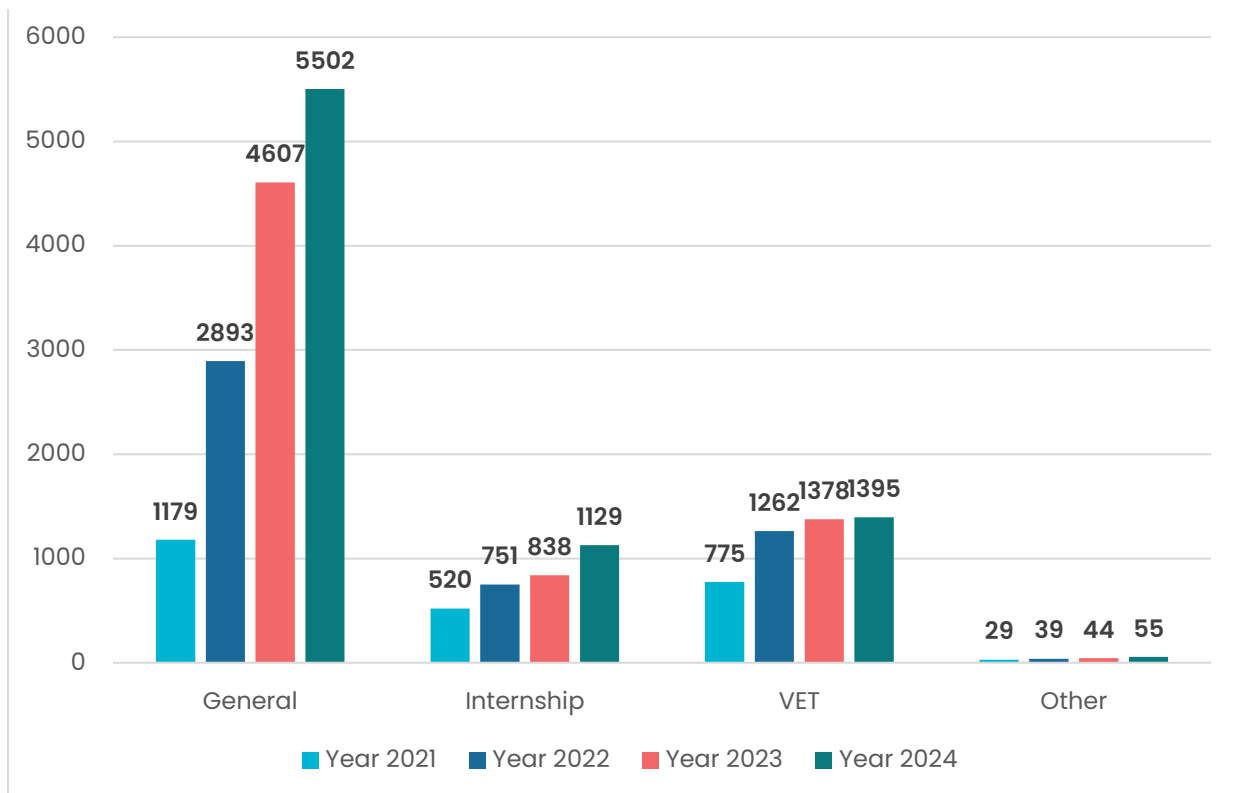
The proposed revised approach outlined in this report will streamline requirements and support a more co-regulatory approach to reduce complexity and provide greater clarity. The revised approach will support the Victorian teaching workforce during a time where PTT is being heavily relied upon, whilst also future proofing the approach for when these challenges may ease and / or change.

As demonstrated in Table 2, the percentage of all registered teachers who hold PTT has increased from 2% to 5% from 2021 to 2024.

**Table 2: Number of PTT holders 2021–2024 & percentage of all registered teachers who hold PTT**

| 2021 | 2022 | 2023 | 2024 |
|------|------|------|------|
| 2503 | 4945 | 6867 | 8081 |
| 2%   | 2%   | 5%   | 5%   |

**Figure 1: Number of PTT holders per category 2021–2024**



As seen in Figure 1, the category of PTT that has seen the most significant increase from 2021 is PTT (General). This is reflective of the current teacher workforce shortages that are facing the profession as this category caters to schools which have been unable to recruit a qualified or currently registered teacher.

The second largest growth category is PTT (Internship), this is likely to be a result of the significant investment made by the Victorian Government to fund innovative employment-based ITE programs. The Institute is pleased to see growth in PTT (Internship) as it views this approach as the most supported pathway into teaching.

For PTT (General) holders, the highest proportion per subject area(s), as of 12 March 2025 are

- LOTE (799)
- Generalist Primary (644)
- Special education (156)

### **Schools with a high proportion of PTT holders**

There are currently 13 schools with a high proportion of PTT holders (over 10% of all teachers working within the school).

Out of the 13 schools, 7 (54%) are government schools and 5 (38%) are Islamic schools. Out of the 13 schools, 10 (77%) are in metropolitan Melbourne and 3 (23%) are in regional Victoria.

The Institute monitors schools that have a high proportion of PTT holders and provides targeted support through employer webinars to support these schools to understand the needs of their PTT holders and ensure appropriate support is provided. The Institute will continue to explore opportunities for its Professional Practice team to deliver bespoke workshops for these schools to address identified areas of need such as classroom management.

### **Moving to provisional registration**

PTT (General) and PTT (Internship) holders are required to progress towards teacher registration. The data in Figure 2 highlights PTT (General) and PTT (Internship) applicants from 2021 and 2022 and their current registration status.

**Figure 2: 2021 and 2022 PTT applicants and registration status as of 8 April 2025**

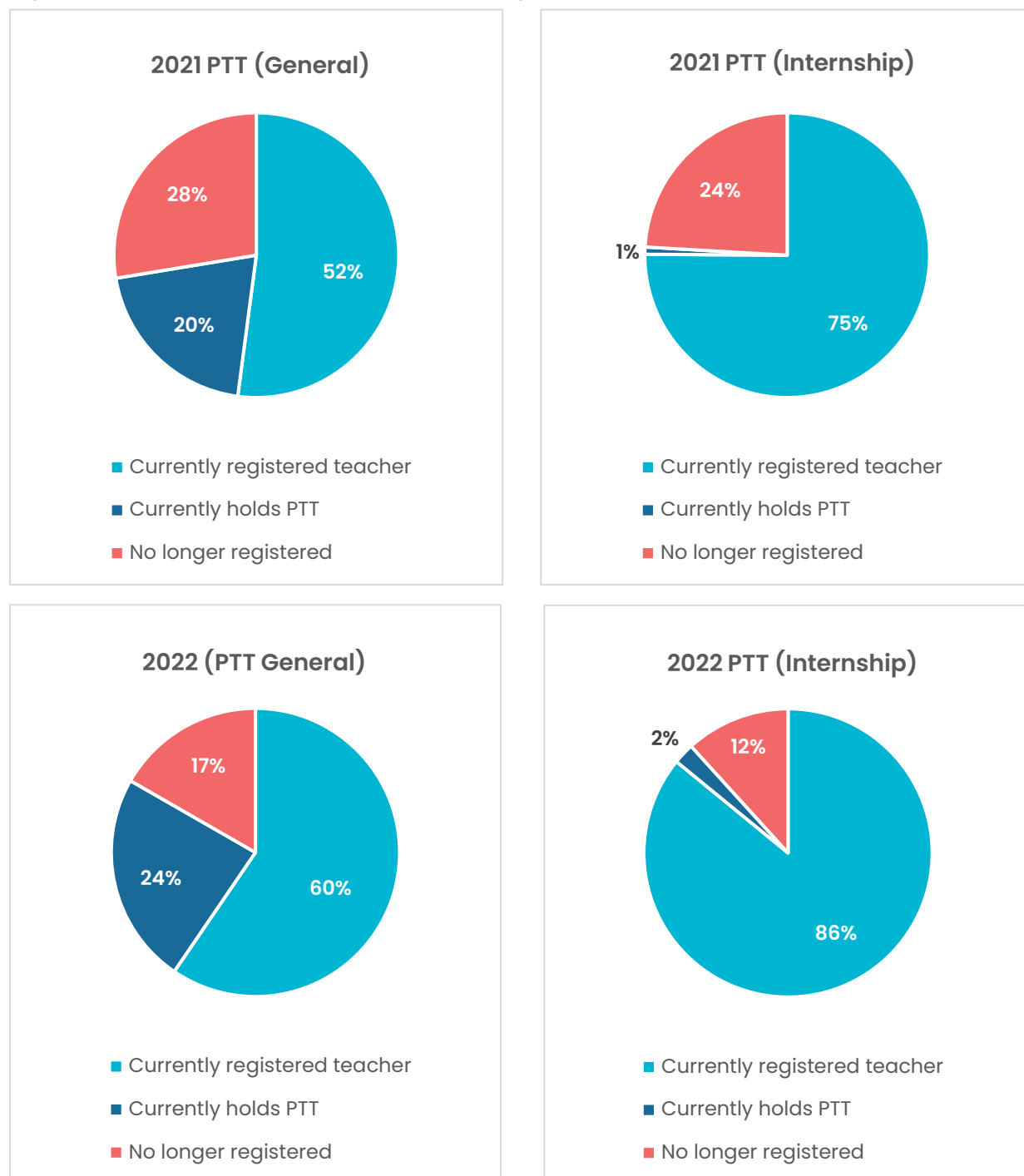


Figure 2 demonstrates that a significantly higher proportion of PTT (Internship) holders are progressing more quickly to teacher registration and completing their ITE qualifications. This is likely due to the fact that PTT (Internship) holders are enrolled in an accredited employment-based ITE program where their work is integrated within their study and their ITE program is specifically designed to enable them to undertake this work whilst completing the program.

Figure 2 highlights that PTT (General) holders are progressing to teacher registration at a lower rate. Noting that, depending on the individual's study load, they may have up to 10 years to complete their degree and therefore they may be progressing as expected.



The data indicated that a higher proportion of PTT (General) holders are more likely to not hold any current form of registration.

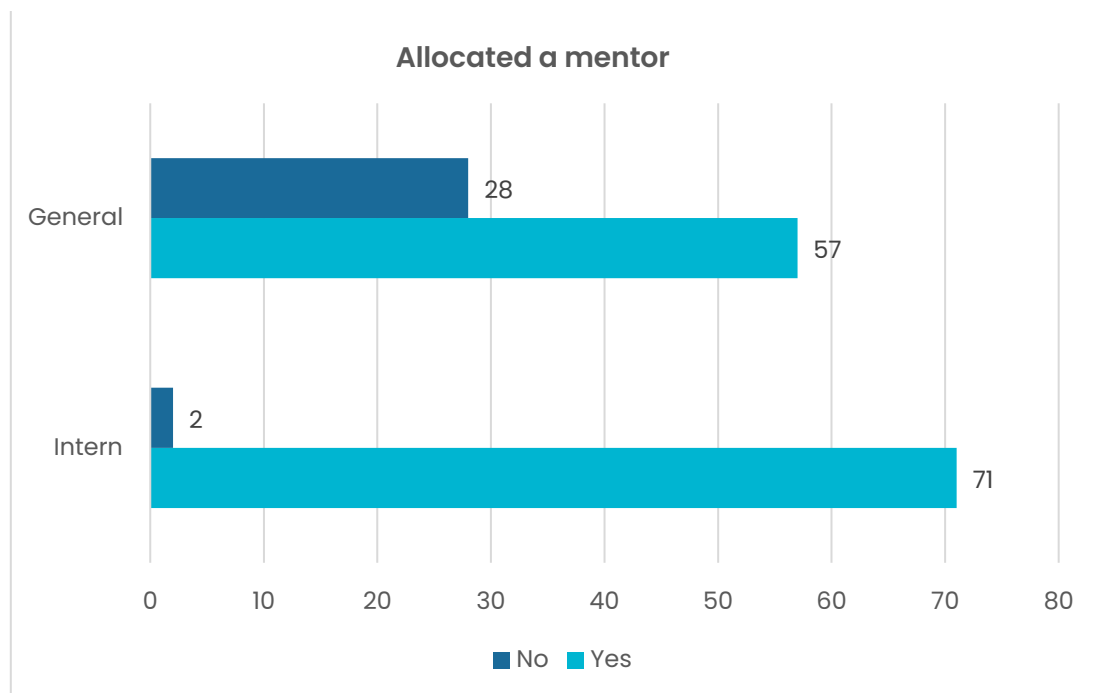
The recommendations within this report are intended to provide greater support to ensure PTT (General) holders are better supported by their employers to complete their ITE award and progress to teacher registration. A greater level of support may also address anecdotal evidence that a lack of mentoring, support and induction can lead to burn-out and lead to some PTT (General) holders choosing to leave their ITE program and / or not continue within the teaching profession.

### PTT holders survey results

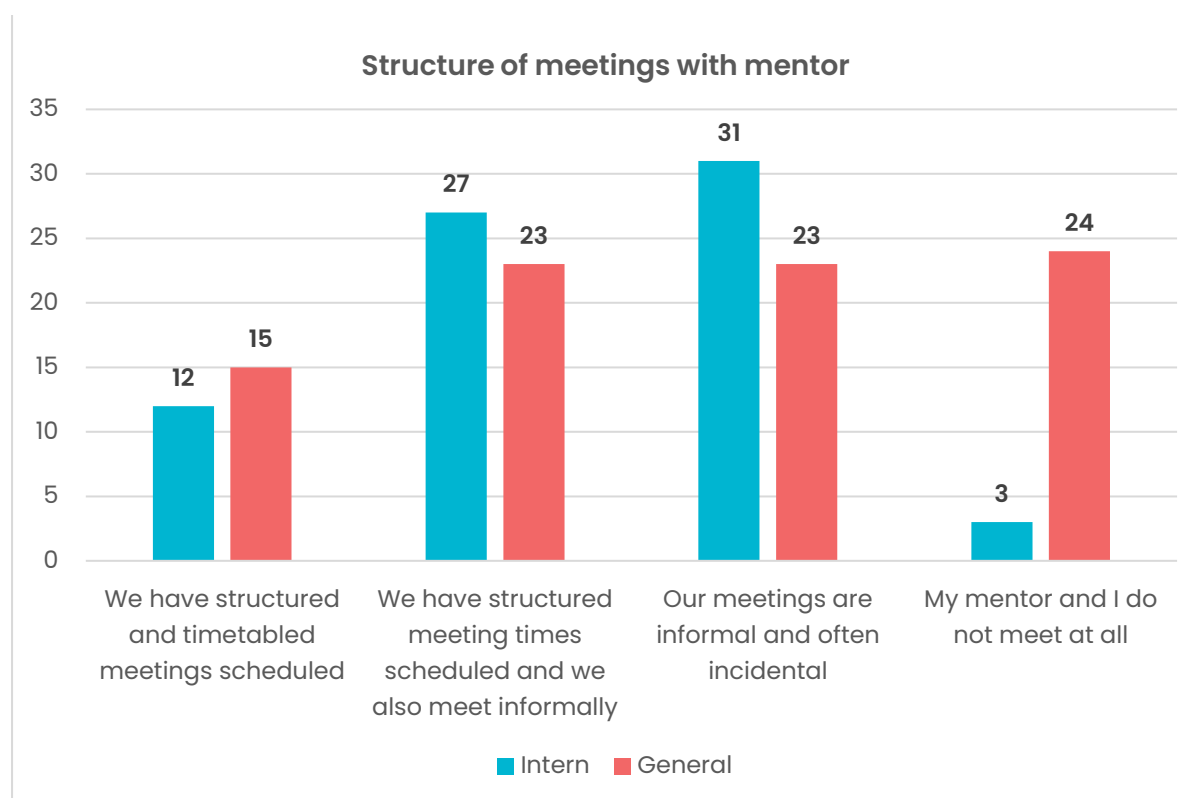
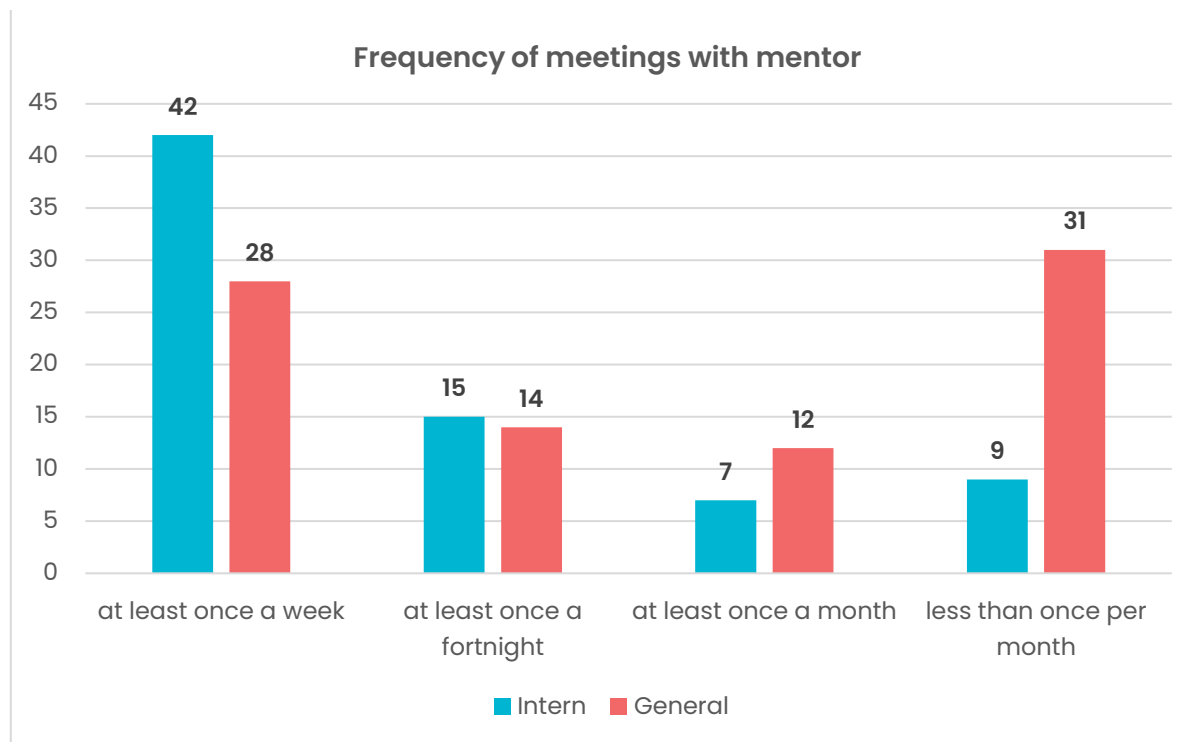
The Institute recently surveyed PTT (General) and PTT (Internship) holders to understand their experiences of working under PTT.

There were 100 responses from PTT (General) holders and 73 from PTT (Internship) holders, noting not all respondents answered every question.

The responses indicated that 97% of PTT (Internship) holders were allocated a school-based mentor compared to 67% of PTT (General) holders.



The frequency and structure of meetings between mentors and PTT (Internship) holders was also generally more formalised than for PTT (General) holders. 78% of PTT (Internship) holders met with their mentor at least once a week or once a fortnight, compared to 49% of PTT (General) holders.



The feedback from PTT holders indicates there was a strong sense that their work under PTT provided them with opportunities to improve their practice and feel more prepared to teach on graduation from their ITE program.

|  | Strongly agree /<br>agree (Interns) | Strongly agree /<br>agree (General) |
|--|-------------------------------------|-------------------------------------|
| My PTT registration provided me with more opportunities to improve my practice   | 90%                                 | 89%                                 |
| I was able to meet the progression requirements of my teaching degree whilst working under PTT                                 | 87%                                 | 72%                                 |
| PTT provided me with more opportunities for professional learning, such as professional discussions, feedback and observations | 84%                                 | 89%                                 |
| I feel more prepared to teach after graduation because of the experience gained from PTT                                       | 95%                                 | 91%                                 |

The following questions were asked only of PTT (General) holders who may have a time-fraction restriction on their PTT grant. Of particular note, whilst the time-fraction restriction supported 79% of PTT holders to balance their work and study requirements, 40% also indicated that it resulted in them needing to find another non-teaching job to maintain financial stability.

| PTT General  |     |
|--|-----|
| Support you to have the time to meet the study requirements of completing your teaching degree | 79% |
| Require you to take an additional non-teaching job to maintain financial stability             | 40% |
| Empower you to have conversations with your school about your workload                         | 14% |

## Section 2: Options for improvement of PTT policy and approach

### Terms of Reference

- b) the Institute's approach to granting PTT, its PTT policy and the application of that policy, including by having regard to:
  - I. whether the PTT policy is fit for purpose and whether the requirements for a grant of each category of PTT are clear and appropriate;
  - II. opportunities to streamline the PTT policy and whether any categories of PTT could be consolidated;
  - III. 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;

The Institute has developed a number of proposed improvements to the PTT policy and processes that it considers proportionate to identified areas of need and maintains consistent expectations that schools should be employing qualified and registered teachers wherever possible.

### Proposed change of name for PTT

The Institute recommends consideration be given to renaming PTT. A change in nomenclature may be beneficial to more accurately reflect its intent and operation. A new name could make it clearer that this category of registration is limited in its reach and does not confer the same level of authority as registration for a fully qualified teacher.

This change would support the Institute's design of a new approach to PTT and greatly assist in communicating the requirements, intent and operation to all relevant stakeholders, particularly prospective PTT holders and employers.

The Institute notes that a change in nomenclature would require legislative amendments. However, it considers the benefits and alignment of language to other Australian jurisdictions should warrant this consideration.

| Jurisdiction                                     | Name of equivalent category of registration in other jurisdictions |
|--|--|
| New South Wales (NESA)                           | Conditional accreditation  |
| Queensland College of Teachers                   | Permission to Teach  |
| Teacher Registration Board of Tasmania           | Limited Authority to Teach   |
| Teacher Registration Board of South Australia    | Special Authority to Teach   |
| Teacher Registration Board of Western Australia  | Limited registration   |
| Australian Capital Territory (TQI)               | Permit to Teach  |
| Teacher Registration Board of Northern Territory | Authority to teach   |
| New Zealand                                      | Limited Authority to Teach   |

## Recommendation 1

That the Institute seek a legislative amendment to change the name of Permission to Teach (PTT).

### Revision of policy

The Institute recognises that the PTT policy is no longer fit for purpose and requires a comprehensive review to determine the best approach to supporting the education sector where an unqualified person is required to teach in a Victorian classroom. Noting that it is the preference of the Institute that the teachers of children and young people are registered teachers who have been assessed to be appropriately qualified and suitable.

The PTT policy is difficult to interpret and is not written in plain English. The structure of the policy makes it difficult to interpret the eligibility requirements or standard conditions for each category of PTT.

The policy should be revised to streamline PTT categories, clarify eligibility requirements for each category, clearly identify the standard conditions placed on each category and to improve readability and accessibility.

The revision of the policy is of high interest to stakeholders. There are varying views on how PTT should operate and when / where it should be available. In revising the policy, the Institute will need to undertake further targeted and considered consultation with key stakeholders to ensure the revised policy and proposed new categories of PTT meets the needs of the of education sector.

### Consolidation of categories

The high number of PTT categories may lead to greater confusion by PTT holders and their employers regarding the process for applying, the operation of PTT and the requirements for either holding / supporting a PTT holder.

The Institute considers it timely and appropriate to consolidate and streamline the differing categories of PTT.

A proposed approach is to consolidate these into the following three categories

| Category of PTT  | Intent and operation   | Previous categories incorporated / areas covered  |
|------------------|--|---|
| PTT (Qualifying) | <p>For all applicants currently undertaking or expected to undertake an Initial Teacher Education (ITE) program.</p> <p>This category will relate to applications for pre-service teachers (PSTs) enrolled in an accredited Internship ITE program and PSTs being engaged by a school due to teacher workforce shortages.</p> <p>This category of PTT will require demonstration of teacher workforce shortage for all applications except those as part of accredited Internship ITE program.</p> | <ul style="list-style-type: none"><li>teacher workforce shortage</li><li>internship for accredited ITE programs</li></ul> |

|                               |  |  |
|-------------------------------|--|--|
| PTT (Specialist – Instructor) | <p>For instructors in specific subject area(s) / school contexts that have been identified as having ongoing teacher workforce shortage issues and / requires a unique set of expertise.</p> <p>Teacher workforce shortage will not need to be demonstrated for each application; however, evidence of ongoing / sustained teacher workforce shortages is required for subject area(s) / school contexts to be included within this category.</p> <p>This category includes the delivery of community languages / small candidature languages that have a limited number of fluent speakers to ensure the continued delivery and maintenance of these languages.</p> | <ul style="list-style-type: none"> <li>• vocational education and training (VET)</li> <li>• religious instruction</li> <li>• Japanese School of Melbourne</li> <li>• higher education studies</li> <li>• Victorian College of the Arts Secondary School</li> <li>• Victorian School of Languages</li> <li>• Aboriginal languages</li> <li>• small candidature languages</li> </ul> |
| PTT (Conditional)*            | <p>For overseas or historically qualified teachers whose qualifications have been assessed as partially equivalent to an ITE with minor deficits that can be rectified via additional study or work.</p> <p>For Australian ITE graduates who meet the qualification requirements but do not meet other (non-suitability) related registration requirements, such as ELC or LANTITE.</p>  | <ul style="list-style-type: none"> <li>• overseas qualified teachers with minor deficits in their qualifications</li> <li>• historically / other trained teachers with minor deficits in their qualifications</li> </ul>   |

*\*PTT (Conditional) is the new category recommended in Report 1 to enable overseas qualified teachers who were assessed to hold qualifications/experience that were partially equivalent to an accredited Australian ITE; enabling these PTT holders to work whilst they upskill to meet the qualification standard for registration.*

This approach would still enable the Institute to apply exemptions and / or relevant conditions depending on the individual context of the applicant and their employing school.

This approach will see the vast majority of PTT applications requiring the demonstration of teacher workforce shortages (approx. 84% based on current data) within the PTT (Qualifying) category.

In addition, the category of PTT(Specialist – Instructor) will require evidence of ongoing / sustained teacher workforce shortages for the subject area(s) / school contexts. This approach will ‘future proof’ the PTT policy and enable additional schools / subject area(s) to be added or removed from the “Specialist – Instructor” category dependent on the context of the time, without having to add additional categories or revise the policy.

The category of PTT (Conditional) is responsive to identified areas of need from stakeholders to enable a more flexible pathway for overseas or historically qualified teachers, whose qualifications are assessed as partially equivalent. PTT (Conditional) enables them to progress towards teacher registration by undertaking additional study / work to upskill to meet the requirements for registration without having to undertake a full ITE program.

This policy position is responsive to feedback from stakeholders and maintains quality thresholds. It ensures a flexible yet proportionate response to identified areas of need and maintains consistent expectations that schools should prioritise employing qualified and registered teachers wherever possible.

A summary of the proposed consolidated categories, eligibility requirements and standard conditions can be found at [Table 3](#).

## Recommendation 2

That the Institute redesign its PTT Policy (renamed) to streamline categories, clarify eligibility requirements and improve readability and accessibility.

**Table 3: Proposed eligibility requirements and standard conditions on PTT**

| PTT categories          | Eligibility requirements                  |   |   |                              |                                 | Standard conditions                   |                       |                               |   |
|-------------------------|---|---|---|------------------------------|---------------------------------|---------------------------------------|-----------------------|-------------------------------|---|
|                         | Skills and experience – content knowledge | Skills and experience – teaching skills | Skills and experience – VET RTO standards | English language competence* | Demonstrated workforce shortage | Progress towards teacher registration | Professional learning | Limited to specific school(s) | Limited to specific subject / subject area(s) |
| Qualifying              | Yes                                       | Yes                                     | No  | Yes*                         | Yes* (except interns)           | Yes                                   | Yes                   | Yes                           | Yes   |
| Specialist – Instructor | Yes                                       | Yes                                     | VET only                                  | Yes*                         | No                              | No                                    | Yes                   | Yes (except VET)              | Yes   |
| Conditional             | Yes                                       | No                                      | No  | Yes*                         | No                              | Yes – alternate (not ITE)             | Yes                   | Yes                           | Where appropriate                             |

\*Alternate English language competency requirements

### LOTE standard

Applicants for PTT to teach, or teach in, a **language other than English** must provide evidence of meeting the following minimum English language test scores.

- International English Language Testing System (IELTS) – Academic module with an average band score of 6.0 across all four skill areas of speaking, listening, reading and writing – where there is no score below 6 in any of the four skills areas. All skill areas must be met on an individual test;
- International Second Language Proficiency Rating (ISLPR) with at least Level 3 in all four areas of speaking, listening, reading and writing. Test achievements are only deemed valid if provided by approved testing sites where the assessment is teaching focused; and must also provide:
- a plan stating what the applicant will do to improve their English language competence during the period of their PTT; and
- a statement of support from the Principal who is endorsing the application as to the assistance the school will provide to help improve the applicant's English language competence during the period of time requested for the permission.

Variations to English language competency requirements with appropriate conditions may be granted in exceptional circumstances.

### Exemptions to ELC

Applicants delivering an Aboriginal language or an emerging or small candidature language would be exempt from ELC requirements. Exemptions to ELC requirements for teaching in an International school, in a language other than English, or delivery of language instruction outside of school hours may be considered on a case-by-case basis by the Institute's Council. Noting, the delivery of an Australian approved curriculum will always require demonstration of ELC.



## Greater co-regulatory approach with employers of PTT holders

In general, it is an employing school that is seeking to engage a person who is not eligible for teacher registration. They may be seeking to engage this person due to teacher workforce shortages or due to specialist subject or content knowledge not available within the existing workforce, such as teachers of Vocational Education and Training (VET) or small candidature languages.

Under its current processes, the Institute places the following obligations on employers

1. Supervision and mentoring
  - a. All individuals holding PTT must be supervised by a registered teacher.
  - b. Supervision includes oversight of the planning and implementation of classroom programs, and professional support with regard to
    - i. teaching methods / practices;
    - ii. student welfare; and
    - iii. assessment procedures and related matters but does not mean that a registered teacher has to be present in the classroom with the PTT holder at all times.

The Institute has received feedback from key stakeholders that the degree of supervision and support provided by an employing school is variable.

If appropriate supervision, support and mentoring is not provided to a PTT holder there are a number of risks

- the PTT holder may not be provided with adequate support to meet any conditions on their registration (including completing their ITE program)
- the PTT holder may not have adequate support to effectively teach and support student learning
- the PTT holder may face pressure to meet the demands of their employer over their requirement to complete an ITE program
- the PTT holder may have a negative experience in a school and choose to leave the profession.

This is of particular risk to those who have not yet commenced an ITE program or are very early on in their studies.

The Institute recognises that employers play a key co-regulatory role in supporting PTT holders and that many of the needs of PTT holders are better met with clear and targeted support from their employers.

To strengthen and clarify a co-regulatory approach with employers and to ensure consistency in the provision of support to PTT holders, the Institute should engage in formal agreements with employers of PTT holders, particularly if the Institute commences lengthening grants in line with contract dates of up to three years.

These agreements would provide clarity for both the employer on their obligations and the PTT holder on the level of support they are entitled to. A formal agreement would enable the Institute to appropriately monitor the provision of this support and take action if it is not being provided.

An example of the proposed requirements under this Agreement are outlined below:

- An employer of a PTT holder must
  - ensure the PTT holder is supervised by a registered teacher
  - supervision includes oversight of the planning and implementation of class programs, and professional support with regard to
    - teaching methods / practices
    - student welfare
    - assessment procedures and related matters but does not mean that a registered teacher has to be present in the classroom with the PTT holder at all times.
  - implement the professional support plan as provided in the endorsement for a PTT application
  - support the PTT holder to meet all conditions on their registration, including by providing sufficient time to study.

### **Proposed legislative amendments**

The Act, as it currently stands, does not adequately enable the Institute to enter into a binding agreement with an employer. To support this co-regulatory approach, the Institute would require legislative amendments.

The Act treats an application for PTT in a similar way to an application for teacher registration, i.e. that it is principally an application by an individual seeking registration (or PTT).

There is, however, a significant difference. When a teacher obtains registration, the teacher may teach anywhere. It is not tied to or dependant on the school in which they teach.

PTT is effectively a joint application between a particular employer and an individual. Section 2.6.13 states that an application must "contain particulars of the person or body who intends to employ or engage the applicant" and supply "evidence satisfactory to the Institute that the person or body intending to employ or engage the applicant had first attempted to employ or engage a teacher registered under Division 3 of this Part to fill the teaching position relating to the application".

The Institute has recognised this difference by designing its application for PTT process to allow it to be initiated by the employer.

The PTT policy obliges employers to supervise and support the PTT holders and to assist them to meet obligations to progress to an appropriate teaching qualification, yet the Act contains no powers to allow VIT to regulate employer compliance.

For these reasons it is proposed that amendments be made to the legislation to facilitate the Institute to monitor and oversee employer support of PTT holders. This aligns with the Institute's obligation to consider the safety and wellbeing of children by assuring quality teaching.

If supported, further consultation on the wording of the legislative amendment may be required. The Institute is liaising with the Department of Education to determine the nature and extent of any legislative amendments that may be required if this recommendation is supported.

### Recommendation 3

That the Institute enhance its co-regulatory approach to PTT by formalising the existing employer obligations owed to PTT holders, through:

1. an agreement between employers / VIT setting the requirements for employing a PTT holder
2. a legislative amendment, setting out employer obligations in relation to PTT
3. establishing through legislative amendment, regulatory tools in relation to those obligations.

### Consistency of assessments

#### Terms of Reference

- c) the Institute's approach to granting PTT, its PTT policy and the application of that policy, including by having regard to:
  - i. possible options to improve consistency in the Institute's assessment of applications for PTT and the outcomes of these assessments

An application for PTT is assessed on its individual merits such as the unique skills and experiences of the PTT applicant, the school context and evidence of teacher workforce shortage. The Institute has received feedback that there is a perception of inconsistency in its assessments. The Institute notes that as each case is assessed on its individual merits and to enable appropriate flexibility, this may lead to some perceived inconsistency in decision making.

The precise circumstances of an assessment are unlikely to be known to all relevant stakeholders, therefore whilst the Institute does not consider that there is any substantial issue with inconsistency of assessments, there are a number of improvements that can be made to ensure consistency and to support stakeholders' understanding of the approach undertaken by the Institute.

The revised PTT policy will provide further clarity regarding the criteria under which the Institute undertakes its assessments. In addition, the Institute will review and refine its internal process documentation to guide the assessment of PTT applications by relevant officers. This will further support relevant officers to undertake consistent assessments in line with the Institute's policy.

### Recommendation 4

That the Institute review and refine internal process documentation for the assessment of PTT to support greater clarity for the Institute and applicants.

### Assessment of subject area(s)

The Institute has received feedback from stakeholders that there is uncertainty about how the Institute undertakes assessments to determine the subject area(s) an applicant can teach.

The Institute acknowledges that the nature of these assessments is not publicly available. As part of the development of its revised policy, the Institute will develop and publish a summary of clear thresholds for the skills / experience to teach a particular subject area(s) to improve transparency of decision making and provide greater clarity to PTT applicants and their prospective employers.

## Recommendation 5

That the Institute develop and publish thresholds for the assessment of a PTT applicant's skills and experience to teach a subject / subject area(s).

### Length of grant and conditions

#### Terms of Reference

- b) the Institute's approach to granting PTT, its PTT policy and the application of that policy, including by having regard to:
  - vi. the Institute's approach to imposing conditions under section 2.6.14(2) of the Act when granting PTT, in particular:
    - A. whether conditions are imposed consistently;
    - B. whether conditions are imposed and designed having regard to the individual circumstances of the applicant; and
    - C. the Institute's approach to determining what subjects or subject areas an applicant is permitted to teach, including evidentiary requirements;

### Length of grant

Under s2.6.14(2a) of the Act, a grant of PTT may not exceed 3 years. In practice, often PTT is granted for 6–12 months. This is generally reflective of the employment contract for the PTT holder, and it enables VIT to monitor compliance with conditions. For example, to ensure that a PTT holder is progressing within their ITE program or there has been improvement in their English language competency. A PTT holder is not precluded from reapplying for a further grant.

The Institute has received feedback that the length of grants has caused challenges in schools due to ongoing uncertainty about the ability of the PTT holder to continue working and the grants not reflecting the realities of the school year.

Feedback indicated that schools are seeking flexibility not rigidity and therefore are seeking grants of PTT to be longer than 6 months. Schools are finding it difficult to attract staff (including PTT holders) when the grants are for 6 months with no guarantee of continuation beyond that point to support either the school or the PTT holder.

The Institute acknowledges these challenges and to ensure greater certainty for schools / PTT holders, it proposes to apply a grant that is generally reflective of the realities of the school year (not exceeding 3 years), in line with their expected progression to teacher registration date.

This approach would be dependent on proposed legislative amendments that are currently under consideration that would require PTT holders to renew their registration annually alongside all registered teachers. If this amendment is made, the Institute can monitor compliance with conditions during annual renewal in September and could revoke PTT where the person has been unable to demonstrate compliance with any relevant conditions.

## Conditions

The Institute recognises that, as conditions vary depending on the category of PTT or the individual circumstances of the applicant, this may lead to some confusion amongst stakeholders. Developing a clear published summary of standard conditions for each category of PTT would be beneficial.

Stakeholder feedback regarding the Institute imposing restrictions on the time fraction that a PTT holder can work has been variable. Some stakeholders indicated the current approach is beneficial to ensure that the PTT holder does not experience burn-out and can continue to complete their ITE in a timely manner. Others indicated the restriction is unduly burdensome on the school and PTT holder and did not take into consideration individual circumstances, particularly in a cost-of-living crisis.

Feedback was received that PTT holders are seeking autonomy in determining their own study and workload for their situation and context. Schools are managing teacher workforce constraints and therefore, by restricting time fractions, there was feedback that this leads to schools needing to recruit another teacher or PTT holder to cover the remaining time fraction within the role. As articulated in Section 1, a recent survey of PTT holders indicated that 40% were required to find another non-teaching job to maintain financial stability due to time restrictions on their PTT grant.

The Institute considers it best to discontinue the use of this condition and to leave this determination between an employer and an individual. Workload discussions are best placed with the employer rather than the regulator. If Recommendation 3 were supported, stakeholder concerns regarding potential burn-out and risk of some schools taking advantage of PTT holders would be mitigated by the development of a clear plan of support from the employing school. An employing school or body could still make a determination about the need to place time-fraction restrictions that is articulated in the plan of support.

## Recommendation 6

That the Institute take a responsive regulatory approach by

- a) establishing and publishing a clear summary of standard conditions for each PTT category
- b) enabling employers and PTT holders (rather than the Institute) to determine an appropriate time fraction for employment
- c) granting PTT for lengths reflective of the school year and where relevant, in line with the PTT holder's expected progression towards teacher registration.

## Religious instruction

Key stakeholders have identified that the operation of the PTT policy in relation to the delivery of religious instruction has been challenging.

The Institute's current position is that any person delivering religious instruction in school, during school hours and as part of a timetabled curriculum, must hold teacher registration or PTT (General). In practice, this means that religious leaders who have specialist knowledge in the delivery of religious instruction are required to seek PTT (General) and undertake an accredited ITE program.

The Institute recognises that the role of religious leaders in the delivery of religious instruction is a unique situation and that progression towards teacher registration poses a barrier to the authentic delivery of religious instruction in some schools.

It is recommended that the Institute explore, in its revision of the PTT policy, the inclusion of religious instruction in the category of PTT (Specialist-Instructor), which would require religious instructors to hold PTT, but not require them to progress towards teacher registration and complete an ITE program.

This approach would support the balance of ensuring child safety and wellbeing by requiring registration with recognising the unique role of these instructors in schools.

Further consultation would be required to clarify when / where teacher registration or PTT would be required in these circumstances; however, a draft guidance note ([Appendix 3](#)) for consideration and further consultation has been developed to demonstrate a proposed approach. In addition, further consultation would be required to establish what *appropriate subject matter expertise* looks like in different faiths.

### Recommendation 7

That the Institute

- a) not require religious instructors to progress towards teacher registration (where appropriate)
- b) undertake further consultation to determine circumstances when religious instructors would be required to progress towards teacher registration (e.g. as part of VCE).

### Instrumental music instruction

The registration requirements for Instrumental music teachers was raised as part of stakeholder consultation, particularly from the Australian Education Union (AEU). As part of the development of the PTT policy after the submission of Report 2, the Institute will undertake further consultation in this space to further clarify and determine in what circumstances this cohort may require registration.

### Bilingual schools

The Institute has received significant feedback from Victorian Bilingual Schools that the current approach to PTT does not meet their needs. They have identified the following challenges:

- the Institute does not recognise language teaching degrees from overseas for the purposes of registration (the Institute notes these degrees are not Initial Teacher Education (ITE) degrees)
- their prospective teachers do not meet English language competency requirements. The schools consider they should not be required to meet this standard as they deliver the curriculum in another language.
- their prospective teachers are often only working temporarily in Australia and the requirement to complete an ITE program is unduly burdensome
- the length of the grant of PTT is often too short and creates uncertainty for both the school and the PTT holder.

The Bilingual schools have requested the following:

1. A separate registration category for Designated Bilingual Schools in Victoria
  - a. This category could have parameters tailored to the unique needs of bilingual schools. It could include:
    - i. A registration duration that mirrors the teacher's visa (either 2 or 4 years).
    - ii. No requirement to improve English above the bilingual school language level.
    - iii. For teachers with several years of experience, the requirement for 45 days of supervised practice teaching as part of the ITE qualification could be waived.
2. A Dedicated Team of Case Workers Familiar with Bilingual Schools  
Having a team of case workers who are trained in the context of bilingual schools and the unique challenges we face would greatly improve the efficiency and consistency of the registration process.
3. Recognition of a Foreign Language degree  
That this could be accepted in the case of Bilingual schools – potentially within our separate Registration Category
4. Waive the 45 days of supervised practice teaching requirement for teachers who already have several years of experience, as part of their ITE qualification.

The Institute notes that there have been 49 applications since 2021 for PTT in Bilingual schools in Victoria. There are 22 Bilingual or immersive language schools in Victoria, 7 of these schools are currently employing PTT holders for bilingual delivery, the numbers can be seen below

| School                         | Number of PTT holders |
|--------------------------------|-----------------------|
| Camberwell Primary School      | 6                     |
| Lalor North Primary School     | 6                     |
| Divrei Emineh                  | 6                     |
| Deutsche Schule Melbourne      | 4                     |
| Footscray Primary School       | 2                     |
| Newlands Primary School        | 2                     |
| Brunswick South Primary School | 1                     |
| <b>TOTAL</b>                   | <b>27</b>             |

The Institute appreciates the unique position of recruiting teachers for a Bilingual school. Whilst consideration has been given to the proposed solutions to the Bilingual schools, the Institute does not consider it best regulatory practice to develop a bespoke approach or category of PTT for a small cohort of teachers.

In addition, the requests would be a significant departure from the Institute's legislative remit to raise the quality of teaching and the intent behind the use of PTT and the general approach of alternative authorisation to teach in other Australian / New Zealand jurisdictions.

Bilingual schools, whilst a unique approach to education, still deliver an approved Australian Curriculum. The curriculum documents, reporting requirements and supporting resources are all developed in English, not in the language delivered in the Bilingual school.

The Institute notes that teachers in bilingual schools are required to undertake all duties of teacher, including

- engaging with and reporting to parents / carers who may not speak a language other than English
- reporting to external government bodies on student progress (e.g. VCAA)
- engaging with curriculum documents
- undertaking professional learning in English
- engaging with child safety requirements such as mandatory reporting.

In essence, a Bilingual school operates and delivers learning to students in the same way as any other school, with some (or most) content being delivered in a language other than English. It is critical that the Institute upholds standards for teaching in Victorian schools and does not disadvantage students within a particular school system by reducing standards. The Institute considers it best regulatory practice and in the best interest of students to maintain that a registered and qualified teacher teach in a Bilingual school, and where a qualified teacher cannot be found, a person with requisite skills and experience can teach using PTT whilst progressing towards teacher registration.

The Institute notes the suggestion for dedicated case managers and considers that the newly appointed case managers assessing overseas qualifications may be best placed as a central contact point for these schools. The Institute will liaise with the relevant schools to notify them of their case managers.

The Institute will ensure that grants of PTT are reflective of the school year and line with their expected timeframe to progress to teacher registration, to reduce uncertainty for the school and PTT holder.

Bilingual schools will be eligible to apply for PTT (Qualifying) for persons who do meet qualifications requirements or PTT (Conditional) for overseas trained teachers with minor deficits in their qualifications. This may enable those who have not met the 45 supervised teaching practice in their ITE program to progress to teacher registration by completing additional study / work in a short time period.

The Institute's current policy position is that an alternate English language competency standard applies to teach, or to teach in, a language other than English. Stakeholder feedback from Bilingual schools has indicated this position may not be well-known or applied consistently. The Institute's revised policy position, processes and communications will ensure the alternate ELC standard is applied for Bilingual schools. Teachers in Bilingual schools who have met the qualification requirements but are yet to meet the ELC requirements may be eligible for the more permissive grant of PTT (Conditional) where they can meet the alternate LOTE standard.



## Section 3: Communications with applicants / employers

### Terms of Reference

- c) the Institute's approach to granting PTT, its PTT policy and the application of that policy, including by having regard to:
  - vi. possible options to improve the way decisions on applications for PTT are communicated to applicants and provide them with clear reasons and information on:
    - a. 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
    - b. in the case of unsuccessful applicants:
      - i. why their application was unsuccessful; and
      - ii. what is required in order for the applicant to be eligible for a grant of PTT.

The Institute acknowledges that the complexity of the current PTT policy and the high number of categories can lead to confusion.

The Institute has standard emails that are provided to applicants (successful and unsuccessful) and employers.

The Institute considers some improvements could be made to these communications to:

- improve clarity on the specific conditions that apply to a successful applicant
- improve clarity on the exact duties that a PTT holder can undertake
- improve clarity on the obligations of an employer of PTT
- to better articulate why an applicant was unsuccessful.

These communications also articulate the conditions that apply to the successful applicant.

However, the language of these communications could be improved to provide greater clarity on the exact conditions that apply, if any action is required to meet a condition and the timeframe within which any action is required.

### Recommendation 8

That the Institute refine and improve its communications with successful / unsuccessful applicants and their employers.

## Section 4: Further analysis of Recommendations 5–7 arising from Report 1 on overseas qualifications

The Minister for Education provided in principle support for Recommendations 1–4 arising from Report 1 and requested further analysis of Recommendations 5–7 to be included in this report.

The below provides a summary of the potential options and strengths and weaknesses of Recommendations 5–7.

| Recommendation  | Option(s)   | Strengths  | Weaknesses   |
|---|---|--|--|
| <b>Recommendation 5:</b> That the Institute consider teaching qualifications from a higher education provider in combination with other relevant higher education as evidence of equivalence. | <p><b>Option 1 (preferred):</b> That the Institute revise its Qualifications policy to enable this activity immediately.</p> <p><i>The Institute will establish clear thresholds of where qualifications outside of an ITE will be considered. Noting that this approach will maintain that the applicant has met all criteria for equivalency to ITE and has completed qualifications substantially equivalent to an accredited ITE program.</i></p> | <ul style="list-style-type: none"> <li>• can be implemented immediately with no additional resourcing</li> <li>• likely to lead to more overseas qualified teachers eligible for registration particularly from countries identified by stakeholders as preferable for recruitment such as Singapore</li> <li>• provides greater flexibility for the Institute to consider substantial equivalence of overseas qualifications packages to an accredited ITE program</li> <li>• this would enable the Institute to look beyond an applicant's ITE program to determine if a person has substantial equivalency. For example, the Institute could look at subjects studied within a Bachelor of</li> </ul> | <ul style="list-style-type: none"> <li>• greater complexity for the Institute in assessing a qualifications package</li> </ul> |

|  |  |  |   |
|--|--|--|---|
|  |  | <p>Arts or Bachelor of Science or a continuing education program such as a Master of Special Education.</p> <ul style="list-style-type: none"> <li>maintains national consistency with standards for entry into the teaching profession</li> </ul>   |   |
| <p><b>Recommendation 6:</b> That the Institute consider teaching qualifications from a higher education provider in combination with relevant teaching experience as evidence of equivalence. That the Institute explore the legislative, policy and process amendments that may be required to enact this approach.</p> | <p><b>Option 1 (preferred):</b> That the Institute consult further with other jurisdictions, other professional regulators, and stakeholders to determine if there is a consistent approach that could be developed to assess professional experience.</p> | <ul style="list-style-type: none"> <li>the Institute can take more time to consider the proposed approach to determine its appropriateness and engage with other regulators who are more advanced in this space</li> <li>provides greater flexibility for the Institute to determine if an experienced and qualified overseas teacher meets the qualification threshold</li> <li>likely to lead to more overseas qualified teachers being found eligible for registration, particularly from countries identified by stakeholders as preferable for recruitment such as Ireland</li> <li>applicants will be more likely to apply directly to the Institute for registration rather than using Mutual Recognition from other jurisdictions that accept</li> </ul> | <ul style="list-style-type: none"> <li>the approach is not consistent with the National Framework for Teacher Registration in Australia or the requirements for entry into the teaching profession for Australian ITE graduates</li> <li>the assessment of professional experience is complex and would require additional resourcing for the Institute</li> <li>there is a higher risk of a decision of the Institute being challenged based on its the assessment of professional experience being challenged.</li> </ul> |

|   |   |  |  |
|---|---|--|--|
|   |   | professional experience or 3-year qualifications such as Queensland, Western Australia or New Zealand  |  |
|   | <b>Option 2:</b> That the Institute take no further action and continue to not accept professional experience when determining eligibility for registration | <ul style="list-style-type: none"> <li>maintains consistency with the National Framework for Teacher Registration in Australia and the requirements for entry into the teaching profession for Australian ITE graduates</li> <li>does not require additional resourcing</li> <li>reduced risk of decisions of the Institute being challenged</li> </ul>  | <ul style="list-style-type: none"> <li>applicants will continue to use Mutual Recognition from other jurisdictions that accept professional experience or 3-year qualifications such as Queensland, Western Australia or New Zealand</li> <li>fewer people would be eligible for registration</li> </ul> |
| <b>Recommendation 7:</b> That the Institute consider developing a new category of Permission to Teach (PTT) for overseas-qualified teachers to upskill and meet the requirements for registration | <b>Option 1 (preferred):</b> That the Institute establish the category of PTT (Conditional) articulated in <b>Recommendation 2 in Report 2</b>              | <ul style="list-style-type: none"> <li>this recommendation is critical to ensure the Institute can respond immediately to issues raised by stakeholders across Report 1 and Report 2</li> <li>supports a more streamlined pathway to registration for overseas or historically qualified teachers with minor deficits in their qualifications</li> <li>likely to lead to more applicants gaining registration</li> </ul> | <ul style="list-style-type: none"> <li>greater complexity in the assessment of qualification packages</li> <li>increased resourcing required to manage unique conditions for each applicant</li> </ul>   |

# Appendix 1: Terms of Reference

## Terms of reference – Report 2

Under the Terms of Reference of the Directive for Report 2, the Review is to cover:

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

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