

Victorian Institute of Teaching response to Ministerial Direction

Report 1 – Assessment of overseas qualifications



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Executive summary

On 18 December 2024, the Chairperson of the Council of 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, its Permission to Teach policy and the application of that policy (**Report 2**).

This report (Report 1) provides a summary of the Institute's current approach to the assessment of overseas qualifications as well as the underpinning legislative and policy frameworks. The recommendations would enable the Institute to take a more flexible approach and improve its policies and communications.

The Institute understands the importance of ensuring its policies and processes are fit for purpose 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. The Institute wants to ensure that Victoria is seen as an attractive destination for overseas qualified teachers to work.

In all of its work, 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. This includes setting the standards of professional practice for entry into the profession and, in doing so, plays a significant role in ensuring that Victorian children and young people have appropriately qualified teachers to support them to meet their learning goals. The Victorian Government and the Institute are dedicated to supporting national and state reforms to improve and ensure the quality of teaching in Victoria.

The report highlights that each year, on average **3%** (**46** out of **1,395** in 2024) of overseas applicants did not meet registration requirements. The Institute notes that it does not have data related to overseas trained teachers who did not submit an application for registration. Notwithstanding the small numbers, the Institute has identified areas for improvement. The Institute also recognises the importance of its continued focus on ensuring the timeliness and efficiency of our registration processes for Australian qualified teachers.

The recommendations in response to the Terms of Reference (TOR) support the following

- maintaining national consistency with high standards of entry into the teaching profession (**Recommendations 1–7, TOR III & V**)
- ensuring greater flexibility in the assessment of overseas qualified teachers and making more effective use of the Institute's regulatory tools (**Recommendation 5 & 6, TOR I, II, XI, I & XII**)
- considering the entire qualification package of the applicant and relevant professional teaching experience to establish substantial equivalence to an Australian Initial Teacher Education (ITE) program, (**Recommendation 5 & 6, TOR I, II, XI, I & XII**)
- where there is partial equivalency to an Australian ITE program, a more flexible grant of Permission to Teach (PTT) be offered whilst the person undertakes additional study / work to meet qualification requirements (**Recommendation 7, TOR II, III & V**)
- providing greater certainty to prospective applicants as to whether their qualification is equivalent *before* they decide to relocate to Victoria (**Recommendation 4, TOR VII**)
- clearer and more accessible communications and advice to prospective applicants, prospective employers and unsuccessful applicants. (**Recommendations 1, 2 & 3, TOR III, VI & VII**).

The Institute benefited from significant input from consultation with key stakeholders and other Australian Teacher Regulatory Authorities (TRAs). The full record of input and consultation can be found in **Appendix 3**.

The following recommendations have been developed as a result of this review, some of which can be implemented in the short term with appropriate allocation of resourcing and others requiring legislative amendment(s) and ongoing resourcing and staffing arrangements.

Recommendation 1: That the Institute revise its Qualifications Policy to clarify expectations and ensure accessible language for all prospective applicants.	Immediately actionable
Recommendation 2: That the Institute consolidate and publish a set of principles under which overseas qualifications are to be assessed for equivalency.	Immediately actionable
Recommendation 3: That the Institute continue to refine and review its communications with unsuccessful applicants in-line with stakeholder feedback.	Immediately actionable
Recommendation 4: That the Institute commence a newly designed fee-for-service to assess overseas qualifications for applicants prior to submission of an application for registration.	Currently underway
Recommendation 5: That the Institute consider teaching qualifications from a higher education provider in combination with other relevant higher education as evidence of equivalence.	Requires policy amendments
Recommendation 6: 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	May require legislative amendments Requires substantial policy amendments
Recommendation 7: 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.	Requires substantial policy amendments

If the recommendations are supported, a more flexible approach to the assessment of overseas qualifications will be enabled. The resulting assessments of equivalency of overseas teachers would fall into the outcome table below.

Outcome of assessment of equivalency of overseas qualifications to an initial teacher education program	Regulatory action
Assessment is determined to be substantially equivalent to an ITE program. (Recommendations 5 & 6)	Grant of provisional registration .
Assessment is determined to be partially equivalent to an ITE program. (Recommendation 7)	Grant of a flexible PTT that is not restricted to subject areas or time fractions.
Assessment is determined to be not equivalent to an ITE program.	Application doesn't meet requirements for registration. Applicant to enrol in an ITE program , during which they make seek PTT due to workforce shortages or as part of an employment-based ITE program.

Summary of recommendations

A summary of each recommendation, rationale and the relevant TOR is outlined below. The Institute notes that it is self-funding on teacher registration fees and has limited resourcing and financial capacity to implement some of the recommendations. The financial considerations are outlined in **Appendix 5**.

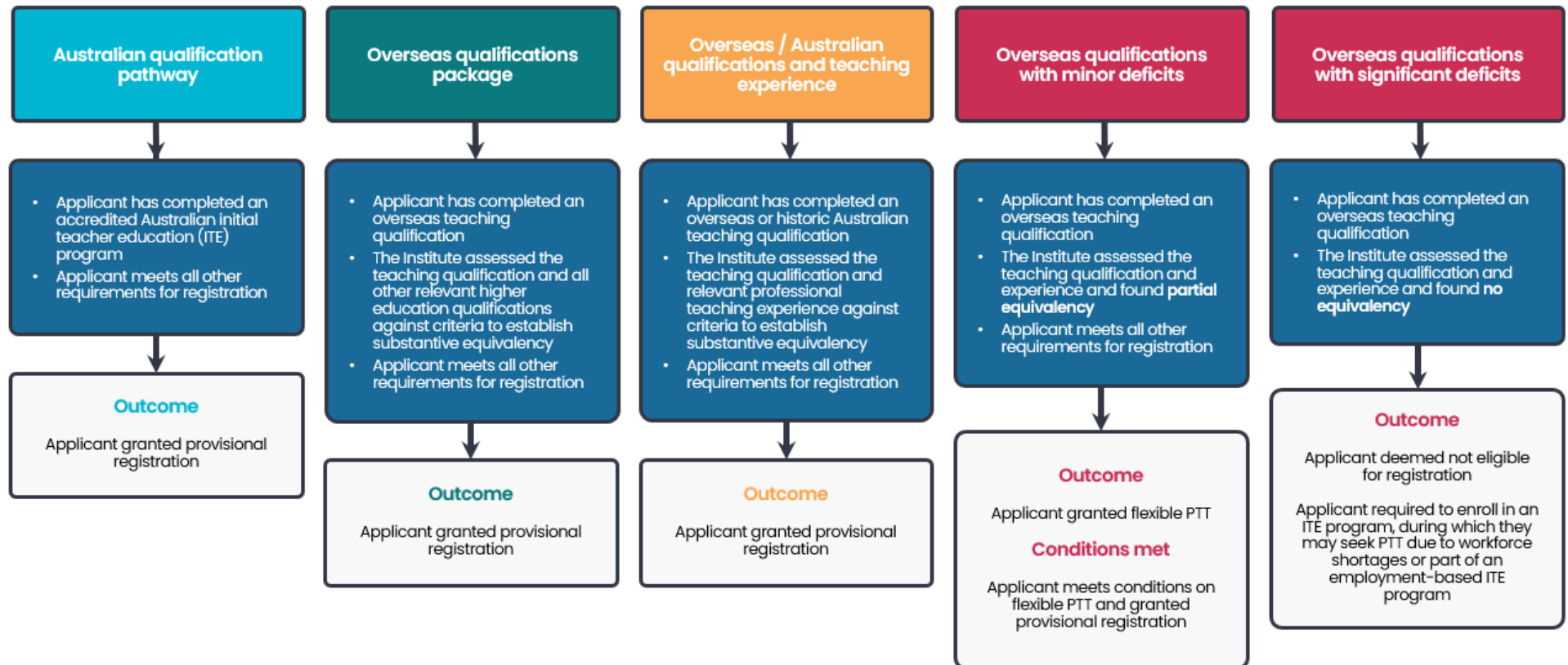
Recommendation	Rationale and additional considerations	TOR	Action required
<p>1. That the Institute revise its Qualifications Policy to clarify expectations and ensure accessible language for all prospective applicants</p>	<p>The Institute recognises that the current Qualifications Policy is not written in plain English and can be difficult to interpret – particularly for prospective applicants from overseas who are not familiar with the qualification and registration requirements and where English may not be their first language.</p> <p>As part of the consultation for this review, stakeholders indicated that the complexity of the Qualifications Policy was a barrier to prospective teachers and employers in understanding the requirements for registration for overseas qualified teachers.</p> <p>The Institute considers it timely to review and refine the policy to simplify the language and presentation for ease of understanding, and to clarify eligibility requirements for registration.</p>	<p>III. VI. VII.</p>	<ul style="list-style-type: none"> • policy revisions
<p>2. That the Institute consolidate and publish a set of principles under which overseas qualifications are to be assessed for equivalency</p>	<p>The Institute has considered feedback from stakeholders about the challenges facing employers and overseas qualified teachers in understanding whether their qualifications will meet the requirements for registration in Victoria.</p> <p>The Institute recommends that it consolidate and publish a clear set of principles that articulate how an overseas qualification is assessed for equivalency.</p> <p>This information should be expressed clearly and published on the Institute’s website and relevant communications.</p> <p>Stakeholder feedback is supportive of the Institute improving its public facing information relating to assessments for equivalency.</p>	<p>III. VI. VII.</p>	<ul style="list-style-type: none"> • policy revisions • communications review

<p>3. The Institute will continue to refine and review its communications with unsuccessful applicants in line with stakeholder feedback</p>	<p>Where an applicant does not meet the requirements for registration, they are provided with a summary of the reasons why their qualifications were assessed as not equivalent. The applicant is also informed of what they will need to do to meet the requirements for registration.</p> <p>In mid-2024, based on stakeholder feedback, the Institute reviewed its communications with unsuccessful applicants to ensure the reasons for the decision were transparent and clearly articulated what the applicant would need to do to be eligible for registration.</p> <p>Whilst the revisions have improved these communications, the Institute considers it appropriate to continue to refine and review these based on stakeholder feedback. If the recommendations made by the Institute in this report are supported, these letters and the advice contained therein will be amended accordingly.</p>	<p>VII.</p>	<ul style="list-style-type: none"> • policy revisions • communications review
<p>4. That the Institute commence a newly designed fee-for-service to assess overseas qualifications for applicants prior to submission of an application for registration</p>	<p>Overseas-qualified applicants and their prospective employers are significantly impacted when their qualifications do not meet the requirements for registration, particularly if they have already relocated to Victoria to teach. Often, the applicant and employer have already made significant resource outlays (financial, social, time and workforce planning) at the point of being advised that their qualifications do not meet the threshold for registration.</p> <p>In response, the Institute has established a new fee-for-service activity to assess overseas qualifications prior to an applicant applying for registration. This service was established to reduce regulatory burden on applicants and employers, and provide greater certainty to applicants, agencies and employers.</p> <p>Until the start of 2025, the Institute did not have a process to 'pre-assess' overseas qualifications. Previously, overseas applicants were required to apply for registration for their qualification(s) to be assessed for equivalency. The Institute has previously identified this as an area of need and this activity commenced in early 2025. Stakeholder feedback during consultation strongly supported this service.</p> <p>The implementation of this new fee-for-service function may also enable the Institute to generate, over time, a list of previously approved qualifications from specific countries.</p>	<p>VII.</p>	<ul style="list-style-type: none"> • implementation commenced • system enhancements required

<p>5. That the Institute consider teaching qualifications from a higher education provider in combination with other relevant higher education as evidence of equivalence</p>	<p>The Institute considers it reasonable to take a more flexible approach to the assessment of an applicant's qualifications outside of their ITE program to determine if the sum of all their qualifications is substantially equivalent to gain registration.</p> <p>Stakeholder feedback to this approach was generally favourable and would address some common challenges with the assessment of qualifications from countries such as Singapore. The processes around such an assessment would need to be further explored with clearly defined thresholds to ensure standards are maintained.</p> <p>The Institute considers that revisions to the Qualifications Policy to clearly articulate what can be considered when assessing equivalency of a <i>'program or course of study leading to qualifications for entry to teaching'</i> would enable a broader assessment of all relevant higher education study <i>in combination</i> with an ITE program.</p>	<p>I. II. XI. XII.</p>	<ul style="list-style-type: none"> • policy revisions
<p>6. That the Institute consider teaching qualifications from a higher education provider in combination with relevant professional 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>The Institute could consider a more flexible approach to the assessment of an applicant's previous teaching experience in a relevant school setting to determine if their qualifications are substantially equivalent to gain registration. This approach would be consistent with other Australian jurisdictions, such as Queensland and Western Australia.</p> <p>Stakeholder feedback to this approach was variable, with concerns being raised regarding any lowering of current standards and the potential impact of undermining the current qualification requirements for Australian trained teachers. The processes around such an assessment would need to be further explored with clearly defined thresholds to ensure standards are maintained.</p> <p>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>I. II. XI. XII.</p>	<ul style="list-style-type: none"> • may require legislative amendments • policy revisions
<p>7. That the Institute consider developing a new category of Permission to Teach for overseas-qualified teachers to upskill and meet the requirements for registration</p>	<p>In circumstances where an overseas applicant has not met the qualification requirements for registration, that the Institute consider a new flexible category of PTT. The Institute can apply any condition on a grant of PTT, with the most common being to complete an accredited ITE program. The cost and time of completing an Australian accredited ITE program for an overseas qualified teacher may be substantial.</p> <p>The Institute recognises that this condition does not take into consideration those who have completed overseas teaching qualifications and have relevant overseas teaching experience.</p>	<p>II. III. V.</p>	<ul style="list-style-type: none"> • policy revisions • system enhancements required • development of targeted and bespoke bridging

	<p>The Institute considers there may be an opportunity, as part of its review of the PTT Policy in part two of the Ministerial Direction, to develop a new flexible category of PTT specifically for overseas trained teachers.</p> <p>This category of PTT would build on our co-regulation arrangements with schools and:</p> <ul style="list-style-type: none"> • maintain the condition that the PTT holder progress towards teacher registration, however, would have a specific focus on the identified ‘gaps’ in their qualifications rather than the need to undertake an entire ITE program • not be automatically restricted to subject areas or a particular school • enable the person to work full time if judged appropriate by the school • not restrict the holder from undertaking casual relief teaching • enable the person to undertake the fuller duties of a teacher. <p>Once a person has met the conditions, they will be granted provisional registration, noting that this could occur at any time during the PTT grant.</p> <p>In order for the Institute to explore this option, ITE providers would need to consider the development of bridging qualifications to support overseas-qualified applicants to meet the qualifications requirement.</p> <p>The Institute can identify and provide common areas where applicants may be required to ‘upskill’ to meet the qualification requirements, to ITE providers to support the design / identification of relevant unit(s) of study for this cohort. The Institute encourages the Victorian Government to partner with the Institute and ITE providers to consider the development of a bridging program(s) that respond to the known areas of gaps in overseas qualifications.</p>	<p>qualifications by Victorian ITE providers</p>
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Proposed flexible approach to assessment of qualifications



Considerations and background

In developing the recommendations outlined in this report, the Institute has been cognisant that it is important to uphold high standards for entry into the teaching profession. Victoria has a highly trained and qualified teaching workforce that is already under significant strain. Enabling persons who are not suitably qualified to enter the profession could add extra burden to the existing workforce due to the additional support, guidance, supervision and mentoring that new entrants may require.

The Institute noted that throughout the stakeholder consultation process, the need to maintain the highly qualified nature of the teaching profession was a consistent theme, with hesitation for any lowering of current standards. Stakeholders also noted the important role that employers play in providing adequate support and mentoring for overseas teachers to work effectively in the Australian school context.

The Institute appreciates the importance of ensuring its approaches to the assessment of overseas qualifications are aligned with those of other Australian jurisdictions and New Zealand, particularly due to the operation of the *Mutual Recognition Act 1992* (Cth) and the *Trans-Tasman Mutual Recognition Act 1997* (Cth). The Institute is supportive of an approach that is nationally consistent and does not unintentionally lead to overseas qualified teachers 'jurisdiction shopping' to gain teacher registration in Australia.

The Institute notes that ITE in Australia is currently undergoing significant reforms to improve the quality of ITE programs, including implementing recommendations agreed to by all Education Ministers arising from the [Strong Beginnings: Report of the Teacher Education Expert Panel \(TEEP\)](#). Any recommendations regarding the assessment of overseas qualifications should be cognisant of these reforms and of graduates from Australian ITE programs who are held to this standard.

In undertaking this work, the Institute has developed recommendations for the Minister for Education's review that consider the need to support the teaching workforce by registering overseas qualified teachers, whilst maintaining the integrity and quality of the teaching profession to ensure that Victorian learners have the best teachers. The recommendations respond to identified challenges raised by stakeholders for overseas qualified teachers applying from countries such as Singapore and, if supported, these recommendations would enable the registration of many of these teachers.

Whilst outside the Terms of Reference of this report, stakeholder feedback indicated there were barriers for overseas qualified teachers to move to Australia due to duplication of processes, including, but not limited to, qualification assessments by the Institute and AITSL for visa purposes. There may be opportunity nationally to explore whether visa applications can be streamlined to reduce duplication, such as a single portal for documentation to reduce the burden on applicants to submit the same documents to different entities, and / or VIT (and other TRAs) being recognised as the independent assessing authority for skilled migrant qualifications assessments. .

The Institute notes, whilst also outside the TOR of this report, stakeholder feedback raised challenges with meeting English language competency requirements. On request from Education Council, the Australasian Teacher Regulatory Authorities (ATRA) engaged The University of Melbourne Language Testing Research Centre (LTRC) to undertake a review of English Language testing requirements in Australia.

There may be opportunity nationally to address some barriers raised by stakeholders if the recommendations of the ATRA endorsed English language proficiency report were accepted by Education Ministers.

Terms of reference

Terms of reference – Report 1

Under the Terms of Reference of the Directive for Report 1, the Review is to cover

- the Institute’s approach to assessing and determining whether an applicant is qualified to be registered as a teacher under section 2.6.8 of the Act where the applicant has completed overseas teaching qualifications, including by having regard to
 - I. the extent to which an applicant’s professional experience as a teacher and overseas teaching qualification can, taken together, satisfy the Institute that the applicant has completed a program or course of study leading to qualifications for entry to teaching that is determined by the Institute to be equivalent to an initial teacher education program and obtained a qualification that is appropriate for entry to teaching under section 2.6.8(a)(i) of the Act;
 - II. possible options for how the Institute could differently or better consider and assess an applicant’s professional experience as a teacher and overseas teaching qualification when determining whether they are eligible to be registered as a teacher;
 - III. the August 2024 Australian Institute for Teaching and School Leadership (**AITSL**) *Framework for Teacher Registration in Australia* and the expectation in the SOE that it focuses on improving national consistency in teacher registration processes as part of Action 5 of the National Teacher Workforce Action Plan;
 - IV. the practical implications for Victoria of overseas teachers gaining registration in other Australian jurisdictions and then seeking registration in Victoria under the *Mutual Recognition Act 1992* (Cth) due to the Institute’s current approach to assessing and determining whether an applicant is eligible to be registered as a teacher where the applicant has completed overseas teaching qualifications;
 - V. the approaches of teacher registration authorities in other states and territories in assessing applications for registration as a teacher from persons who have completed overseas teaching qualifications and who have overseas teaching experience;
 - VI. the benefits of, and whether there are any opportunities to improve, consistency in the Institute’s assessments of applications and decisions; and
 - VII. whether there are any opportunities to improve communications to unsuccessful applicants who have completed overseas teaching qualifications and provide them with clear information on
 - a) why their application was unsuccessful; and
 - b) what is required in order for the applicant to be eligible for registration as a teacher.

Section 1: Current approach to the assessment of overseas qualifications

Terms of Reference

- A. the Institute's approach to assessing and determining whether an applicant is qualified to be registered as a teacher under section 2.6.8 of the Act where the applicant has completed overseas teaching qualifications

Education and Training Reform Act 2006 (Vic)

The Institute operates under Part 2.6 of the *Education Training and Reform Act 2006 (Vic)* (the Act). The Institute is responsible for the registration and regulation of all teachers in Victoria. The Institute's purpose is to regulate for a highly qualified, competent and reputable teaching profession.

In its exercising its functions, the Institute must

- consider the wellbeing and safety of children, including by taking into account community expectations (s2.6.3(1A)); and
- have regard to raising the quality of teaching (s2.6.3(3)).

Section 2.6.8 of the Act relates to qualifications required for teacher registration and states that a person is qualified to be registered as a teacher if they have completed an ITE program (or a program or course of study leading to qualifications for entry to teaching that is determined to be equivalent to an ITE program and that is appropriate for entry to teaching).

To be qualified as a teacher, the Act also states that applicants must produce evidence that they meet the criteria set by the Minister for Education relating to

- suitability to teach.
- competence in speaking and communicating in English
- standards of professional practice.

Section 2.6.8 Qualification for registration as a teacher

A natural person is qualified to be registered as a teacher—

a) if the person—

- I. has satisfactorily completed an initial teacher education program or a program or course of study leading to qualifications for entry to teaching that is determined by the Institute to be equivalent to an initial teacher education program and obtained a qualification that is appropriate for entry to teaching; and
- II. produces evidence that the person satisfies the criteria approved by the Minister about—
 - A. suitability to be a teacher; and
 - B. competence in speaking or communicating in the English language for the person to teach in a school; and
- III. produces evidence that the person has achieved the standards of professional practice required for registration that are approved by the Minister.

Qualifications Policy

The Institute's [Qualifications Policy](#) provides further detail about the qualifications required for entry into the teaching profession.

The policy outlines the qualification packages accepted for registration, articulates the requirements of the Act and conforms with a nationally consistent approach to the registration of teachers.

The policy articulates the following considerations for the Institute when determining equivalency of an overseas qualification

- whether the academic and teaching qualifications are approved by the relevant higher education authorities in the countries where they are offered
- whether the vocational and professional qualifications are approved by relevant government authorities in the countries where they are offered
- Country Education Profiles (**CEP**) published by the National Office on Overseas Skills Recognition and / or its successor organisation will be accepted by the Institute as the authoritative reference source for equivalency determinations on overseas qualifications.

The Qualifications Policy was last approved by the Minister for Education on 6 December 2016. The Institute recognises that the current policy is not written in plain English and can be difficult to interpret, particularly for prospective applicants from overseas who are not familiar with the qualification and registration requirements for teachers in Victoria and where English may not be their first language.

As part of the consultation for this review, stakeholders indicated that the complexity of the Qualifications Policy was a barrier to prospective teachers and employers in understanding the requirements for registration for overseas qualified teachers.

The Institute considers it timely to review and refine the policy to simplify the language and presentation of the policy for ease of understanding, especially for overseas and interstate applicants and potential employers, to clarify eligibility for registration and the process for notifying applicants of their ineligibility. It should be noted that a revised Qualifications Policy will require approval from the Minister for Education.

Recommendation 1

That the Institute revise its Qualifications Policy to clarify expectations and ensure accessible language for all prospective applicants.

Supporting overseas applicants to understand their eligibility for registration

In addition to Recommendation 1 to revise the Institute's Qualifications Policy, the Institute has considered feedback from stakeholders regarding the challenges facing employers and overseas qualified teachers in understanding whether their qualifications will meet the requirements for registration in Victoria.

The Institute recommends that further work be undertaken to consolidate, refine and publish a set of principles on its website that clearly articulate how an overseas qualification is assessed for equivalency. This information should be published clearly on the Institute's website and provided to prospective applicants along with relevant country specific guidance notes to support employers and prospective applicants in determining their potential eligibility for registration.

Recommendation 2

That the Institute consolidate, refine and publish a set of principles under which overseas qualifications are to be assessed for equivalency.

National approach to initial teacher education program accreditation

The Institute adheres to the nationally agreed approach to ITE accreditation, endorsed by the Education Council in 2015. This process ensures all ITE programs meet the Australian standards established by AITSL and outlined in the [Accreditation of initial teacher education programs in Australia: Standards and Procedures \(Standards and Procedures\)](#). These standards are designed to ensure all graduates of ITE programs have the knowledge, skills and experience to make a positive impact on student learning.

The Standards and Procedures prescribe the requirements for the knowledge and skills to be included in an ITE program. These requirements are substantial and include, but are not limited to

- the requirement for all 37 descriptors of the Australian Professional Standards for Teachers (APST): Graduate Teacher level are taught, practiced and assessed, and require that pre-service teachers (PSTs) have demonstrated successful performance against all of the Graduate Teacher Standards prior to graduation
- the successful completion of a Teaching Performance Assessment (TPA), which is a tool used to assess the practical skills and knowledge of PSTs in their final year of an ITE program and ensure they are 'classroom ready'
- the completion of a minimum of 60 days of supervised teaching practice in a postgraduate program.

It is expected that any applicant who has completed their ITE program in Australia has completed an accredited ITE program.

ITE in Australia is currently undergoing significant reforms to improve the quality of programs, including implementing recommendations agreed to by all Education Ministers arising from the [Strong Beginnings: Report of the Teacher Education Expert Panel \(TEEP\)](#). These reforms require among others the implementation of core content into all ITE programs.

Assessment of overseas qualifications

Under Section 2.6.8 of the Act, the Institute will undertake an assessment of overseas applicants' qualifications to determine **equivalency** to an initial teacher education program.

In undertaking the assessment, the Institute is not seeking to establish that an overseas qualification meets all requirements of Australian accredited ITE programs as this would be impractical. For instance, it would not be necessary for an overseas qualification to have ensured all graduates have demonstrated the Graduate Teacher level of the Australian Professional Standards for Teachers.

In determining the equivalence of an overseas qualification, the Institute will refer to Country Education Profiles managed by the Commonwealth Department of Education as the authoritative reference source. The Institute may also consider the individual content of ITE programs and / or Australian Institute of Teaching and School Leadership (AITSL) skills assessments.

The assessment of an overseas qualifications will look for the following to support a determination of equivalency

- be a course of initial teacher education
- include a minimum of 45 days¹ of supervised teaching practice (STP) in a primary / secondary school setting
- involve higher education study of at least four years full-time equivalent (FTE) academic study
- include professional studies in teacher education of at least one year of FTE academic study
- include discipline studies appropriate to the teaching area/s.

Applications for teacher registration from overseas have significantly increased since 2021, with an approximate **500%** increase from 2021 to 2024. There are a number of factors that have contributed to the increase of overseas applications, including the opening up of borders after the COVID-19 pandemic and increased overseas recruitment activities by the education sector due to teacher workforce shortages.

A summary of the number of applications received, approved and those ineligible for registration can be found in **Table 1**, noting this data does not include overseas qualifications assessed for the Department of Education where the assessment did not include an application for registration.

Table 1: Overseas applications for registration 2021–2024

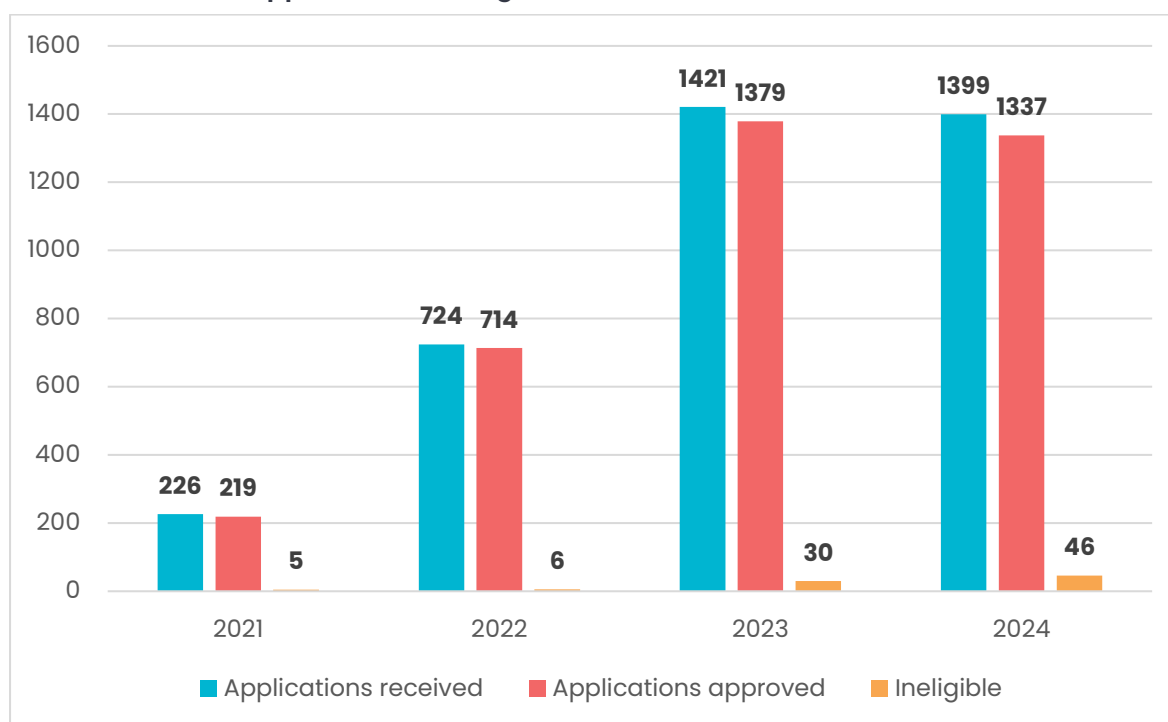


Table 1 demonstrates that the vast majority of overseas applicants are approved for registration, with approximately **3%** of applications did not meet the requirements for registration.

¹ Please note 45 days of supervised teaching practice is the minimum requirement nationally and for visa assessments. Australian ITE programs require a higher threshold of 80 days in an undergraduate award and 60 days in a postgraduate award.

In 2024, **46** applications did not meet the requirements for registration out of **1,395** received and assessed by the Institute. Of these, **6** subsequently applied for and were granted PTT. A further **2** applications were later approved via mutual recognition (**MR**) (one via Western Australia and one via New Zealand). Of the **46** applicants, there were **12** applicants who completed England's school-centred initial teacher training (**SCITT**). The SCITT program is outlined below.

In 2023, **30** applications did not meet the requirements for registration out of **1,419** received and assessed by the Institute. Of these, **10** subsequently applied for and were granted PTT. A further **2** applications were later approved via MR (one via Western Australia and one via ACT). Of the **30** applicants, there were **6** applicants who completed SCITT.

In 2022, **6** applications did not meet the requirements for registration out of **724** received and assessed by the Institute. Of these, **1** subsequently applied for and was granted PTT, and **1** applicant was later approved via MR (via Western Australia).

In 2021, **5** applications did not meet the requirements for registration out of **226** received and assessed by the Institute, and **1** subsequently applied for and was granted PTT.

Where an applicant is refused registration, the Institute will suggest (when appropriate) that the applicant may be eligible to apply for PTT whilst they progress towards teacher registration.

Common gaps in overseas qualifications

There is significant diversity in teaching qualifications internationally, with each application assessed on a case-by-case basis.

The Institute has identified some key themes of where there are 'gaps' in an overseas qualification that make an applicant ineligible for teacher registration. Noting, some applicants may have one or more reasons why they are found not eligible for registration.

Reasons for ineligibility include, but are not limited to

- the applicant did not complete an initial teacher education program
- the applicant studied an education program that was not delivered by a higher education provider
- the applicant's higher education studies do not include sufficient professional and pedagogical studies equal to one year
- the applicant's higher education studies do not include the study of relevant subject areas for teaching the curriculums in secondary schools in Australia secondary schools
- the applicant's higher education studies do not include sufficient coverage of the key learning areas in Primary Schools. For instance, the program only covered Science and Maths and did not address English, Humanities, Health and Physical Education and Art
- the applicant does not have four years of higher education study.

In addition to the above, another common reason for ineligibility of registration for an overseas applicant is that they are unable to provide evidence of English language competency at the requisite standard.

The largest proportion of applicants who do not meet the requirements for registration are from England and the United States of America, an explanation of the common challenges from these countries is outlined below.

England

The approach to teacher education in England often results in qualifications / approval to teach that does not meet the Institute's qualification requirements. This position is also aligned with AITSL's skilled visa migration assessment, where some programs as outlined below are not accepted.

In England, a person can apply for Qualified Teacher Status (**QTS**), it is generally required that a person hold QTS to teach in a state-maintained school.

The Institute can only consider ITE programs that result in a formal academic award, final academic transcript and a statement of STP all issued by the institution awarding the teaching qualification.

In England, it is common that prospective teachers undertake a Postgraduate Certificate in Education (**PGCE**). Whilst some PGCE's result in a formal qualification from an approved higher education provider and meet the Institute's qualification requirements, many do not result in a formal qualification or meet equivalency requirements.

Often a PGCE is undertaken as a SCITT program. Trainees in these programs undertake most of their study and learning within a classroom, often these trainees are only assessed in school and there are no formal assessments or qualifications granted by a higher education provider.

The following scenarios may result in a PGCE that does not meet the qualification requirements for registration in Victoria / for migration purposes as assessed by AITSL

- a PGCE studied part-time over 1 academic year (or 12 months)
- a PGCE focused on academic units only – all ITE qualifications must include a program of professional studies in education relevant to the age range of the students for the occupation you have nominated that includes
 - discipline-specific curriculum
 - pedagogical studies
 - general education studies; and
 - supervised teaching practice.
- a PGCE that does not include compulsory STP assessed by the awarding institution – this includes STP that is undertaken whilst studying a PGCE qualification but is managed and/or assessed via a third party rather than the university (such as a school or SCITT provider)
- a PGCE that accepts prior STP as advanced standing or as an entry requirement into the course
- a PGCE where the awarding institution is not able to provide the required evidence for STP
- a PGCE that is for in-service teachers or designed as further study on top of ITE qualification.

The Institute's approach to the assessment of English qualifications is consistent with AITSL's approach in assessing visa applications as well as the Scottish and New Zealand TRAs where these programs are also generally not accepted.

The Institute notes a SCITT program is well below the threshold for registration; it does not consider a SCITT program graduate would be eligible for registration, regardless of any recommendations outlined in this report.

Case study 1 – England

Applicant A holds a PGCE from Bath Spa University in England and holds Qualified Teacher Status.

The Institute refused the application for the following reasons

1. the PGCE did not contain sufficient academic studies that equate to one year of study in teaching
2. the STP was not supervised or assessed by Bath Spa University.

This application is unlikely to have met the requirements for AITSL's skilled visa migration assessments.

The applicant was subsequently granted PTT and is completing a Master of Teaching (Secondary) at a Victorian university.

Unites States of America

There is considerable variability in the qualification / training requirements for teachers across each state in America. Whilst some states require the completion of an initial teacher education program, others do not require any formal ITE program to enable someone to teach.

In some instances, a person may have completed an education program and received a teaching credential, however these programs are not equivalent to an ITE program and often do not meet the discipline and pedagogical study requirements for registration in Australia.

Case study 2 – USA

Applicant B has been a high school teacher in California for five years. She completed a Certificate in Education at Fortune School of Education.

The Institute refused the application for the following reasons

1. Fortune School of Education is not listed on the US (Federal) Department of Education or Council for Higher Education Accreditation approved institute list for the USA.
2. The school is provisionally listed to offer degree programs (until 25 October 2024 and full accreditation by 25 Oct. 2027) with the Bureau for Private Postsecondary Education but as this organisation states, they are not an accrediting body.
3. While the school is accredited by the California Commission on Teacher Credentialing - this is not recognised federally.
4. As the Certificate in Education was not completed at an approved and federally accredited higher education institute in the USA, the Institute cannot recognise any qualification completed at the Fortune School of Education as an approved ITE program.

This decision is aligned with the qualification requirements in the Framework for Teacher Registration in Australia, which requires all applicants to have completed four years of higher education at a recognised higher education institute.

Section 2: Communications with unsuccessful applicants and opportunities to improve consistency of assessments

Terms of Reference

- VI. the benefits of, and whether there are any opportunities to improve, consistency in the Institute’s assessments of applications and decisions; and
- VII. whether there are any opportunities to improve communications to unsuccessful applicants who have completed overseas teaching qualifications and provide them with clear information on:
 - a) why their application was unsuccessful; and
 - b) what is required in order for the applicant to be eligible for registration as a teacher;

Communications to unsuccessful applicants

Where an applicant does not meet the requirements for registration, they are provided with a summary of the reasons why their qualifications were assessed as not equivalent. The applicant is also informed of what they will need to do to meet the requirements for registration.

The letter provides information to the applicant on what they will be required to do to meet the Institute’s requirements and, where appropriate, the applicant is provided details of where to complete an Australian accredited ITE program.

In mid-2024, based on stakeholder feedback, the Institute reviewed its communications with unsuccessful applicants to ensure the reasons for the decision were transparent and included what the applicant would need to do to be eligible for registration. The revised letter provides a table that articulates the Institute’s findings of its assessment of the applicant’s qualifications and the reason(s) why the qualification(s) did not meet the requirements.

An example extract from a revised letter can be found in **Appendix 1**.

Recommendation 3

That the Institute continue to refine and review its communications with unsuccessful applicants in line with stakeholder feedback.

Country specific guidance notes

In response to overseas recruitment programs from the Victorian education sectors, the Institute developed several Guidance Notes to clarify and summarise the process for applying for registration for overseas qualified teachers, documentation requirements and a summary of the factors taken into consideration by the Institute when determining the equivalence of an overseas qualification to an ITE program.

In response to common questions and to clarify expectations for specific countries, the Institute developed country specific guidance notes with specific detail about documentation / qualification requirements from those countries. At the time for writing, the Institute has developed country specific guidance notes for Canada and the United Kingdom (England).

The Institute considers it appropriate to continue to develop country specific guidance notes to continue to support overseas applicants to understand what is required in order to apply for teacher registration in Victoria and to support employers seeking to recruit from overseas.

Fee-for-service to assess overseas qualifications

As outlined in **Table 1**, the number of applications for registration from overseas qualified teachers has significantly increased and this number is expected to rise.

As a result, the Institute is expending more resources to manage

- the complex assessments required for overseas qualifications
- the often-lengthy engagement with applicants and employers seeking to hire overseas-qualified teachers, international ITE providers and other stakeholders such as the Department of Education and recruiting agencies.

Overseas qualified applicants and their prospective employers are significantly impacted if they have relocated or are considering relocating to Victoria to teach and their qualifications do not meet the Institute's requirements.

Overseas qualified applicants can only apply for registration if they are already in Australia or can provide evidence that they will arrive in Australia within **3** months. The **3**-month requirement is to ensure that overseas criminal records are appropriately current when the Institute assesses the application, and that applicants can comply with Australian criminal history check proof of identity requirements.

Until the start of 2025, the Institute did not have a process to 'pre-assess' overseas qualifications. Currently, individuals who have undertaken their qualifications overseas must apply for registration for their qualification(s) to be assessed for equivalency. This means that an applicant must

- pay an application fee;
- have a job offer and/or demonstrate an intention to move to Victoria within 3 months;
- meet the Institute's English language competency (ELC) policy - often, this means paying **\$400-\$450** to sit an approved ELC test; and
- pay for a nationally coordinated criminal history check as well as any relevant overseas criminal record check(s).

In cases where a qualification is assessed as not equivalent, the Institute must undertake extensive and often challenging engagement with the applicant and employing agencies, including schools, recruitment agencies, the Department of Education and employer representative groups.

Often, the applicant and employer have already made significant resource outlays (financial, social, time and workforce planning) at the point of being advised that their qualifications do not meet the threshold for registration.

In late 2024 and commencing January 2025, the Institute established a new fee-for-service (**\$285**) to assess overseas qualifications prior to an applicant applying for registration. This new service was established to

- reduce regulatory burden on applicants and employers
- respond to the Minister of Education's 2024 Statement of Expectations section B.2 which specifically requires the Institute to improve the teacher registration processing and approval times, including for international teachers
- provide greater confidence and certainty to applicants, agencies, and employers in the prospect of an overseas-qualified applicant obtaining registration in Victoria.

Currently two jurisdictions in Australia offer a fee-for-service assessment of qualifications, Teacher Registration Board of Western Australia (**TRBWA**) and Teacher Registration Board of South Australia (**TRBSA**).

- TRBWA charges **\$473–\$508** for the assessment, depending on whether it is for provisional or full registration, and **\$330** for advice about any additional qualifications required for registration.
- TRBSA charges **\$153** for the assessment.

From 2025, all applications that contain ITE qualifications from outside of Australia will be required to undertake the pre-assessment process (MR applications excepted).

The applicant applies to have international qualifications pre-assessed via their MyVIT account

- submits documentation for pre-assessment (including academic transcripts and evidence of supervised teaching practice)
- pays a pre-assessment fee (**\$285**).

The Institute has employed two additional staff to undertake the pre-assessment process which

- assesses documentation
- seeks further information (if necessary)
- captures the assessment outcome in Nexus (i.e. qualifications are ‘valid’ or ‘invalid’)
 - i. qualifications assessed as equivalent will trigger the ‘qualification module’ in an initial registration application to be marked as ‘valid’
 - ii. individuals whose qualifications have been pre-assessed as valid will not need to complete this module when they apply for registration and the Institute will not be required to reassess this module when assessing the application.
- provides a detailed qualification assessment outcome letter, including next steps (i.e. apply for initial registration if qualifications are assessed as valid or undertake additional study if qualifications are assessed as invalid / not equivalent).

The Institute’s newly commenced fee-for-service to assess overseas qualifications will provide greater assurance to employers recruiting overseas and overseas applicants that they will be eligible for registration prior to moving to Australia. During consultation, stakeholders welcomed this new fee-for-service process.

An overview of the previous application process and revised process with pre-assessment of qualifications can be found at **Appendix 2**.

Recommendation 4

That the Institute commence a newly designed fee-for-service to assess overseas qualifications for applicants prior to submission of an application for registration.

The implementation of this new fee-for-service function may also enable the Institute to generate, over time, a list of previously approved qualifications from specific countries. This may support prospective overseas teachers to understand whether their qualification is likely to be approved for registration, noting each qualification would still be required to be assessed as part of the application due to variances in the structure of the program for each individual and / or the years(s) of delivery.

Section 3: Exploring a flexible approach to assessing overseas qualifications and teaching experience

Terms of Reference

- II. the extent to which an applicant's professional experience as a teacher and overseas teaching qualification can, taken together, satisfy the Institute that the applicant has completed a program or course of study leading to qualifications for entry to teaching that is determined by the Institute to be equivalent to an initial teacher education program and obtained a qualification that is appropriate for entry to teaching under section 2.6.8(a)(i) of the Act;
- III. possible options for how the Institute could differently or better consider and assess an applicant's professional experience as a teacher and overseas teaching qualification when determining whether they are eligible to be registered as a teacher;
- V. the approaches of teacher registration authorities in other states and territories in assessing applications for registration as a teacher from persons who have completed overseas teaching qualifications and who have overseas teaching experience;

Professional teaching experience is not currently considered when assessing qualifications for teacher registration. This approach is consistent with the expectations for Australian ITE graduates, the qualification requirements under the Act and the Framework for Teacher Registration in Australia.

Approach in other Australian jurisdictions

All Australian jurisdictions consider the following in assessing an overseas qualification for equivalency. The qualification must

- be a course of initial teacher education
- include a minimum of 45 days of supervised teaching practice in a primary / secondary school setting
- involve higher education study of at least four years full-time equivalent (FTE) academic study
- include professional studies in teacher education of at least one year of FTE academic study
- include discipline studies appropriate to the teaching area/s.

To ensure national consistency in the assessment of overseas qualifications and maintain appropriate standards for entry into the teaching profession, the Institute considers that the above requirements in assessing equivalency should be fundamentally maintained.

A summary of the approach of each jurisdiction can be found at **Appendix 4**. The Institute has commenced consultation with each jurisdiction to gain a deeper understanding of their policies and process.

Proposed revised approach to recognise professional teaching experience in addition to teaching qualifications

The Institute recognises that professional work experience as a teacher can contribute towards the development of skills and experience to enable a person to work effectively as a teacher, when considered in combination with relevant qualifications.

3-year teaching qualifications

Under the Institute's current Qualifications Policy, **8** years of relevant work experience can be considered equivalent to an undergraduate degree and contribute towards meeting the **4** years of higher education qualifications requirement when combined with a minimum **1**-year ITE program. For instance, this would enable a tradesperson who completed an apprenticeship, with **8** years of experience in that field to enter and to complete a post-graduate ITE qualification. On completion of the post-graduate ITE program, the Institute will consider this person eligible to meet the qualifications requirements for registration.

The Institute considers it may be appropriate to allow for the combination of an initial teacher education program of a minimum of **3** years, along with extensive and contextually relevant professional teaching experience to be considered equivalent to the qualification requirements for **4** years of higher education for entry into the teaching profession.

This approach would enable **3**-year qualified teachers with extensive and contextually relevant professional teaching experience to be eligible to be granted provisional registration.

This would support Australian teachers with a historic qualification of **3** years to be eligible for registration and would support some overseas teachers to meet the eligibility requirements, most notably this may include New Zealand, Ireland and some other European countries. There is a risk that **3**-year trained teachers from Australia who were required to complete a fourth year of study and / or were refused registration based on a **3**-year qualification may be dissatisfied with this change.

A large proportion of MR applications are from New Zealand (**61%** in 2024), where a **3**-year qualification is accepted. This approach has the potential to reduce applicants applying to New Zealand for registration in the first instance and then subsequently applying to the Institute under MR to avoid the requirements for a **4**-year higher education qualification.

This may encourage teachers from neighbouring countries to apply directly to the Institute and further support Victoria being seen as an attractive destination to work as a teacher.

It is important to note that this approach could be considered contrary to the Framework for Teacher Registration in Australia which requires the completion of **4** years of higher education. The Institute considers that whilst potentially contrary to the Framework, this approach is in line with the approach undertaken in other Australian states and territories and New Zealand and aligns with expectations under the Higher Education Standards (TEQSA) which allows for the recognition of prior learning, including work / life experience, for entry into higher education awards.

Case study 4 – Ireland

Applicant D holds a Bachelor of Education from Ireland and has been teaching for **5** years.

The Institute found the qualifications didn't meet requirements as the applicant did not complete **4** years of higher education. The bachelor's degree was three years.

If **Recommendation 6** was supported and implemented, this is an example of where the Institute could consider whether it is appropriate to utilise teaching experience to determine equivalency with a **4**-year qualification.

Proposed approach to assess an applicant's whole qualifications package

As outlined in the case studies, some applicant's qualifications are currently assessed as not being equivalent due to their ITE program lacking a sufficient number of studies in key learning areas, either in relation to the Australian primary curriculum and / or the secondary school curriculum.

The Institute could consider a more flexible approach to the assessment of an applicant's qualifications in conjunction with their ITE program to determine if they are substantially equivalent to an ITE program to gain provisional registration.

For example, where a person has not covered all Primary key learning areas, but has exposure to these areas in their non ITE qualifications [e.g. in additional qualifications such as a Bachelor of Science or Master of Education (Special Needs)], this in conjunction with an appropriate ITE program could be considered substantially equivalent and the applicant could be granted provisional registration.

Case study 5 – Singapore

Applicant E has worked as a Primary School Teacher in Singapore for **3** years. They hold the following qualifications

1. Postgraduate Diploma in Education, Nanyang, Technological University
2. Master of Education (Curriculum and Teaching), Nanyang Technological University
3. Bachelor of Laws with Honours, University of Nottingham

The Institute found their qualifications did not meet requirements as their ITE qualification (Postgraduate Diploma in Education) which is a primary teaching degree, did not cover the following key learning areas: science, technology, health and physical education, the Arts, and studies of society and environment.

Applicant A applied for and was granted registration in Western Australia and subsequently was granted registration in Victoria under mutual recognition.

If **Recommendations 5 and / or 6** were supported and implemented, this is an example of where the Institute could have taken into consideration the applicant's additional studies and /or teaching experience in its assessment. Applicant E had completed units relating to Arts, Technologies, Social Studies and Science during their Master of Education and had taught units in these curriculum areas at their previous workplace.

Stakeholder feedback was supportive of the Institute assessing all relevant higher education qualifications when determining equivalency.

The Institute considers that revisions to the Qualifications Policy to clearly articulate what can be considered when assessing equivalency of a 'program or course of study leading to qualifications for entry to teaching' would enable a broader assessment of all higher education study in combination with an ITE program.

Recommendation 5

That the Institute consider teaching qualifications from a higher education provider in combination with other relevant higher education as evidence of equivalence.

Legislative requirements to take a more flexible approach to the assessment of overseas qualifications

To reduce ambiguity on the interpretation of s2.6.8 and the ability to include professional teaching experience as part of an assessment, a minor legislative amendment should be considered to mirror a similar approach to TRBWA's current governing legislation.

An example with this amendment is highlighted below for reference.

Section 2.6.8 Qualification for registration as a teacher

A natural person is qualified to be registered as a teacher—

- a) if the person—
 - I. has satisfactorily completed an initial teacher education program or a program or course of study leading to qualifications for entry to teaching that is determined by the Institute to be equivalent to an initial teacher education program and obtained a qualification that is appropriate for entry to teaching;
 - A. in determining equivalency, the Institute may consider relevant teaching experience in conjunction with teaching qualifications
 - II. produces evidence that the person satisfies the criteria approved by the Minister about—
 - A. suitability to be a teacher; and
 - B. competence in speaking or communicating in the English language for the person to teach in a school; and
 - III. produces evidence that the person has achieved the standards of professional practice required for registration that are approved by the Minister.

This approach would be consistent with the approach of other Australian jurisdictions.

The Institute is liaising with the Department of Education to determine the nature and extent of any legislative amendments that may be required to allow for the consideration of professional teaching experience in an assessment. Amendments to the Qualifications Policy will also be required.

Stakeholder feedback regarding the inclusion of relevant teaching experience as part of the assessment process was variable, with some stakeholders raising strong concerns about undermining current standards for entry into the teaching profession.

With this in mind, a proposed legislative amendment may require further consultation with stakeholders. This would be necessary to determine the level of experience required to support an

assessment of substantial equivalence to an ITE program, and which 'gaps' in a qualification would be appropriate to have professional teaching experience considered.

Guidance material would be developed by subject matter experts regarding the assessment of experience / other study. The Institute would also need consider the most appropriate assessment and approval processes. The Institute notes that inclusion of this approach to the assessment of qualifications will require additional staffing and resourcing.

This approach will likely require both legislative and policy amendments as outlined above.

Recommendation 6

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.

Proposed outcomes of a more flexible approach to the assessment of overseas qualifications and teaching experience

If the recommendations within the report are supported and relevant legislative and policy changes are enacted as outlined above, the Institute would be enabled to take a more flexible approach to the assessment of overseas qualified teachers.

Assessment outcome	Regulatory action
Assessment is determined to be substantially equivalent to an ITE program.	Grant provisional registration.
Assessment is determined to be partially equivalent to an ITE program.	Grant a permissive category of PTT that is not restricted to subject areas, time fractions or one school.
Assessment is determined to be not equivalent to an ITE program.	Applicant to enrol in an ITE program , during which they make seek PTT due to workforce shortages or as part of an employment-based ITE program.

Section 4: Permission to Teach for overseas applicants

In circumstances where an overseas applicant has not met the qualification requirement for registration and a school has proven workforce shortage (i.e. unable to recruit a qualified and registered teacher) PTT may be granted.

The grant of PTT is dependent on matching the skills and experience of the applicant with the demonstrated workforce shortage within a particular school. For instance, the school is seeking a religious studies teacher, and the applicant has experience teaching religion in Malaysia.

PTT is an alternative authorisation to teach that exists primarily to address a workforce shortage within Victorian schools. Whilst there are a variety of PTT categories, the most commonly used is PTT (General).

The Institute can apply any condition on a grant of PTT. The most common conditions / policy requirements are that the

1. grant is limited to teach specific subjects or subject areas at a particular school, and therefore cannot be used to undertake casual relief teaching
2. grant is limited to a reduced FTE load (for example, 0.6 FTE) unless they are in their final year of an approved ITE program
3. PTT holder is expected to [progress toward teacher registration](#).

It is expected that a PTT holder progresses towards teacher registration, which would most commonly mean completing an accredited ITE program.

The cost and time of completing an Australian accredited ITE program for an overseas qualified teacher may be substantial. Depending on their eligibility for higher education study, an ITE program is either a four-year undergraduate degree or a two-year postgraduate degree. As the PTT holder is also working in a school, the time for completion at a part-time rate would likely be longer.

The condition placed on PTT limiting a PTT holder to teaching only specific subject areas at a particular school can raise challenges for schools in addressing their staffing needs and the needs of students. The reasoning behind this condition is critical, as it is a recognition that the PTT holder is not qualified as a teacher and therefore should not undertake the full duties of a teacher. For example, for an Australian applicant, PTT may be granted to a person with strong language skills in Indonesian, and they work under PTT to teach this subject whilst they study an Australian ITE award.

Proposed new permissive category of PTT for applicants with minor deficits in qualifications

The Institute recognises that this condition does not take into consideration those who have completed overseas teaching qualifications and have experience teaching overseas in schools, but have not met the qualification threshold for registration.

The Institute considers there may an opportunity as part of its review of the PTT Policy in response to the Ministerial Direction (Report 2), to develop a new more permissive category of PTT for overseas trained teachers whose qualifications are assessed as partially equivalent.

The Institute will further explore the opportunity to develop a new category of PTT, but considers there may be the following possible opportunities

- maintaining the condition that the PTT holder progress towards teacher registration, however, would have a specific focus on the identified 'gaps' in their qualifications rather than the need to undertake an entire ITE program
- not automatically restricted to subject areas or a particular school
- not restrict the holder from undertaking casual relief teaching
- enabling the person to undertake the full duties of a teacher.

Once a person has met the condition, they will be granted provisional registration, noting that this could occur at any time during the PTT grant.

This opportunity will be further explored in **Report 2** in response to the Ministerial Direction.

In order for the Institute to explore this option, Victorian ITE providers would need to consider the development of bridging qualifications to support overseas qualified applicants to meet the qualifications requirement.

The Institute can identify and provide common areas where applicants may be required to 'upskill' to meet the qualification requirements to ITE providers to support the design / identification of relevant unit(s) of study for this cohort. The Institute encourages the Victorian Government to partner with the Institute and ITE providers to consider the developing of a bridging program(s) that respond to the known areas of gaps in overseas qualifications.

Case study 3 – Spain

Applicant C holds a Bachelor of Philosophy and a Master's degree in Teacher Training. The applicant has been teaching high school for **4** years.

The Institute found their qualifications did not meet requirements as the ITE program included only **31** days of STP. The current requirements under the Institute's policies and the Framework for Teacher Registration in Australia is for a minimum of **45** days of STP (this threshold is higher for Australian ITE graduates – **60-80** days).

This application is an example of where the Institute could grant PTT (International) with a condition to undertake additional supervised teaching practice with an Australian ITE provider.

Recommendation 7

That the Institute consider developing a new category of Permission to Teach for overseas-qualified teachers to upskill and meet the requirements for registration.

Section 5: Framework for Teacher Registration in Australia and the impact of Mutual Recognition

Terms of Reference

- B. the August 2024 Australian Institute for Teaching and School Leadership *Framework for Teacher Registration in Australia* and the expectation in the SOE that it focuses on improving national consistency in teacher registration processes as part of Action 5 of the National Teacher Workforce Action Plan;
- C. the practical implications for Victoria of overseas teachers gaining registration in other Australian jurisdictions and then seeking registration in Victoria under the *Mutual Recognition Act 1992* (Cth) due to the Institute's current approach to assessing and determining whether an applicant is eligible to be registered as a teacher where the applicant has completed overseas teaching qualifications;

Framework for Teacher Registration in Australia

The AITSL led work to develop a nationally consistent framework for the registration of teachers in all states and territories in 2011 which established the Framework for Teacher Registration in Australia (the **Framework**).

The Framework was reviewed in 2023–2024, and a revised Framework was agreed by Education Ministers in August 2024. The Institute worked closely with AITSL and all other Australian jurisdictions to revise the Framework to improve national consistency in teacher registration. The Framework sets out uniform principles for the registration of teachers in education settings (including teachers in early childhood settings) across Australia. It outlines a nationally consistent approach to the registration of teachers, where applicable, across the states and territories.

The Framework articulates that there is a minimum qualification, including a teacher education qualification, for registration.

The qualifications required for registration are

- at least four years of higher education (full-time or equivalent) study, including an initial teacher education program accredited in Australia, using the Accreditation of initial teacher education programs in Australia: Standards and Procedures, or
- a teacher education qualification approved by Australian Children's Education and Care Quality Authority (**ACECQA**); and/or
- an overseas or historic qualification assessed as equivalent.

The Institute's Qualifications Policy and approach to the assessment of qualifications is informed by and consistent with the requirements articulated in this framework.

AITSL migration assessment

Overseas qualified teachers can apply to AITSL for their qualifications to be assessed under the assessment for migration pathway

- an application for a skills assessment with AITSL costs \$1,050, with an appeal cost of \$868
- in some cases, AITSL assessments do not align with the Institute's registration requirements.

All applications assessed by AITSL are assessed against two criteria, both of which must be met.

1. Qualifications

- completion of a minimum of 4 years full-time (or part-time equivalent) higher education (university) level study that results in qualification/s - this must include a relevant initial teacher education qualification and can include other qualifications
- The study must include an initial teacher education qualification comparable to the educational level of an Australian Bachelor degree (Australian Qualifications Framework Level 7) or higher, which includes
 - i. at least 1 year full-time (or part-time equivalent) higher education (university) Primary / Secondary initial teacher education
 - ii. completion of at least 45 days of supervised teaching practice with students in the relevant stage of schooling (e.g. Primary or Secondary).

2. English Language Competency

It is important that the approach to overseas qualification assessments undertaken by the Institute is consistent with that undertaken by AITSL to avoid differing decisions regarding eligibility to work as teacher in Australia.

Whilst outside the Terms of Reference of this report, stakeholder feedback indicated there were barriers for overseas qualified teachers to move to Australia due to duplication of processes, including but not limited to qualification assessments by the Institute and AITSL for visa purposes. There may opportunity nationally to explore whether visa applications can be streamlined to reduce duplication, such as qualifications assessments being undertaken by the relevant TRA.

Mutual recognition

Section 17 of the *Mutual Recognition Act 1992* (Cth) (**MR Act**) provides that a person registered to practise an occupation in one Australian jurisdiction is entitled to practise an equivalent occupation in other Australian jurisdictions.

Section 16 of the *Trans-Tasman Mutual Recognition Act 1997* (Cth) (**TTMR Act**) provides that a person registered to practise an occupation in Australia is entitled to practice an equivalent occupation in New Zealand, and vice versa, without the need for further testing or examination. Under both the MR Act and TTMR Act, a person registered as a teacher in any Australian State or Territory and / or New Zealand may apply for registration in Victoria with the Institute.

Notwithstanding the variances in legislation / policies in assessing overseas teaching qualifications, once an applicant has successfully registered as a teacher in an Australian state or territory or New Zealand that person is eligible to apply for registration in another state or territory under the MR Act or TTMR Act. The Institute must accept that the applicant has the qualification requirements for registration without further examination.

Consequently, a person who may be assessed as not meeting the qualification requirements in Victoria may apply for registration in another jurisdiction and then apply for MR to register as a teacher in Victoria.

As the MR Act and TTMR Act are both Federal laws that operate more broadly than the teaching profession, there are limited avenues to alter their operation. The Institute considers it more appropriate to work collaboratively with the Australian TRAs to better ensure consistency in the assessment of overseas qualifications.

As outlined in **Section 1** of this report, there are a limited number of instances where the Institute has identified an applicant who has been refused registration in Victoria and subsequently been granted registration in another jurisdiction and then applied to the Institute under MR.

The number of MR applications have increased significantly since 2021 as outlined below in **Table 2**.

Table 2: Total number of MR applications 2021 – 2024

	2021	2022	2023	2024
Number of MR applications with overseas qualifications	139	249	497	598
Total number of MR applications	749	1,040	1,507	1,662
Percentage of MR applications with overseas qualifications in all MR applications	18.5%	23.9%	33%	36%

The increase in the number of MR applications is likely reflective of recruitment activities both within Australia and in neighbouring countries. As outlined in **Table 3**, the largest number of applicants under MR are from New Zealand, accounting for **61%** of total applications in 2024.

As the Institute must accept that an MR applicant has the qualification requirements for registration without further examination, it is not feasible to ascertain whether these applicants would have met the qualification requirements if they had applied directly to the Institute.

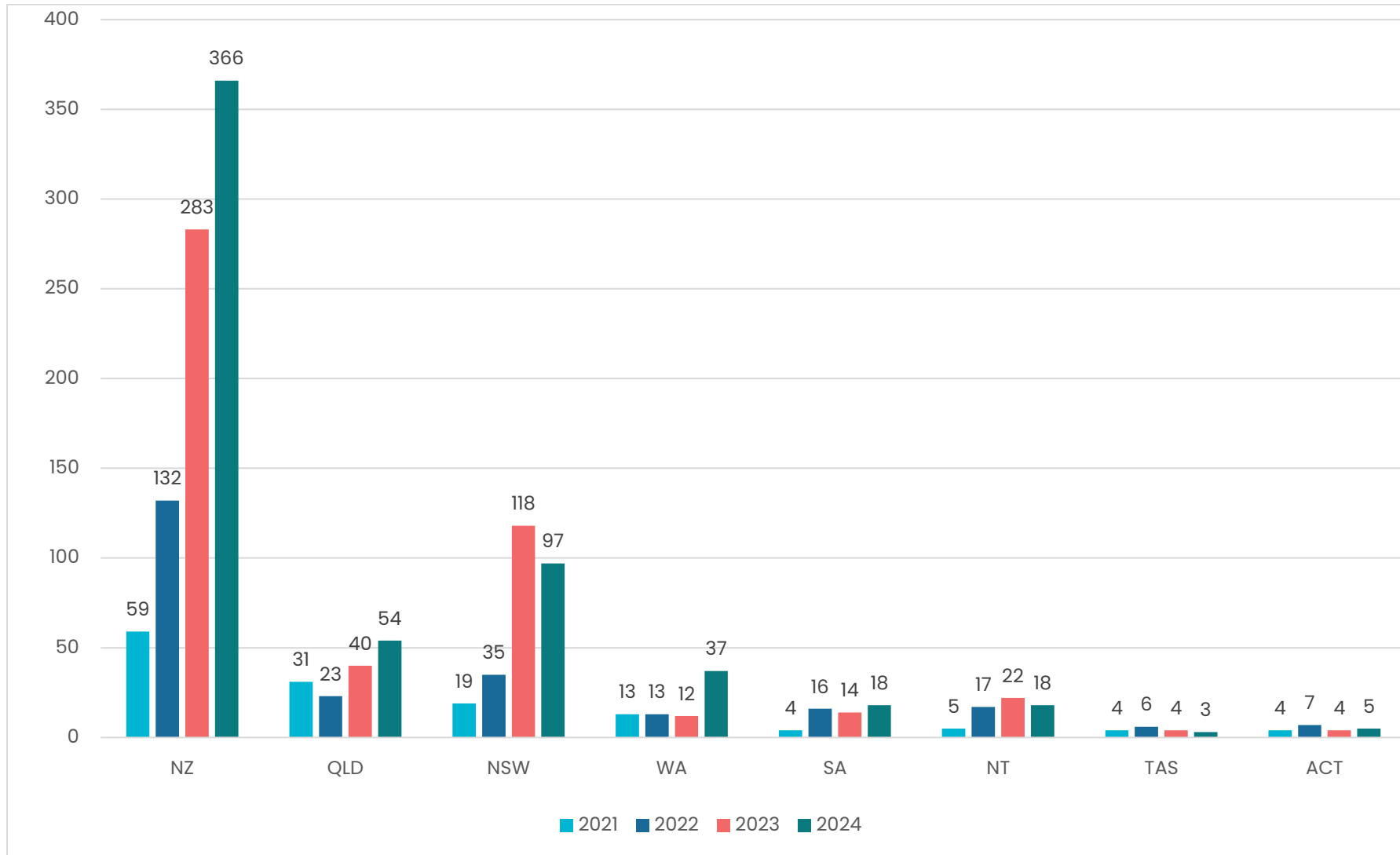
The Institute considers it likely that the high number of applications from New Zealand are due to the following factors:

- the vast majority of these applicants are New Zealand trained teachers relocating to Australia
- recruitment activities to encourage interstate and New Zealand teachers to teach in Victoria
- recruitment activities in the Pacific Islands by Australian states / governments where applicants may be encouraged to apply via New Zealand.

The Institute is intending to consult in depth with The Teaching Council of Aotearoa New Zealand in the coming weeks and will provide further detail to the Minister on any key difference to the approach to the assessment in New Zealand. However, the Institute considers it likely that some Pacific Island trained teacher may first be seeking registration in New Zealand as they accept **3-** year qualifications and have differing English language competency requirements.

There are increasing numbers of MR applications from Queensland, Western Australia and New South Wales. The Institute considers this may be due to some of the variances in how these jurisdictions assess overseas qualifications as outlined in **Section 3** of this report. The Institute has received feedback from stakeholders that some prospective overseas teachers are encouraged to apply for registration in another jurisdiction for this reason. The Institute recognises that it should work towards greater national consistency in the assessment of overseas qualification and considers that if **Recommendations 4** and **5** were actioned this would provide greater consistency with other jurisdictions.

Table 3: MR applications with overseas qualifications 2021- 2024



Appendix 1: Sample letter to unsuccessful overseas applicant

Registration application assessment outcome

Dear [REDACTED]

Thank you for your application for teacher registration with the Victorian Institute of Teaching (VIT) - [REDACTED]

Qualification requirements

To be registered to teach in a Victorian school setting, applicants are required to have completed an approved initial teacher education (ITE) program with four (4) years of full time or equivalent higher education study, including an approved initial primary and/or initial secondary teaching qualification of at least one (1) year's duration which contains a minimum of 45 days supervised teaching practice.

An applicant for teacher registration satisfies English language competence requirements if

- they have completed of four years of higher education study that includes an approved ITE program, in English in Australia, New Zealand, the United Kingdom, United States of America, Canada or the Republic of Ireland; or
- they have completed an approved [English language test](#) with the required scores for the registration being sought.

Assessment

The VIT has assessed your application and, based on the information supplied, has determined that it does not currently meet the requirements for registration in Victoria.

Your application does not meet the requirements for teacher registration for the following reason.

1. The Initial Teacher Education (ITE) qualification you have provided is not equivalent to Australian Standards to be eligible for teacher registration.

The VIT's equivalency assessment of the qualifications provided in your application for registration are outlined below.

Qualification	Duration (higher education)	Comments
Bachelor of Arts (Honours) via The Brighton Institute of Modern Music.	4 years FTE	Undergraduate qualification equivalent to an Australian bachelor's degree. (Not an ITE.)
Professional Graduate Certificate in Education (PGCE) Via the University of Brighton	1 years FTE	The Professional Graduate Certificate in Education (Further Education & Training) is considered to be a vocational or lifelong learning program and not a teacher training program designed to teach in secondary schools. In Victoria, this qualification is more suited to teach in a vocational centre such as TAFE or a

		Vocational Education and Training (VET) environment, both of which are not within the mainstream secondary education system and do not require VIT registration.
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Next steps

Your current application for registration [REDACTED] has been closed as ineligible as it does not meet the requirements outlined above.

If you wish to apply for teacher registration with VIT in future, you will need to provide evidence of

- an approved initial primary and/or initial secondary teaching qualification of at least one (1) year's duration which contains a minimum of 45 days supervised teaching practice (as per the [VIT qualification policy](#)); and
- English language competency (as per the [VIT English language competence policy](#)).

A list of approved ITE programs in Victoria can be found on the [VIT website](#). A full list of approved ITE programs in Australia can be found on the [Australian Institute of Teaching and School Leadership \(AITSL\) website](#). Any of the programs listed will be accepted for teacher registration in Victoria.

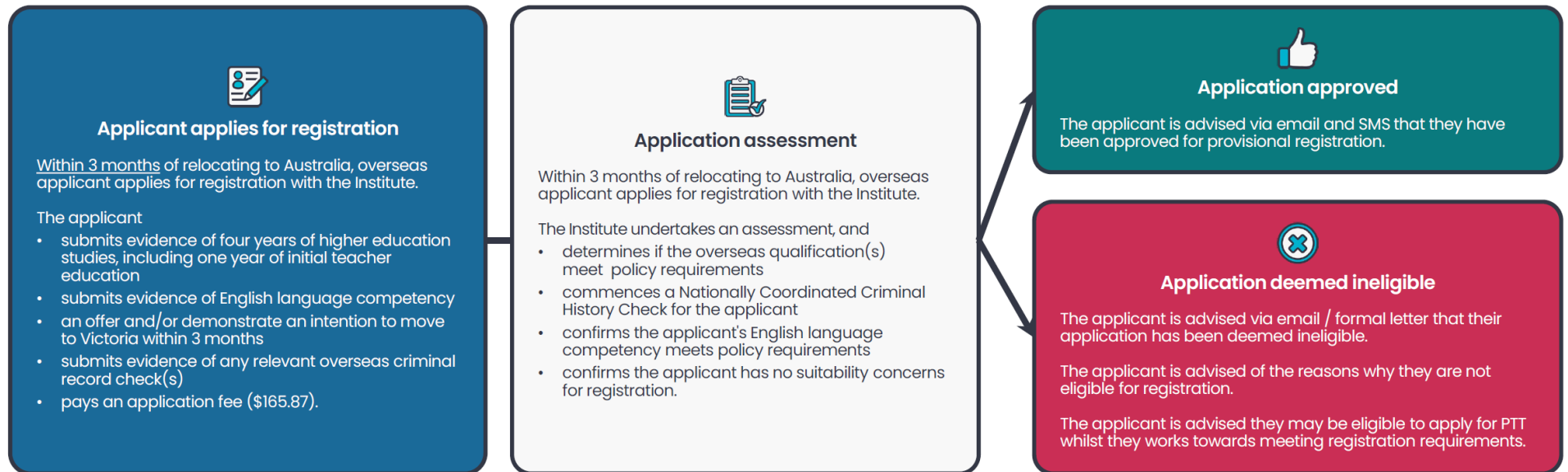
While progressing towards teacher registration you may be eligible for permission to teach (PTT). PTT is an alternative authorisation to teach used where a school has a workforce shortage. Further information about PTT can be found in the [VIT PTT policy](#).

If you are able to supply the above evidence, in full, within the next 14 days, please contact VIT and your application may be re-instated.

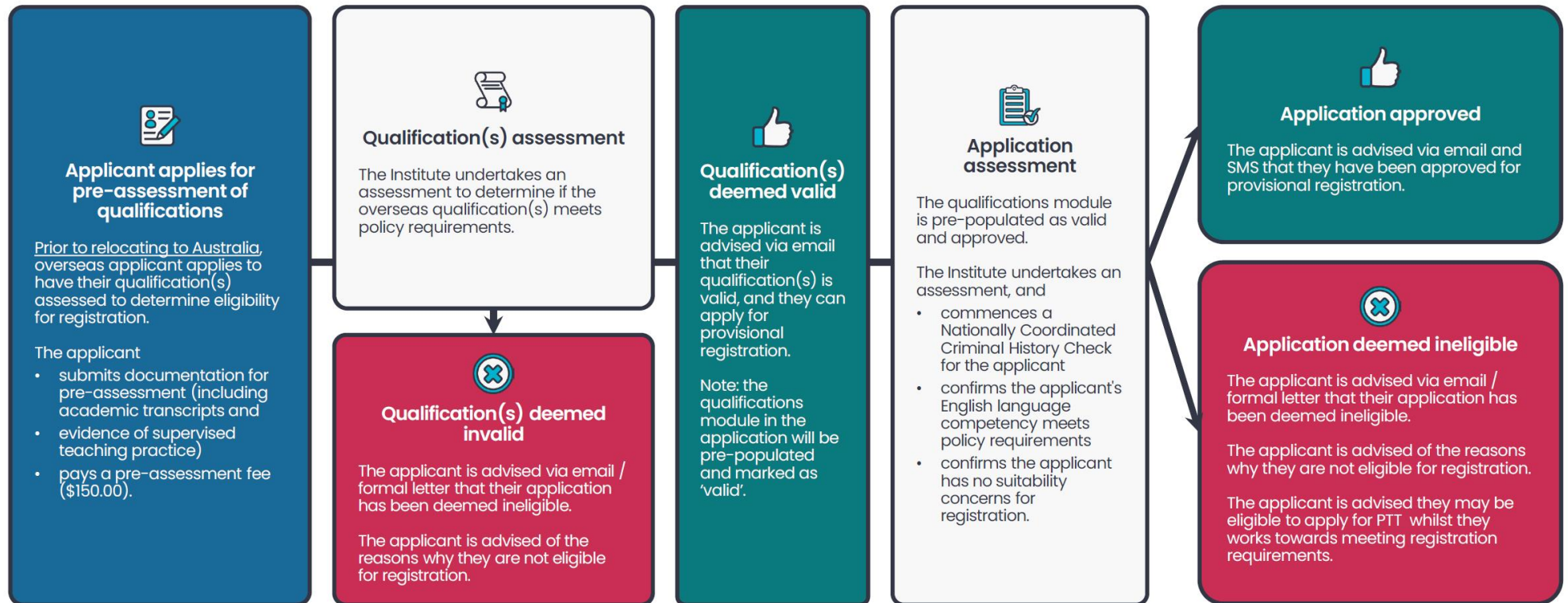
If you would like further information, please feel free to respond to the email this document was attached to.

Appendix 2: Application process maps

Previous application process for registration for overseas applicant



Application process with pre-assessment of qualifications



Appendix 3: Approach to the assessment of overseas qualification across Australia / New Zealand

Jurisdiction	Approach to assessing overseas applicants / qualifications	Average number of applications
<p>New South Wales Education Standards Authority (NESA)</p>	<p>In accordance with the Teacher Accreditation Act 2004 (NSW) and the NSW Teachers Accreditation Manual. NESA will look for the following to support a determination of equivalency in the assessment of an overseas qualification.</p> <ul style="list-style-type: none"> • include a course of initial teacher education • include a minimum of 45 days of supervised teaching practice in a primary / secondary school setting • involve higher education study of at least four years full-time equivalent (FTE) academic study • include professional studies in teacher education of at least one year of FTE academic study (curriculum methods/pedagogy, teaching practice etc) • include discipline studies appropriate to the teaching area/s • all qualifications must be equivalent to AQF7 or above to be considered • all qualifications must lead to the award of a degree. <p>To be granted provisional teacher accreditation, applicants must provide evidence that they have a qualification or qualification package that is equivalent to an accredited/approved four-year teaching degree, or a four-year qualification package approved by NESA.</p> <p>NESA will use the Country Education Profiles as an assessment resource to determine equivalency. If an international applicant does not satisfy the four-year duration, NESA may apply section 2.2 of the TA Manual and grant Conditional accreditation with the requirement to undertake further study.</p> <p>Conditional accreditation can be granted to overseas applicants with an undergraduate bachelor's degree when there is a formal offer of employment in a NSW school. To reach</p>	<p>Approx. 1,600</p>

	<p>Provisional or Proficient Teacher accreditation, those with conditional accreditation must complete the necessary teaching qualifications within the specified maximum timeframe.</p> <p>NESA may consider the AITSL skills assessments, however does not rely on these as AITSL has advised these are not assessed at the same qualification level required (<i>NESA requires all qualifications to be AQF7 or above</i>).</p>	
Queensland College of Teachers (QCT)	<p>The qualifications required for teacher registration are successful completion of</p> <ul style="list-style-type: none"> • a four-year initial teacher education program including teacher education studies of at least one year (e.g. a Bachelor of Education, or a double Bachelor degree in Science and Teaching); • a one-year* graduate initial teacher education program following a degree (e.g. a one-year Graduate Diploma of Education (Secondary) after a three-year Bachelor degree); or • another course of teacher education that the QCT is reasonably satisfied is the equivalent of (a) or (b). These are considered on a case-by-case basis. <p>To satisfy the regulatory requirements, a qualification must:</p> <ul style="list-style-type: none"> • be a course of initial teacher education • involve higher education study of at least four years full-time equivalent (FTE) academic study • include professional studies in teacher education of at least one year of FTE academic study • include supervised teaching experience • include discipline studies appropriate to the teaching area/s. 	Approx. 900 overseas applications
Tasmania (TRBTAS)	<p>The TRBTAS Board will assess overseas qualifications to determine if they are comparable to Australian-accredited initial teacher education programs and meet Board requirements. To be eligible for teacher registration in Tasmania an applicant must meet all four of the qualification criteria listed below</p> <ol style="list-style-type: none"> 1. A teaching qualification that meets the following requirements <ul style="list-style-type: none"> • prepares students to be teachers 	TBC

	<ul style="list-style-type: none"> • contains general education studies • contains discipline-specific curriculum and pedagogical studies • includes sufficient professional experiences in a school setting <p>2. A conferred degree equivalent to four years of full-time study You must hold a conferred degree(s) awarded by a higher education institution(s) and that equates to four years of (full-time equivalent) tertiary study.</p> <p>3. A pattern of tertiary study that aligns with one of these requirements The Board may recognise any of the following higher education qualifications (a degree awarded by a higher education institution) for teacher registration</p> <ul style="list-style-type: none"> • a national and international four-year undergraduate initial teacher education (ITE) programs assessed as comparable to those currently approved by the Board • other national and international two-year graduate entry or postgraduate ITE programs assessed as comparable to that currently approved by the Board, combined with the equivalent of a suitable three-year undergraduate degree (minimum) • other national and international one-year graduate entry or postgraduate ITE programs assessed as comparable to those currently approved by other Australian regulatory authorities or the Australian Institute for Teaching and School Leadership, combined with the equivalent of a suitable three-year undergraduate degree (minimum) • other national and international programs of teacher education, as the Board may determine in a particular case, where the applicant has tertiary qualifications that are assessed as being equivalent to a four-year degree (minimum) when combined with the teacher education programs. <p>4. The professional experience components of your ITE program are sufficient and evidenced. The professional experience components (practicum) of an ITE program must consist of supervised and assessed teaching practice undertaken over a substantial and sustained period, in a recognised school setting. The professional experiences must be as diverse as possible and provide opportunities for pre-</p>	
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	<p>service teachers to observe and participate purposefully in a school/site as early in the program as is practical. Sufficient professional experience is</p> <ul style="list-style-type: none"> • at least 80 days in a four-year undergraduate or double-degree ITE program • at least 60 days in a two-year graduate entry or postgraduate ITE program • at least 45 days in a one-year graduate entry or postgraduate ITE program. 	
South Australia (TRBSA)	<p>Overseas teaching qualifications as assessed in accordance with the Board's minimum prescribed qualification requirements for registration as a teacher.</p> <p>The qualifications for registration as a teacher are</p> <ul style="list-style-type: none"> • an approved undergraduate teacher education qualification of at least 4 years' (full-time) duration which includes a sufficient supervised teaching practice component. OR • an approved postgraduate teacher education qualification at least 1 year's (full-time) duration which includes a sufficient supervised teaching practice component AND a non-teaching undergraduate qualification of at least 3 years' (full-time) duration <p>The practical component of the teaching degree must include a minimum of 45 days of supervised teaching practice.</p>	
Western Australia (TRBWA)	<p>Whilst a qualification will be considered on its merits, the Board will generally recognise as equivalent to an accredited ITE program, a qualification (or combination of qualifications)</p> <ul style="list-style-type: none"> • where the qualification: a. includes a program of ITE at the Bachelor degree level or higher; • totals at least 4 years of (full-time or part-time equivalent) higher education study; • includes at least one year (full-time or part-time equivalent) of professional teacher education content; and • includes at least 45 days of satisfactory supervised teaching practice undertaken at a primary or secondary school or early childhood education setting. <p>The qualification requirements for Full or Provisional Registration are that a person must have</p> <ul style="list-style-type: none"> • a teaching qualification from an accredited initial teacher education (ITE) program; • a teaching qualification that the Board recognises as equivalent to such a qualification; or 	<p>Annual average over the last 5 years (2019/20 to 2023/24) is 345 applications, noting there was a considerable increase in 2023/24.</p> <p>Annual average of 2.2% refused over 5 years</p>

	<ul style="list-style-type: none"> • a teaching qualification and teaching experience the Board considers sufficient to hold registration as a teacher. <p>When considering (a) above, a person is considered to hold an accredited ITE qualification if, at any time during their enrolment in the program, the program was accredited by the Board or another Australian teacher regulatory body.</p> <p>When considering (b) above, the TRBWA may take into consideration the following</p> <ul style="list-style-type: none"> • the degree to which the content of the program demonstrates similarity to the content of an accredited ITE program • the full time duration of the qualification • an assessment of the academic level of the qualification • relevance of program content to the Australian/Western Australian curriculum • the amount and nature of the professional teacher education content of the qualification • the amount and nature of supervised teaching practice within the qualification • any assessment of an applicant’s qualification undertaken by AITSL for the purposes or migration to Australia • any other factors or information relating to the qualification. <p>In general terms, the TRBWA will consider whether there is a sufficient degree of similarity between the qualification held by an applicant and an accredited ITE program, such that the qualification may be considered equivalent.</p> <p>When considering (c) above, the TRBWA will consider those who have not completed an accredited ITE program nor one that is considered equivalent and whether the person holds a teaching degree and teaching experience which may be considered sufficient for registration as a teacher (in the categories of Full and Provisional Registration). In general terms, this is likely to apply to applicants who have significant and relevant experience as a teacher. The TRBWA will consider each case on its individual merits and in the context of the evidence provided in the application.</p>	(2019/20 to 2023/24).
Australian Capital Territory (TQI)	Qualifications obtained in a country other than Australia will be assessed based on information sourced from the Country Education Profiles (CEP) and/or UK NARIC.	TQI doesn't have this data on hand

	<p>Where teachers have met the requirements described in CEP or UK NARIC for eligibility. to teach in schools in the country in which they gained their qualification, these requirements will be assessed to determine comparability to one of the following program structures:</p> <ul style="list-style-type: none"> • an academic degree (or equivalent diploma) consisting of at least three years (full time or equivalent) together with another recognised course of at least one year (full-time or equivalent) initial primary and/or secondary teacher education (for example Diploma in Education/Teaching, Graduate Entry Bachelor of Education or Master of Teaching), • a four year (full-time or equivalent) Bachelor of Primary Education, Bachelor of Education Early Childhood and Primary or Bachelor of Secondary Education or primary or secondary teaching double degree (for example Bachelor of Arts/Bachelor of Teaching - Primary or Secondary) • A two or three year (full-time or equivalent) post-Year 12 initial course of primary or secondary teacher education, e.g. a Trained Teachers Certificate or Diploma of Teaching, together with further recognised awarded higher education qualifications to a total combination of four or more years (full -time equivalent). <p>If qualifications are not described in CEP or UK NARIC, applicants must provide certification from the University or the Country's Education Department or appropriate authority, indicating that the program of study was a program accredited as a higher education program in that country by the appropriate authority.</p> <p>If the overseas qualifications include initial teacher education, the above certification must confirm the program was a higher education program approved for the award of a school teaching qualification. A statement must also be provided to show that the program of initial teacher education required supervised school teaching practice and document the number of days or hours required. These qualifications will be assessed on a case-by-case basis and may be referred to the Teacher Professional Registration Committee (TPRC) for consideration. The TPRC will consider whether the qualifications have sufficient recognised higher education study and initial teacher education comparable to one of the programs structures above.</p> <p>Supervised teaching practice All applicants must provide evidence of completion of school teaching practice undertaken</p>	<p>and would take some time to gather.</p> <p>In most cases the applicant withdraws the application if they are unable to provide the required documentation. So TQI have very few, if any, refusals a year.</p>
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	<p>as part of their initial teacher education program. For programs commenced prior to 1 January 2013, a statement confirming at least 45 days of supervised teaching practice in a school setting must be provided on Final Academic Transcripts or in the form of a letter from the higher education institution. Programs commenced on or after 1 January 2013 will require teaching practice comparable to that prescribed by the Australian Institute Teaching and School Leadership (AITSL on Accreditation of Initial Teacher Education Programs in Australia - Standards and Procedures).</p> <p>Where initial teacher education programs have been completed and evidence of the required teaching practice cannot be provided, post qualification school teaching evidence may also be considered where appropriate post qualification supervisor assessment reports are provided.</p> <p>Where initial teacher education programs have been completed in a country other than Australia or New Zealand prior to 1 January 2013, TQI will consider teaching practice days stated in the AEI CEP for the award of the teaching qualification. If the teaching practice does not meet the above requirements, evidence of post qualification teaching in a school may also be considered where appropriate supervisor assessment reports are provided.</p>	
Teacher Registration Board of the Northern Territory (TRBNT)	<p>The Board must be satisfied that you hold appropriate qualifications to teach children in the Northern Territory. This means that you must hold</p> <ul style="list-style-type: none"> • a degree awarded by a higher education institution on completion of a 4 year full-time (or the equivalent part-time duration) initial (pre-service) teacher education course that includes a minimum of 45 days of supervised teaching practice in a school; • at least four years of full-time study (or the equivalent part-time duration) completed at a higher education institution that results in the award of a degree/s including an alternative qualification awarded on completion of a teacher education course of at least one-year full time duration (or the equivalent part-time duration) that includes a minimum of 45 days supervised teaching practice in a school. 	TBC
The Teaching Council Aotearoa New Zealand (the Teaching Council)	<p>Individuals with overseas teaching qualifications will need to apply for a teaching International Qualifications Assessment (IQA).</p>	Approximately 2200 overseas applications

	<p>The Teaching Council relies on the assessment of overseas qualifications completed by the New Zealand Qualification Authority (NZQA). They are the official body in New Zealand to assess and approve qualifications from New Zealand and overseas. Under the Education and Training Act 2020 Schedule 3 (3) the Teaching Council determines whether a person is satisfactorily trained to teach and must take into account</p> <ul style="list-style-type: none"> • the person’s qualifications; and • whether the person has satisfactorily completed training recognised by the Teaching Council as suitable for people who want to teach. <p>In order to determine if a person is satisfactorily trained to teach, the Teaching Council established the Discretionary Pathway panel, which considers qualifications, teaching experience, appraisal material and professional development as a package to determine whether a person can be granted registration as an exception to policy.</p> <p>The Teaching Council bases their assessment of qualifications on the NZQA New Zealand Qualification and Credentials Framework once it has not met the requirements of a New Zealand Initial Teacher Education programme.</p>	<p>completed in 2024.</p> <p>Approximately 3% refused.</p>
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