

Rethinking Permission to Teach – Consultation Questions

The Victorian Association of Secondary Principals (VASSP) supports the intent to simplify and clarify the current Permission to Teach framework. Schools are increasingly relying on PTT arrangements due to workforce shortages, and a clearer, more flexible and better understood process is needed. The proposed shift to **Conditional Authority to Teach (CATT)** better reflects that this is a conditional authorisation, not full teacher registration. The proposed model also acknowledges that while qualified and registered teachers should remain the priority, schools require practical pathways to respond to workforce shortages.

Draft PTT (CATT) policy position and approach

1. Is it clear what the eligibility requirements and standards conditions are for each new CATT category? Why/why not?

Broadly, yes. The consolidation from multiple PTT categories into three CATT categories is clearer and easier for schools to understand. The distinction between **CATT (Qualifying)**, **CATT (Specialist-Instructor)** and **CATT (Transitional)** is helpful.

However, further guidance would be valuable, particularly around:

- what evidence schools need to provide to demonstrate workforce shortage
- how “minor deficits” will be assessed for CATT (Transitional)
- what standard conditions will look like in practical school settings
- how schools should distinguish between specialist expertise and teaching readiness

2. Does the policy clearly articulate how VIT assesses skills and experience for CATT?

Partially. The policy identifies that skills, experience, content knowledge, safety, student relationships and teaching capability are relevant considerations. However, from a school perspective, there is insufficient clarity of the *how*—specifically, how these factors will be assessed, prioritised and weighted in practice.

VASSP recommends that VIT provide clearer guidance on:

- acceptable evidence of skills and experience
- expectations for industry experts, VET instructors and specialist instructors
- the role of principal judgement in confirming suitability
- how consistency will be maintained across applications

This would support schools to prepare stronger applications and reduce uncertainty or delays.

3. Is the proposed approach reasonable and proportionate to support schools during times of teacher workforce shortages? Why/why not?

Yes, in principle. The proposal is a reasonable and proportionate response to workforce shortages, provided it remains grounded in the principle that fully qualified and registered teachers remain the preferred appointment.

Schools need flexibility, particularly in regional, rural and hard-to-staff settings. The move to fewer categories and clearer conditions should reduce complexity and improve responsiveness. However, the process must not create additional administrative burden for schools already managing significant staffing pressures.

VASSP would support the approach if it is accompanied by:

- streamlined application processes
- clear templates
- timely decision-making by VIT
- consistent advice to schools
- recognition of principal judgement and local workforce realities

We would request in the Specialist CATT for VET- **Limited to specific subject / subject area(s)** is limited to **areas** not subject as it is currently e.g: A VET teacher should also be able to teach Design Technology (Wood) not just VET Building and construction.

This would provide schools with greater flexibility to utilise staff effectively and support full-time employment arrangements, particularly in areas experiencing workforce shortages.

Employer agreements

4. To what extent is it appropriate that employers have a clear and transparent plan to support a CATT holder they employ?

It is appropriate and important. CATT holders are not fully registered teachers, so a clear support plan is necessary to protect students, support the individual, and provide confidence to schools and regulators.

That said, the support plan must be practical and proportionate. Schools already support graduate teachers, pre-service teachers, education support staff, tutors and casual staff. Any employer agreement should build on existing school structures rather than duplicate them.

A useful plan should clarify:

- supervision arrangements

- mentoring support
- professional learning expectations
- workload considerations
- progress toward registration, where relevant

The consultation paper's proposed employer agreement includes support for planning, pedagogy, curriculum, child safety and workload accommodations, which is appropriate if implemented in a manageable way.

5. Are employers and individuals better placed to determine their time fraction rather than VIT? Why/why not?

Yes. VASSP supports removing fixed time-fraction restrictions from VIT and allowing the employer and individual to determine the appropriate time fraction. Schools are best placed to understand the role, timetable, subject area, available mentoring and local workforce context.

The individual is also best placed to understand their study load, personal circumstances and capacity. This is particularly important for pre-service teachers balancing employment and initial teacher education.

However, the decision should be documented through the employer agreement, with consideration given to:

- workload
- study requirements
- mentoring capacity
- student continuity
- risk of burnout

This aligns with VIT's proposal to remove time-fraction restrictions and allow decisions to rest with employers and individuals, supported by clear agreements.

6. Would clear employer agreements help mitigate concerns regarding employers taking advantage of PTT holders? Why/why not?

Yes, if the agreements are clear, consistent and monitored proportionately. Employer agreements can help ensure CATT holders understand the support they are entitled to and that schools understand their obligations.

However, the language should avoid assuming schools are acting inappropriately. Most schools use PTT because of genuine workforce shortages and are seeking to support students with the best available staffing option.

The agreement should function as a safeguard and support mechanism, not as an additional compliance burden.

7. Does the proposed approach to employer agreements enable flexibility to cater for different school contexts / individual needs?

Yes, but this will depend on the quality of the templates and guidance. Schools operate in very different contexts, including small rural schools, large secondary colleges, specialist settings, VET providers and schools with acute workforce shortages.

Employer agreements should allow flexibility in:

- mentoring models
- subject and timetable arrangements
- level of supervision required
- study and workload accommodations
- school size and staffing capacity

VASSP would encourage VIT to co-design templates with principals to ensure they are practical, streamlined and fit for purpose.

Access and equity (for representative groups only)

8. Considering the cohort you represent, are there any additional accessibility and/or equity considerations VIT should consider in the development of this policy?

Yes. VIT should consider the equity impact on schools and communities most affected by workforce shortages, particularly regional, rural and outer-metropolitan schools. Key considerations include: ensuring the process does not disadvantage schools with limited administrative capacity providing clear and accessible guidance for principals avoiding delays that worsen staffing shortages recognising the needs of small schools with limited mentoring capacity supporting overseas-trained teachers and career-change professionals to transition into registration pathways ensuring CATT processes support, rather than restrict, access to specialist programs such as VET, languages and senior secondary subjects VASSP would also encourage VIT to monitor whether the policy is improving access to teachers in hard-to-staff areas, rather than simply adding further process.

Overall position VASSP supports the proposed move from PTT to CATT and the intent to create a clearer, more flexible and proportionate framework. The success of the policy will depend on practical implementation, timely advice, reduced administrative burden, and genuine recognition of the workforce pressures schools are managing. Clear guidance, simple templates and ongoing consultation with principals will be essential.

Respondent details

Name: Belinda Hudak

Email address: bhudak@vassp.org.au

Phone number (optional): 0419351993

I am responding as:

- An individual A representative group

Which of the following categories best describes you?

- PTT holder Teacher
 Principal / Employer Parent
 Other (Association President)

Which of the following categories best describes your place of employment / the group you are responding as a representative of?

Representative body of:

- Schools Teachers
 Employers of teachers Parents
 N/A

School / group of schools (please select type):

- DE Catholic Independent school

Higher education (please select type):

- University TAFE / RTO

Other:

- Department of Education Other (please give details)