

English language competency 'Exemption' guide for providers

Purpose:

Since the introduction of the [Language Competency for teaching in Aotearoa New Zealand Policy](#) in 2019 ITE providers have been responsible for making decisions about candidates' capacity to *meet* the evidence required in that policy – with the Teaching Council responsible for *making decisions about* 'exemption' cases.

From 1 November 2025 the exemption process will be transferred from the Council to initial teacher education (ITE) providers – this guidance represents one key source of information to assist providers make judgements about any exemption decisions you wish to make.



Table of Contents

Purpose:	1
Table of Contents	2
1. <i>Changes to some language test requirements (as from 1 October 2025)</i>	3
2. <i>What are language competency ‘exemptions’</i>	3
3. <i>‘Approved’ countries, and other countries</i>	3
4. <i>Evaluating the quality of overseas qualifications</i>	4
5. <i>Training not supported by qualifications</i>	4
6. <i>What types of evidence can be used to demonstrate English language competency?</i>	4
7. <i>Examples of ‘hard’ exemption evidence (recognising that evidence from ‘approved countries’ offers immediate assurance)</i>	5
8. <i>Examples of ‘soft’ exemption evidence (recognising that evidence from ‘approved countries’ offers immediate assurance)</i>	5
9. <i>Quantities of exemption evidence required</i>	5
10. <i>Examples of lower-quality exemption evidence</i>	6
11. <i>Case studies of higher-quality exemption evidence combinations:</i>	6
12. <i>Case studies of lower-quality exemption evidence combinations:</i>	7
13. <i>Combining language tests</i>	7
14. <i>Using recently expired language tests</i>	8
15. <i>Statutory Declarations for exemption decisions</i>	9
16. <i>Testimonials/references for exemption decisions</i>	9
17. <i>Do previously NZ-registered teachers need to provide language competency evidence?</i>	9
18. <i>Case studies regarding English Language Competency exemption decisions</i>	10
<i>Approved countries (approved 2019)</i>	13

1. Changes to some language test requirements (as from 1 October 2025)

As from 1 October there have been some small refinements to test score requirements for a couple of the approved language tests. ITE providers will need to be aware of these changes for all English Language Competency decision-making, including exemption decisions.

Pearson Test of English (PTE) Academic	61	62	73	79	69
TOEFL Internet-based test (iBT)	24	24	27	23	98

For the most update information about language tests please consult:

(web) [Language competency requirements :: Teaching Council of Aotearoa New Zealand](#)

(pdf) [PDF - Language competency for teaching in Aotearoa New Zealand](#)

2. What are language competency ‘exemptions’

The *Language Competence for Teaching in Aotearoa New Zealand Policy* released in 2019 describes evidence categories which ITE providers (provider) can use to establish if candidates for ITE programmes meet the English language or te reo Māori expectations of the policy.

In some circumstances, candidates may not clearly meet any of the evidence categories for English language competency but may partially meet multiple categories. In those cases, the Teaching Council's (the Council) exemption panel would have historically offered the provider (and the candidate they were working on behalf of) an exemption from sitting/passing an approved English language test.

As of 1 November 2025, this exemption process is being transferred from the Council to ITE providers. We have developed this guide to assist you to make your own exemption decisions.

3. ‘Approved’ countries, and other countries

The list of ‘approved’ countries from the policy indicates that providers can gain *immediate* assurance of English language competency for any candidates schooled or gaining tertiary qualifications from these countries. These countries are listed in the appendix of this document.

Equally likely, when considering exemptions, providers will need to review candidate evidence from countries *not* on the approved country list. To assess schooling and qualification evidence from these countries, you will need to undergo your own investigation to *gain assurance* of the quality of candidates’ English language competency.



4. Evaluating the quality of overseas qualifications

Tertiary qualifications can be important elements of combined evidence justifying exemption. Qualifications from countries on the ‘approved’ list offer *immediate assurance* as to evidence quality, and another form of assurance is from sighting a NZQA International Qualification Assessment (IQA) of an overseas qualification.

However, providers are entitled to also consider overseas qualifications that are *not* supported by an IQA. In these cases, the provider will need to perform their own investigations to evaluate the quality of the English language competence represented by the qualification.

5. Training not supported by qualifications

Some candidates may present evidence of ‘training’ that has not been recognised by formal qualifications. Providers are entitled to consider such evidence as part of a wider evidence combination.

6. What types of evidence can be used to demonstrate English language competency?

For the purposes of language ‘exemption’, evidence categories fall into two informal divisions:

1. Quantitative (‘hard’) - evidence which is more measurable.
2. Qualitative (‘soft’) - evidence which is less measurable.

If a candidate cannot *meet* the exemption requirements through a single evidence category, a ITE provider can evaluate if *different combinations of partial evidence* are *equivalent* to the required level of competence in English.

COMBINATIONS OF EVIDENCE POSSIBLE	Hard exemption evidence	Soft exemption evidence
Hard exemption evidence	Combinations have high potential value	Combinations have high potential value
Soft exemption evidence	Combinations have high potential value	Combinations have lower potential value



7. Examples of ‘hard’ exemption evidence (*recognising that evidence from ‘approved countries’ offers immediate assurance*)

- (approved) Secondary school qualifications
- Place and years of schooling (primary and secondary)
- Successful tertiary education
- Tertiary qualifications at Level 7 or above on NZQF
- (approved) Language tests (including partial tests or expired tests)

8. Examples of ‘soft’ exemption evidence (*recognising that evidence from ‘approved countries’ offers immediate assurance*)

- Workplace testimonials referencing high level English usage within all domains of Listening/Reading/Writing/Speaking (L/R/W/S).
- Evidence of using English at a high level within workplace employment including from documents such as job descriptions.

9. Quantities of exemption evidence required

There are no firm guidelines about the *quantities* of (hard and soft) evidence required – this allows you to use your professional judgement to consider a range of sources of evidence that will give you confidence the candidate can manage their programme of study with English as the primary medium of instruction.

- If partial evidence (of any kind) is very strong and if the evidence complements each other, large numbers of evidence categories are not required. For example, if a candidate i) *almost* meets the schooling category and also ii) *almost* achieves success in a language test, these two category types alone would be together sufficient to justify a provider’s exemption approval.
- Conversely, if evidence (of any kind) is weaker, it may take multiple pieces of such evidence to form a satisfactory aggregated exemption ‘combination’ – providers will need to make more considered decisions in cases such as these.
- Please refer to the case studies supplied later in this document for further guidance on this matter.

10. Examples of *lower-quality* exemption evidence

- **Workplace testimonials *but without reference to (L/R/W/S) domains.***

Many candidates may be able to supply evidence of workplace responsibility or testimonials from past or current employers, but this evidence is considered lower quality within an exemption process *unless the testimonial specifically critiques the candidate's competency in English across all four domains of L/R/W/S.*

- ***Living* in New Zealand or an 'approved country' for extended years**

Living in an approved country represents highly variable exemption evidence because it does not *necessarily* indicate usage and practice of English at a high communicative level.

11. Case studies of higher-quality exemption evidence combinations:

- Ferez has effective combined hard/soft evidence combinations of:

a successful language test (more than 2 years old) and	'hard' evidence
a L6 Diploma (one year – approved country), and	'hard' evidence
two testimonials from recent employers (L/R/W/S)	'soft' evidence

- Damian has effective combined hard/soft evidence combinations of:

primary schooling (from an approved country), and	'hard' evidence
two partially successful language test results, and	'hard' evidence
a testimonial from a recent employer (L/R/W/S)	'soft' evidence

- Samuela has effective combined hard/soft evidence combinations of:

Level 5 (equivalent) tertiary study in Canada, and	'hard' evidence
language test result (passed in three domains) and	'hard' evidence
job description and tenure evidence of using English at a high communicative level	'soft' evidence

12. Case studies of lower-quality exemption evidence combinations:

- Marianna has the combined exemption evidence below – it is considered insufficient because it is only comprised of ‘soft’ evidence types.

four testimonials from previous employers (Listening/Reading/Writing/Speaking) and	‘soft’
evidence of living in New Zealand for 12 years	evidence requiring more information

- Frederique has the combined exemption evidence below - it is considered insufficient because it is only comprised of ‘soft’ evidence types.

Evidence of working in England for four years and	‘soft’
a testimonial from a New Zealand employer (L/R/W/S)	‘soft’
being born in Australia	evidence requiring more information

13. Combining language tests

It is also possible to combine ‘domain scores’ across different tests including tests of a different type if the tests are recent, with an example provided below. Pieter has the below recent scores across two different tests:

	Listening	Reading	Writing	Speaking
PTE	63	58	75	62
April 2025	Fail	Fail	Pass	Fail
IELTS (Academic)	6.5	8.0	6.0	8.0
December 2024	Fail	Pass	Fail	Pass

In this case, Pieter’s *combined* scores were very strong in three domains, and only slightly low in one (Listening). But because his three passing domains were well above the pass mark, the provider would be entitled to exempt Pieter based on these two tests *alone*



A contrasting case is shown below for Zac.

	Listening	Reading	Writing	Speaking
PTE	58	58	73	61
May 2025	Fail	Fail	Pass	Fail
IELTS (Academic)	6.0	7.0	6.0	7.0
November 2024	Fail	Pass	Fail	Pass

Because Zac’s overall combined score is marginally only a ‘pass’, the three passing domains are not sufficient alone to justify an exemption. The provider could potentially ask Zac to provide some extra evidence to support his application, perhaps including a testimonial which refers to his L/R/W/S competency.

14. Using recently expired language tests

If a partially successful (approved) language test is *within* the two-year expiry period it has more value than a partially successful *expired* test. However, language tests which are only a few years expired can still have some value as part of *combined* exemption evidence, especially if the candidate was successful in the test(s). An example is provided below for Lilly:

	Listening	Reading	Writing	Speaking
PTE	66	63	73	72
January 2022	Pass	Fail	Pass	Pass
PTE	68	72	76	71
October 2022	Pass	Pass	Pass	Pass
IELTS (Academic)	7.5	7.0	8.0	7.0
November 2020	Pass	Pass	Pass	Pass

Although expired, the tests show consistent and significant language competency in English, and this evidence alone would merit exemption.



15. Statutory Declarations for Exemption Decisions

Sometimes ITE providers are approached by candidates who for different reasons cannot provide documented evidence of their evidence claims. Examples of this could be applicants who attended a school in an approved country, but the school was subsequently closed/destroyed and school records lost.

In such cases, ITE providers are entitled to invite candidates to sign a Statutory Declaration with reference to the missing evidence, using the [NZ Government template](#). This process does not involve the Council.

Statutory Declarations can be used to either assist a candidate to provide evidence of meeting the language competence policy, or as part of a language exemption decision.

16. Testimonials/references for exemption decisions

Testimonials/references gain significant value for an exemption decision when they:

- **reference the candidate's ability in Listening/Reading/Writing/Speaking (L/R/W/S) in a professional context**
- are written by a professional leader
- are on centre/school letterhead
- are from within an approved country
- are free of conflict-of-interest

Regarding potential conflict-of-interest: For example, a teacher may be working under a Limited Authority to Teach (LAT) – both she and her current principal want her to join an ITE programme and become a qualified teacher. A testimonial from this principal is potentially conflicted and the ITE provider would need to exercise caution about use of this evidence.

17. Do previously NZ-registered teachers need to provide language competency evidence?

Any candidate for an ITE programme who previously held NZ teacher registration is considered to have met the language competency policy. No exemption decision is necessary.

As part of this consideration, any candidates who hold Australian teacher registration are also considered to be NZ teacher registered under the Trans-Tasman Mutual Recognition Agreement.



18. Case studies regarding English Language Competency exemption decisions

1. **Potential exemption:** A candidate has a 1.5 year Master's degree (face-to-face) from the United Kingdom, judged by NZQA to be at Level 9 – is this sufficient exemption evidence?

Council advice: The Policy requires a minimum of two years at Level 7 or above – *this case could not currently be considered a valid exemption case* in its current form.

Potential solution: This 1.5 years Master's study could potentially be 'topped up' with some additional 'hard' or soft' evidence as part of an exemption decision such as a testimonial with reference to L/R/W/S, **or** possibly a recently expired successful language test result.

2. **Potential exemption:** A candidate has completed three years of tertiary study (L6 NZ equivalent) in the Republic of Ireland. She also has two strong testimonial principal letters specifying L/R/W/S from five years teacher-aide work in NZ – is this sufficient exemption evidence?

Council advice: *This could be considered a valid exemption case*

3. **Potential exemption:** A candidate has completed three years of English-medium primary study in Papua New Guinea, has a one-year L7 diploma from Australia and two very strong L/R/W/S testimonials from a current employer in NZ – is this sufficient exemption evidence?

Council advice: The schooling from Papua New Guinea would need to be researched as this country is *not* included in the [English Language Competency Pathway \(ELCP\) for Tagata o le Moana | Pacific Peoples](#) amendment to the language competency policy. The one year of tertiary study represents 'half' of the two years required, and the strong testimonials are also of significant value. *This could potentially be considered a 'borderline' valid exemption case.*

4. **Potential exemption:** A candidate has completed all years of English medium primary schooling in Canada. She also has a two-years Master's qualification (Level 9 equivalent) awarded by a British university, studied entirely in Sri Lanka in English medium– is this sufficient exemption evidence?

Council advice: The primary Canadian schooling by itself is not sufficient. The tertiary qualification is above Level 7, took two years to complete, was completed face-to-face in English medium, and was awarded by an approved country. However, the policy requires the qualification to be *gained whilst living in an approved country*, so the British



qualification would require some investigation to confirm that English was the primary medium of instruction. *In combination, this evidence could potentially be valid for exemption.*

Potential Option: This application could potentially be ‘topped-up’ by partial or recently expired language tests, or by strong testimonials, if confirmation of English as the medium of instruction was not able to be provided.

5. Potential exemption: A candidate has the following evidence – is this sufficient exemption evidence?

- two years primary schooling in South Africa (evidence of English medium instruction)
- two years secondary schooling in Northern Ireland
- a one-year Level 5 (NZ equivalent) diploma from Wales
- a testimonial from a recent New Zealand employer testifying to the candidate’s integrity.

Council advice: The testimonial makes no reference to L/R/W/S so is of no significant value. The combined schooling is insufficient in itself. The tertiary study is from an approved country but is far short of L7 for two years.

Potential Option: One potential remedy is for the candidate to contact the employer and ask (if appropriate) for the testimonial to be rewritten with reference to the domains of Listening/Reading/Writing and Speaking.

6. Potential exemption: A candidate has 2025 IELTS (Academic) test results of 9.0 Listening, 8.5 Reading, 6.5 Writing, 8.0 Speaking – is this sufficient exemption evidence

Council advice: The general advice for such cases is that if a single domain is marginally low, a high overall score mitigates the weakness. *This case could therefore be considered a valid exemption.*

7. Potential exemption: A candidate has 2025 PTE results of 66 Listening, 65 Reading, Writing 74, and Speaking 62. There is also an employer (school) testimonial which specifically calls out the candidate’s strength in the Speaking domain. Is this combined evidence sufficient?

Council advice: The overall PTE score is too low to ‘pull up’ the low Speaking score in itself, but the testimonial relating to that domain gives assurance. *This could be considered a valid exemption case.*

- 
8. **Potential exemption:** a candidate was schooled in Cambodia and has worked as an untrained ECE teacher in NZ for 11 years after completing a one-year L6 ECE teaching diploma – is this sufficient exemption evidence?

Council advice: The years of ECE work by itself has little exemption value unless employers can supply testimonials relating to the candidate's domain strengths in L/R/W/S. If testimonials from leaders indicate strength in the four domains in recent years, *this potentially could be a valid exemption application in combination with the L6 diploma.*

9. **Potential exemption:** a candidate has a PhD from Pakistan, has worked there as a teacher of English across three schools, and holds multiple testimonials from those employers in relation to strengths in L/R/W/S – is this sufficient exemption evidence?

Council advice: Because Pakistan is not an 'approved country', the qualification and the teaching work there offers no *immediate* assurance – the provider would need to perform their own research into the value of this evidence. Similarly, the testimonials are not from an approved country and would require greater consideration. *This case may or may not have sufficient exemption evidence.*

10. **Potential exemption:** a candidate has all primary and secondary schooling in Tonga. The school (and school records) was later destroyed by a cyclone, and did not reopen, and the candidate cannot supply documentation to verify the schooling - is this sufficient exemption evidence?

Council advice: This candidate could be considered under the 2024 [English Language Competency Pathway \(ELCP\) for Tagata o le Moana | Pacific Peoples](#) amendment to the English Language Competency Policy. However, given that the candidate cannot provide this evidence, he/she would need to complete a Statutory Declaration (see elsewhere in this document) to assure the ITE provider of that schooling evidence.



Appendix

Approved countries (approved 2019)

- New Zealand
- Australia
- Canada
- Republic of Ireland
- United Kingdom
- United States of America
- South Africa (with conditions)

New Zealand Realm countries (approved by amendment in 2023)

- Cook Islands
- Niue
- Tokelau

Other Pacific countries (approved by amendment in 2023)

- Samoa
- Fiji
- Kiribati
- Tuvalu
- Tonga