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*Promoting Quality in Teacher Education*

17 March 2020

Amanda Spielman

Her Majesty’s Chief Inspector

OfSTED

70 Petty France

London SW1H 9EX

Dear Amanda

**UCET RESPONSE TO ITE INSPECTION FRAMEWORK CONSULTATION**

I have pleasure in attaching UCET’s formal response to the consultation on the new ITE inspection framework. I hope that you will agree that our response is balanced and fair, identifying both positive and potentially negative aspects of the proposed new framework.

We thought that it would be helpful if we were to preface our response with some issues of principle. UCET believes that teacher education programmes should equip all new teachers to be:

* **Competent and confident professionals** who recognise and understand that educating is a professional, thoughtful and intellectual endeavour. They learn from research, direct experience, their peers and other sources of knowledge.
* **Epistemic agents**, who act as independent thinkers, recognising that knowledge, policy and practice are contestable, provisional and contingent. As such, teachers search for theories and research that can underpin, challenge or illuminate their practice. They are able to analyse and interrogate evidence and arguments, drawing critically and self-critically from a wide range of evidence to make informed decisions in the course of their practice.
* **Able to** **engage in enquiry-rich practice** and have a predisposition to be continually intellectually curious about their work with the capacity to be innovative, creative and receptive to new ideas emerging from their individual or collaborative practitioner enquiries.
* **Responsible professionals** who embody high standards of professional ethics. They act with integrity and recognise the social responsibilities of education, working towards a socially just and sustainable world.

An ITE inspection framework should facilitate teacher education providers to deliver these outcomes. We are concerned however that the new framework could act against this in some areas. For example, we agree that student teachers should have an entitlement to minimum core content. In respect of the Core Content Framework however it was always the intention of the Advisory Group (of which I was a member) that providers should be encouraged to engage with it in a way that allows them and their student teachers to critique the underpinning research and assumptions. To do this they need to draw on the wealth of expertise that exists within, for example, the university component of partnerships. Student teachers must be able to understand the ‘why’ as well as the ‘how’. However, an interpretation of the draft inspection framework could lead to OfSTED inspectors expecting programmes to cover possibly contentious issues within the CCF in an uncritical and inflexible way, and indeed accept them as a ‘given’. This is not helped by references in the draft OfSTED framework to the list of research that has informed the ITE content framework (for example, in the grade descriptor on page 40), and which is not part of the framework, which could be taken to imply that the research itself should be embedded in programmes. ITE providers must have the freedom to interpret, apply, sequence and add to the content framework in a way that is consistent with their contexts, values and principles, and with the welcome statement in the draft inspection framework that radically different approaches to the curriculum are to be encouraged.

Similar concerns arise in respect to references to the teaching of early reading. Systematic synthetic phonics has, partly thanks to organisations such as UCET, been successfully embedded within ITE and its value is almost universally accepted. But the proscription of references to alternative ways of teaching early reading, even in cases in which SSP might not on its own be sufficient, is a cause for concern as it undermines the academic freedom and integrity of ITE providers and will prevent student teachers from learning about approaches to reading that might be helpful to them. The references to SSP in the grade descriptor for ‘good’ on page 39 and, even more so, for ‘inadequate’ on page 44 in particular need to be changed.

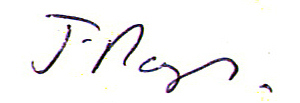
The expectations in the inspection framework relating to the structure and organisation of partnerships are problematic, particularly for providers operating at scale whose continued ability to be judged ‘good’ or ‘outstanding’ should not be structurally undermined given the significant contribution they make to teacher supply. While consistent sequencing of ITE curricula and shared understandings across all subject areas may be achievable and desirable in some cases, it will not be possible for providers working with a significantly large number of schools, who themselves might be working with a number of accredited ITE providers. It will clearly be problematic for two or more providers to ensure consistency of each of their programmes within the same school setting. The expectation is conceptually flawed. It is also inconsistent with the government’s intention that schools have influence over the content and delivery of ITE programmes, given that different schools within the same partnership might have different expectations and priorities. This is another reason why expectations that there should not be a ‘cigarette paper’ of difference between school and centre based ITE is logically unsound. The level of engagement of schools within partnerships also, for good reason, varies and care will have to be taken to ensure that expectations on schools, including those in respect of mentoring and the new Early Career Framework, are not pitched so high as to tempt them to withdraw from ITE, adding to the already challenging placement difficulties providers face and potentially impacting on teacher supply. ITE partnerships are dynamic, often in a state of flux, and programmes are tailored to meet particular needs and contexts. A ‘one-size-fits-all’ approach to their structure and organisation would not be appropriate. Account must also be taken of the fact that accredited providers are not in a position to require partner schools and colleges to deliver lessons in a particular way or in a particular sequence. While no provider will knowingly place a student teacher in a setting that would give them a negative experience and threaten their continuation in the profession, the quality of experience will inevitably vary across partnerships, and removing schools from partnerships will inevitably mean a reduction in the number of student teachers a provider is able to recruit. This problem could of course be overcome in part if the inspection framework for both schools and colleges included an expectation that they participate in training and educating the next generation of teachers.

On another note, much of the language is very primary and secondary focussed, with post-compulsory and EYITT sometimes appearing to be added as an afterthought. It would be helpful if it were made clear the extent to which references to ‘schools’, ‘pupils’ etc. apply to non-primary and secondary settings. References to the ITE content framework could, in places, be taken to imply that it covers non-QTS programmes, which it clearly does not.

We do welcome aspects of the new framework and hope that you will take our comments as a whole. For example: the one-stage model; the focus on ‘quality of education and training’; flexibility in regards to assessment and lesson planning; the ‘no grading of lesson observations’; the focus on ‘reflective educationally focussed discussions’ and, as previously mentioned, the confirmation that radically different approaches to the ITE curriculum are allowed. But, as stated, we are worried that aspects of the framework, as drafted, could prevent this.

We would, finally, ask that in the light of the current Corona crisis that ITE providers be given more time to prepare for the introduction of the new framework. Their focus at the moment is on the well-being of student teachers and ensuring that schools have the teachers they need next year. The introduction of the new framework should be delayed until September 2021 the earliest.

Yours sincerely,



James Noble-Rogers

Executive Director

**DRAFT ITE INSPECTION FRAMEWORK: DETAILED UCET COMMENTS**

**To be read in conjunction with covering letter dated 17 March 2020**

ITE core content framework (multiple references)

Although it is acknowledged by the DfE and the advisory group that providers are encouraged to ‘go beyond’ the Core Content Framework to enable wider research-informed knowledge to underpin ITE, the extensive reference to complying with ITT Core Content indicates that it is this content that is to dominate future inspections and is viewed as impacting most on the learning and development of teachers. Secondary subject pedagogies and primary specialist pedagogies are crucial to effective student teacher development but are in danger of being ‘squeezed’ for space in curriculum design and awarded secondary importance. They are not of secondary or subsidiary importance – they are part of the strength of the university’s role in partnership provision, particularly in increasing research-informed teaching that is genuinely critically engaged with a wide range of evidence about the teaching of subjects.

There is a troubling concept of inspecting the ‘sequencing’ of the ITE curriculum as a way to gauge how the providers are implementing the ITT Core Content and to use this as a way to track student teachers’ progress. This suggests that:

1. Student teachers learn at the same rate and that this corresponds with the ‘sequence’ of the curriculum.
2. There ought to be a linear approach to ‘sequencing’ the curriculum (even though the documentation says that no preferred model is expected).
3. There is a linear pattern to student teachers’ progress.

Student teachers frequently have to ‘relearn’ teaching approaches when they move to a new placement, where different contextual factors challenge their assumptions about what is ‘working’. The start of a new mid-year placement often brings with it a reassessment of what has been mastered. Learning to teach involves cycles by which student teachers need to re-visit previous ideas about teaching because it is only with experience that they are deeply understood and made useful e.g. grouping strategies, ways of working with prior pupil knowledge, and the application of assessment for learning strategies. Thus, an ITE curriculum model that sequences ‘grouping’ or ‘assessment for learning’ in a linear model is not addressing the ways that student teachers learn over time, holistically, in an integrated way. They need to embed, modify and re-embed such knowledge as a result of fresh challenges that come with increased teaching in varied contexts on teaching placements. This is most relevant to the structure of PGCE programmes rather than employment-based routes, but it is a vital aspect of what university provision does to develop deep learning with student teachers. In addition, it may well be the case that students are unable to demonstrate competence and confidence in certain aspects of the curriculum, despite when it has been addressed in the ITE programme, due to the context of their placement and the timing of the activity.

Despite the assurance that no preferred model is expected, the emphasis on ‘sequencing’ will encourage providers to propose linear ITT curriculum models that are built around covering the ITT Core Content, rather than structured around subject and phase pedagogies that lend themselves to a spiral curriculum approach. in which various content elements are inter-related, are subject to review through practice experience and are adapted to the developmental stage of individual student teachers. Further work is needed to refine the ITT Core Content before it is enforced through the new inspection model.

Paragraph 34, all bullet points: As well as setting out the kinds of information that OfSTED will not expect to see, greater clarification on what will be expected would be welcome. The move way from basing judgements on objective data will also mean that individual inspectors will have to understand the different approaches to ITE and partnership working that exist across the sector. The limited understanding of ITE amongst some inspectors has been an issue in the past.

Paragraphs 34 & 36, page 9: It will not always be possible, or desirable, to sequence ITE curricula in a uniform way across (particularly) larger providers, across different subjects and for different student teachers. The text implies a common sequencing of ‘the curriculum applied in the same way’ across provision.

Paragraph 41/42, page 10: Principles informing the ITE Curriculum:  High expectations (TS1) through to Professional Behaviours (TS8). These are paraphrased versions of the teacher standards (footnote 30 identifies them as such). The role of the standards as principles informing the ITE curricula is something that providers will have to consider in the context of the content framework.  We also note the reference to inspectors checking that providers have ‘*assessed trainees against the relevant standards’*, which we presume will be student teachers who have completed their ITE rather than those currently on programme. As formative on-programme assessments, inspectors will have to recognise the need for providers to be able to consistently track the progress of student teachers, and provide informed feedback, towards the achievement of the standards.

Paragraph 42, page 10: We welcome the decision not to grade lesson observations.

Paragraph 42, 4th bullet, page 11: We support the decision not to advocate a particular approach in regards planning, although we wonder whether this is to some extent contradicted by statements elsewhere in the document.

Paragraph 43, 8th bullet, page 11: The relevant standards for the post-compulsory sector are the Professional Standards for the Learning & Skills Sector, not the QTLS standards.

Paragraph 46, page 12: We welcome the move from a Thursday to a Wednesday notification call. However, the new notice period might not be sufficient to coordinate meetings with and visits to partner schools, mentors etc. Furthermore, if as stated the Thursday follow up call isthe beginning of the inspection, then the notice period has been reduced rather than increased. Also, the deadline for requesting a deferral of the inspection is 4.30 p.m. on the Thursday, after the inspection has, on some readings of the document, already begun. It would, finally, be helpful to know when calls might and might not be made (e.g. the weeks during or immediately prior to half term).

Paragraph 49, 13th bullet, page 13: It might not always be possible for an ITE partnership to include schools and colleges judged as ‘requires improvement’, and covering the full range of socio-economic settings will not be possible for all.

Paragraph 49, 17th bullet, page 14: Although ITE providers can and do provide high quality professional development to mentors and trainers, ensuring mentors take up such opportunities can be an issue, as can the workload implications for mentors. Individuals move in and out of mentor roles according to the priorities of partner schools and colleges. Neither is any definition given of what is meant when the document refers to ‘the experience and expertise of mentors’.

Paragraph 56, 1st bullet, page 15: Given that six or more years may have elapsed since previous inspections, will requiring evidence that previously identified areas for development have been addressed actually be relevant?

Paragraph 56, 7th bullet, page 15: The integration of centre-based and placement-based curriculums will have to allow for the particular circumstances of some, for example larger, partnerships with partner schools and colleges demonstrating different levels of engagement and/or in different contexts (e.g. urban and rural). Inspectors will also have to allow for the autonomy of schools and colleges, especially on employment based routes, to identify their own priorities in regards to curriculum content and sequencing.

Paragraph 83, page 21: This needs clarification. The UCET Post 16 forum was unable to understand what it meant.

Paragraph 91, page 22: We agree that OfSTED should not advocate teaching approaches that should be used exclusively with trainees. This is however inconsistent with references elsewhere in the document to systematic synthetic phonics, the ITE core content framework and sequencing.

Paragraph 92, page 22: University ITE providers include many expert researchers who are recognised both nationally and internationally as experts in their field. They should be free to draw upon research which they consider to be worthwhile when developing ITE programmes and curricula. Care must be taken to ensure that OfSTED ‘approved’ research does not prevent the use of a range of research evidence, or that particular examples of research evidence are engaged with in a non-critical way and not be subject to degrees of academic interrogation.

Paragraph 102, 3rd bullet, page 25: As previously mentioned, it will not always be practical or desirable to impose particular sequencing across all partnership settings.

Paragraph 117, page 28: If providers are to be discouraged from using the Teacher Standards Assessment Framework then how will they monitor progress towards QTS? If progress cannot be tracked against these there may be issues of consistency in the tracking by mentors and across the wider partnership. It is important that providers aren’t penalised for making formative assessments against the teacher standards in order to inform trainee progress, help with target setting and to keep other school placement providers informed of progress. It is worth noting that the introduction to the teachers standards say that they apply to student teachers working towards QTS.

Requires improvement grade descriptor, page36: Some examples of non-compliance are technical in nature and easily corrected. It would not be reasonable in such cases to impose an RI grade, with the implications that would entail.

Good grade descriptor, page 39: It should be for ITE providers to decide which approaches, in addition to systematic synthetic phonics, to use in the teaching of early reading. University ITE providers often include internationally renowned experts in the teaching of early reading, and it should be for them rather than for an OfSTED inspector to decide which approaches are supported by ‘*the most up to date evidence’*.

Good grade descriptor, page 40: While it is absolutely right that student teachers are equipped to be aware of up-to-date research findings, the reference to the research that is appended to (but not part of) the ITT core content framework having to be covered, and indeed accepted uncritically, should be removed. Also, there is a lack of detail about what OfSTED evidence OfSTED will expect in terms of the Impact of ITE curricula.

Inadequate good grade descriptor, page 44: Categorising a provider as ‘inadequate’ because they don’t exclusively teach early reading using systematic synthetic phonics is unacceptable. It undermines the integrity of the ITE sector, and makes no sense from an educational perspective (e.g. in regards to non-phonetically translatable words). It also contradicts the grade descriptor on page 39 (which we are also unhappy with) which states that alternatives which are supported by up to date research are in fact permissible.

Paragraph 170, 1st bullet, page 47: It will not always be practicable to ensure that the ITE content framework is reinforced in each partnership setting (e.g. in a small school that has occasional students on second placement). References to the content framework should also make it clear that it applies to primary and secondary QTS programmes only.

Paragraph 174, page 49: While ITE providers will only ever recruit students with the potential to be good teachers, it should be recognised that they are being encouraged by government to take greater risks than in the past about who they recruit, something which will impact on the qualifications and experience that some candidates possess. ITE providers are also prohibited from requiring previous schools experience as a condition of entry to QTS programmes. The position of students on in-service PCET programmes, who are recruited by partner colleges, must also be understood.

Good grade descriptor, page 51: Account must be taken of the pressures placed on mentors and the significant workload challenges many of them already face. Neither will it always be possible to ensure that all school and college partners ensure that mentoring supports the ITE curriculum.

Inadequate grade descriptor, 5th bullet, page 53: ‘teach’ should be replaced with ‘use’.