

DfE consultation on the review of the ITE Market

UCET response

Executive summary

There are some parts of the Market Review proposals which we support in principle. We agree that: ITE¹ programmes should be informed by the most up to date and robust research; there should as far as possible be consistency between ITE curricula and the experience of student teachers in school; and that mentors should have a key role in the delivery of ITE programmes and should be both properly trained and adequately resourced. We also acknowledge that government, or another regulatory authority, has both a right and responsibility to hold ITE providers to account and to ensure a measure of consistency, although not uniformity, in the way that new teachers are trained and educated.

This response will be accompanied by a more detailed paper about the proposals and underlying assumptions relating to the quality requirements.

Universities make an essential contribution to teacher education and to teacher supply. They are involved in the education of some 80% of new teachers entering England's schools each year, either through core postgraduate and undergraduate programmes that are designed and delivered in partnership with schools, or by working with SCITT, School Direct, Teach First and Apprenticeship partners. Universities give student teachers the opportunity for time away from placements to allow them to share and reflect on their experiences with those working in different schools settings. University programmes are subject to rigorous internal and external quality assurance processes in addition to those that apply to ITE. Universities give student teachers access to centrally provided resources such as library facilities and to pastoral, well-being and other support. They allow for access to subject and pedagogic expertise and to a research-rich teacher education environment. The importance of the involvement of universities in teacher education, which is a characteristic of high-performing education systems throughout the world, cannot be overstated.

We have a number of concerns about the Market Review proposals in regards to:

- The effective and indiscriminate reconfiguration of all ITE programmes, and proposed replacement with a design that is experimental on several levels.

¹ While the consultation document refers in most places to 'Initial Teacher Training (ITT)', in our responses we prefer to reference 'Initial Teacher Education (ITE)'

- The level of prescription and lack of academic autonomy in terms of content (which goes far beyond CCF alignment) and structure, assessment, mentor training and the implications of the proposals for the status and professionalism of teaching.
- The need for an accreditation/reaccreditation system.
- The impact that any reduction on the number of accredited ITE providers will have on teacher supply and the availability of school placements.
- The cost implications of the proposals and the burdens that would be placed on schools.
- The proposed timescale.

These concerns are set out in further detail below.

(a): The effective and indiscriminate reconfiguration of all ITE programmes, and proposed replacement with a design that is experimental on several levels

The proposal is to reconfigure ITE and replace it with a model which is experimental in terms of: recruitment; curriculum; assessment; and, crucially, stakeholder roles. Our concern is with the extremely destabilising impact this will have on a system that is already managing uncertainties associated with the pandemic. During unprecedented disruption, schools, ITE providers and the DfE have worked together to provide the most professional transition into first posts for Early Career Teachers. It is concerning to see the focus will now be to introduce extensive disruption and increase pressure on both schools and ITE providers. It is very likely that many expert and highly successful providers of ITE will decide not to participate in this disruptive process. It is hard to tell whether this is an intended or unintended consequence of the proposals but it is a real prospect.

(b): The level of prescription and lack of academic autonomy in terms of content and structure, assessment, mentor training and the implications of the proposals for the status and professionalism of teaching

It is important that ITE programmes are research informed and that new teachers are equipped to be able to interpret, apply, critique and contextualise relevant research. This is, at least in part, acknowledged in the consultation proposals. However, the proposals also imply that some research is incontestable. We do not agree with this. There are always alternative approaches and new teachers should be aware of these. The status of teaching as a profession depends in part on it being an intellectual endeavour. Teachers should be more than just executive technicians. The continued involvement of some universities in teacher education might be at risk if they are expected to slavishly follow and accept current and potentially time-limited DfE approved orthodoxies and deliver prescribed curricula. The withdrawal of such institutions would do huge damage to the prestige of the profession.

There is a need for initial teacher education reform on this scale to be informed by the widest range of robust, independent research into the development of teachers as professionals and the extensive knowledge base that exists about what constitutes effective teacher education.

OfSTED expects ITE providers to develop ambitious curricula that, while ensuring student teachers receive their CCF entitlement, reflects their particular contexts and that of their partner schools. Any prescription to curriculum content over and above this could undermine the scope providers have to provide this contextualisation, and might de-professionalise teacher education and through that the teaching profession.

(c): The need for an accreditation system to deliver the reforms

The proposals are divided into two parts: (i) those relating to the content and structure of ITE programmes; and (ii): the shape of the market needed to deliver these programmes. But there does not appear to be any link between (i) and (ii). No evidence is given in support of the claim that changes to the ITE market are needed to deliver the reforms. There is no reason why, if they were properly funded, the proposed new quality requirements could not be achieved by changing the Secretary of State's requirements for ITE, to which all programmes must adhere and compliance against which is checked by OfSTED. This is not to say that we agree with all of the new quality requirements. We do not. But the case for a complex, costly, disruptive and time-consuming accreditation process has not been made.

(d): Implications for teacher supply of a reduction in the number of accredited ITE providers and the ability of schools to offer placements

The proposals could lead to the withdrawal of high-quality ITE providers, including those in teacher-supply cold spots, for a number of reasons. The extra costs of running ITE programmes and increased prescription about how resources are used, combined with the uncertainties surrounding accreditation could lead senior staff within some universities to conclude that ITE is a too unpredictable and expensive activity to be involved in and focus their resources instead on other more cost-effective and stable areas of activity. Others might decide that delivering ITE content in an uncritical and unquestioning way would be inconsistent with their ethos and would lead to a de-professionalisation of teaching of which they would want no part.

The withdrawal of existing providers would impact negatively on teacher supply (including in rural areas), the levelling-up agenda and the diversity of the teaching profession. Reducing the number of accredited ITE providers would reduce the choice prospective teachers have about where to train. Many people choose, for family, financial or other personal reasons, ITE providers that are close to where they live. Increasing the distance to be travelled to either providers or placements will result in fewer applicants. Many student teachers choose to train at specific universities. For example, some apply to postgraduate ITE programmes at the same universities where they studied for their undergraduate degrees, a supply line that would be lost if those HEIs withdraw from ITE. Some student teachers choose an ITE provider because of its reputation and pedagogical, subject and research expertise. Others might prefer a SCITT provider focussed on providing teachers for particular local communities. Effective markets depend on choice. Removing options will reduce applications.

University ITE providers are particularly well placed to recruit student teachers from a range of backgrounds, and are able to provide targeted support (for example through centrally provided university services) to meet the particular needs of students from different groups, including those with disabilities.

The strong partnerships that have developed between accredited ITE providers and schools has been one of the education sector's great successes in recent years. These partnerships take a number of forms, with the extent of school engagement varying according to the circumstances and priorities of the schools concerned. Schools should have a choice about how they participate in ITE. Their contributions should be nurtured and cherished. It is, as the report itself acknowledges, already difficult for providers to secure placements, particularly in some key subjects such physics and MFL. This in turn has led to an artificial cap being placed on recruitment. The reforms should not do anything to make these challenges even more acute.

In many cases partnerships work because of the close and often personal relationships that have developed over a number of years between ITE providers and schools, and are based on them taking collaborative approaches to securing the best possible provision for students within the partnerships. These relationships are flexible, with schools increasing or decreasing their involvement because of changing priorities. It seems unlikely that all existing partner schools would be content to negotiate partnership arrangements with new, potentially distant, providers, especially if this would mean them having less ownership and control over the content and delivery of ITE than they currently have and having to enter into more formalised, quasi-contractual, relationships².

(e): The cost implications of the proposals and the potential burdens that would be placed on schools

The Market Review proposals will add to burdens on schools at a time when they are focussed on meeting the needs of pupils in the context of the pandemic. The proposals would also appear to be inconsistent with the government's stated objective of reducing the workload of teachers. Increasing the amount of time that student teachers spend in school will impact on placement capacity³. Increased expectations, such as releasing mentors for training and providing intensive placement experiences, will also add to the burdens faced by schools, who will at the same time be focussing on more immediate priorities, including the mentoring and other responsibilities that will follow from the national roll-out of the ECF in September 2021.

There are also cost implications for ITE providers:

- The minimum length of postgraduate ITE programmes will increase to 38 weeks a year. Longer programmes will be more expensive to run⁴.
- Accredited ITE providers will be responsible for identifying lead mentors to work across partnerships⁵, for ensuring they have access to new entitlements in respect of training and that student teachers receive 2 hours minimum mentor support each week. Intensive initial school placements, with the additional mentor support that will require, will also add to costs and will have an impact on pupils.
- If schools are to have student teachers on placement for a greater proportion of the year, they will expect an increase in funding, which will not be offset by a reduction in provider costs. Such increases would also require the significant re-configuration of postgraduate and undergraduate programmes.
- Removing the flexibility that ITE partnerships have to adjust budgets and responsibilities across partnerships in the light of changing circumstances, which might range in scale from a global pandemic to the withdrawal of one school from a partnership, could also undermine financial sustainability as well as adding to bureaucracy. HEIs work with schools to agreed funding models, the renegotiation of which will take time and could destabilize partnerships.

(f): Timescale

² Which would also sit oddly with references in the OfSTED ITE inspection framework about partnerships being co-constructed and based on shared leadership.

³ It will also make it more difficult for providers to use centre-based training to ensure consistency across partnerships.

⁴ There will also be implications for the timing of QTS recommendations.

⁵ HEI providers do not in fact have the authority to do this.

The planned timescale, especially if ITE providers have to go through an unnecessary accreditation procedure, are unreasonable. It can take at least 9 months for programmes offered by universities to be re-designed, consulted on with partner schools and go through revalidation processes. Programme details must also, under CMA regulation, be published before students apply for courses. The expression of these concerns do not of course imply that we would be content with the proposals if issues of timing were addressed.

We think that the current consultation should be halted and replaced with an open, transparent and collegiate review of teacher education that invites evidence from across the education sector, allows for a public debate of the evidence and leads to co-constructed reforms that schools, ITE providers, professional associations and others can unite behind. This would also allow time for evidence about the impact on teacher development of the CCF and the ECF to be collected and analysed.

The consultation document refers to the DfE commissioning an external organisation to analyse responses. We would welcome clarification on how this organisation will be appointed and reassurance that it will have a sufficient knowledge and understanding of ITE to analyse responses properly.

Conclusion

We trust that these comments, those in the attached Annexes and those to follow will be given proper consideration before any final decisions are taken. We stand ready to discuss the response as and when required.

JNR
UCET
July 2021

Annex A: Draft UCET comments on review recommendations

Recommendation 1: providers of ITT develop a new evidence-based training curriculum as a condition of accreditation which allows trainees to understand and apply the principles of the CCF in a controlled, cumulative and logical manner, as set out in the Quality Requirements

ITE curricula should not be imposed on ITE providers or act as straightjackets that prevent programmes from equipping new teachers with the characteristics identified in our response to consultation question 8 in Annex B. It is already a condition of accreditation that ITE providers align their curricula with the CCF, and compliance against this is checked by OfSTED. To that extent this recommendation is redundant. The introduction to the CCF makes it clear that research can be critiqued and questioned. We are concerned that these proposals will prevent that, especially if, as suggested, the content of academic awards are also centrally prescribed.

Recommendation 2: providers should design and deliver an intensive placement experience of 4 weeks (20 days) for single-year courses and six weeks (30 days) for undergraduate, over the duration of their course, as a condition of accreditation, that allows opportunities for groups of trainees to practise selected, sequenced components of their training curriculum, and receive highly targeted feedback, as set out in the Quality Requirements

The consultation does not provide sufficient information about what these placements will entail. Independent research into the effectiveness of 'intensive' ITE placement experience should be provided as the basis for the proposal, alongside research into other models, and clarification of the evidence of the benefits.

The practical implications will need to be considered. Are there sufficient schools that will be able to offer such placement experiences? Do the proposals imply that student teachers will take the lead on the education of pupils? Will they require teachers in schools spending more time supporting student teachers at the expense of pupils? Will some student teachers be required to travel longer distances to placements and, if so, will this make it impracticable for some to participate in ITE? Will the intensive placements be phase or subject specific? How realistic will intensive placements be for smaller schools and those in rural and remote areas, many of which are already cold-spots in terms of ITE provision?

DfE should carry out a scoping exercise to identify whether sufficient capacity for this exists within schools, and carry out research to identify the potential impact on ITE applications. Any new arrangements should be piloted before being introduced nationally.

Recommendation 3: providers should identify, as a condition of accreditation, sufficient 'lead mentors' who will ensure that trainees receive mentoring and support across placement schools which is aligned with the curriculum and informed by practice at all times, as set out in the Quality Requirements

We agree that mentor support is an essential component of ITE and we welcome the recognition that is given to this in the consultation. There is however a lack of clarity about what the lead mentor role will entail. The role should not be restricted to a narrow form of instructional coaching, although neither should it duplicate the role of ITE tutors. What would the implications be for the relationship between school staffing decisions

and ITE providers' oversight obligations? What would the QA procedures be, and would the school or the accredited provider be held to account?

Some schools offer placement opportunities to student teachers from a number of different ITE providers. Would the lead mentors need to be shared across the providers in such contexts? If so, which provider would be responsible for the training and QA of the lead mentor?

Recommendation 4: Providers should ensure that lead mentors take either the NPQLTD or one of the other two specialist NPQs or training with the equivalent content and quality, as a condition of accreditation, and every school which hosts a trainee has at least one member of staff who is undertaking or has completed the course

We agree that mentors should have an entitlement to funded training. Many ITE providers already run high-quality mentor training programmes, sometimes accredited at Master's degree level. It should be possible for mentors to undertake these programmes instead of the NPQLTD (even if that qualification is fully on stream) if the partnership thinks that it would be more appropriate and reflective of local needs and circumstances. The cost of any additional training, for schools and ITE providers, would have to be met by central government. Mentors would also have to be given sufficient time to undertake the training. Attendance at mentor training has been an issue within many partnerships in the past, although the development of on-line and blended learning during the pandemic has helped to address this.

Recommendation 5: providers should develop a detailed training curriculum for mentors at all levels, as a condition of accreditation, including elements specific to subject and phase, and minimum time allocations for delivering this to be required, as set out in the Quality Requirements

We support this recommendation, provided that ITE providers are to continue to be able, in consultation with their partner schools, to develop curricula that reflects the professional status of mentoring and aligns to the contexts of the partnerships concerned. These curricula should enable mentors to become more than just instructional coaches.

Recommendation 6: providers should demonstrate the capacity to develop an assessment framework reflecting the priorities as set out in the Quality Requirements for assessment as a condition for accreditation

We agree that ITE providers should develop assessment frameworks, as in fact they already do. Further clarity is required about what is being proposed, over and above existing arrangements. Due to the complex nature of the specialised knowledge and understanding a teacher develops, the assessment of student teachers should be done in a holistic manner and not be atomised into individual components of the curriculum.

While the current teachers' standards remain in place, it is only reasonable that student teachers should receive feedback throughout their programmes on how well they are progressing towards them. Accredited ITE providers are fully aware of the difference between formative and summative assessment. Providing such feedback only on completion of their ITE is unfair. We have never understood the rationale behind the blanket ban on in-course referencing of the teacher standards which is set out in these proposals and in the new OfSTED ITE inspection framework.

Recommendation 7: providers should design and implement rigorous quality assurance arrangements as set out in the Quality Requirements as a condition of accreditation

ITE providers already develop, and regularly review, QA arrangements. Programmes are also subject to external QA procedures through OfSTED, and for university programmes internal quality assurance through the use of external examiners and validation procedures, and externally through QAA requirements. These measures all ensure a level of consistency in terms of the quality of the student experience.

Recommendation 8: DFE should facilitate any accredited providers which wish to do so, partner with an institution, such as the Institute of Teaching when it is ready, to offer their postgraduate award

Accredited ITE providers are already able to offer qualifications at undergraduate or postgraduate level. HEI providers already have degree-awarding powers, and other accredited providers such as SCITTs can deliver programmes that lead to qualifications accredited by an HEI. SCITTs already have a large choice about which HEIs to partner with for accreditation. A 2021 survey conducted by NASBTT found that 81% of SCITTs were very happy with their PGCE provider. References made to the costs and benefits associated with existing validation arrangements are misleading and inaccurate. Postgraduate ITE programmes often cost the same to deliver whether they are associated with an academic award or not.

We think that all ITE programmes should be accompanied by an academic award, although such awards should be outside the scope of the Market Review. Academic awards give added status and currency to QTS programmes and ensure that programmes include intellectual as well as practical components. We believe that it should be a condition that all QTS programmes are linked to an academic award, and that for postgraduate programmes this should be at Master's degree level, consistent with what happens in the best performing education systems internationally. Postgraduate level awards are supported by the research infrastructure of universities in terms of internationally validated research expertise and resources, and are comparable with level 7 awards offered within Master's provision elsewhere in the university. We would resist, however, any attempt to limit the content of academic PGCE programmes in the way implied by paragraph 67.

This recommendation will inevitably be interpreted as a further attempt to undermine the role of universities in initial teacher education. If this is not the case, a rationale for the proposal should be provided. There is, furthermore, no guarantee that PGCEs validated by the untested Institute of Teaching will, assuming it receives Degree Awarding Powers, have the same domestic and international currency as those awarded by universities, particularly if they are expected to conform to content requirements that will, in effect, prevent them from meeting the standards and expectations that are generally associated with higher academic awards.

Recommendation 9: Single year ITT courses that lead to QTS should be required to be of 38 weeks duration, as a condition of accreditation, of which the minimum spent in schools should be 28 weeks

It is difficult to see what meaningful difference an increase from 36 to 38 weeks will make to the experience of student teachers, although it will clearly add to costs. The £9,250 tuition fee income for ITE programmes is already insufficient, and significantly less than that provided for other professional programmes where professional placements attract additional funding. What evidence is there in favour of student teachers spending such a significant amount of time in school?

Increasing the amount of time that student teachers spend in school will also reduce the scope that accredited providers have to use centre-based training to secure greater consistency for student teachers placed in a range of different partnership schools.

Recommendation 10: Teaching School Hubs should partner with an accredited organisation to play a role in the delivery of ITT (unless they are operating at accredited provider level). DfE should place a requirement on teaching school hubs to support local ITT delivery in specific strategic ways as required, for example through building school capacity for ITT by building an active mentor network in the local area, providing specific support for schools serving disadvantaged communities to enable them to engage with ITT, or modelling high quality intensive placement for other schools undertaking this aspect of ITT for the first time.

Effective partnerships already exist between ITE providers and Teaching School Hubs. The nature of those partnerships should be a matter for local discretion, and should not be driven in inappropriate directions by any centrally imposed KPIs for Teaching School Hubs. The capacity of TSHs to accept burdensome new responsibilities, especially during their formative years and while they are coming to grips with their ECF and Awarding Body responsibilities, should also be taken into account. This is particularly true for the many TSHs that currently have little or no involvement in ITE.

Recommendation 11: prospective accredited providers of ITT should go through a new, rigorous accreditation process to ensure that they are able to deliver the Quality Requirements

No rationale is given for this. It would be time consuming, disruptive and hugely expensive, both for ITE providers, their partner schools and central government, i.e. the taxpayer. Clarity is needed on the criteria that would be used to assess requests for accreditation and on who would consider those requests. Will all providers who are able to demonstrate that their programmes meet the new 'quality' requirements be accredited, or will other factors also be taken into account? If so, what factors will these be?

The absence of any detailed information about the accreditation criteria and process means that this proposal is not being appropriately consulted upon.

Recommendation 12: DfE formally notifies providers who do not meet aspects of the Quality Requirements, as set out in the ITT criteria. Where this is the case, DfE should mandate support between providers to ensue improvement as a condition of continued accreditation. Where a provider is unable or unwilling to improve, DfE should broker a transfer of trainees to another provider.

We assume that this relates to providers who receive accreditation and are subsequently found to be failing to comply. If so, a re-inspection comparable to those which already take place for providers deemed to require improvement would be sufficient, without any requirement to work under the direction of a DfE 'approved' provider, which we assume would be the Institute of Teaching. Artificially limiting the number of student teachers such providers are allowed to recruit would de-stabilise them and undermine their ability to achieve the 'improvements' DfE require.

Recommendation 13: DfE and OfSTED should explore how involvement in ITT might be included in the Education Inspection Framework (EIF)

ITE providers and representatives of school leaders should also be involved in these discussions. While we would welcome measures to encourage schools to have greater involvement in ITE, forcing them to do so would be counter-productive. Reluctant partners are rarely effective partners, and their involvement would lead to a poor ITE experience for the student teachers concerned.

Encouragement to schools to take part in ITE could be effective. Government could point out to schools the benefits in terms of teacher recruitment and teacher development that involvement brings. The participation of schools should be publicly lauded.

Recommendation 14: as trusts grow, there should be an expectation that actively meets their responsibilities for ITT Involvement in the areas they serve. Regional School Commissioners should therefore consider involvement in ITT as a condition of growth for trusts. DfE should also make ITT involvement part of the eligibility for academy funding streams, such as the Trust Capacity Fund (TCF) or sponsor grants.

Similar considerations apply as in our response to recommendation 10 above. The effect on placement availability at existing partnerships in the same geographical areas, which could potentially be cold spots relevant to the levelling-up agenda, will also be an issue.

ANNEX B: Outline responses to specific consultation questions

NB: Questions 1-6 relate to details of the respondent

- 7. Which of the themes set out in the report do you particularly recognise as the key areas where there is an opportunity to further increase the quality of ITT? You may choose as many themes as apply.**
- a. Consistency across partnerships and between providers in the content and quality of the training curriculum
 - b. Rigorous sequencing of the training curriculum
 - c. Alignment between the taught curriculum and training environments, in particular teaching placement schools
 - d. Sufficient opportunities for trainees to benefit from highly focused practice of, and feedback on, essential components of the curriculum
 - e. High-quality mentoring to ensure that mentors both know and understand the training curriculum and have a sufficient level of influence over the progress of trainees
 - f. Clarity about the way in which the market operates for potential trainees
 - g. A supply of enough high-quality placements with the capacity fully to support the delivery of the trainee curriculum
 - h. None of the above

There is unlikely to be anyone involved in teacher education who does not think that these themes are important. The questions that should have been asked are: to what extent are these themes already reflected in ITE programmes? What measures might be taken to embed them further?

The challenges associated with securing precise alignment between ITE curricula and what student teachers experience in school should not be under-estimated. ITE providers often work with a large number of schools, and ITE providers, quite rightly, cannot dictate to schools what they teach and when they teach it.

It is appropriate that there should be some consistency of provision across the ITE sector. Teaching is a profession with a shared knowledge base and schools, parents and student teachers have a right to expect a degree of commonality. This is already ensured through the Secretary of State's ITE requirements, the teachers' standards and the CCF. However, consistency must not be confused with uniformity. There must be scope for ITE programmes to reflect the needs of particular schools and communities, and indeed the ethos of individual providers and the schools they work with. The challenges and desirability of uniformity within partnerships should also not be overlooked. Larger providers often operate across wide geographical areas with many different schools. The scope for alignment across all schools would, unless schools are to be required to follow their ITE providers lead in terms of what they teach and when (which would not be very 'school-led'), is limited. And the variety in the nature and contexts of the different schools working within some individual partnerships means that uniformity would not be appropriate as it would prevent contextualisation. Such challenges would be even more acute if the Market Review was to lead to fewer and larger ITE partnerships.

We agree about the need for clarity about how the 'market' operates, and welcome the emphasis on there being only three core routes into teaching, as this

moves away from the overly complex and confusing way in which the DfE has described the different routes in the past.

8. Do you think that there are any other key areas for improvement in the ITT system that are not included in the above list?

We believe that ITE programmes should be designed and delivered in such a way as to equip new teachers to be:

- **competent and confident professionals** who recognise and understand that educating is a professional, thoughtful and intellectual endeavour and who are able to learn from research, direct experience, as well as other sources of knowledge.
- **epistemic agents, acting as independent thinkers** who recognise that knowledge is contestable, provisional and contingent and thus 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 recognise the social responsibilities of education, such as working towards a socially just and sustainable world and understand the responsibilities of educators and education as a whole. Teachers are self-aware and aware of, and sensitive to, the needs of others, always acting with integrity.

The proposals relating to ITE content will, we fear, make it more difficult to develop teachers with these characteristics because of the uniform approach that ITE programmes will have to adopt. This would damage the status of the teaching profession and the quality of education in our schools. High quality teaching flourishes within particular contexts that allow for mutually empowering professional relationships and collegiality. Teacher education can cultivate such collegiality through strong professional collaboration amongst all partners. Such collaboration is characterised by shared intellectual responsibility bringing together complementary forms of knowledge and experience. Thus, teacher education is a collective, co-constructed endeavour to which each partner brings unique forms of expertise and perspectives that are subject to change in an ongoing collaborative and dynamic process.

9. If you think that there are alternative approaches to addressing these challenges, please specify what these are.

It would have been a straightforward matter for DfE to work with representatives of ITE providers, schools and others to: identify the key characteristics that ITE should contain; identify the extent to which these characteristics are already reflected in ITE; and agree measures that might be taken to address any gaps. It is a matter for regret that DfE has chosen not to take an approach based on co-construction and partnership. There is however still scope to do this. The current consultation should be halted to allow this to happen.

10. Please provide any comments you have on a) the proposed approach to intensive practice placements, b) any barriers to implementation, and c) any support you would need to overcome these barriers.

Independent research into the effectiveness of 'intensive' ITE placement experience should be provided as the basis for such a proposal, alongside research into other models and clarification of the evidence of the benefits.

All aspects of the ITE curriculum should be closely integrated in order to enable trainee teachers to interrogate what they learn from a range of different perspectives. We welcome the recognition given to the value of giving student teachers experience in schools in disadvantaged communities, and the fact that the four key areas of focus for intensive placements need not necessarily all be drawn from the CCF.

The consultation does not provide sufficient information about what intensive placements will entail or what evidence exists to support their introduction. The practical implications would appear to be significant. Are there sufficient schools that will be able to offer such placement experiences? Do they imply that student teachers will take the lead on the education of pupils? Will they require teachers in schools spending more time supporting student teachers at the expense of pupils, and what impact will this have on pupil learning? Will the intensive placements be phase or subject specific and, if not, how will subject and phase specificity be ensured?

One key challenge will be the capacity, willingness and ability of schools to offer intensive placements, particularly given constraints in terms of space, staff resources and the scope to accommodate significant numbers of adults on site.

Before it proceeds with this recommendation, DfE should: clarify more precisely what is envisaged and why, what the benefits will be and carry out a scoping exercise to see if the capacity to deliver actually exists. Any new arrangements should be piloted before being introduced nationally.

11. Please provide any comments that you have on the minimum timings set out in the table.

ITT minimum time allocations	Postgraduate	Undergraduate
Total weeks of course	38	N/A
Minimum weeks in school placements (including general and intensive placements)	28	40
Minimum weeks in intensive placements (not necessarily consecutive)	4	6
Minimum hours in classrooms (including observing, teaching, co-teaching, etc.) each week during general school placements	15	15
Minimum hours mentoring each week during general school placements	2	2
Minimum planned and supported hours per week during intensive placement	25	25

ITT minimum time allocations	Postgraduate	Undergraduate
Minimum hours of expert support per trainee per week during intensive placement	5	4
Minimum hours initial training time for general mentors	24	24
Minimum hours initial training time for lead mentors	36	36
Minimum hours annual refresher training for mentors	6	6
Minimum hours annual refresher training for lead mentors	12	12
Minimum ratio of lead mentors: trainees (FTE)	1:25	1:25

Adding 2 weeks to the length of postgraduate ITE programmes will make little practical difference to the experience of student teachers, although it will add to provider costs. The £9,250 ITE providers receive for each student is already insufficient and is much less than is provided for students on other professional programmes, where placement experiences receive additional funding. The fee income for ITE students has to cover all costs associated with: the design & delivery of programmes; payments to partner schools (which will vary according to how responsibilities are distributed); meeting QA and regulatory requirements; and giving students access to central HEI services such as library facilities, health and well-being services etc.

More generally, it should not be a matter for central government to dictate to partnerships to such a level of detail as is outlined in the table above. While it is appropriate, within reason, for a regulatory body to set conditions in terms of programme design and content, such detailed specification by central government is inconsistent with the principles of partnership and with the last decade's policy drive to give schools more ownership over the content and delivery of ITE, particularly if (as implied by paragraphs 39 and 46) ITE providers are to take decisions about what happens in schools. Government should recognise that centralised control is not always effective and that partnerships on the ground are often best placed to take decisions about how things should be done and how agreed outcomes can be met.

- 12. Please provide any comments you have on any of the other curriculum requirements (excluding those requirements relating to intensive practice placements and minimum time allocations covered above), referencing by number any of the specific requirements included in the Quality Requirements for ITT providers that you wish to comment on.**

Universities are well placed to provide access to subject and phase specific expertise through their links to their own subject departments. They also give student teachers access to research expertise. Universities can, and do, provide access to such resources to smaller providers with whom they work in partnership.

- 13. Please provide any comments you have on a) the proposed approach, b) any barriers to implementation, and c) any support you would need to overcome these barriers.**

We agree that mentor support is an essential component of ITE and we welcome the recognition that is given to this in the consultation proposals. There is

however a lack of clarity about what the lead mentor role, which should complement rather than replace that of the ITE tutor, would actually entail. If they are, as is the case for all mentors at present, employed by partner schools, then HEI providers have no direct influence over which individuals are appointed. What would the implications be for the relationship between individual school staffing decisions and an ITE provider's oversight obligations? How would schools be compensated for the time that lead mentors spend on mentoring activities across the partnership and outside their employing schools, especially given the pressure that is already placed on mentors because of the ECF and the CCF? What would the QA procedures be, and would it be the school or the accredited provider that is held to account?

We agree that ITE providers should develop training curricula for mentors at all levels, provided they are to continue to be able, in consultation with their partner schools, to develop curricula that reflects the professional status of mentoring and aligns to the contexts of the partnerships concerned. These curricula should enable mentors to become more than simply instructional coaches.

Some schools offer placement opportunities to student teachers from a number of different ITE providers. Would the lead mentors need to be shared across the providers in such contexts? If so, which provider would be responsible for the training and QA of the lead mentor?

We agree that mentors should have an entitlement to funded training. Many ITE providers already run high-quality mentor training programmes, sometimes accredited at Master's degree level. It should be possible for mentors to undertake these instead of the NPQLTD (even assuming that the NPQLTD is on stream in time) if the partnership thinks that would be more appropriate and reflective of local needs and circumstances. The cost of any additional training, for schools and ITE providers, would have to be met by central government. Mentors will also have to be given sufficient time to undertake the training. Attendance at mentor training has been an issue within many partnerships in the past, although the development of on-line and blended learning during the pandemic has helped to address this.

14. Please provide any comments you have on this proposed approach to assessment of trainees undertaking ITT, referencing by number any of the specific requirements included in Quality Requirements for ITT providers that you wish to comment on.

We agree that ITE providers should develop appropriate assessment frameworks, as in fact they already do. Further clarity is required about what is being proposed, over and above existing requirements. Due to the complex nature of the specialised knowledge and understanding a teacher develops, the assessment of student teachers should be done in a holistic manner rather than being atomised into individual components of the curriculum

While the current teachers' standards remain in place, it is only reasonable that student teachers should receive feedback throughout their programmes on how well they are progressing towards them. ITE providers are aware of the distinction between formative and summative assessment. Providing such feedback only on completion of their ITE is unfair. We have never understood the rationale behind the blanket ban on in-course referencing of the teacher standards which is set out in these proposals and in the new OfSTED ITE inspection framework.

15. Please provide any comments you have on this proposed approach, referencing by number any of the specific requirements included in Quality Requirements for ITT providers that you wish to comment on.

ITE providers already develop, and regularly review, QA arrangements which adhere to these recommendations. Programmes are also subject to external QA procedures through OfSTED, and for university programmes internal quality assurance through the use of external examiners and validation procedures, and externally through QAA requirements. These measures all ensure a level of consistency in terms of the quality of the student experience.

16. Please provide any comments you have on this proposed approach, referencing by number any of the specific requirements included in the Quality Requirements for ITT providers that you wish to comment on.

Effective partnerships depend on shared ownership and flexibility. We are concerned that requiring accredited ITE providers to specify in advance how resources and responsibilities are to be shared across different aspects of the partnership will imply a contractual rather than a partnership approach. It would also make it difficult for ITE providers to tailor the sharing of responsibilities and resources to the needs and circumstances of different schools within their partnerships. Contractual relationships are by their nature inflexible, and would prevent genuine partnership working. They are also by their nature bureaucratic and expensive to administer. How resources and responsibilities are shared within partnerships are fluid and have to be kept under review in the light of, for example, staff changes, schools temporarily withdrawing from partnership or emergencies such as a global pandemic.

We are also concerned about the implications within the consultation document and the EAG report that ITE providers will have to operate at a minimum scale in order to secure accreditation, and if they want to continue to be involved in ITE they will have to do so as delivery partners working under the auspices of larger accredited providers. One of the strengths of the current system is that a range of providers exist, in terms of size and ethos, that collectively meet the needs of different student teachers, schools and communities and gives choice to students and to schools about the kind of ITE partnerships they engage with. It is extremely unlikely that all small and medium sized providers (both SCITT and HEI) will be willing to surrender their autonomy and be subsumed within larger partnerships, thus removing the freedom they have to provide targeted and bespoke teacher education. It is unlikely that partner schools will be happy to work with new and potentially remote accredited providers, especially if this means any diminution in the influence they have over the design and delivery of ITE. And it is extremely unlikely that all of the student teachers who would otherwise have attended the providers that lose their accredited status will want to, or be able to, apply to the larger partnerships.

It is important that the proposed new requirements allow for ITE programmes to be flexible enough to reflect the needs of different schools and local communities, and that region and context specific curricula are allowed. Programmes must also be adaptable enough to meet the needs of particular student teachers, including those with disabilities and those from a range of different backgrounds.

17. Please provide any comments you have on this proposal (PGCE question)

Accredited ITE providers are already able to offer qualifications at undergraduate

or master's degree level. HEI providers already have degree-awarding powers, and other accredited providers such as SCITTs can deliver programmes that lead to qualifications accredited by an HEI. SCITTs already have a vast choice of HEIs who they can partner with for accreditation purposes. A 2021 survey by NASBTT found that 81% of SCITTs were very happy with their PGCE provider. References in the consultation document to the costs and benefits associated with existing accreditation arrangements are misleading and inaccurate. Postgraduate ITE programmes often cost the same to deliver whether they are associated with an academic award or not.

We think that ITE programmes should be accompanied by an academic award, although such awards should be outside the scope of the Market Review. Academic awards give added status and currency to QTS programmes and ensure that programmes include intellectual as well as practical components. We believe that it should be a condition that all QTS programmes are linked to an academic award, and that for postgraduate programmes this should be at Master's degree level, consistent with what happens in the best performing education systems internationally. Postgraduate level awards are supported by the research infrastructure of universities in terms of internationally validated research expertise and resources, and are comparable with other level 7 awards. We would resist any attempt to limit the content of academic PGCE programmes in the way implied by paragraph 67.

These proposals will inevitably be interpreted as a further attempt to undermine the role of universities in initial teacher education. If this is not the case, a rationale for the proposal should be provided. There is, furthermore, no guarantee that PGCEs validated by the untested Institute of Teaching will have the same domestic and international currency as those awarded by universities, particularly if they are expected to conform to content requirements that will, in effect, prevent them from meeting the standards and expectations that are generally associated with higher academic awards.

18. Do you think that there are any specific considerations that a) providers of undergraduate ITT and b) providers of employment-based ITT would need to account for when implementing the proposed Quality Requirements? In your answer, please include the approaches providers might take to address these.

The scope for student teachers on employment based programmes to participate in intensive school placements will be limited because of their teaching responsibilities and the legitimate expectations of their employing schools. For those on apprenticeship programmes, care will have to be taken to ensure that the new requirements do not conflict with the detailed, inflexible and byzantine rules that apply to apprenticeships more generally.

A number of employment-based providers, including some universities, provide high-quality and bespoke ITE in partnership with employing schools, sometimes at a modest scale. These programmes make an invaluable contribution to teacher supply and quality in their areas. It is difficult to see how such provision would fit in with the proposed market structures.

The implications for undergraduate programmes are complex and will have to be subject to careful and detailed discussion. Increasing the amount of time undergraduate ITE students spend in school will have implications for the configuration of whole programmes, and will reduce the amount of time available

in university for undergraduates to spend on the development of subject knowledge and expertise in key areas such as SEND and child development.

19. Please provide any comments on any indirect impacts on provision of a) Early Years ITT and b) Further Education ITE if these recommendations were to be implemented.

Some 34 education departments in higher-education institutions are responsible for training some 5,000 teachers for the further education and skills sector each year. In addition, accredited ITE providers train some 500 EYITT teachers each year. If universities withdraw from providing ITE for prospective school teachers most of this provision will be at risk, as it is unlikely that education departments within HEIs would continue to operate in the absence of QTS programmes. Master's level and doctorate programmes available to teachers in all sectors of education would also be at risk, as would educational research carried out by universities.

20. Please provide any comments you have on the proposed approach to accreditation and re-accreditation.

No rationale is given for this. It would be time consuming, disruptive and hugely expensive, both for ITE providers, their partner schools and for central government, i.e. the taxpayer. Clarity is needed on the criteria that would be used to assess requests for accreditation and on who would consider those requests. Will all providers be able to demonstrate that their programmes meet the new 'quality' requirements to be accredited, or will other factors also be taken into account? If so, what factors will these be?

The lack of detail provided about the proposed accreditation process means that this recommendation is not being appropriately consulted upon.

21. Please provide any comments that you have on the proposed approach to monitoring set out above

Where accredited providers are found to be non-compliant, they should be given the opportunity to address any issues themselves. There would not seem to be any reason why providers should be coerced into new collaborative arrangements, and certainly not until they have been given the opportunity to become compliant by themselves. Neither can it be assumed that other providers would be willing or able to take them on.

22. Please provide any comments you have on: 9a) the proposed target of September 2023 for the first delivery of the quality requires; and (b DfE's proposed timeline?

The planned timescales, especially if ITE providers have to go through an unnecessary accreditation process, are unreasonable. It can easily take 9 months for programmes offered by universities to be re-designed, consulted upon with partner schools and go through revalidation processes. Programme details must also, under CMA regulation, be published before students apply for courses.

The current consultation should be halted to allow a meaningful, open, and transparent review of ITE to take place. This would involve an open call for evidence and the co-construction of proposals. The process that led to this

consultation was neither open nor transparent and appears to be underpinned by a number of hidden agendas and assumptions.

NB: Questions 23-25 are institution specific

26. Please provide any comments you have on the proposed role of Teaching School Hubs in the future of the ITT market

Effective partnerships already exist between ITE providers and Teaching School Hubs. The precise nature of those partnerships should be a matter for local discretion, and should not be driven in inappropriate directions by any centrally imposed KPIs for Teaching School Hubs. The capacity of TSHs to accept burdensome new responsibilities, especially during their formative and untested years and while they are coming to grips with their ECF and Awarding Body responsibilities, should also be considered.

27. Please provide any comments you have on the proposed approach to increasing the involvement of trusts in ITT?

Similar considerations apply as in our response to the recommendation on Teaching School Hubs. The effect on placement availability at existing partnerships in the same geographical areas, which could potentially be cold spots and those covered by the levelling-up agenda, might also be an issue.

28. Please provide any comments you have on other incentives that could encourage schools and trusts to participate in ITT.

ITE providers and representatives of school leaders should also be involved in these discussions. While we would welcome measures to encourage schools to have greater involvement in ITE, forcing them to do so would be counter-productive. Reluctant partners are rarely effective partners, and their involvement would lead to a poor ITE experience for the student teachers concerned.

Encouragement to schools to take part in ITE could be effective. Government could promote to schools the benefits in terms of teacher recruitment and teacher development that involvement brings. The involvement of schools in ITE should be publicly lauded. The professional associations could be asked to promote ITE engagement to schools.

29. Please provide any comments you have on: (a) the impact of the proposed reforms on the recruitment and selection processes, including potential for streamlining of the recruitment process and sharing of recruitment practices; (b) any barriers to implementing the reforms at the recruitment stage; and support that would need to overcome these barriers.

The proposals themselves would not seem to have any direct implications for recruitment processes, although any reduction in the number of accredited providers would result in fewer applicants and reduced placement capacity. There does not, despite suggestions to the contrary, appear to be any economies of scale in terms of size of provider and recruitment costs.

30. Please use this space to raise any (a) equality impacts; and (b) any impacts specific to schools in rural areas that would result from the implementation of the proposed Quality Requirements

HEIs have a strong track record of recruiting students from a diverse range of backgrounds, and of providing targeted support through the provision of central services, including support for students with disabilities and providing networking and pastoral support for different groups. Many HEIs have a mission to recruit student teachers from within their local communities and, in doing so, supporting levelling-up policies. Care must be taken not to jeopardise this.

The loss of small and medium sized accredited ITE provision could have a disproportionate impact on schools in remote areas. Some SCITTs, for example, are the only ITE provider close to some communities, and the only provider accessible to people from those communities who want to become teachers. Some HEIs are the key provider for small schools across wide geographical areas consisting of small towns and villages. The loss of such provision would do huge damage to the infrastructure of such communities.