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**DfE consultation on the review of the ITE Market**

**A Response from Birmingham City University**

Background Information

Birmingham City University is a long established provider of Initial Teacher Education. It is the largest provider of ITE in the West Midlands. In Primary Education, courses are offered at both undergraduate and postgraduate (Mainstream and School Direct), with between 500 and 600 new trainees commencing each cycle. Secondary ITE is offered at undergraduate and Postgraduate level, with more than 350 students recruited annually to 19 subject disciplines.

In addition to a number of successful School Direct partnerships, the University works with SCITTs to offer both validated PGCEs and a PGCert that is delivered alongside a SCITTs; QTS programme. The University also provides a validated BA Primary with QTS course to three SCITTs, a distinctive feature in ITE in England.

The University has a significant role in respect of Post Compulsory Education and Training with a full time PGCE PCET as well as a relationship with a number of Further Education and tertiary Colleges to enable them to deliver the Diploma in Education and Training (DET) and/or the PGCE PCET.

We work on an annual basis with more than 400 core partnership schools and colleges, across 26 Local Authorities.

We hold a contract with the Department for Education to deliver Subject Knowledge Enhancement from September 2021, ensuring a pipeline of applicants for our own postgraduate ITE provision as well as servicing the ITE provision across through the sector through a range of face to face, blended and online courses.

The University has a framework at Masters’ degrees in Education that are designed to meet the need of professionals at various stages of their career as well as opportunities for doctoral study through the EdD and PhD routes.

We have a strong and growing profile in research, with particular areas of expertise in music education and post-compulsory education. Our focus on ‘close to practice’ research is enabling us to build a community of researchers in ITE, including students and colleagues in our partnership schools and colleges.

Summary

There are some parts of the Market Review proposals which we support in principle. Initial Teacher Education programmes should be informed by research that is current and robust. Students should be encouraged and supporting in accessing a wide range of evidence and critique this in the recognition that evidence is contestable, taking this forward to inform their practice.

Consistency is importance and there needs to be a clear synergy between the ITE curricula and the experiences that trainee teachers have in their placement schools. High quality mentoring is of paramount importance and the training and development of mentors, along with appropriate levels of resourcing to enable them to undertake their role are key requirements.

Whilst there are significant concerns about the nature and the potential degree of prescription of the ITE curriculum in the proposals, we recognise that the Government – or a regulated body working on behalf of the Government – has the right and the responsibility to hold providers to account and to require consistency of provision. But, consistency is not the same as uniformity and our response draws attention to this important difference and the need to ensure that training programmes are able to reflect the needs of students, schools and their communities.

We agree with the Universities Council for the Education of Teachers (UCET) in respect of the areas of concern that thy have identified and submitted in their formal response to the consultation:

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

Having contributed to the development of the University Alliance group’s response to the consultation, we are in agreement with the position that is being taken on behalf of the Mission Group:

“We believe in providing world-class teachers to educate the children of today and tomorrow. We fully support the context and aims of the review to drive up educational standards and to ensure all trainee teachers receive first-class teacher training. We are not opposed to change and support the need to evolve teacher training to sustain standards however as we will detail in this response we believe that there are fundamental problems with the approach taken in conducting this review thus far, problems that are now baked into the recommendations which will make implementation incredibly challenging and which we fear will ultimately break the teacher training system. We believe this for three fundamental reasons:

1. A lack of meaningful collaboration and engagement with the sector in order to build trust and understanding of the true complexities and nuances involved in delivering teacher training thereby bringing the key agents of change on this important journey collectively to evolve teacher training together.

2. An absence of clear and compelling evidence to demonstrate what exactly the quality issues are with the current teacher training system that have led to this review

3. A lack of acknowledgement of the true challenges of the wider socio-economic landscape facing early years, primary and secondary education and educators which unless recognised and dealt with will hinder the realisation of the aims and objectives of this review and at worst could exacerbate the levels of deprivation experienced across the country leading to greater disparity in educational outcomes for children and young people across the country. “

We are concerned that the proposals present a significant risk to the supply of teachers in to the future and have the potential to bring about disruption and damage to what are successful partnerships between ITE providers and partner schools. The consultation process is being conducted at a time when schools are closed and this impacts on the value of the consultation process. Without our schools, we cannot deliver Initial Teacher Education!

The attached annex is Birmingham City University’s response to the specific questions set out in the formal Consultation for the ITE Market Review.

Kevin Mattinson

August 2021

**ANNEX A: Responses to the Consultation Questions**

1. **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.***
   1. Consistency across partnerships and between providers in the content and quality of the training curriculum
   2. Rigorous sequencing of the training curriculum
   3. Alignment between the taught curriculum and training environments, in particular teaching placement schools
   4. Sufficient opportunities for trainees to benefit from highly focused practice of, and feedback on, essential components of the curriculum
   5. 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
   6. Clarity about the way in which the market operates for potential trainees
   7. A supply of enough high-quality placements with the capacity fully to support the delivery of the trainee curriculum
   8. None of the above

*In looking at the seven areas identified, it is difficult not to argue that all are important and that all need to be foci of the drive for continuous improvement. However, the market Review feels as though it has started from a position that is questionable. The real questions relate to the extent to which these features are already present in ITE courses across the sector and what can and should be done to further embed these.*

*The list is, we believe, one sign of a consistent theme that runs throughout the Market Review, this being that it is not just about a Market Review but a Market Reform. Should new providers be seeking to come in to the ITE market, the points set out are things that one would look for in provision and the document , in that sense, acts as a guide for a potential entrant. In essence, it could be seen that the Market Review Report is a blue print to guide a new potential provider.*

*What should, we believe, be the foci is how we enhance the elements identified. Enhancement. It should not go unnoticed that, for the vast majority of teacher training students they are being taught in Good or Outstanding provision (as rated by Ofsted up until the launch of the Market Review in January 2021).*

*As TEAG has pointed out in its response to the consultation, drawing on research from UCL, “it is important to note that when teachers leave the profession early in their career, they are not citing their ITE as the cause – the big reason is workload and efforts to improve retention would be better spent on further work in this area”.*

*There are challenges faced by all providers in aligning the ITE curriculum and what trainee teachers then experience in school. But, the training and development of teacher sis not about a simple and instrumental approach to practicing what has been learnt that week in the centre-based sessions. Opportunities to implement depend on context and a set of variables impact on this for each and every trainee teacher. In addition, schools and children are not laboratories where the learning of children can be skewed to meet the training needs of beginning teachers. ITE providers, quite rightly, cannot dictate to schools what they teach and when they teach it.*

*It is appropriate that we strive for consistency in ITE, delivering improvements for all trainees. There are structures and requirements already in place that are designed to ensure that we deliver consistency – the ITE Requirements, the National Standards and – since September 2020 – the Core Content Framework.*

*However, consistency is not the same as uniformity and the two must not be confused. ITE provision must be able to reflect the needs of its partnership and the schools and communities within these, and the flexibility to address context has been a key pillar of Government policy since 2010, the mantra around Schools Direct being ‘grow your own’.*

*The principle of a carefully sequenced curriculum is one that we are in agreement with. Again, we believe that this is already evident in providers’’ courses across the sector. The structure and sequencing of the curriculum is rigorously monitored through validations and internal and external QA scrutiny. What would be of concern to us would be if there was a ‘fixed or approved’ sequencing that was being determined centrally. This is a level of ‘command and control’ that would not be acceptable to us. It is for the provider to demonstrate the appropriateness of the sequencing and how this enables trainees to move successfully through their training to achieve the highest possible outcomes at the end of their training.*

*We are supportive of the need to address continued improvements in the operation of the market. The past ten years has seen a plethora of routes that have been confusing for some applicants. The language of the Department for Education has not helped in terms of the messaging to potential applicants and recent refinements to this, along with the opportunities that the Market Review presents, will potentially impact for good on the market and its ability to deliver the requisite number of trainee teachers.*

*As noted elsewhere in our response, high quality mentoring is at the heart of effective ITE. The commitment to this is welcomed. However, some of the prescription and reference to time allocations is potentially counter-productive as we do not believe that it will generate the increase in mentor supply that is required; rather, it has the potential to reduce supply as schools choose not to engage with ITE, and this is at a time when there are additional pressures on mentor capacity due to the roll-out of the Early Career Framework..*

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

*Whilst we believe that some of the key themes are identified, it is important to note that - as per the previous response - the questions for the Market Review should be about the extent to which these are already there and how they can be further enhanced and embedded.*

*In respect of one of the above (clarity around how the market operates), there is an absence of focus and the need to make the market work for the potential applicant is not there. In addition, some of the proposed reforms are potentially disruptive in engaging applicants.*

*What is not particularly evidenced in the Market Review is what we need from a system of Initial and Continuing Teacher Education. Teaching is much more than a craft/skill, whereby the teacher operates in a formulaic manner. It is an intellectual process, hence why any sense of a prescriptive curriculum that constrains what can be built in to a programme of ITE is a concern. Knowledge is contestable and there is a need for teachers to be able to exercise a critical voice as they develop the capacity to analyse a range of variables that will enable them to improve their professional practice and understanding and through this, impact on their pupils at the same time as achieving growth and satisfaction in their career (in turn, boosting retention rates). It is because of this that we strongly believe that we should be talking about Initial Teacher Education and not Initial Teacher Training.*

*We are supportive of the position set out by UCET in their response to the consultation that ITE programmes should be designed and delivered in such as a way as to equip new teachers to be:*

* *competent and confident professionals*
* *epistemic agents, acting as independent thinkers*
* *able to engage in enquiry-rich practice*
* *responsible professionals*

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

*We believe that, at a time where the education system is seeking to recover from Covid, there should be a halt to the process and there should be a commitment for all of the key stakeholders to look at ITE in a collaborative manner and work through the development of a set of principles that are collectively constructed and owned - which will enable the sector to move forward to deliver the continuous improvement that we all aspire to.*

*It should not be forgotten that ITE has been judged to be good or very good and that we should be looking to build on the strengths and successes of the current system as opposed to a risky dismantling of structure without an evidence base to support change, at least without the evidence from piloting proposals. This has the potential to disrupt teacher supply at a time when there are risks to that supply because of the age demographic and the fact that attrition rates have been 'distorted' because of the Covid pandemic, meaning that that a rise in departures from the profession can be expected.*

*The Core Content Framework has been in place since September 2020, again implemented at a time of significant disruption (unparalleled in modern times). There is a lack of an evidence base as to how the CCF will deliver improvements in ITE and we recommend that time is taken to evaluate the impact of this before risking further change.*

1. **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.**

*The concept of an ‘intensive placement’ is an interesting one but there is a lack of clarity as to what this might actually be for and how it could be delivered. As a ‘placement’ it presents a number of challenges and concerns about deliverability, costs and impact on placement capacity. However, there are potential opportunities to explore what this could mean, looking to offer a form of ‘intensive practice’ that has a clear set of principles. As UCET has identified, which we are supportive of, there is a need and indeed the opportunity to undertake research before implementation of such a proposal as to what might be delivered and the effectiveness of this. A range of approaches could be evaluated and this would then provide an evidence base to inform policy and practice.*

*The relationship between all strands of an ITE programme is central to effectiveness and the use of some form of intensive practice has the potential to strengthen and embed reflective and reflexive practice into the training and development programme. There is value in providing trainee teachers with a range of experiences, which have the potential to deliver a better understanding of ‘what, how and why’. We note that the key areas of focus for ‘intensive placements are not required to be drawn from the CCF and we see this as a positive move.*

*The timing of ‘intensive placements’ are a matter that would need careful consideration, as this can significantly impact on purpose and value. For example, there are employment-based routes in ITE that have a ‘front-loaded’ delivery, but it is questionable as to whether this is intended to deliver robust understanding and the creation of an intellectual and pedagogical framework that enables the trainee teacher to analyse her/his practice and that of others, as opposed to equipping the trainee with a ‘toolkit’ to take up a teaching timetable as quickly as possible.*

*Again, the lack of information means that there is insufficient information about what intensive placements will entail or what evidence exists to support their introduction. There is a potential contradiction which could manifest itself in the delivery of this. I ITE, and in the Market Review, there is a strong emphasis on the development of the effective subject teacher. This demands that the subject is a central context for learning. Potential models of delivery of intensive placements, driven by capacity and efficiencies, could result in a generic set of experiences and inputs.*

*Capacity to deliver has not been addressed in the Market Review and this is a concern for us. Models imply large scale numbers. As well as potentially resulting in ‘genericism’, there are questions about the impact on mentors and on pupils. Will the requirement take key member of staff from children and will schools be willing to accommodate this? Do schools want significant numbers of of trainees in their school/’experimenting and practicing’ at what is a critical point in the academic year (early in the autumn term).*

*The proposal as presented, again, without the detail needed, would potentially work more effectively for secondary than for primary - with the former being able to have a ‘critical mass’. But, as noted, that critical mass would, it appear be through not having a focus on subject. For primary schools, it is very difficult to see how the requirement, - presented as a ‘placement’ =- could be delivered. Similarly, the model as presented seems to have considered practice within urban contexts. For rural schools and trainees, there are different challenges.*

*There are implications for trainee teachers around travel to a school for intensive placement and the cost incurred. This may in turn lead to the exclusion of students who are needed to ensure that we have a diverse profile and teachers that are more reflective of the communities within which they work.*

*In essence, the challenge will revolve round 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.*

*There is, we believe, a potential risk to placement capacity in terms of schools feeling ‘excluded’ from this activity. One of the drivers for some schools to engage with ITE is that of involvement from the outset and for who whole of the trainee’s journey. There is a risk, albeit not quantifiable, that some schools would choose not to be involved in ITE if they were not able to have a role at the point of the ‘initial forming and influencing of the trainee’.*

*The value of an intensive placement for undergraduate trainees does not appear to have been considered. In this proposal, as with many of the others, the focus appears to have been the postgraduate route and undergraduates are almost presented as something of an ‘afterthought’. If one considers ‘intensive practice or specific experiences’ there is the opportunity to embed this through an undergraduate’s 3-4 year journey, but these forms of focused experiences are already embedded in many courses and doing this does not necessitate the increase in the number of weeks that are being proposed to be spent in school.*

*We believe that there should be further consideration as to models of delivery around a set of principles that need to be clarified. These can then be piloted. Indeed, the principle of piloting is something that we would argue should be extended to all the proposals before implementation, as there is a need to have the evidence that such changes delver positive outcomes before they are rolled out on a national basis.*

1. **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 |
| 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 |

*To set out a series of minimum timings is, we believe, counterproductive and could impact on the ability of providers to place trainee teachers on the scale that is necessary. In addition, there appears to be a lack of evidence to underpin some of these proposals.*

*Throughout the Market Review, there has been a strong emphasis on curriculum delivery and a recognition that the CCF is not the curriculum but a minimum that must be embedded in all ITE programmes. Recent Ofsted Inspection Reports have made reference to areas of knowledge that, in their view, some students did not have and that there was a reliance on the acquisition of this knowledge during placement. Therefore, it is counter-intuitive to reduce the amount of time on ‘centre based training’ (wherever the location of this) by two weeks on a postgraduate course.*

*There is a lack of an underpinning evidence for why the actual number of weeks are set out as they are. The current model of 24 weeks was established at the point of the move to ‘school-based’ ITE in 1992. Since then, there has been significant change in the ways in which teachers are trained and partners/stakeholders both understand their roles and deliver these. A Review should consider time and purpose and, despite this being raised, the proposed outcome is to increase time on placement.*

*To increase time on placement has potential cost implications in respect of payments to schools and, as TEAG recommends in its response to the Market Review, it is important to identify these additional placement and other costs and seek additional funding through the Spending Review.*

*There does not appear to be any justification for the significant increase in time to be spent on placement for undergraduate students (which is currently 24 weeks for those on a 3-year course and 32 weeks for a 4-year course. Such an increase has significant implications for the length of the academic year for these students, as they have to meet their 120 academic credit requirement each academic year in order to achieve their degree. Again, there are cost implications in respect of payments to schools but also relating to additional student financial support (maintenance loans).*

*The proposed increase in time will also potentially impact on placement capacity. Many schools take undergraduate trainee teachers alongside postgraduate students and providers work to manage their placements across a cycle. Such an increase in time to be spent will respect in placements being competing as opposed to complementary in the calendar and this may well lead to schools reducing the total number of trainees that they take throughout the academic year.*

*The high level of prescription, with the inevitable increase in demands on schools, will again potentially impact on placement capacity and schools will choose not to work with ITE. The challenges of sufficiency of placement and the issue of mentoring as a specific factor in this has been acknowledged throughout the discussions in the market Review; setting out this level of requirement will not encourage schools to commit to ITE. As UCET has also pointed out in its response to the Market Review, this level of prescription ‘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’.*

*A more appropriate approach would to have agreement around the principles for particular areas of activity/roles and then look to providers/partnerships to deliver high quality in line with these.*

*It is also important to recognise that there are significant concerns about the nature of prescription as set out and what this might mean for providers during an inspection and Ofsted’s approach to ‘compliance’.*

1. **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.**

*The Market Review sets out the importance of the curriculum being ’evidence based’ and that “the curriculum must be designed in the light of the best evidence for effective teacher training and development”. The HE sector is extremely well placed in this respect*

*As a University, we are able to provide access to subject and phase specific expertise through our links to our own subject departments. Offering both undergraduate and postgraduate ITE means that we have Teacher Educators immersed in the delivery of their subject discipline as well as having the close links to subject experts who are working at the forefront of the subject. Student teachers are given access to research expertise.*

*Through partnership with SCITTS and School Direct Lead Schools, access to resources can be and is available to smaller providers.*

1. **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 believe that high quality mentoring is at the heart of successful and effective ITE. Therefore, the emphasis placed on this in the Review is very welcome. However, the role of the Lead Mentor needs further clarification. This needs to be costed out in respect of the time and the implications in relation to accessing the NPQ and, in particular, the costs to schools of backfill for release time.*

*It is also not clear as to how the Lead mentor would operate vis-a-vis roles currently undertaken by the ITE provider. If the lead mentor is employed by a school, how can the ITE provider exercise the management and control that is required of it? There are a series of questions around QA and lines of accountability and on finance that need to be clarified.*

*We support the requirement that there should be the development of a training curricula for mentors at all levels. However, there is, again, a lack of detail. Many schools work with more than one ITE provider and it does not make sense if mentors potentially face having to undertake training for each provider. What would be helpful would be the development of a set of principles, developed in partnership, for all providers to design their mentor training around. This would allow for mutual recognition of a provider’s training as well as providing the benchmark/baseline that is important in respect of QA.*

*The proposal that mentors should have access to funded training is one that we welcome. However, we are concerned about the prescription around the training being the NPQLTD. There is a lack of evidence to indicate that this is an appropriate/the appropriate training and development for ITE mentors. Most if not all providers have their own mentor training and development programmes, including awards at Master’s degree level. We believe that there should be flexibility around the nature of the training; again, the development of a set of principles, the sector working together on this, would be something that would be welcome.*

*The specificity around the NPQLTD also raises concerns in terms of Inspection. An approach that offered a range of suitable routes/programmes would be preferable (the language in the Market Review) is a ‘hostage to fortune’ in terms of how it might be ‘read and adhered to’ by a particular Ofsted Inspection/team.*

*Mentors need time and support to undertake the training and we know that the ability /willingness of schools to release staff has been one of the key issues for providers. Changes to modes of delivery, with the use of blended and online learning, has already shown during the Covid-19 pandemic that higher levels of engagement can be achieved.*

1. **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 support the statement that ITE providers should develop appropriate assessment frameworks. This is already the case. What is not clear from the Market Review is what this is expected as there are already requirements in place.*

*Any change will require the necessary training and development of partners/mentors to ensure that principles and practices are understood and effectively embedded.*

*As both UCET and TEAG have indicated in their responses to the Consultation, there are contradictions between the need for ongoing formative assessment so as to ensure that each trainee knows where/she/he is on the journey to successful completion and the requirements that “Assessment specifically against the Teachers’ Standards should be reserved for end-of-course’ assessment), as in fact they already do. Further clarity is required about what is being proposed, over and above existing requirements. It is essential that assessment is holistic and avoids an instrumental and mechanistic approach.*

*The changes that have taken place, with the introduction of the Core Content Framework (CCF) and the emphasis on assessing the curriculum, along with the wider changes as a result of the introduction of the Early Career Framework (ECF), means that there are fundamental concerns about the value and relevance of the current Standards. Historically, the Standards have been reviewed every five years and there were 4 iterations of the Standards prior to the introduction of the current Standards in 2012. They are long overdue for a review and even more so with the introduction of the ECF. The current position is that a trainee is assessed for QTS against something that is ‘absolute’ and after a two-year programme of professional development through the ECF, s/he is assessed against that same ‘absolute’ Standards. The absence of an effective Standards framework that can identify and confirm progression and growth is something that is absent from the Review. As has been said, we now have the initial training and development of teachers that can be seen as a three-year seamless process for those following a postgraduate route n to the profession.*

*Prior to 2012, there was a framework that would have facilitated an approach of recognising growth and development, with the Q Standards for trainee teachers and the C Standards for those who had qualified and were early career teachers.*

1. **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.**

*In common with all other ITE providers, we have, and regularly review, QA arrangements which align and adhere to these recommendations. Courses are also subject to external QA procedures through Ofsted. Within the University, there are internal and external quality assurances structures and processes, with annual reviews and continuous improvement cycles, the use of specialist External Examiners for each ITE programme and validation/revalidation processes alongside formal periodic review. All programmes have to meet subject benchmarks and other QA requirements as set by the QAA.*

*All of these processes are designed to enhance provision as well as providing the assurances in respect of the requirement as set out in the Market Review.*

1. **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.**

*We all recognise and agree that partnership is key to successful ITE. However, the effectiveness of partnerships is dependent on shared values/ownership of provision and on flexibility. High quality ITE already demonstrates co-construction and co leadership and management within partnerships, each partner playing key roles to ensure the highest quality learning experience for the students.*

*This flexibility also allows for different levels and scale of activity, increasing the capacity of a partnership as different schools and other partners contribute in different ways (which can be readily and confidently adjusted to meet changed circumstances)*

*We are concerned that the requirements as set out in respect of roles and responsibilities and resources will potentially change the nature of relationships, establishing something that is more about contractual relationships rather than partnership working.*

*Again, as UCET has argued in its response to the consultation, “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.”*

*The references to scale in the Market Review are a concern to us. Although we are one of the largest providers in the Country, we work with a range of partners, supporting SCITTS not only in the West Midlands but more widely. These small scale providers meet local and regional need and deliver high quality ITE. They recruit locally and ensure that there is a greater diversity in the profession and one which is reflective of the communities which they serve.*

*The system as it is currently configures allows for and supports a variety of providers. Indeed, this is a success of the current system and reflects that ambition as set out by both the current Government since 2010 and the early developments under the previous administration from 1997-2010. The system gives choice and meets the needs of students, schools and their communities.*

*Any change that removed/reduces the freedom of some providers and/or Lead schools could result in losing them to ITE, with a consequent impact on capacity and the lost of dedicated, skilled and experienced teacher educators and mentors.*

*A reduction of any significant scale in the number of providers will potentially result in ‘gaps’ in that some students will not want to train within a larger scale organization and/or will not be willing to travel the greater distance to a provider.*

*Consistency is important but this does not mean uniformity. It is important that, again, in line with policy over the last decade or more, ITE programmes are sufficiently flexible to reflect and address context and to meet the needs of individual students.*

*As we work through the continuing effects of the Covid-19 pandemic, there is a need for stability. Stability and the successful training of students in the past two cycles has been due to the strength of existing partnerships. It is this that has ensured that there is the supply of qualified teachers coming through in 2021, as in 2020, to meet the staffing requirements of schools. The introduction of the ECF is potentially creating additional capacity pressures that places ITE at risk and, again, this exemplifies the need of stability.*

*This part of the market Review is a concern. It does suggest some form of greater centralization (which is in addition to concerns expressed about centralization of a/the curriculum, gives concern that the model is more akin to ‘command and control’). There are concerns that these recommendations are seeking to align ITE with the approach adopted for the early Career Framework; this would, in our view, be counter-productive and would not deliver the teacher supply requirements nor the improvements in ITE that we are all committed to.*

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

*As a University and an accredited ITE provider, we already offer qualifications at level 6 (undergraduate ) and Level 7 Masters’ – in common with all HEIs across the sector. In addition, we already work closely with SCITTS to provide a validated PGCE for their course or to deliver and/or support the delivery of a Level 7 PGCert alongside the SCITT’s QTS programme. Our evidence is that partner SCITTs are extremely happy with the working relationship that they have with BCU, as the institution which holds degree awarding powers and have little desire to seek to move their provision to an untested organisation such as the Institute for Teaching.*

*We have concerns about references in the consultation document to the costs and benefits of existing arrangements. It is the case that courses are of the same or similar cost irrespective of whether they offer an academic award or not. Reference to courses being substantially lower in cost can be challenged, as there are examples throughout the country of QTS courses charging the full student tuition fee.*

*We believe that ITE courses should carry an academic award as this is a recognition of the nature of ITE as a highly demanding intellectual process and how trainee teachers are challenged to think about their practice, drawing on relevant research. For postgraduates, a level 7 award ensures recognition and parity across Europe and more widely, where – in many constituencies – Teaching is a Master’s Level profession. Paragraph 67 seems to imply a control being exercised over the content of academic postgraduate programmes and this is something that, as a University, we cannot accept.*

*THE PGCE is something that has currency and is recognised throughout the world. We cannot see any evidence being offered that would justify actions that would undermine this provision. The proposed Institute for Education is an unknown quantity and there is a risk of devaluing the standing of the PGCE, at home and overseas, where such a body is validating the PGCE of other ITE providers. Reference is made to the IoT as a ‘flagship’ and the real risks of this organisation being driven by policy around content will raise concerns that the expectations and standards associated with academic awards at level 7 may not be met.*

1. **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.***

*There are already a number of challenges around employment-based routes, with employing schools, understandably, focusing on the teaching responsibilities of their trainee – with a consequent reluctance to release them for extended periods of time in a contrasting/complementary/second placement. An expectation to provide for an intensive placement – whether this is as a block activity or managed in a different form over the duration of the training – will be something that many schools will be resistant to. This could, in turn impact on their willingness to consider employment-based routes and this in turn impacts on the sector’s ability to recruit across a diverse range of candidates.*

*The drive to expand the teaching apprenticeship route would also be adversely affected by changes in time to be spent on placement.*

*One of the strengths of a number of predecessor routes in to teaching (flexible PGCE, GRTP, was the ability to offer bespoke provision that reflected on prior experience – so provision was more than ‘assessment Only’ but which could be significantly shorter than a ‘standard’ course. These routes were supportive of employment-based provision and the introduction of these new requirements – which appear, again, to drive an approach that lacks flexibility, may impact on recruitment*

*The implications for undergraduate programmes are complex and will have to be subject to careful and detailed consideration. Students are pursuing their degree at the same time as undertaking their ITE and there is the need to ensure that the academic standing of their degree, including ensuring that subject benchmarks are met, is not put at risk. The reality of the proposals, should they be implemented, is that an undergraduate degree would, potentially, have to move to an extended year (similar to that for Nursing, which is 45 weeks) so as to ensure delivery of the necessary academic subject learning.*

*The increase in the amount of time on placement will have potentially significant effects on the capacity of schools to support the number of placements required across undergraduate and postgraduate courses. There are also the cost implications for funding transfer to placement schools as well as the costs of releasing mentors for additional time to undertake their role effectively*

*In respect of recruitment, there are risks as an extended academic year will impact on students being able to generate income outside of the academic terms, this being important for many students as they seek to sustain themselves during their studies. There are also costs to the Exchequer through the need to increase the level of student maintenance loan to reflect an extended academic year.*

*The current model of undergraduate degrees, with carefully sequenced and graduated professional development over a prolonged period of time is a strength and there is evidence of higher retention rates over the first five years of teaching after qualifying. Such courses also provide opportunities for deeper experiences than are possible on a one year course. For example, in common with many other provider, BCU provides a range of extended experiences in a variety of setting that address individual needs. It t is important that this route in to teaching, which delivers a significant proportion of the total newly of new teachers, is not placed at risk.*

1. **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.**

*As an established provider of Further Education ITE, where staff are integrated into the wider team, so that we can ensure that we deliver the highest quality from subject specialists across age phases (for example, though shared work for Secondary and Further Education around key areas (teaching, learning and assessment, at Key Stages 4 and 5), any move to reduce/remove involvement in ITE would have knock on effects for FE training, both our own courses and our ability to support provision with collaborative partner colleges across the region.*

*BCU does not currently offer EYITT but, again, any move that impacts on ITE would inevitably mean that we could not consider EYITT (our tutors within the 3-7 ITE courses would be key staff for the 0-5 courses).*

*For EYITT, as with many of our primary partners, setting are very small in scale and the requirements around intensive placements/practice and the level of mentoring required would inevitably lead to a reduction in engagement with ITE*

*The loss of ITE would also mean that we would not be in a position to sustain wider Education provision, be this in working with SCITTs for their own ITE courses or professional development at Master’s and Doctoral level for education professionals across the sectors that we currently work with. The loss of ITE would also make educational research unviable. A strength of our research is the focus on ‘close to practice’ and this is important in supporting the improvements in practice – which in turn impacts on the ‘levelling up agenda.*

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

*Within the consultation, no rationale has been offered for why this is necessary. – unless the intention is to bring about market reform (as opposed to a market Review – Review does not have to lead automatically to reform) and bring in new ITE providers, whilst at the same time potentially ending the involvement of well-established providers, all of which would be destabilising both the quality of training and to the supply of teachers.*

*There is an existing system of accreditation in that ITE providers are inspected by Ofsted. In the event of inspection that delivers a judgement of less than ‘Good’, the provider is given the opportunity to address the identified weaknesses and areas of concern. Should a re-inspection result in a judgement of insufficient improvement to award a provider the minimum of a ‘Good’ grade, then the process is already established to remove accreditation/the licence to train teachers.*

*Similarly, where a new provider wants to come in to the market, there are established processes with the DfE and Ofsted to address this.*

*Nothing in the current practice around the accreditation of new providers has indicated that there is not a high entry bar being operated. There is a lack of supporting evidence within the market Review Report that would counter this.*

*Therefore, the consultation, as already noted, offers no rationale for this. As UCET sets out in its response to the consultation, ‘It would be time consuming, disruptive and hugely expensive, both for ITE providers, their partner schools and for central government, i.e. the taxpayer’.*

*Accreditation and re-accreditation is a highly time consuming process. Given what is set out in the Market Review, it will, we believe require revalidation of programmes. In addition, the requirements go well beyond programme approval in respect of ‘content’ but also necessitate all of the associate elements that will support and ensure effective delivery. This will require extensive provision of resource over a prolonged period of time. It is standard practice for us to factor in re-approval events so that there is lead in and development time of 9-12 months. For provision of the scale of Birmingham City University, this would equate to the equivalent of c 3-4 full time staff. Staff release to undertake this work would also need to be met.*

*ITE is based on strong partnerships and it is expected practice that school and colleague partners are involve in the co design/co-construction of programmes. A range of external ‘experts’ are a requirement of University approval processes so as to ensure that there is the necessary testing and benchmarking of proposals.*

*The commitment looked for from partners in schools in college may not be forthcoming because of the resource implications.*

*It is not evident that the wider implications of an accreditation process have been understood by the Market Review group. CMA guidance require institutions to provide clear information about provision and this has to include information about the accredited provider. For PGCE courses, information would need to be ready for the beginning of the recruitment cycle (at least a year ahead of the commencement of the course) which, when development and production schedules are added, gives a time line of c 18 months. In respect of undergraduate, our position as a university is that we cannot make changes in CMA terms from the point at which potential applicants commence their IAG process – which we identify as the beginning of the student’s first year of A Level or equivalent qualification (that is, two years before entry to a course)*

*In any accreditation and reaccreditation process, consideration has to be given to the costs and benefits in the process. The Report is lacking in respect of ‘proportionality’, so that the requirements could be adjusts depending on a judgement of ‘risk’. Where there are providers with a long track record of high quality provision, then an accreditation process could and should reflect this. Similarly, the Report does not provide evidence that the manageability of the process – in terms of the demands of the individual provider or of the number of providers that need to go through the process in a limited time frame are understood.*

*It is essential that clarity is provided in respect of the criteria that will be used to determine whether an existing or new provider will meet the accreditation threshold. Nor is there any information as to who will undertake the assessment of accreditation requests.*

*A reading of paragraph 79 of the Report leads one to conclude that a feature of this Review is to reduce the number of accredited providers, with wider scale consequences for existing providers and their partnerships than first might be identified as the intention also appears to bring in new providers. There has never been a great need for some stability in the sector, as providers and schools work together to support recovery from the Cvid-19 pandemic. It is not evident that the economies of scale referred to are there I practice and a strength of the current situation – which is a success of and reflects policy, particularly since 2010 – is the existence of small and medium size provision, including school Direct, which is meeting particular needs and assisting in both diversifying the nature of the profession and helping to reach ITE ‘cold spots’.*

*We are concerned that the lack of information in the Market Review Report means that there is not a proper consultation process in place on this significant issue. The timing of the consultation, and the fact that this potentially impacts on the school sector and their engagement with the process is also a concern – but this applies not only around how schools would be involved through their partnership in the accreditation process but I all other aspects of the Market Review proposals.*

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

*It is important that, whether through an unsuccessful accreditation application, or through an inspection that results in an outcome that is less than ‘Good’, providers should be provided with the opportunity to address issues. An approach that seeks to ‘pressure’ providers to seek to enter into arrangements/partnerships with other providers – without the opportunity to ‘make good’ identified issues – would not be acceptable. Nor can it be assumed that other providers would be willing to take on a provider who was being ‘coerced’ to seek a new partner/structure.*

*In respect of the role of Ofsted in monitoring provision, a risk-based approach again would be potentially of value. It certainly is the case that monitoring and improvement visits are more appropriate than moving immediately to forcing a provider to act on changing the nature of their status (if the approach of monitoring and improvement visits has been used, successfully, for years in the school sector, then it seems an appropriate approach to consider for ITE).*

*The length of the Ofsted inspection cycle is something that has and should continue to be considered. Until the end of the 2011/12 academic year (the last year of the then inspection framework), providers were inspected on a three year cycle. The mantra of ‘improvement through inspections’ was one that was frequently used and there was an acceptance of the Ofsted process and a professional manner of working between providers and Ofsted. A transparent and planned cycle of inspection in to the future is something that can facilitate effective monitoring.*

1. **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?**

*As stated in a prior response, the timelines for accreditation/reaccreditation need to be of a length that enables the necessary work to be undertaken as well as taking into account the broader external requirements such as CMA.*

*Therefore, the timelines, as well as the process, are unreasonable. Tine lack of information about what an accreditation process would look like also makes it impossible for providers.*

*We would ask that the timescale needs, at the very least, to be substantially changed. It would be preferable that there was a halt to consultation are at least a significant period of time post-consultation submissions for a detailed review of the evidence. This would provide for the opportunity to undertake a process of evidence gathering and the development, in collaboration, of proposals that would be transparent to and understood by all.*

NB: Questions 23-25 are institution specific

**17 Having read ‘Initial teacher training (ITT) review – draft Quality Requirements for ITT providers’ and the anticipated timeline, if you think that your organisation would wish to deliver ITT in the future, would your organisation be likely to apply to become an accredited provider, seek to become or remain as a lead partner, or seek to become or remain as a placement school? As stated by the review, organisations may in some cases wish to take more than one role – as such, please select as many options as apply.**

**Response: Accredited provider**

As a significant provider of ITE, in our own right, in supporting a number of SCITTS and School Direct partnerships and further education institutions (DET and PGCE PCET), we believe essential that we seek to continue to continue to provide leadership and support in the region.

We also hold one of the new 4-year framework contracts with the DfE for the delivery of SKE. This not only supports a pipeline for our provision but also places us in an important role in servicing ITE partners regionally and more widely.

A caveat in our response has to be in respect of the final outcomes around contractual relationships and the management, distribution and level of finance. Should the final framework be such that it imposes inappropriate and unmanageable levels of real and opportunity cost, we would need to consider the implications of trying to remain in ITE as opposed stepping back. As the University for Birmingham, we believe we have a central role to play across the region but financial impacts + what we judge to be unacceptable risks in terms of management, control and accountability would lead us to reconsider our position

**18. If adopting a future model such as the one set out in the review, would**

**you be looking to add more organisations to your current partnership?**

**Response: YES**

**19. Please provide any comments you have on the proposed role of teaching school hubs in the future of the ITT market**

*Providers have had established and highly effective partnerships with Teaching Schools and these relationships have developed as Teaching School Hubs have been established.. A number of these TSH have SCITTs within them*

*Teaching School Hubs are , as yet, untested, A number have experience and expertise in respect of ITE but others are much more limited in this respect, their expertise and spheres of activity having been around ongoing professional development, improvement and school-to-school support.*

*It is important, at all times but particularly so as the partners work together in the recovery planning and delivery for the education of children, that the nature of partnerships should be developed at local level and in an organic manner. The use of centrally determined KPIs will not be particularly helpful as these untested structures seek to establish themselves and work across their respective regions. The priorities around ECF and Awarding Body status are significant in themselves and expecting a rapid increase in ITE involvement may be counter-productive.*

*Again the established relationships that exist throughout the sector mean that providers and TSH will work together to deliver ITE as appropriate with the other priorities that exist. These partnerships can grow and strengthen as TSH become established and unnecessary demands and expectations at this time would not be of value to their growth and effectiveness nor to managing the supply of new teachers – compulsion and or confusion will not help with delivery.*

1. **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.*

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

*It is important that involvement in a discussion about this is widespread and should include ITE providers and leaders from the school sector.*

*We have recognised for a long time that it can be a challenge to get some schools to engage with ITE and that there can be some instability in placements/partnerships as schools (very often for understandable and justifiable reasons) decide to take time out from supporting ITE through the provision of placements.*

*We are supportive of the need to look at we incentivise involvement. However, the use of ‘stick rather than carrot’ would be counter-productive. There would be the risk that the quality of the student experience – and consequently the quality of provision – would not be at a level required. In terms of the accredited provider, there is the responsibility of ensuring appropriate quality but it is difficult to ensure this when partners/participants are doing this unwillingly.*

*Reference to and celebration of a school’s involvement in ITE within the school’s own Ofsted report would be a positive step. However, judgements around lack of involvement that translate into impact on a school’s Ofsted grade would not be a welcome step.*

*The promotion of the benefits of working with ITE and promotion of the profession (and the roles of teachers in the development of the next generation of their colleagues) would be extremely helpful. There is a culture of this in a number of other areas and the notion of the ‘professional and professional identify’ is still underdeveloped in teaching.*

1. **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.**

*It is our understanding that, when a review of ITE started some years ago, the Review of the market would be a logical next step. There have been concerns about the nature of the market and the ease of navigability for a potential applicant. The purpose of Review has to be to improve the process for those who are considering entering the profession.*

*There is very little if anything that indicates that the needs of the potential applicant have been considered. The proposals themselves would not appear to have any direct impact on applicants. However, a reduction in the number of providers could impact on total recruitment. Many applicants are not mobile and are looking to train close to home, some returning back to their locality after undertaking their degree further afield. Other students seek to undertake their ITE at the same institution as where they studied for their degree and the loss of accredited provider status could impact on the pipeline through to ITE.*

*A reduction in the number of providers could lead to an unintended adverse impact in respect of diversity in the profile of applicants as well as challenges in some subjects, where changes to providers impacts upon the subject portfolio offered.*

*Reference has been made within the Report to economies of scale and this is a theme in the consultation meetings that have taken place. However, there is little or no evidence presented that would support this view. In addition, the lack of reference to the recruitment process means that it is not possible to comment on possible changes to IAG and recruitment that might deliver efficiencies.*

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1. **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 across the portfolio of subjects (it is the HEI sector that has sustained recruitment in many of the STEM subjects and enabled the DfE to get close to its teacher supply targets), 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. In addition, HEIs are successful I recruiting from their own undergraduate programmes. It is essential that an unintended consequence of policy is not that of negatively impacting on these strengths.*

*Whilst the development of a system with a small number of very large providers could deliver financially robustness for them (although, as already stated, there is limited evidence that scale will deliver significant economies of scale), the loss of medium and small scale providers, both HEIs and SCITTs, could have a significant impact on provision in some areas and in some subjects.*

*As set out both by UCET and TEAG in their formal response to the consultation, “some SCITTs 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”.*

1. **Final Thoughts**

Top of Form

Bottom of Form

**Please use this space to give any comments you have on any aspect of the report of the review or the ‘Initial teacher training (ITT) review – draft Quality Requirements for ITT providers’ document that you have not had the opportunity to provide in response to any of the other questions.**

*At an unprecedented time, when the sector has come together to support the training of teachers and support schools in continuing to engage their learners, the notion of market Reform is counter-intuitive and, we believe counter -productive.*

*This is a time for serious recovery planning and management of the system, collaboratively, over the medium term.*

*Market Review does not mean Market Reform, yet 'change for changes sake’ feels like a spine throughout the Market Review process and the Final Report.*

*There are serious questions to be asked about the evidence base that is being used as a justification/underpinning framework for what is being proposed. We do not have confidence in the breadth or depth of evidence and - as in teacher training itself - evidence is contestable.*

*When the Carter Review was undertaken in 2015, there was an extensive process of evidence gathering before the Report was produced. Although there were concerns at the time, we can reflect on the fact that this was robust and informed by a depth of evidence, along with a level of consultation that feels absent from this Market Review of ITE.*

*There are themes that unite everyone and these are a commitment to continuous improvement in ITE, a levelling up in achievement and attainment of our learners across the age phases - so that disadvantage, inequality and social justice do not continue to dominate and damage our communities - and that we work together to ensure that we achieve real and sustainable recovery from the impact of the past 18 months.*

*We would ask that , following the gathering of the evidence from the consultation process, a brake is then placed on action and, instead, the sector works together to undertake a far reaching review of ITE that is measured and results in a set of principles that are owned and understood by all. In days past, things of significant import had a Royal Commission. Whilst we would not necessarily go as far as seek one in this instance, the future of ITE and its impact on future generations of learners is too important to be determined by a Review that has united the education sector against it in a manner that we have not seen in all of my time in Education (40 years).*