**UNIVERSITIES UK/GUILDHE TEACHER EDUCATION ADVISORY GROUP RESPONSE**

**DFE MARKET REVIEW CONSULTATION**

The Teacher Education Advisory Group (TEAG) is a jointly organised group by Universities UK and GuildHE representing the views of higher education providers of initial teacher education. Universities UK represents more than 140 universities across the UK and GuildHE represents more than 50 universities and colleges. This consultation response draws on discussions at several TEAG meetings, including with the ITT Review Chair, Ian Bauckham, comments from members on a number of drafts of the consultation as well as drawing on consultation responses from a number of individual institutions.

**Summary**

**In our consultation response we cover a wide number of areas that should be read in detail, but we wanted to highlight a few key points:**

* **Reforms should meet three key tests. That they improve the quality of newly qualified teachers; that we maintain and enhance a strong pipeline of teachers into the profession; and that have we ensured the most effective use of resources so that as much funding as possible is going into the student learning experience and isn't being wasted on unnecessary administration.**
* **Reforms must be evidence-based, and where a robust evidence-base doesn’t exist then reforms should be modelled, piloted and evaluated before being implemented**
* **Reforms must be implemented well and not just quickly, in practice this means for new students starting in September 2024 at the earliest, to be properly tested and meet various CMA compliance, internal and external quality assurance processes**
* **Re-accreditation, if deemed absolutely necessary by DfE, should be risk-based to minimise burden and cost on high quality providers. At a time of other major education reforms, and building back from the pandemic, now is not the time to be diverting key resources to processes that do not directly enhance the student learning experience and risk destabilising teacher supply**
* **Curriculum should be evidence-based and within a broad framework, but not so inflexible that it does not allow tailoring to the needs of individual trainees and different contexts**

NB: Questions 1-10 relate to details of the respondent

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 [those in red are proposed to be ticked].***
   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

***DRAFT TEAG Response***

*The issues identified above provide a good overview of the key features of most ITT provision, particularly in HEIs.*

*However, whilst these are the right areas for further enhancement it is important to note 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) and so we are starting from a strong starting point. Indeed, 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[[1]](#footnote-1).* *We would therefore suggest that the next stage of ITE reforms should focus on the continued enhancement of provision. There is a concerning implication here that a reconfiguration of the sector is required in order to secure further improvement in these areas whereas our belief is that this can be achieved by building on existing structures and provision, capitalising on the strong partnerships built up over many years. Given that schools need to focus on education recovery for children estimated to take at least five years post-covid, this seems a very difficult time to propose any form of radical reform.*

*The one area where we would agree that there is a particular need to improve in ITT is the “clarity about the way in which the market operates”. There has been a significant increase in the number of providers delivering ITT over the past decade and whilst this helps support student choice and geographical provision it can result in confusion amongst prospective students. Annex C gives an overview of the ITT providers, with 240 providers operating through the three routes undergraduate, postgraduate (fee-funded) and postgraduate (employer-funded). Indeed, with the 70 HEIs training 31,027 trainees and 170 SCITTs training 10,154 trainees it shows that 71% of providers train just 25% of trainees. This would suggest that there are a number of very small providers. Whilst many small providers already work with HEIs or other ITT providers there could be increased collaboration between smaller providers, with HEIs, or on a geographical basis, and that might help provide greater clarity to prospective trainees. It will however be important to ensure that we retain outstanding provision serving remote communities across the country and that collaboration is based on enhancing provision. Additionally, we appreciate the clarity for undergraduate applicants who opt for undergraduate QTS programmes and would like to ensure that the consistency of this route is sustained.*

*It is worth commenting that in key area a) above it refers to both consistency and quality of the teaching curriculum. It might be worth separating out this principle as whilst there can be questions about the consistency across provision this should not be automatically seen as being synonymous with poor quality provision, there may be good reasons why a more tailored approach is being taken, based on the needs of the individuals, schools and communities involved. Additionally, it seems that by consistency (in terms of the content and quality of the curriculum) the intention is to impose a mandatory curriculum for all ITE providers/partnerships. Consistency should not be confused with uniformity or conformity and we are unclear of any evidence that suggests this is needed.*

*Key area c) outlines the importance of “alignment between curriculum and training environments”. This is clearly an important principle, and the use of word “alignment” is helpful as that would suggest coherence between curriculum and training without being overly prescriptive. In the report, however, these principles appear to be taken to extremes so that the overall effect is centralisation, prescription and lack of flexibility. It is possible to improve aspects without rigid specification. The strength of the current system with high quality providers is that they can cover the basics whilst adding value in different and diverse ways; this should not be seen as negative.*

*For key area b) “sequencing” must be based on a robust evidence base. However, the principle of sequencing must not come at the expense of the ability to adapt the training curriculum to the needs of a particular cohort, it is the curriculum that should be rigorous, not the sequencing. Overarching principles are important but so are adaptiveness and responsiveness. We do not agree with the notion of an “authorised” sequence as this would lose some of the responsiveness to the cohort and individuals.”*

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?**

***TEAG Response***

*The key areas outlined do not get to the heart of the purpose of teacher training – what are we trying to achieve through this training and therefore what should be the key areas of focus?*

*Initial teacher education is one of the principal means by which a profession is formed – a profession able to appraise and deploy evidence, to challenge inappropriate evidence and to have high ethical and professional standards. Teacher training is about supporting trainees to develop the skills, knowledge and attributes to equip them to be outstanding teachers, enabling their pupils to achieve their potential, but also to support teachers to continue to develop throughout their career.*

*Teaching is not just a trade that you learn once and you are then set for your whole career; it is a constantly evolving profession, where the evidence and theory continues to evolve as our understanding deepens and practices change. We believe that reflective practice is essential, we want teachers to be thinkers, more than technicians.* *An essential feature of any teacher training is therefore equipping future teachers to be able to engage with this evolving evidence base – and is why we prefer to refer to initial teacher education and training.*

*ITE providers and partnerships are committed to developing*

* *competent and confident professionals*
* *teacher with the ability to engage in enquiry-rich practice*
* *responsible and committed professionals who recognise the social responsibilities of education.*

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

***TEAG Response***

*Teacher education is currently generally very good and so any reforms should recognise that we are starting from a strong basis. Our collective endeavour is always to seek to* *enhance provision further. It is also important to restate that whilst the review identified some areas for improvement, it did not find the evidence to conclude that the current system was fundamentally broken. We would stress that the proposals have to be suitably tested (and evaluated) before being implemented rather than implementing such sweeping changes which could result in significant destabilisation.*

*Given the strong starting point it is important that any next steps are building on the successes of the current system rather than creating unnecessary disruption that may impact on teacher supply. It is worth noting that the Review started before the latest round of OfSTED inspections, based on the new framework, have been published and so the extent to which these inspections address the key areas identified, including the alignment with the CCF, should be considered. We would also re-iterate the point that the way to improve a system is not simply to provide a linear, rigid approach to sequencing the curriculum which has to be adapted across the country. An approach that allows a degree of flexibility is important and alignment with the CCF should provide this framework.*

*We would suggest that most energy should be focused on rebuilding the education system post-pandemic. Where the DfE believes the case for reform has been made this should focus on those areas of most needed reform, this should include reviewing those providers that are not able to demonstrate a strong track record of delivering high quality teacher training, and we would suggest that these providers are prioritised as being the first to go through the accreditation process.*

*We firmly believe that these challenges can be addressed much more simply, and with significantly less disruption to the market, than introducing a reaccreditation process which we think poses enormous risks to teacher supply and the quality of provision, and could exacerbate many of the challenges set out here rather than solve them.*

*In Annex C of the Review it notes that in 2020/21 there were 240 providers delivering ITT and that the largest 53 providers deliver 70% of undergraduate and postgraduate trainees. Key area f) outlines that there should be “more clarity in the ITT market for potential trainees” and proposed approach of “accredited” and “lead” providers approach might deliver some of the benefits of scale that the Review refers to. If the DfE do press ahead with the proposal for re-accreditation it might be possible to start implementation by focusing on the smallest half of providers. This would address both questions of a complex market and the benefits of scale whilst at the same time minimising some of the risk associated (eg teacher supply) with major reforms to the largest providers of ITT. There are clearly risks of trying to develop a sector-wide new system, especially given all the other major reforms that are currently ongoing including the new admissions service for PGCE and different routes for UG and PG, ECF/NPQs reforms, the new OfSTED framework as well as reforms in schools, including the relatively new EIF. We would therefore argue that a period of stability is needed, especially following the pandemic. It will however be important to consider any unintended consequences of reducing some small provision such as the impact on remote areas which might be hard to replicate through networks or larger provision.*

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 them.**

**TEAG Response**

*The intensive practice placements proposal is as yet untested and it would be important to see the evidence that intensive placements would have on the quality of trainee outcomes before introducing the reform. It will be important to both test the impact and potential unintended consequences of the proposal – with a range of ITT providers - as well as considering whether there is an alternative way of delivering the same impact.*

*Some of the potential unintended consequences of intensive placements that it would be worth considering include the additional support required from staff in school, the likely additional costs to both accredited and lead providers, whether all schools would be able to deliver these or if not whether that required additional travel by trainees, the impact on the trainees – and their mental health - of a more intensive approach potentially further away from home.*

*The market review appears to be based on urban school partnership (particularly MATs) and secondary scenarios. For rural providers with many primary partners it would be very challenging to suggest sending large groups of student teachers - there would be more adults than children in some circumstances, travelling many miles away from the provider. It would be important to consider how this affects the progress and well-being of children who are experiencing ‘life in the zoo’ or being observed for intensive periods by large groups and the well-being of teaching staff.*

*We would suggest piloting the proposal to identify any potential consequences and ways in which these could be overcome. This principle of piloting reforms should be extended to all the proposals to ensure that they will have the beneficial impact that is expected and that any potential negative consequences are identified, this should also consider the impact on different types of provision and partnerships.*

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 |

***TEAG Response***

*The increased teaching and placement time will result in additional costs. As an example for a PGCE programme an additional four weeks of standard school-based training would attract an additional four weeks of school payment to host the placement (circa £200 per trainee), plus additional mentor release time (four half days, totalling 2 days of supply cover, circa £500 per trainee), plus additional QA support (one additional visit of our standard QA tutor circa £50 per trainee). This would mean an additional £950 per trainee partnership cost. These costs would be even higher in undergraduate provision. We would propose identifying these additional costs, and other resource implications, and would recommend additional government funding to cover the costs of placements as is currently the case for other placement based subjects such as pre-registration nursing, midwifery and allied health. This additional funding will be necessary when linking to additional expectations around mentoring support.*

*The additional expectations will also have implications for school resourcing and it will be important to test closely with schools – particularly with smaller or rural schools - their ability and desire to meet these enhanced commitments and weigh this against the benefit of these changes. It will also be important to assess the potential impact that this may have on the ability of schools to offer placements in the numbers that they currently do.*

*It would be important to see the pedagogical evidence base for the proposed alternative timings, to assess the impact of the changes. The number of minimum hours is too prescriptive level of detail being proposed centrally that does not reflect the partnership discussions between providers and schools agreeing approaches based on the professional judgement of those designing the curriculum.*

*The proposal to have a minimum of two hours mentoring per week might seem sensible at first glance but the unintended consequences must also be considered. Individuals selected as mentors are usually the most competent and highly regarded class teachers. How will this impact on pupil outcomes more generally if these individuals spend more time out of the classroom? The expectation of having two hours per week for mentors might also reduce the number of schools offering placements. It will be important to model the costs of this proposal – considering all factors in the round – to consider the true benefits of the proposal.*

*There is also an interesting question about how prescriptive the proposals are about the number of hours that trainees spend in school during their ITT. If there is to be continuity and seamless progression from ITT courses onto the ECF, the length of the course does not necessarily need not be changed, nor indeed the number of weeks in schools. It is recognised that ITT is just that, initial, and that progression will continue beyond the end of the initial year.*

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.**

***TEAG Response***

*The requirements set out in the Introduction for section 1) of the Quality Requirements for an “evidence-based curriculum” and that “the curriculum must be designed in the light of the best evidence for effective teacher training and development” is a particular strength of HEI engagement in ITT.*

*As highlighted in the recent OfSTED research report it outlined how “Leaders gave examples of how they had continually reflected on ITE curriculum plans in response to rigorous academic research.” This included “using up-to-date and/or pertinent research to inform their ITE curriculum choices…some require trainees to read research papers before and after centre-based training. Some send weekly emails covering articles from academic literature, including relevant and rigorous research. Others present extensive reading lists” ([OfSTED](https://www.gov.uk/government/publications/teaching-teachers-during-covid-19/teaching-teachers-during-covid-19), 2021).*

*Additionally HEI providers are able to draw on academic expertise not just from their education faculty but also from subject experts.*

*The curriculum needs to have in-built flexibility to allow expert educators to enhance the curriculum rather than simply relay it. We want potential teachers also to be able to interact with the curriculum and to ‘make it their own’. We recommend flexibility within a set of parameters.*

*We acknowledge the need for agreed national standards for example, as set out in the MR, such as those required for the award of qualified teacher status (QTS), and agree that ITT partnerships need to design and develop a curriculum that prepares trainees to meet these standards.  However, providers should have autonomy over how they meet these standards especially in regard to the curricula they set and the manner in which courses are taught, supervised or assessed. The right for autonomy in these areas is protected for all English higher education providers through the Higher Education and Research Act (2017). The potential impact of this on the longer term engagement of some universities in delivering Initial Teacher Education has been highlighted in the responses from the* [University of Oxford](http://www.education.ox.ac.uk/initial-teacher-training-market-review-response/) *and the* [University of Cambridge](https://www.cam.ac.uk/notices/news/statement-on-the-uk-government-initial-teacher-training-itt-market-review-report)*.*

*The curriculum currently embedded is based on the Core Content Framework (CCF). As the CCF was only introduced in September 2020 there needs to be appropriate time for this to be embedded. Curriculum is developed as a partnership and highly relevant to the needs of our student teachers and schools. The CCF is intended to provide consistency for ITE programmes nationally and the need to be more prescriptive is unclear.*

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 them.**

**TEAG Response**

*Mentors are an essential element of good teacher training and the recent OfSTED research outlined the quality of mentoring support is an area that required some improvement. “This makes the role of placement mentors critical in developing subject knowledge. Some trainees had good support and direction in their subject from mentors, but others had very little interaction with them” (Ofsted, 2021). It is worth noting that the new OfSTED framework considers the quality of mentoring (para 167,* [*OfSTED*](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/986249/Initial_teacher_education_framework_and_handbook.pdf) *ITE Framework and Handbook) including regular mentoring time (para 181) and that an “effective cycle of mentor induction, training and feedback that involves all partners” is considered Good in their framework. There is therefore a question about whether the anticipated enhancements in mentoring would already be driven through the OfSTED framework?*

*The additional support provided by the mentors, and in particular the lead mentor, would likely increase the costs of provision and place increased demands on busy teachers. It would be necessary to cost fully the proposals and provide clarity about who is responsible for the cost of training mentors. For example, a provider with a significant number of school partnerships could have large numbers of mentors requiring NPQ courses, then a rolling programme as mentors move on to other posts. Plus for intensive placements, 2 NPQs are required in each school. The annual training requirement would also be very expensive in terms of buying school staff out of their timetable and actually delivering the amount of content specified here. The additional costs should be considered as part of the additional funding for the extra costs of provision as outlined in Question 11. 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 if the partnership thinks that would be more appropriate and reflective of local needs and circumstances.*

*We welcome the strong focus on mentoring throughout the consultation document, however, significant details of the proposal are absent. For example: What is the difference between the lead mentor and the ITT Link Tutor role in most university-led provision? How does the DfE expect ITT providers to exert control over the appointment of mentors when this must be a school decision? How are the increased mentoring expectations to be funded?*

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.**

***TEAG Response***

*HEI providers of ITT already have robust assessment frameworks. It is worth noting that any changes will result in adjustments to processes and paperwork and require significant training for mentors and so the opportunity costs of revising processes need to be further considered. We would however suggest that there is an inherent contradiction between the recognition that “focused feedback designed to enable trainees to improve” should be ongoing and that “Assessment specifically against the Teachers’ Standards should be reserved for end-of course assessment”, many trainees would value the opportunity to reflect on where they are in relation to Teachers’ Standards and how they might best focus their efforts to enable them to meet these by the end of the course. Assessing against the standards at the end of a programme can prevent a mechanistic approach to assessment; however, it should take into consideration that it can provides structure and continuity throughout a period of training that is transparent for trainees and mentors alike when it comes to final assessment criteria. This model assumes that trainees are all on the same journey, from no experience to QTS, and does not acknowledge that for many, they have been working in schools for many years and start the course already meeting some aspects of the TSs.*

*A linked comment is whether the Teacher Standards themselves need to be updated. They were previously updated on a regular basis, approximately every five years, until 2012.*

*There is also a question about how prescriptive the proposals are about the number of hours that trainees spend in school during their ITT. If there is to be continuity and seamless progression from ITT courses onto the ECF, the length of the course does not necessarily need not be changed, nor indeed the number of weeks in schools. It is recognised that ITT is just that, initial and that progression will continue beyond the end of the initial year.*

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.**

***TEAG Response***

*University ITT providers have rigorous and robust internal and external quality assurance and external examination processes including developing and validating the course as well as ongoing processes of assurance. These processes seek to enhance provision as well as providing assurance and meet the requirements outlined in the Review.*

**20. 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.**

***TEAG Response***

*Partnership is a strong feature of the current ITT market with some HEIs having many hundreds of partnerships with different schools and phases. These partnerships work best when there is shared ownership and flexibility and strong governance arrangements. These partnerships also allow the benefits of scale and the ability to cover a range of subjects and phases is an important point that is reflected in much of the HEI ITT provision. In the current ITT market there are currently a number of very small autonomous providers and a future system based on fewer autonomous tiny providers of ITT may make the providers more financially robust and secure their longer-term future and enable greater coherence across subjects and phases of ITT provision, but it will be important to ensure that this does not result in the loss of significant provision in remote areas.*

*Scale can be important, but partnerships of the willing are much more likely to succeed in the long run, and so thought should be given to how greater collaboration between providers could be encouraged rather than forced. It is important to ensure that we do not lose the benefits of partnerships between HEIs and schools and the flexibility that these processes currently allow.*

*These partnerships also support placements but there can be an almost hidden market in placements. Robust arrangements between partners on the number and quality of placements are key to prevent placements being reduced or removed at short notice requiring trainees having to travel large distances to access alternative placements.*

*The demands of securing sufficient high-quality placements cannot be underestimated and this has become even more challenging through the recent pandemic. We had hoped that the placement situation might ease as we emerge from the Covid19 pandemic, but the significant resource demands of the new Early Career Framework are creating new risks for the provision of sufficient trainee teacher placements. The ITT landscape is very fragile in this area and the DfE should be doing everything possible to support stability in the ITT sector at this time.*

*We are, however, concerned by the nature of this section and the articulation of ‘lead partners’, which suggests a significant shift to a centralised, delivery model of ITT provision. There appears to be a suggestion that, much like the ECF delivery, a small number of large-scale providers contract out to local and/or regional ‘delivery partners’. This represents a significant threat in destabilising our partnership.*

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

*We agree that all ITT programmes should be related to an academic award, recognising the intellectual demand of the teaching profession.* *The PGCE is described by the DfE as a well recognised qualification[[2]](#footnote-2), valued both here in the UK and internationally. This recognition comes, at least in part, from being a level 7 qualification, mapped against other level 7 qualifications nationally and against European standards, and delivered by high quality providers. This should continue to be the case, with only those providers with degree-awarding powers able to award this qualification, whether directly or through a partnership approach.*

**22. 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.***

***TEAG Response***

*The implications for undergraduate programmes are complex and it will be important to think through any possible unintended consequences such as those resulting from increasing the amount of time undergraduate ITE students spend in schools. Those on undergraduate courses are studying for a degree – an academic award as well as QTS. Increasing time on placements would need consideration along with intensive placements. For those providers with large PGCE and UG courses, this could potentially impact on placement capacity. Additionally, UG courses provide opportunities to experience in more depth special schools, autism units etc. Often these individuals then complete a dissertation in their area of specialism in this area. This positively impacts their work as early career teachers whether in mainstream of special education.* *Increasing the time spent in schools to 40 weeks across the programme will lengthen significantly the time required for course completion. Reducing academic study time within the programmes to accommodate an increase in school-based training would be problematic in relation to QA regulations about the academic integrity of honours degree Programmes. Undergraduate programmes have higher retention rates over five years post qualification, we need to protect this route into teaching.*

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.  
     
   TEAG Response**

*If universities withdraw from providing ITE for prospective school teachers, because they either voluntarily withdraw or do not meet the new accreditation criteria, most of this provision will be at risk, as it is unlikely that education departments with 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.*

*There are particular challenges of implementing some of the proposals in the Market Review in smaller contexts or for different phases such as primary or EYFS, for example proposals such as intensive placements may pose a particular challenge in EYFS.*

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

***TEAG Response***

*Accreditation of new provision is an important part of any process to ensure that provision is high quality and meets local needs and that there is a high bar to entry. It would be helpful to know the rationale for requiring existing ITT providers to be reaccredited. We do not accept that this is necessary as we already have a robust cycle of review and evaluation.* *The re-accreditation of all providers would require significant additional resource to manage this process, both within ITT providers and also DfE and so what investment is being put in place to ensure that the accreditation processes will not be delayed by staffing issues at the DfE?*

*In terms of resource to prepare for re-accreditation within an HEI it would require significant resource. For example, one university outlined that revalidation of one of their ITT programmes is associated with around 600 hours of work on our academic workload modelling procedure; to re-accredit all programmes and all routes would require significant investment of academic team, circa 3,000 hours, or two full time members of staff for one academic year. The resource implication is such that some partnerships may not see this as financially viable, as well as the disruption caused by having to ‘back-fill’ the time and resource for these staff. Additionally, the full partnership should be involved in co-construction of any new programme design and implementation plan. School partners may not have the resource to engage in this process, threatening further their relationship and engagement with ITT provision.*

*The costs/benefits of re-accreditation for existing high quality providers need to be carefully considered. In particular there should either be consideration of a more proportionate process required by providers with a long track-record of high quality delivery, or indeed a staggering of the accreditation processes with higher risk providers going through accreditation in phase 1, medium risk in phase 2 and low risk in phase 3. This more risk-based approach or staggered accreditation process would also prevent a bottle-neck with all providers seeking to be accredited at the same time - as we saw with the recent registration with several hundred providers getting registration at the Office for Students and taking a considerable amount of time.*

*As part of the cost/benefit analysis it will be important to consider the opportunity cost of how additional resources would otherwise be used to enhance the quality of provision. Any re-accreditation process would include additional costs and also the time that this will take to seek accreditation. It is important to note that CMA guidance outlines that prospective students should expect to receive clear and transparent information about their course which would include employer accreditation. For students starting their course in September 2023 the course information would need to be available from March 2022 to ensure a strong recruitment cycle and for printed prospectuses. If the accreditation process is prolonged and institutions are required to put “Accreditation pending” on their information it will increase confusion and disruption to applications and therefore teacher supply.*

*The human resource implications of re-accreditation are likely to be significant, especially on staff that are exhausted following the huge burdens on staff resulting from the pandemic and other major reforms that are currently ongoing.*

*Good regulation is proportionate to the risk of the provider and those with a strong track-record of excellent provision should be supported with a fast-track approach to accreditation.*

*Paragraph 79 of the Market Review Report suggests the need for a greater rationalisation of the ITT market, highlighting the benefits of economies of scale, and this could create benefits in some parts of the ITT market. Indeed, many of these benefits have already been seen in HE ITT providers (outlined in Annex C of the Market Review document), with most providers with significant numbers of students and partnerships. It will however be important to carefully consider the benefits of bringing providers together to ensure that geographical concentration is considered, as well as wider factors such as complementary culture of providers. As outlined earlier the different ways in which these kinds of collaborations could be incentivised should be considered, especially in the smallest providers.*

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

***TEAG Response***

*The concerns about the 6-year OfSTED cycle reflect other changes to more ongoing monitoring in the higher education sector. In a risk-based system it might be appropriate for the length of the cycle to be linked to the perceived risk of the provider, more akin to the schools sector where Grade 3 schools receive more regular visits, whereas Grade 1 schools are visited much less frequently. In the schools sector Grade 3 schools are given regular Monitoring Visits to improve their provision before the ultimate sanctions are brought in. This type of approach might be appropriate in the ITT sector as well, rather than moving straight to forced collaborative arrangements.*

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?**

***TEAG Response***

*The proposed timescale is hugely challenging and we believe any reforms must be implemented well and not just quickly, in practice this means for new students starting in September 2024 at the earliest, to be properly tested and meet various internal and external compliance processes. It is important to note that CMA guidance outlines that prospective students should expect to receive clear and transparent information about their course which would include employer accreditation. For students starting their course in September 2023 the course information would need to be available from March 2022 to ensure a strong recruitment cycle. Indeed, March 2022 would be the very last date for the printed version of the prospectus and distribution. If the accreditation process is prolonged and institutions are required to put “Accreditation pending” on their information that is likely to increase confusion and disruption to applications and therefore teacher supply.*

*Trying to develop a new accreditation process and taking anywhere up to 240 current ITT providers (as well as some possible new providers) through the process by March 2022 looks like an unnecessary risk, especially if the process is as robust as proposed. We would therefore suggest that the accreditation happen over a couple of years with the highest risk providers prioritised in phase 1, followed by medium risk providers in phase 2 and then lowest risk providers in phase 3, with their accreditation continuing as under the current arrangements until they are eligible to enter the accreditation process. This phasing of accreditation would allow the lowest risk providers to go through their own robust internal quality assurance processes – such as internal course validation processes within universities, in recognition of their enhanced autonomy based on their track-record of delivering high quality ITT.*

NB: Questions 23-25 are institution specific

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

**TEAG Response**

*Teaching School Hubs already work closely with HEI providers. Some also have their own SCITTs. There is no clarity about whether SCITTs would continue to exist if the TSHs were to become delivery partners. TSHs are coming to terms with ECF from Sept ’21 and are worried that ITE will be additional burden and do not have capacity with existing resourcing. The precise nature of partnerships between TSHs and HEIs should be a matter for local discretion, and should not be driven in inappropriate directions by any centrally imposed KPIs for Teaching School Hubs.*

*We would suggest to the DfE that Teaching Hubs are asked about their views on this – they are already challenged by additional responsibilities in relation to the ECF and it would be important test their desire to now get involved in ITE.*

***TEAG members are requested for any comments for this response.***

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

**TEAG Response**

*We would suggest that DfE that trusts are asked about their views on this – they are already challenged by additional responsibilities in relation to the ECF and it would be important test their desire to now get involved in ITE.*

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

***TEAG response***

Whilst it should not be part of a school’s grading nor mandatory, TEAG has long argued *of the benefit of an OfSTED judgement for schools feeding into a comment about the extent to which the schools are supporting the renewal of the profession through their engagement with ITT.*

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.**

***TEAG response***

*The number of providers currently delivering ITT can make the current market difficult to navigate and this should be considered. The recruitment process would be streamlined and made more accessible if all applications were made to accredited providers, including School Direct fee-paying, School Direct salaried and Apprenticeship applications.*

*There is a danger that this major level of disruption to the system at an already pressurised time will have a serious impact both on teacher recruitment and retention. At a time when stability is required, this system-wide change could result in undermining the very system the review was designed to improve. Whilst at the moment there appears to be an increase in applications, this is no guarantee that it will continue.*

*The longer term impact of the profession having limited opportunity to exercise professional judgement and opinions in a relatively prescriptive system may not be as attractive to highly motivated and gifted potential applicants.*

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**

***TEAG response***

*HEIs have a strong track record of recruiting students from a diverse range of backgrounds and across a wide range of subjects. This can be particularly important in providing a pipeline of prospective level 7 students into teaching – and with subject specialisms that other ITT providers can struggle to recruit - through active recruitment of students whilst they finalising their studies. The reforms should seek to build on these strengths. Additionally, HEIs have strong widening participation programmes offering routes into undergraduate ITT for students from a diverse range of backgrounds.*

*A system based on fewer tiny providers of ITT may make the providers more financially robust and secure their longer-term future and enable greater coherence across subjects and phases of ITT provision, but it will be important to ensure that this does not result in the loss of significant provision in remote areas. Some SCITTs and School Direct clusters, 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 and result in a gap in teacher supply in those areas.*

1. [Teachers are leaving the profession due to the nature of workload, research suggests | Institute of Education - UCL – University College London](https://www.ucl.ac.uk/ioe/news/2019/apr/teachers-are-leaving-profession-due-nature-workload-research-suggests) [↑](#footnote-ref-1)
2. The UK’s methods of teacher training and development are highly respected and sought after around the world (2021) [↑](#footnote-ref-2)