## USCET Cymru: Response to Draft Strategic Education Workforce Plan

On behalf of USCET, thank you for the opportunity to respond to the draft Strategic Education Workforce Plan (SEWP). We recognise and appreciate the significant work invested in this draft and we welcome its intent to bring greater coherence to professional learning, workforce wellbeing, and system improvement. We also understand—and support—the intention to develop a separate ITE Delivery Plan for further detail.

However, we would also like to stress that issues relating to ITE are not simply matters of ITE programme design; they are core workforce issues and therefore, we argue, must be embedded within the SEWP itself. Specifically:

- **Teacher supply and ITE recruitment** are fundamental levers of workforce sufficiency (including Welsh medium and shortage subjects), not only HE operational concerns.
- **Mentoring and school experience placements** constitute essential workforce infrastructure underpinning recruitment, induction, early career retention, and professional learning across the system.
- **Welsh-medium ITE capacity** is a system-level enabler of national language and equity targets, but relies on a strong upstream pipeline of learners, opportunities to study through Welsh, and a competitive postgraduate career offer.
- **Over accountability on ITE and regulatory load** may risk provider viability, innovation, and the sector's ability to deliver the workforce of teachers Wales needs.

For these reasons, while the ITE Delivery Plan should rightly hold the *how,* we believe the SEWP must contain the headline commitments and system expectations in these areas—so that ITE is positioned not as a standalone programme, but as the foundation of the teacher workforce ecosystem. Our detailed comments that follow are offered in that spirit: collegiate, solutions oriented, and direct—reflecting sustained, sector wide concerns raised over time and a shared desire to ensure the SEWP lands with clarity, feasibility, and impact within the sector.

### 1. The plan's strengths from an ITE perspective

We strongly support the plan's five themes and the emphasis on careerlong professional learning, effective pedagogy, professional enquiry, and reflective practice. These are foundational to high quality ITE and align with the values we embed from day one of our

programmes. We also welcome the commitment to structured pathways for teachers, leaders and teaching assistants, and the recognition of mentoring as a core professional function. These are essential ingredients for coherence across the continuum.

**2. Right-sizing expectations for ITE (including PGCE) and clarifying "consistency"**

A recurring concern across the sector is the overloading of expectations on ITE—particularly one-year PGCE routes. The plan's ambition to ensure student teachers develop competence in child development, mental health, neurodiversity, literacy and numeracy is appropriate; however, such expectations must be aligned with accreditation criteria and any revised QTS Standards, realistic to programme length, and can feasibly be resourced in practice (staffing, placement capacity, mentor quality).

Relatedly, the call for a "consistent approach" needs unpacking. We recommend defining consistency as clear minimum expectations and assessment standards, not uniform delivery models. Monitoring should be proportionate and avoid excessive compliance burdens that draw capacity away from innovation and partnership work.

**3. Early Career Pathway (ECP): roles, induction coverage, mentoring quality**

We welcome the ECP and its potential to strengthen continuity from ITE into induction and the early years in role. To make this real:

- **Clarify roles and responsibilities:** who does what across ITE partnerships, schools, local authorities, and Dysgu—particularly for mentoring and enquiry.
- **Make induction explicit:** confirm how the ECP dovetails with statutory induction requirements.
- **Set mentoring standards:** introduce national expectations and a vision for mentoring across the early career continuum

**4. Welsh-medium capacity: match ambition with practical support**

USCET supports the ambition to expand Welsh-medium teaching. However, providers face challenges arising from gaps earlier in the system, which affect the recruitment of high-quality Welsh-medium teacher educators, alignment of student locations with available school placements, and subject-specific viability for Welsh-medium cohorts. Strengthening the pipeline into ITE, offering targeted incentives for schools to support Welsh-medium placements, and coordinating regional placement opportunities could all help address these systemic challenges.

**5. Alternative routes: innovate – with caution**

We recognise the intent to explore degree apprenticeships, vocational pathways, and undergraduate secondary routes. This reflects the sector's ambition to be innovative and forward-looking in the design of ITE. However, in a small system, new pathways risk redistributing applicants rather than increasing overall recruitment. Even with current recruitment trends below workforce needs, school-based placement and mentoring capacity is already stretched. Careful market research and the proposed feasibility study are therefore essential to ensure new routes strengthen the ITE system without destabilising recruitment or exacerbating existing pressures.

We understand that criteria, accreditation, and inspection are vital to assuring quality and integrity in ITE. Yet compliance-heavy processes and dual oversight—EWC and Estyn, alongside university QA—can consume finite partnership resources. Fixed criteria may also unintentionally constrain innovation, making it harder to develop flexible, responsive routes. Moving toward intelligent, proportionate assurance would uphold standards while freeing capacity for partnership-led improvement.

Within the current fiscal context, universities may have limited capacity to develop and sustain new curriculum offers or alternative structures. Historical experience shows that cost and viability challenges frequently undermine such initiatives, and pressures associated with apprenticeship models continue to raise sustainability questions. Future policy should carefully consider historical evidence and system-wide cost implications to ensure new routes are deliverable and financially sustainable.

**6. Placements and mentoring: the critical capacity gap**

The plan underplays the growing capacity challenges for schools as joint deliverers and partners in ITE: shortages of partner schools for placement, variability in mentoring quality, behaviour/workload pressures, and inconsistent placement experiences are some of the reasons cited for this. These are now systemic risks to ITE delivery and require national action at a school and workforce level.

**7. Universities' role: beyond "delivery agents"**

There is scope for the plan to more fully reflect universities' roles as leaders in education research, shapers of professional identity, and critical friends to the system—not only delivery partners. A stronger articulation of the HE civic mission will help mobilise cross-faculty expertise, research infrastructure, and evidence mobilisation in service of classroom practice.

**8. Research and enquiry: impact, infrastructure, and funding signals**

We welcome the review of the National Strategy for Education Research and Enquiry. To drive impact:

- Summarise lessons learned to date.
- Establish brokerage mechanisms (school-HE networks, small-scale enquiry funds, research champions).
- Provide funding signals to build sustainable capacity in schools and partnerships (e.g., collaboration grants, lesson-study networks, practice conferences).

**9. Recruitment and retention: link visibly to the Senedd inquiry**

Teacher recruitment into ITE is a pressing challenge. The SEWP should visibly link to the recent Senedd inquiry findings, aligning communications, incentives (including Welsh-medium), shortage subject pipelines, and regional degree availability with ITE admissions and placement planning.

**10. "Review the structure of ITE": scope, timelines, and safeguards**

The proposal to review ITE structure is significant. The sector would value early clarity on scope, timelines, and evidence sources, alongside how any such review would consider provider viability, placement/mentoring capacity, workload realities, and market stability. USCET members have invested heavily in the current model and, amid ongoing financial pressures, the capacity for major structural change is challenging.

We suggest a proportionate approach which provides upfront terms of reference and impact assessments, focuses on the consolidation of recent reforms rather contemplating redesign, allow space for innovation and be co-designed with USCET and partners within a realistic timeline.

Thank you for the opportunity to offer these reflections. USCET remains committed to constructive partnership and to supporting a coherent approach to strengthening teacher supply and early career development. While we have highlighted areas where greater clarity or caution may be needed, we do so with the shared aim of ensuring the plan is workable, sustainable, and aligned with the realities facing providers and schools. We look forward to continuing this dialogue as the strategy evolves and to contributing to the next stages of development in a way that supports system stability and high-quality initial teacher education.