

University Alliance response to the ITT Market Review Recommendations

About us

University Alliance (UA) is the voice of professional and technical universities. We represent large and mid-sized universities across the UK working at the heart of their communities. Alliance universities partner with industry and the professions to deliver the workforce of today and tomorrow through professional, practical, skills-based learning and applied research.

We welcome the opportunity to respond on behalf of our Initial Teacher Education network to the Department for Education's Initial Teacher Training Market Review and recommendations contained within it. Our response is deliberately high-level to allow for our respective members to provide their individual feedback in respect of their own university, geography and local partnerships against each of the recommendations. Our response has been informed by discussions with expert colleagues responsible for Initial Teacher Training specifically at the following member universities.

- Anglia Ruskin University
- Birmingham City University
- University of Brighton
- University of Greenwich
- University of Hertfordshire
- Kingston University
- Leeds Beckett University
- Oxford Brookes University
- University of South Wales
- Teesside University
- University of the West of England, Bristol

We have in discussion with expert colleagues across our members RAG rated each of the recommendations and for the purpose of this response will primarily focus on explaining in more detail around the "Reds" and "Ambers". Below are the descriptors we have used for the purposes of RAG rating each of the recommendations:

RAG RATING DESCRIPTORS

RED	We have <u>significant concerns</u> with the recommendation
AMBER	We have <u>some concerns</u> with the recommendation
GREEN	We <u>support</u> the recommendation

Context to our response

We feel it is worth setting the context to our response before we focus in on our concerns.

As long-standing professional and technical institutions, teaching training is very much a part of our institutional DNA and we pride ourselves on the immense knowledge and expertise we have collectively amassed over literally hundreds of years.

We are passionate educators who have consistently served the nation evolving and responding to every socio-economic challenge thrown at us to ensure there has always been a highly professional and trained teaching workforce since the industrial revolution through two world wars and global events including the current pandemic: first as teacher training colleges and later as these were integrated into the higher education institutions that we recognise today.

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.

University Alliance RAG rating of the ITT Market Review Recommendations, explanation of the rating and proposed mitigation and solution where Red or Amber

	Review Recommendation	RAG rating	Explanation of concern	Mitigation
1.	Providers of ITT should develop an <u>evidence-based training curriculum</u> as a condition of accreditation which allows trainees to understand and apply the principles of the CCF in a controlled, cumulative and logical manner, as set out in the Quality Requirements.		<ul style="list-style-type: none"> As experienced HEI ITT providers we already produce an evidence-based training curriculum but the inference now for this needing to be done in a ‘controlled, cumulative and logical manner’ suggests that all ITT training first and foremost needs to be ‘identikit’ in content and procedure regardless of the quality and effectiveness of the content. This has the potential to be deeply constraining and unfulfilling for both trainee and mentor alike reducing teacher training to “learning by rote” and will ultimately ‘turn off’ the most talented and ambitious students we would hope to attract and 	<ul style="list-style-type: none"> Allow the implementation of the CCF to fully bed in and be tested before re-examining whether there is evidence for further directional requirements within the ITT curriculum

			retain in the profession.	
2.	Providers should design and deliver an intensive placement experience of at least 4 weeks (20 days) for single-year courses and 6 weeks (30 days) for undergraduate, over the duration of their course, as a condition of accreditation, that allows opportunities for groups of trainees to practise selected, sequenced components of their training curriculum, and receive highly targeted feedback, as set out in the Quality Requirements.		<ul style="list-style-type: none"> • Serious practical considerations over school placement capacity and resource to accommodate these intensive placements leading to potential placement provider exits from the ITT training and placement ecosystem, thereby further exacerbating the placement issue and adding to the teacher supply problem long-term. 	<ul style="list-style-type: none"> • Careful scoping of what placement providers are actually practically able to provide based on their size, location and staff to pupil ratios and rather than being over prescriptive set minimum baselines for placements based on the type of setting, size of school and location e.g. a large London secondary comprehensive versus a mixed form entry primary school in rural Oxfordshire are very different educational environments both valuable in placement terms both with challenges for the placement provider to accommodate.
3.	Providers should identify, as a condition of accreditation, sufficient 'lead mentors' who will ensure that trainees receive mentoring and support across placement schools which is aligned with the curriculum		<ul style="list-style-type: none"> • Resource, cost and capacity issues for schools could be prohibitive to 'lead mentors' being identified and released from day-to-day teaching 	<ul style="list-style-type: none"> • Enable lead mentors to be identified and appointed from across the ITT ecosystem: either the school, SCITT, or across the school partnership or the

	and informed by practice at all times, as set out in the Quality Requirements.		duties to effectively support mentors.	Higher Education Institution thereby drawing from a greater pool of expertise, capacity and energy.
4.	Providers should ensure that lead mentors take one of: the NPQLTD, one of the other 2 specialist NPQs, or training with the equivalent content and quality, as a condition of accreditation; and every school which hosts a trainee has at least one member of staff who is undertaking or has completed the course.		<ul style="list-style-type: none"> Concerns around the absolute prescription of the undertaking of specific and untested qualifications that don't recognise prior mentoring experience and qualifications which could in theory 'offend' and put off potentially highly valuable lead mentor candidates to put themselves forward for these roles Cost, capacity and resource issues for schools in releasing staff for lead mentorship training. 	<ul style="list-style-type: none"> Being openly permissive and flexible about "or training with the equivalent content and quality" and "recommending" the NPQs as opposed to mandating them would allow for greater scope and choice around the qualification / or training undertaken by the lead mentor recognising also that some mentors may well come with significant, valuable prior mentoring experience or indeed qualifications where an NPQ would add little value.
5.	Providers should develop a detailed training curriculum for mentors at all levels, as a condition of accreditation, including elements specific to subject and phase, and minimum time allocations for delivering this should be required, as set out in the Quality Requirements.		<ul style="list-style-type: none"> Timeline for delivery is a concern if accreditation is dependent on the mentor training curriculums being in place at the time of accreditation. 	<ul style="list-style-type: none"> Sufficient time provided before the accreditation process begins to allow for providers to fulfil all necessary requirements of the accreditation process

6.	Providers should demonstrate the capacity to develop an assessment framework reflecting the priorities as set out in the Quality Requirements for assessment, as a condition of accreditation.			
7.	Providers should design and implement rigorous quality assurance arrangements as set out in the Quality Requirements, as a condition of accreditation.			
8.	DfE should facilitate any accredited providers which wish to do so, to partner with an institution, such as the Institute of Teaching when it is ready, to offer their postgraduate award		<ul style="list-style-type: none"> Concern around allowing awarding degree powers to a new as yet unproven institution 	<ul style="list-style-type: none"> Confirm that the Institute of Teaching will follow the same OfS registration process as any institution seeking degree awarding powers.
9.	Single-year ITT courses that lead to QTS should be required to be of 38 weeks' duration, as a condition of accreditation, of which the minimum spent in schools should be 28 weeks.		<ul style="list-style-type: none"> Concerns around capacity, resource and cost issues for the school sector which is in of itself very diverse with a risk that high quality placement providers are squeezed out as they are unable to accommodate this thereby narrowing choice and availability of placements across different types of providers. 	<ul style="list-style-type: none"> Recognising the diversity of sector and adopting realistic flex for smaller placement providers

<p>10. Teaching school hubs should partner with an accredited provider to play a role in the delivery of ITT (unless they are operating at accredited provider level). DfE should place a requirement on teaching school hubs to support local ITT delivery in specific strategic ways as required, for example through building school capacity for ITT by building an active mentor network in the local area, providing specific support for schools serving disadvantaged communities to enable them to engage with ITT, or modelling high quality intensive practice placements for other schools undertaking this aspect of ITT for the first time.</p>		<ul style="list-style-type: none"> Concerns around the infrastructure capacity of Teaching Hubs leading to them being overwhelmed and potentially leading to the collapse of Teaching Hubs 	<ul style="list-style-type: none"> Properly examine infrastructure of teaching hubs to ensure capacity can be met.
<p>11. Prospective accredited providers of ITT should go through a new, rigorous accreditation process to ensure that they are able to fully deliver the Quality Requirements.</p>		<ul style="list-style-type: none"> Providers are already stretched to capacity due to the implementation of other frameworks AND dealing with the challenges of the pandemic. 	<ul style="list-style-type: none"> Phase the accreditation process starting with technically “new” providers into the ITT ecosystem and then phase in re-accreditation for existing providers
<p>12. DfE formally notifies providers who do not meet aspects of the Quality Requirements, as set out in the ITT criteria. Where this is the case, DfE should mandate support between</p>		<ul style="list-style-type: none"> Concerns around the scope, role and responsibilities of the inspector versus those of the central government department with 	<ul style="list-style-type: none"> This recommendation should be clearly positioned as a ‘last resort’ with the opportunity and clearly defined

	<p>providers to ensure improvement as a condition of continued accreditation. Where a provider is unable or unwilling to improve, DfE should broker transfer of trainees to another provider.</p>		<p>risks for significant overreach on the part of central government plus the risk of implementing change through a culture of fear which risks forcing some providers to exit the market for fear of failure and impacts on reputation thereby ultimately risking teacher supply issues.</p>	<p>stages for providers deemed not to be meeting the requirements allowed an opportunity to rectify the position.</p>
13.	<p>DfE and Ofsted should explore how involvement in ITT might be included in the education inspection framework (EIF).</p>			
14.	<p>As trusts grow, there should be an expectation that they actively meet their responsibilities for ITT involvement in the areas they serve. Regional school commissioners should therefore consider involvement in ITT as a condition of growth for trusts. DfE should also make ITT involvement part of the eligibility for academy funding streams, such as the Trust Capacity Fund (TCaF) or sponsor grants.</p>			

Summary of Impacts of ITT Review Recommendations

- Increased cost and burdens for ITT providers and placement providers risks placement providers deferring or worse exiting the ITT ecosystem thereby exacerbating placement availability which will fundamentally undermine the aims of the review and risk compromising future teacher supply.

Unintended consequences of the implementation of the ITT Review Recommendations:

We believe there are a number of unintended consequences of the implementation of the ITT if providers exit or are forced out of the ecosystem if the review recommendations are not re-considered for their impacts.

- Exacerbate recruitment and retentions issues within the teaching profession through placing even greater demands on teachers and schools when they are still reeling from 18 months of teaching through a pandemic whilst still fulfilling their current duties of ITT training
- Drive high quality exits from the ITT ecosystem especially among small training and placement providers which will ultimately see a shrinking ecosystem leaving providers concentrated principally in the major conurbations that are better able to absorb the additional requirements. As a result the ITT ecosystem will lose a key strength of the current of ecosystem in its diversity and accessibility of provision for potential trainees.
- A smaller, more centrally focussed ITT ecosystem will dramatically limit access opportunities for certain socio-economic demographic groups who for various reasons are only able to access training local to home. With less opportunities for access we are risking creating a less diverse teaching workforce of the future and compounding teacher supply issues in the most socio-economically challenged parts of the country where educational standards are already compromised through life disadvantage. This will be a key blow to the government's levelling up agenda which will rely on driving up education standards in the most deprived parts of the country.

University Alliance recommendation: We believe given the size and scale of the reforms being proposed and the high risk stakes both in teacher supply and reputational terms if the department gets this wrong that the review would significantly benefit from a gateway review to reflect and recalibrate timescales whilst at the same time rebuilding trust and collaboration with the sector to work together to evolve Initial Teacher Training and deliver the overarching aims and objectives.

If you wish to discuss any or all of this submission in more detail, we would be more than happy to do so and indeed invite representatives from our members to provide more detail on the issues highlighted.

University Alliance