

## ITT market review consultation

**Questions 1 to 10 are bespoke to the individual completing the form.**

11. Which of the themes set out in the report do you particularly recognise as key area(s) where there is an opportunity to further increase the quality of ITT? You may choose as many themes as apply.

- a. Consistency across partnerships and between providers in the content and quality of the training curriculum
- b. Rigorous sequencing of the training curriculum
- c. Alignment between the taught curriculum and training environments, in particular teaching placement schools
- d. Sufficient opportunities for trainees to benefit from highly focused practice of, and feedback on, essential components of the curriculum
- e. High-quality mentoring to ensure that mentors both know and understand the training curriculum and have a sufficient level of influence over the progress of trainees
- f. Clarity about the way in which the market operates for potential trainees
- g. A supply of enough high-quality placements with the capacity to fully support the delivery of the trainee curriculum
- h. None of the above

**We have chosen not to highlight any of the above, but to provide a written response.**

Please provide any additional details to explain your selections.

While we support the review's objective of promoting consistently *high-quality* teacher training, the proposals restrict rather than embrace the ambitious nature of teacher education courses; the majority of which are already of the highest quality, according to multiple inspection frameworks. They make an assumption that the CCF embeds quality, which is at best untested, given its recent introduction. Providers' courses (such as ours) are already focused on a continuous cycle of improvement across their ITE provision, with detailed and rigorous approaches to course development and quality assurance. This question does not recognise that different providers will have different foci for development, which are applicable in their local context. Imposing 'catch all' 'improvements' on every provider will actually disrupt and reduce quality provision which has been built in detail over many years.

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

The idea that you build a coherent and high quality teacher education system by making a list of 'improvements' is unhelpful, without a clear evidence base, for why, and in which specific contexts, these improvements might be required. We educate our teachers to be competent and confident professionals, to think independently, to engage in enquiry-rich practice, and to have high standards

of professional ethics. The proposals make it difficult to develop teachers with these characteristics due to the uniform approach that ITE programmes will have to adopt. This would do significant harm to the status and attractiveness of the teaching profession and the future quality and development of education in our schools. Indeed, any 'list' of improvements needs to be built from the national and international research evidence about what makes high quality teacher education, not a restricted view generated from limited evidence and a small number of people. One area for improvement would be to ensure all beginning teachers have the opportunity to work at Masters level, and to ensure Masters level professional development accreditation for mentors.

*13. Taken together, the review's proposals set out an overall approach to addressing the challenges identified in paragraph 18 of its report. If you think that there are alternative approaches to addressing these challenges, please specify what these are.*

The narrow scope of representation on the Expert Advisory Group, and the very limited engagement with long-standing, high-quality, successful ITE providers, fail to allow for a true portrayal of the current state of teacher education. Indeed, there is a distinct lack of evidence presented for identifying these as challenges.

There remains scope to engage with the wider sector. The current consultation should be halted. Representatives, including university and school-based colleagues, from a range of ITT programmes should be consulted in an open and transparent way so that genuine challenges can be identified and relevant needs identified and supported, drawing on national and international understanding of high quality teacher education. The system is not in need of *revolutionary* change; providers should be supported in continuing their own self-improvement approaches, perhaps working to support each other locally to ensure sustained high-quality teacher supply. This would allow subject and phase expertise to be available more widely, but still contextualised to the local situation.

It needs to be made clear that the consultation sets out the equivalent of a national curriculum for teacher education. This does not accord with a commitment to academic freedom in Universities, which has facilitated our own innovative and ambitious teacher education curriculum. Undermining of academic freedom through the prescriptive curriculum proposed is likely to lower standards, restrict continued improvement in teacher education and pupil experience, and lead to universities withdrawing from teacher education altogether.

Finally, we would like to reiterate our willingness to work with the Government, alongside representatives of other providers, such as UCET, to help develop productive and appropriate outcomes going forward.

*14. 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*

There is no evidence provided in the proposals that intensive placements, of the type envisaged, will lead to high quality ITE. Intensive placements reflect very limited notions of how trainee teachers grow and develop, and provide no foreseeable benefits for existing high quality partnerships; indeed, they will lower the standard of provision, not least by wasting time on activity which does not lead to sustained professional learning. The assumption that teaching is merely a set of skills, and that every trainee should concentrate on the same skills, irrespective of their prior experiences, existing skills, specific subject or phase, is a flawed one. Indeed, there appears limited opportunity to

engage with the variety of professional and academic experiences which trainees bring to the course, putting them through a mechanistic and 'one-size-fits-all' programme which is not adequate to develop longer-term professional learning.

The requirement to engage in such placements will also erode long-standing partnerships with, and create a number of serious challenges for, partner schools who have themselves contributed to and greatly enriched the design of our programmes for trainees. Intensive placements are particularly problematic from the perspective of Primary and Early Years providers, where hosting large numbers of trainees will be entirely impractical. An unintended consequence of these placements is likely to be intense impact on, and unsustainable scrutiny of, pupils and school colleagues, that would make partnerships less desirable from the perspectives of many schools whose contributions have been integral to the effectiveness of our own PGCE.

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

The financial cost and time-burden which these proposals will entail will detract from providers' and schools' attempts to ensure a continued supply of excellent trainee teachers, and to support the post-pandemic effort to support students' learning. Specifically, the proposal to increase the length of the course slightly while at the same time reducing the time currently spent in University based sessions (by two weeks) will increase costs to schools while obstructing opportunities to offer the ambitious, high-quality curriculum currently on offer through providers like us (which, incidentally, is already statutorily required to embed the CCF). It will erode subject-specialist and specialist age-phase teaching and lead to the provision of generic teacher education and a consequent lowering of standards. Furthermore, reduced university-based training will compromise the ability of the University to ensure consistently high-quality provision for trainees undertaking placements in a wide range of different settings. Moreover, extending the course to 38 weeks would require accreditation from the University which may not be possible to achieve within the short time frame proposed.

*16. 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 that you wish to comment on.*

The Market Review states that "Providers must have a fully-developed, evidence-based curriculum which explicitly delivers all aspects of the ITT Core Content Framework (CCF)." We see a key issue with this: a truly evidence-based curriculum cannot simply deliver all aspects of the ITT Core Content Framework without problematising some of the key evidence which underpins it. For example, we see a huge issue with the emphasis placed on cognitive science within the CCF given that recent research conducted by the EEF (the same organisation which independently reviewed the evidence used to inform the CCF) warns "while cognitive science approaches can have a meaningful impact on learning, evidence on how they can be applied successfully in classrooms remains limited". This raises significant questions about the emphasis placed on the CCF in terms of trainees' learning, with our own experts questioning the lack of evidence. As such, an independent observer would be forced to conclude that it is **not** based upon the best-evidence available. Its genericism completely ignores the importance of subject and phase in learning to teach, and there is consensus across the sector that the evidence underpinning the CCF, ECF and NPQs is at best restricted and partial. We all remember learning styles (something which the CCF is now imploring us to critique); critical analysis

by universities was key to exposing the lack of evidence for such approaches, and we must preserve our ability to guard against 'fads' that may turn out to be unhelpful to future teachers.

*17. 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.*

The points raised in the previous question signpost a fundamental flaw in the Market Review: whilst championing an evidence-based approach, much of the evidence that the review engages with is either untested or not sufficiently robust. Extending the requirement for mentors to be educated against this same restricted and partial evidence base will compromise standards. We think mentors should be entitled to education which draws on a full and comprehensive understanding of evidence, and we, and many other Russell Group providers, already provide bespoke mentor education, which in many cases feeds into a Masters degree. We would not want mentors in our Partnership to be forced into completing a poorer mentor training course than we already provide. Implementation of mentoring requirements reflects lack of understanding of the sector. Schools nominate mentors based on a variety of factors. We have very strong attendance and engagement in mentor training, and do not see the need to artificially prescribe the amount of time required. We also think the funding for the additional commitment required in some partnerships will be prohibitive. Our partnership builds mentors as part of our deep and long-standing relationships with schools and teachers. The model proposed is mechanistic and restrictive to sustained quality. This would lead to Universities like us withdrawing from the sector. We are happy to contribute to ongoing discussions, alongside other providers, about how to ensure the highest quality mentoring happens in our schools.

*The review recommends adoption of the requirements set out in section 3 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 47-48 in the review's report), which would require providers to develop an assessment and progression framework which is aligned to the planned and sequenced curriculum and assesses trainees with appropriate frequency both on knowledge of the content of the curriculum and ability to apply it in classroom practice.*

*18. 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 the Quality Requirements that you wish to comment on.*

The Market Review states that "Providers must ensure that all mentors and others involved in assessment of trainees have received sufficient training to enable them to understand and use the provider's assessment framework accurately and appropriately." This is something which has characterised our programme for years. However, in a proposed system where different providers will write distinct assessment frameworks, our concern is how this will be operationalised when schools work with multiple providers. This would prove particularly problematic for colleagues in smaller settings, such as primary schools, where there is often only one person responsible for ITT. In addition, formative assessment against a linear sequential framework does not reflect the way in which trainees learn to teach, with an approach to assessment which accounts for trainees' individual development being more appropriate.

The assessment approach given also appears to be incompatible with the Masters level requirements set out by QAA in 2014, with the flawed idea that evidencing knowledge will

necessarily help trainees to make progress towards the Teacher Standards. Learning to teach is not just about remembering and then practising, and as such we assess trainees' development holistically, to ensure they make deep and sustained progress. The assessment framework envisaged does not recognise trainees' holistic development.

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

We already have strong and long-standing mechanisms for quality assurance, both in terms of professional and academic learning. The University would be unlikely to accept imposed requirements for its quality assurance processes, and any attempt to do so could easily disrupt partnerships, threatening teacher supply.

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

Partnership arrangements are negotiated between members of our Partnership and are detailed in our Partnership agreement, with that agreement being regularly reviewed by our Partnership Standing Committee. Our Partnership has been built over decades, and is very stable indeed. We have significant concerns about the impact of any national prescription on the stability of our Partnership, which would lead to lower standards through restricting our ability to shape provision to local needs and contexts. The contractual model suggested is also problematic in that it contradicts and weakens the notion of shared values and shared responsibility.

*21. Please provide any comments you have on this proposal.*

The University's quality assurance and accountability requirements would not enable 'ad-hoc' provision of a PGCE to other providers. Having said that, we do support the idea that Masters level ITE should be available to all trainee teachers.

*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 Quality Requirements? In your answer, please include the approaches providers might take to address these.*

We do not provide undergraduate or employment-based routes into ITT.

*23. 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.*

Our own early years programme has the same status as the primary and secondary programmes. Any impact of these proposals on the primary and secondary programmes would have identical effects on the early years provision. We do not provide further education ITE, and we do not provide non-QTS early years ITT.

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

This would require a significant amount of unnecessary work for colleagues across the sector. We do not see the need for providers who are already delivering high-quality teacher education to go through a reaccreditation process when their energies should be focused on supporting schools, pupils and trainee teachers to deal with the impact of the pandemic. Any re-accreditation would lead to a renewed risk assessment of the course by the University, which would focus both on the

risks inherent in having to be re-accredited (eg. course quality) as well as a focus on the financial viability of the course.

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

As a longstanding provider of ITE, we already have a range of monitoring and quality assurance measures in place which ensure the ongoing improvement of our provision. Regular and robust engagement with both internal and external university-based/ school-based colleagues who carry out systematic monitoring and evaluation of every element of our courses means that our course continues to thrive. The Market Review Proposals would result in no change to our approach to monitoring. As such, we would not expect to receive a negative Ofsted judgement. However, if that were to be the case, any attempt to mandate support or broker mergers would be severely problematic, and lead to the University's withdrawal from ITE provision.

*26. Please provide any comments you have on a) the proposed target of September 2023 for first delivery of the Quality Requirements and b) DfE's proposed timeline as set out above.*

The proposed timescale set out in the review is unrealistic and unworkable. Following collaboration with partner schools and other stakeholders to redesign the programme, required revalidation processes in university-based courses are extensive and lengthy. Even if they were possible, ironically the short-time proposed to redesign these complex programmes would compromise the quality of our existing, long-established, high quality programmes developed over many years. The short time frame alone would preclude our involvement. Because of this, we suggest that the consultation is halted, and we would urge the government to meaningfully engage with the sector.

*27. 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.*

*a. Accredited provider*

*b. Accredited provider under certain conditions – please state what these are*

*c. Lead partner*

*d. Lead partner under certain conditions – please state what these are*

*e. Placement school*

*f. Placement school under certain conditions – please state what these are*

*g. Would choose to withdraw from ITT*

*h. N/A*

*28. If adopting a future model such as the one set out by the review, would you be looking to add more organisations to your current partnership? a. Yes b. No c. N/A*

N/A

29. If you answered yes to Q24, would your organisation require support to identify potential partners? Please also explain what support would be needed and what barriers this would overcome. a. Yes b. No c. N/A

N/A

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

Less than 50% of Teaching School Hubs are currently involved in ITT, and alongside coping with the impact of the pandemic, they already face significant challenges related to capacity as they assume responsibility for the ECF, NPQs and acting as appropriate bodies for ECTs. Teaching School Hubs have not had time to adjust to assuming such huge responsibilities and, as of yet, there is no evidence that their role will result in higher outcomes within the sector. This raises two key concerns: i) time is needed for the new role of Teaching School Hubs to be established and evaluated; ii) the increased responsibility for ITT may prove too much for their already stretched capacity. As such, we would, as always, liaise with schools in our local area. Our two local TSHs are based in our own partner schools and we have existing relationships with those schools.

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

There are many sources of expertise in teacher education in this country. The question is not about what status potential providers have, but whether they can provide high quality teacher education. There is no evidence that 'trusts' can provide such high quality provision. The reality is that some 'trusts' often assume responsibility for schools which face significant challenges/ are deemed to be requiring improvement/ inadequate by Ofsted. Without careful consideration and clear guidance, this could result in trainees being placed in schools which do not have the capacity to support trainee teachers. Our Partnership is not one with trusts, but with schools; partnership with schools helps to secure the deep and sophisticated relationships required for high-quality partnership.

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

High quality ITE is not built on incentives; it is built on strong relationships, built over time, and founded around research-based, subject- and phase-specific teacher education. In this way, both the University and schools recognise the benefits involved.

*33. Please provide any comments you have on a) the impact of the proposed reforms on the recruitment and selection process, including potential for streamlining of the recruitment process and sharing of recruitment practices, b) any barriers to implementing the proposed reforms at the recruitment stage, and c) support that would be needed to overcome these barriers.*

The proposed streamlining of the recruitment process and sharing practices would have a detrimental effect on recruitment and therefore teacher supply. Currently prospective teachers have the opportunity to choose their preferred route of training; one option is to apply to a postgraduate University-based course with Master's level study, supported by internationally validated research expertise and resources. The reputation of these courses attract high quality candidates with substantial subject expertise, many of whom go on to become school leaders. They value the more academic components of the programmes provided by HEIs to develop their professional knowledge

and understanding. HEI providers are a key source of subject and phase expertise, with academic staff capable of developing (and galvanising) trainees' subject- and phase-specific pedagogy to a very high level, often drawing on their own research in doing so. By offering one model of ITT which does not include Master's level study, the proposals risk making teaching a less attractive profession for trainees with a strong academic profile. The more rigid conformity proposed in this review compromises opportunity and choice and is contrary to what happens in the best performing education systems internationally, which recognises that further professional academic study raises the status of the teaching profession.

*34. 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.*

Many universities have a social mission to support their local communities and have long-established partnerships with schools in rural areas across a wide geographical area. These schools not only provide high quality professional placements but recruit trainees for their first appointments from the programme. If university programmes withdraw from ITE, the teacher supply to those rural schools would be threatened. Furthermore, opportunities for successful trainees acting as role-models to pupils and positively enhancing pupils' aspirations will be diminished. Our own university sees the PGCE as part of its widening access endeavour, providing a stream of teachers who can encourage and guide talented, bright young people in under-represented and often rural areas towards future study at a leading university. In terms of equality for trainees, the University has well developed pastoral and academic support, provided, for example, by the counselling service, the disability resource centre (which provides mentoring, information technology and other support services), and by colleges which provide pastoral support. Having subject-specialist lecturers, who work directly with individual trainees also helps to ensure equity of opportunity, accounting for individual trainees' learning needs.

*35. 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.*

We support the review's objective of promoting consistently high-quality teacher training, subject to robust quality assurance mechanisms. In particular, we agree that 1) ITE programmes should be informed by up to date and robust research, 2) mentors should have a key role in the development of trainee teachers, and be provided with high quality training to achieve this, 3) trainees' centre-based and school-based training should form part of a coherent curriculum.

However, we remain deeply concerned that the proposals themselves would require us to adopt a model within which we could no longer guarantee the high standards we have achieved to date. The proposals appear to confuse quality with uniformity and conformity. Our key concerns are as follows.

- The single, prescriptive model of training proposed would obstruct our delivery of a flexible, highly-personalised, innovative curriculum, responsive to trainees' and schools' needs and based on the best available research.
- The introduction of such a prescriptive approach for teacher training, which is unevidenced and experimental, would reduce opportunities for trainees to develop as critically engaged



professionals, who are ready to take on the complexities of their role, rather than simply operate as technicians. The status of teaching as a profession depends in part on it being an intellectual endeavour.

- The recommendations would require a cut in teaching time in the Faculty by approximately 10 days. We believe that this would impact further on our ability to provide the ambitious, subject-driven curriculum described above.
- Within a report which emphasises the need to be informed by the best evidence available, there appears to be no evidence that the proposed systems of trainee recruitment, mentor training and roles, and course design would lead to better outcomes.
- The report makes a series of specific recommendations about how school placements should be structured, which threaten to erode our existing deep and longstanding relationships and partnerships with schools. In particular, it prescribes more intensive placements in a smaller number of schools and new regulations for the training and responsibility of 'lead mentors'. It is likely that all these measures would prove very challenging for many of our existing schools. Many of our trainees also take jobs in these schools, and the erosion of such relationships would therefore jeopardise teacher supply in local education services.
- The proposals threaten an already established expert mentor community, underpinned by evidence informed mentor training. The imposition of a top-down system for managing mentors threatens to dismantle existing strong networks of mentors which have formed over many years. Their rich and substantial local, national and research-based expertise ensures new teachers can make a significant impact on the schools with which they work.
- The financial cost and time-burden which these proposals will entail will detract from providers' and schools' attempts to ensure a continued supply of excellent trainee teachers, and to support the post-pandemic effort to support students' learning.
- Allowing other organisations to recruit and train future teachers independently, on behalf of the University of Cambridge, would present an unacceptable loss of accountability and quality assurance for a University committed to teaching and learning at the highest international level of excellence.

Given these concerns we cannot, in all conscience, envisage our continuing involvement in ITT should these proposals be implemented in their current format.

We reiterate that we would be happy to engage with the government and other ITT providers to consider an alternative way forward, engaging alongside representatives of other providers, including UCET.