

## CONSULTATION RESPONSE

# MillionPlus Deans of Education Response to the ITT Market Review Consultation

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The MillionPlus Deans of Education Network represents modern universities who engage in initial teacher training (ITT). We work together and with sector bodies and government to share best practice and to offer informed comment on policy, as well as generating policy of our own.

The Network has engaged with government and the review team during the ITT Market Review process. Below are the responses to some of the questions asked in the formal consultation on behalf of our membership.

### The Quality Requirements

#### Questions 7, 8 and 9

All providers aim to deliver the highest quality and consistent ITT provision, and all themes identified are already integral parts of how they deliver this. There is always an opportunity to increase quality, but this should be done through the sector working together to develop ever greater knowledge of how to better deliver ITT, with regard to regional variations and needs. Consistency of provision does not mean the same as uniformity of provision, and although all trainees should be able to expect a high standard of provision irrespective of where and when they train, a one-size-fits-all model would be an unhelpful way to attempt to achieve this, and could impede the ability of providers to continually build their provision on new knowledge and experiences, as is currently the case.

We would somewhat reject the idea that you can easily pick and choose areas of themes for improvement across the whole system, as teaching is a profession built on collaboration and responding to specific needs in a given context. What works for one may not work for another, and the profession requires the space to develop these ideas and continue to grow. This is particularly true in the relationship between universities and partner schools, where the flexibility to work together in a way that best suits the needs of the trainees and the school is vital, and where a more prescriptive model would stifle innovation and diminish the productivity of the partnership more generally.

Where there are challenges, be they regional or national, the best way to tackle them would be an open and honest dialogue between the wider sector and government, based on a principle of mutual trust and respect. It is perfectly possible for different parties within the sector to disagree on certain issues, or have differing ways of seeing or tackling an issue, however a clear, open and upfront dialogue would enable the sector to understand the differing positions and work towards a common approach to continuous improvement.

The case for root and branch reform, as outlined in the ITT Market Review Report, is incredibly thin, with significant evidence gaps throughout. The scale of the sector reforms proposed, and the significant risks that come with them to teacher supply, would suggest a widespread and endemic problem within ITT, and we do not believe that this has been remotely demonstrated in any of the reviews work. The proposed reforms taken together are little short of a pure experiment in ITT, and to conduct an experiment on this scale,

without clear evidence into either its need or into these proposed methods of delivery, and without even a pilot system in place, has the potential to incur significant risks and potentially damage the ITT ecosystem. If there are areas where improvements are required, then the best approach is to work together to address them in a way that mitigates any risks to teacher supply and supports a sector that has worked incredibly well under the most challenging of circumstances over the past 18 months.

It would also be wise to include the voices of schools as much as possible in this discussion, and the clear evidence from our membership is that their partners schools do not agree with the fundamental assessment of a major quality issue within ITT. For schools, a major issue with regard to ITT remains funding, both to enable them to take placements and also to enable them to have the additional resource to work with providers in this area as effectively as possible. It is not possible to improve the quality and consistency of approach to ITT without appreciating this core and fundamental fact. It is also unhelpful to run this consultation in July and August for only six weeks, which significantly decreases the chances of hearing directly from schools.

## Curriculum

### Questions 10, 11 and 12

We would like to see the robust evidence base that suggests this would be a beneficial idea, as well as more information on what they would practically entail before making a formal comment. We would also like to hear from schools as to their desire to have intensive placements, and their ability to deal with this additional time without any additional resource.

## Mentoring

### Question 13

Mentoring is a fundamental and critical component of high quality ITT, and universities work closely with partner schools to offer support and training for mentors every year. The proposed system, however, lacks sufficient detail for us to be able to give an informed comment on its utility and the ability of it to be implemented effectively. The idea of a lead mentor is incredibly similar to that of a university ITT tutor, so would this new system mean these would therefore be replaced by lead mentors, and if so they would now be employed by the school and not the university? This brings with it questions over oversight and influence – particularly in a system whereby providers need to demonstrate consistency within a detailed curriculum.

Schools work with universities for many reasons, but one of them is due to the mentoring support and knowledge that a university can offer. This is part of the success of these partnerships, whereby both parties work to support the other and resource is utilised effectively and efficiently. To potential diminish, or even destroy, this system, without the level of published detail as to its replacement, is incredibly risky, and the plans for exactly how this system would operate need to be detailed as soon as possible. For example, under these proposals the school-based mentors will need additional training and support for what is a significantly enhanced role, but there are no details as to where this will come from and how it will be resourced.

We would also reject the idea that a formal link to an NPQ is necessary, as there are a range of options that providers can use to develop mentoring skills, many of which have a higher cache and are more transferable (such as a Masters qualification). A system of formally linking lead mentoring to an NPQ removes flexibility and imposes a top-down approach that will only serve to benefit government targets for these qualifications, rather than the people for whom it was intended.

## Assessment

### Question 14

Without greater detail on what is being proposed in addition to what providers already undertake it is impossible to give a formal comment on this proposal.

## Quality Assurance

### Question 15

With this already being firmly embedded within the ITT sector more information on what additional requirements would be required are necessary to make an informed comment on this proposal. Universities have robust quality assurance measures in place already, and these are assessed externally by Ofsted and the Quality Assurance Agency (QAA), the Office for Students (OfS), as well as internally by providers themselves.

## Structures and Partnerships

### Question 16

The model suggested speaks to a fundamental misunderstanding of how partnerships operate within ITT. A more prescribed and contractual or transactional model risks undermining the huge successes of the current model, whereby partnership is a more organic and responsive two-way street. Universities and partner schools work to address specific needs, sometimes as a result of regional issues that a standardised approach could miss. Universities are also able to provide CPD to school staff as part of that work, at no cost to the school, utilising the expertise and size of the institutions. A more contractual model risks breaking this more organic link between the two bodies, and increasing unnecessary bureaucracy, making it harder for either school or provider to respond quickly and intelligently to a change in circumstances.

The Covid-19 pandemic has highlighted perfectly just how critical that deeper and more responsive relationship is for the ITT system. The trusted relationships built over many years enabled trainees to be placed under extraordinarily challenging circumstances, and innovative methods were developed to help the system continue to operate to a high level of quality, and at a high level of capacity, that we should by no means take for granted. In many cases it was the size and permanence of universities that enabled a coordinated response between government, the sector and schools, and risking this relationship after it has successfully weathered this storm would be incredibly risky.

The intended benefits of this proposal are already being enjoyed through the current system, and these will be put at risk through this model. Indeed, the current model of schools and providers working in rich and productive partnerships feels like an end point that this new proposed system would one day seek to aspire towards, so it makes little or no sense to reverse the excellent work that has developed to then try and build it up again with some different actors.

We would also question the need for providers to be of a certain size to continue to develop their own provision and maintain their partnerships. The diversity within the current system is a strength, not a weakness, and putting at risk the viability of medium and small providers to continue in the market, as many will not wish to take up smaller roles as part of a larger chain over which they have no control, is both unnecessary and potentially highly damaging.

## Qualified Teacher Status and PGCE

### Question 17

Providers can already do this, and established relationships exist within the sector to facilitate it. The ITT Market Review Report states that many SCITTS are happy with this relationship, and clearer and more robust data on issues flagged by others who are less happy should be shared with the sector in order to boost joint improvement.

The proposal to enable all providers to have the ability to partner with the Institute of Teaching (IOT) to offer postgraduate awards is worrying as the IOT has not even been founded yet and as such has no track record in this area. Such a system puts a great deal of pressure onto a fledgling body, and without details on how this arrangement would be quality assured it could set a worrying precedent, and undermine the hard-earned degree awarding powers that universities have, backed up by robust quality assurance mechanisms which are internationally coveted.

## Routes into Teaching

### Questions 18 and 19

There has been far too little focus on undergraduate provision throughout this process, and it would be wrong to suggest bolt-on measures to a system not designed for this cohort. The best course of action would have been for the review to look more holistically at all the routes into the profession from the outset.

Similarly, for EYITT, this was never a focus of the review at all and any consequences will be largely unintended and hard to predict until more detail is forthcoming, and the future shape of the market is more settled. For example, if providers feel this new system is unworkable and pull out of ITT, it is highly likely EYITT will suffer as a consequence.

We are equally extremely concerned Further Education (FE) provision is out of line with ITT within this review. For example, FE is not required to embed the CCF according to Ofsted, however Ofsted will inspect FE teacher training against a framework that is framed by the CCF. At present FE has a distinct professional formation process which is currently under review by ETF, as are the Diploma in Education and Training criteria.

## Accreditation

### Questions 20, 21, 22, 23, 24 and 25

The proposed model of accreditation is set out with little or no information as to its necessity in the improvement of quality or consistency within ITT. A new system of bureaucracy does not guarantee either of those points, and the lack of information that accompanies the proposal not only makes an effective judgement of it difficult, it actually serves to destabilise the current market.

The criteria for the proposals are not set down, beyond vague aspirations to improvements in quality. To whom would providers be applying, based on what, when, and how would these take place? How long would accreditation last for, and how can such a system ensure stability within the ITT market to enable providers to have the confidence to invest their time and resources into the development of courses. ITT is a time and resource intensive part of a universities overall provision, and if greater barriers are put in place in the delivery of ITT, married with the potential for greater volatility in the market, there is a very real and present danger that some will feel the need to scale back their work in this area or even exit the domestic market entirely.

Accreditation for its own sake will achieve nothing, but if there is a clear evidence base that suggests it will improve the ITT system then we would work with government to ensure it is implemented effectively. However, the lack of detail, and the inferences from the Review itself that change for changes sake is built into the purpose of the exercise, means that these proposals need to be spelled out much more clearly, with evidence presented in their favour, and then consulted upon specifically.

On timescales, the proposed timelines are unreasonable and unrealistic. The review can either work with the sector to improve quality in a timeframe that works to that goal, or it can rush through unworkable proposals and destabilise the market. We would strongly suggest a pause in these proposals so that the whole sector can focus on the former.

## Teaching School Hubs

### Question 26

An initial question would be to determine if there is appetite and capacity within the hubs to deliver on the proposals outlined. Members have suggested that many that they work with do not wish for these changes, nor do they feel capable of taking on these extra responsibilities in the short term.

These proposals also change the nature of what those bidding to become teaching school hubs signed up to. It is wrong and unfair to change some of the fundamental principles of what they are being asked to do after a process of bidding and awarding contracts was undertaken.

## ITT as a System-Wide Responsibility

### Questions 27 and 28

We agree that it is important to encourage more schools to engage in ITT, and we welcome many of the proposals in the report in this regard. It is clear that funding remains a strong determining factor in school involvement, and recent work commissioned by MillionPlus on the opinions of school leaders restates this

fact<sup>1</sup>. The report stopped short of recommending more funding in this regard, and we consider this a serious problem if additional responsibilities for schools are taken forward.

We would also highlight again, however, that this consultation is open at the worst possible time for schools to engage with it, so a simple answer as to how better to involve schools would be to make it easier for them to actually tell you, and extend the consultation deadline or set up a series of events targeted at schools across England for their thoughts.

## Recruitment

### Question 29

Any significant destabilising of the market brings with it risks to recruitment. These will be felt more acutely regionally, as if providers pull out of the ITT market it will be hard for others to step in and ensure these potential trainees can access the training they want. Teaching is a profession that is grown locally, and it takes the work of schools and universities in regions to create pathways into the profession, and offer advice and support along the way. For many teaching is a career that opens up to them due to changes in lifestyle circumstances, and being able to access local provision is fundamental to keeping a pipeline open to a range of trainees who would otherwise not come into the profession. Removing any local angle, and the ability to think locally and respond to regional need, would be highly risky to the teacher supply model. For example, many members recruit recent graduates from their institutions onto postgraduate teaching courses, and this is a pipeline that is hard to measure but incredibly important for supply and recruitment regionally.

## Impact Assessment

### Question 30

The risks to smaller providers built into these proposals are potentially highly damaging, and the obsession with scale being a proxy metric for quality is misguided. In rural settings some of these proposals will be incredibly hard to facilitate (for example, an intensive placement in an area with only 2 schools), and in rural areas it is even more important that smaller provision is supported rather than stripped of its ability to provide courses. It is also worth noting that smaller and more local provision has a smaller carbon footprint and is more environmentally friendly in rural areas, with any moves to centralise provision in larger hubs adding to travelling and emission rates.

## Final Thoughts

### Question 31

MillionPlus has always worked constructively with government, and we believe there is more to be gained through cooperation than confrontation. Through the Deans of Education Network we have met with the Review team and officials to discuss proposals, and see how we could help all work towards improving ITT, whilst recognising the excellence present within the current system. We did not necessarily believe a full market review was necessary, but if done correctly it had the ability to identify areas where we could all focus

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<sup>1</sup> <https://www.nfer.ac.uk/initial-teacher-training-placement-capacity-in-english-schools-analysis-for-millionplus/>

and seek to improve ITT from the perspective of trainees, providers, schools and in the end pupils and the next generation. Sadly, we believe the review that took place missed a real opportunity to do just this, and as such we have fundamental issues with the report and its recommendations that mean that we believe the process needs to be entirely re-evaluated, as opposed to the sector trying to accommodate initiatives that we feel are at odds with what is best for teacher supply and the delivery of high quality ITT.

We simply do not see any evidence for a problem of such a scale that the proposals outlined in the review are a proportionate response. The proposals are highly experimental and are not based on any robust evidence or data that point to how and why they need to be implemented. The ITT sector in England functions to a high degree of quality already, with robust quality assurance in place to maintain that. Indeed, the introduction of the new international QTS (iQTS) signals that England ITT is a gold standard that international marketplaces should be importing. It is the right of the government of the day to wish to make changes to the system, however to put forward proposals of this nature that claim to be 'evidence-led' but lack the detail to justify that damages the credibility of ITT and destabilises the market. If robust data that points towards this course of action exists it should be clearly highlighted. Too much of what is in the report is either anecdotal, vague or an interpretation of evidence that by no means tells a complete picture.

It should also be noted that alongside a lack of clear evidence for such seismic change, the timing of such a move is equally hard to understand. Recovering from a global pandemic in which education was disrupted to a degree hitherto unheard of, schools require stability and support. Members have reported a serious increase in the number of schools worried about yet more changes to the ITT system, which leads to a higher chance of schools pulling out as they seek to concentrate on core functions of their work in an already difficult teaching environment. Alongside the pandemic, there has been a significant amount of policy change in any case over recent years, and the new Core Content Framework (CCF) has not even had a year to fully bed down (and no time at all outside of a pandemic), before yet more policy is being introduced to build on it. Successful policy cannot be judged so close to implementation and in these unique conditions. With this level of change it is increasingly possible that schools choose to scale back their involvement in ITT, as the capacity and resource required to keep up with this level of policy change is incredibly challenging.

It is not just schools who are at risk under these proposals. The way this system proposes to willfully shake up and destabilise the market means that many universities, who form the bedrock of ITT across England, will consider the viability of their continuing involvement in this area at the scale that they currently operate. With ever increasing pressures in the wider higher education context, the attractiveness of ITT is diminished if these proposals mean greater resource is required from them, with no prospect of increased income and a process of accreditation that has yet to be outlined fully and that could see them lose their autonomy or risk reputational damage if arbitrary measures are put in place to ensure a degree of change within the system. Teaching is a profession that is driven locally, and losing any major local providers will have huge ramifications for supply in many regions, and there is no clear evidence that other providers can simply step in. It also has ramifications for subject knowledge, a stated focus of Ofsted, whereby if universities scale back or withdraw they take with them expertise and subject knowledge that will be hard to replace. For example, many members of ours engage in Subject Knowledge Enhancement (SKE) programmes but should they move away from delivering ITT at scale, or at all, how effectively can these programmes be run either locally or nationally?

The review report needs to be carefully considered by government, but the huge gaps in information, the risks that are baked in to the proposals, as well as a simply unworkable and unhelpful timescale mean that the only prudent course of action is to pause this initiative and re-set the consultation process to ensure the whole sector is able to shape the future, with a particular emphasis on the voices of schools. MillionPlus is

committed to working with government to achieve its desired improvements, but only through working together is this a possibility. There are more pressing concerns than rearranging the architecture of the sector, and this will distract attention and resource away from tackling some of the issues that the ITT sector will face in a post-pandemic world.