



The National Association of
School-Based Teacher Trainers

NASBTT's Response to the Initial Teacher Training (ITT) Market Review Consultation

NASBTT's response to the ITT Market Review consultation is shared on the following pages. You may find it helpful to read our response, along with our statement and letter to the Secretary of State for Education, before considering your own response to the consultation.

[ITT Market Review Final Report and Consultation: NASBTT statement](#)

[Letter to the Secretary of State for Education – ITT Market Review: A Risk to Teacher Supply](#)

We encourage **all** providers to submit a response to the consultation.

Useful links

[Initial teacher training \(ITT\) market review: recommendations - Government consultation](#)

[Initial teacher training \(ITT\) market review: overview](#)

[Initial teacher training \(ITT\) market review report](#)

Providers can complete the consultation [here](#)

The deadline for responses is **22nd August 2021**

Part 2: The Quality Requirements

The case for change

7. 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

Please provide any additional details to explain your selections.

From the perspective of school-led/school-based provision, first and foremost, the vast majority of us that are involved are wedded to the philosophy of continuous improvement to ensure that training is of the highest possible quality and, in that spirit, we would identify with most of these 'key themes'. **That is not to say that we believe the current system is performing poorly, or that systematic and widespread change is needed, simply that there is always room for improvement in any system, no matter how well-performing.**

- a&c. The quest for consistency across all components of the curriculum on offer is a constant; there has been a transformation in the arrangements providers have instituted in recent years to *assure* quality – contexts and circumstances will inevitably provide barriers from time to time, but programme leaders are committed to ensuring that the gap between the best and least effective practice is narrowed to a workable level of tolerance.
- b. In our experience, SCITTs have, and are, focusing their energies and efforts on redesigning their learning sequences so that trainees can develop, on a cumulative basis, their knowledge and understanding of all that is involved in becoming an effective teacher. In truth, this is a complex and time-consuming process which, in fairness, will take more than a single academic year to introduce, refine and embed across partnerships. The impact of a 'jigsaw' approach to the ITE curriculum (often purposefully planned) and typical of the recent past must not be underestimated – as many trainees and recently qualified teachers will happily testify.
- d. The concept of strategically placing modelled components of teaching together with opportunities for trainees to immediately apply such components in a curated quality learning environment is naturally appealing but, as pragmatists involved in school-led ITE, the main concern we have is that of logistics and ensuring consistency of entitlement for all trainees.
- e. High-quality mentoring is fundamental, of course, but we do find the following wording quite

strange: “ ... and have a sufficient level of influence over the progress of trainees”. In school-led ITE we have long understood the truth of this: they are key players and influencers and in our part of the sector we have striven to train and equip mentors with the necessary skills to do this.

- f. There is scope to make explicit to applicants what has always been implicitly understood by those of us who operate within the sector and understand its workings. There are, and ever have been, three routes to QTS: through an undergraduate route, a postgraduate tuition fee route and a postgraduate employment-based route. Whilst many providers and subtly varied programmes may sit underneath these, they all fall within one or the other of these three routes. There has been unnecessary confusion for individuals applying to ITT caused, not by the number of accredited providers available, but by technical issues associated with the application system which conflate where places are held (i.e. within School Direct Lead Schools) with the institutions who provide the training (accredited providers). A very simple technical fix which (a) allows applicants to search within reasonable search parameters of their preferred location and (b) directs them to the accredited provider of the programme they have chosen (rather than offering a full list of the SDLs they may work with) would go a very long way to simplifying the applicant journey with no structural changes needed to the way the system operates in practice.
- g. We believe this final point represents one of the most fragile aspects of the ITT landscape, a fact which was made explicit during the Covid-19 pandemic when some of our largest institutions were unable to secure placement opportunities for their trainees. Whilst this report focuses on the advantages of operating ‘at scale’, it has failed to recognise that it is in smaller, closely aligned partnerships where this aspect of ITT provision is at its strongest. Partnerships built on trust and mutual respect find that leveraging additional placements in a time of crisis is a much more achievable process, with all parties working towards a common goal. The larger a partnership becomes, inevitably, the more distant individual schools feel from its ethos, aims and aspirations and the harder it becomes to leverage additional capacity and support from partner schools who feel neither invested in, nor responsible for, the central organisation’s needs. One of the central dangers of a move towards larger, centralised ITT provision is the loss of autonomy and investment partner schools have in ITT programmes; and this would represent a catastrophic reversal of ten years of exceptional work, collaboration and the formation of strong partnerships which make our approach to ITT so successful and so well respected around the world.

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

No

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

We set out detailed suggestions elsewhere in our response but, in brief, we broadly support the quality requirements suggested by the report (with a number of important caveats and suggested alternatives which we explore in more depth later in our response).

However, 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, conversely to its intent, exacerbate many of the challenges you set out here rather than solve them.

The simplest and least disruptive way to address most of these challenges would be to update the ITT criteria to reflect the quality requirements that the responses to this consultation deem to be most effective and give the sector sufficient time, support and resource to be able to meet those requirements (once adequately costed, tested and refined to reflect the evidence gained from a 'test and learn' approach). We already have extremely robust systems of quality assurance in place to measure how well providers are able to meet these requirements and it is our extensive experience, over successive iterations of ITT requirements, that the sector is able to rise to whatever is asked of them quickly and effectively. Where pockets of weaker practice exist, these will quickly be identified through an inspection process and developmental support and guidance can be provided to ensure that rapid improvements are made.

There is simply no need for an expensive, untested and enormously disruptive reaccreditation process which puts providers and, therefore, the supply of teachers into our schools at unnecessary risk.

Quality Requirements for ITT providers

Curriculum

10. 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.

We can see many benefits to this approach in principle, although a change of this scale should, we feel, be piloted carefully so that unintended consequences can be avoided and any key lessons learned before it rolls out across the system as a whole. Key questions must be addressed around how intensive placements might work including thinking about very practical issues such as limitations of space in most classrooms. Additional clarity will be needed around suggested group sizes and guidance around which aspects of practice should be prioritised.

We understand that the very limited research that exists into the effectiveness of intensive teaching placements of the kind described in the report is highly contested and, therefore, the wholesale adoption of such a fundamental change to the structure of ITT programmes must be carefully scoped and tested before it is implemented. It may be that there are barriers which are not immediately evident, but we do see some immediate logistical barriers to the implementation of such an approach:

1. Intensive placements will require significant expertise and commitment from the schools in which they will take place. We would urge the government to scope the availability of schools who are (a) willing and (b) have the capacity and level of expertise that is envisioned in the report. Capacity for school placements has already been identified by the authors of the report as an area of challenge and the availability of intensive placement opportunities does not appear to have been thoroughly researched. Without significant reassurances that such placements are available, providers may be unable to meet the quality requirements through no direct fault of their own.
2. Further research must be done into the geographical availability of such school placement opportunities. The DfE's own research has identified that 'distance from home' is a key driver in an applicant's choice of provider. Should intensive placement

opportunities not be suitably geographically spread, the requirement to travel to an intensive placement school for a minimum of four weeks could become a barrier to entry from applicants who are unable or unwilling to travel significant distances for their training and could adversely affect teacher supply.

3. There is, quite rightly, a focus on subject specificity in this report and in the expectations of providers under the new inspection framework. The availability of intensive placement opportunities with suitable geographical spread will become even more logistically challenging for providers if there is a focus on expertise which is available at a subject level. If, on the other hand, the intensive placements are envisaged as being 'context free' placements which, for example, focus on behaviour management strategies outside of the subject context, this is at odds with the drive towards programmes being 'designed around subject and phase' and takes a significant proportion of time away from subject-specific training opportunities.
4. Very few schools are designed in a way which would readily accommodate large numbers of additional adults as observers in a live classroom environment. Intensive placement opportunities which gather large cohorts together in a single environment will challenge school spaces and bring additional logistical considerations to the availability and capacity of sufficient numbers of intensive school placements.
5. It is likely that schools who do act as intensive placement environments will need suitable recompense which is not currently accounted for in provider budgets. The true cost of the intensive placement model needs to be carefully modelled, and the impact on available spending elsewhere in programmes considered before this approach can be considered for wide roll-out. Without a carefully tested pilot, the cost to benefit ratio cannot be predicted and this could lead to programmes which are, on balance, less effective than they are currently.

In terms of the ways in which the above barriers could be overcome, our recommendations are as follows:

1. A robust and carefully controlled pilot phase in which the cost, logistical implications and outcomes of such an approach are rigorously tested and analysed.
2. Consideration could be given to alternative approaches to intensive placements, such as 'live stream' remote opportunities. However, this approach to ITT and its potential impact is largely untested and would, therefore, need to be built into the pilot phase.
3. Careful consideration should be given to intensive placements which are not centred around subject and phase. Whilst 'context free' placements may ease some of the logistical challenges we have identified, the cost of lost time and opportunities to learn within a rich, subject-specific environment should be measured as part of the pilot phase.
4. A rigorous model for the true cost of this approach must be conducted before it is rolled out as a requirement for all. Without a clear understanding of the costs, it is impossible to predict whether the approach would need more funding. Schools must be included in this costing model so the government can understand the level of recompense they would expect to receive for acting as an intensive placement school and this can be balanced against the impact on outcomes for trainees.

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

Taking each of the recommended timings in turn (and commenting primarily on postgraduate programmes):

Total weeks of course	38	The current average length of our members' programmes is already 38.6 weeks (<i>NASBTT Survey of members, July 2021: collated responses from 61 providers</i>). This is, therefore, likely to be of little concern for school-based provision.
Minimum weeks in school placements (including general and intensive placements)	28	The current minimum entitlement to time in school is 24 weeks, although many programmes offer in excess of this. The additional four weeks proposed in this report account for the intensive placement arrangements. In almost all cases, schools currently receive a payment from their provider for hosting a trainee teacher. The amount they receive varies by provider and is linked to the level of involvement and the capacity they give to the ITT partnership as part of the partnership agreement. It seems unlikely that providers, or schools, would want to, or be willing to, negotiate reduced payments for future placement opportunities and, therefore, the full cost of the additional four-week intensive placements must be found from elsewhere. As this feature is not currently built into programmes of ITT, additional funding would be needed to meet the cost of these arrangements.
Minimum weeks in intensive placements (not necessarily consecutive)	4	See above and previous answer re intensive placements.
Minimum hours in classrooms (including observing, teaching, co-teaching, etc.) each week during general school placements	15	This seems reasonable and is, in many cases, below the number of hours of classroom experience that many trainee teachers already undertake. However, more precision is needed around the term 'etc.' here to ensure that there is equity of provision across programmes and to avoid multiple interpretations of suitable activity.
Minimum hours mentoring each week during general school placements	2	<p>The majority of providers currently mandate a minimum of between one and two hours per week (<i>average 1.5 hours – NASBTT Survey of members, July 2021: collated responses from 61 providers</i>). Whilst we support the increased focus on mentoring support in principle, financial arrangements between providers and schools will be predicated on the current level of support required. It seems inevitable, therefore, that an increase in the time needed from in-school mentors will need to be recompensed with additional funding.</p> <p>Even if additional funding were to be available, we have grave concerns about the mentoring capacity that exists within schools which is already challenging to source. With the additional pressures and demands placed on mentors and schools by the requirements of the ECF, the CCF and now these further demands suggested in</p>

		this report, we fundamentally do not believe that sufficient capacity currently exists within the system. An unintended consequence of these recommendations could be that schools are forced to cease involvement in ITT because they simply do not have sufficient capacity to provide the level of mentoring support that is required of them. Whilst additional funding could go some way to alleviate pressures, where there is not sufficient capacity in schools to back-fill mentor time, money alone does not solve the problem. Only with sustained investment which builds capacity across the system will the level and intensity of mentoring support envisaged across these recommendations alongside the ECF be achievable.
Minimum planned and supported hours per week during intensive placement	25	Please see comments above – particularly regarding the costs of facilitating these placements and our concerns about the lack of capacity and expertise available in schools at a suitable scale and with the appropriate geographical spread.
Minimum hours of expert support per trainee per week during intensive placement	5	
Minimum hours initial training time for general mentors	24	On average, providers currently offer 8.7 hours of mentor training for new mentors and 7.2 hours for returning mentors (<i>NASBTT Survey of members, July 2021: collated responses from 61 providers</i>). Whilst we fully support the intentions behind these recommendations, and fully support the need for a highly trained mentor workforce, achieving these levels of training will be extremely challenging for the sector without significant additional investment. Please also see our comments above about the severe lack of capacity within the system, and our concerns about the choices schools may be forced to make about involvement in ITT if their capacity is stretched even further by these increased demands without sustained and significant capacity building across the entire school sector to facilitate it.

12. 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.

Broadly speaking, we support much of what is being proposed in terms of the quality requirements in this report. The ambition is, quite rightly, very high and there are some practical, logistical and financial barriers to implementation which we highlight elsewhere in this consultation response. If careful planning, testing, modelling and piloting is undertaken, however, we can see that many of these barriers can be overcome. However, in order to achieve the high-quality set out in these recommendations, concerted time and support will need to be given to the sector, and the timescales currently proposed make this impossible to achieve well. The danger is that the quality requirements will be rushed and under-funded, which will potentially lead to something which is less robust and of a lesser quality than what

came before it.

In our extensive experience of working with our members, we strongly believe that the sector is able and willing to meet the high bar set out in this report. In the vast majority of cases, they are already working towards many of the quality requirements identified, and are making progress towards these at a pace, in response to the requirements of the CCF and the new Ofsted inspection framework. Given that this has been achieved against the backdrop of a global pandemic, with all the disruption this brought to the system, we believe this is evidence of the exceptional fortitude and expertise which already exists within our system. With sufficient time, support and guidance, we have no doubt that the sector, as it currently exists, will confidently and expertly meet the expectations laid out in this report.

We acknowledge that some aspect of the recommendations may be more challenging for smaller providers, in particular item 1.7 which makes reference to subject and phase specificity. Whilst we recognise this challenge, however, we can also envisage clear solutions which will achieve these outcomes whilst retaining the vital, local role that small providers play within the system. We have already seen the power of collaborative practice in recent months, with members coming together in multiple innovative ways to solve the crises they were faced with as a result of the pandemic. As an organisation representing 96% of the sector, we have been able to facilitate this collegiate working, bringing together the benefits of scale whilst retaining the local, contextual, school-centred autonomy that is such an internationally recognised and celebrated facet of our ITT provision. As we move forward, we will continue to facilitate our members working in this way, with subject-specific expertise and support procured centrally but provided locally for local trainees in local schools.

Mentoring

13. 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.

In principle, we fully support the aim for high-quality mentor training programmes which create a skilled mentoring workforce with the system. We have yet to understand the capacity within the NPQ delivery structure to meet the requirement for ALL lead mentors to undertake one of these qualifications and, therefore, have some reservations about the deliverability of this. Whilst funding arrangements are confirmed for teachers employed in state schools, we are concerned about the capacity for schools to release mentors for training (or to incentivise them to undertake training in their own time) as already set out elsewhere in this response. We are also unclear from the proposals about the timescales proposed for all lead mentors to achieve the NPQ; providers with multiple lead mentors, some of whom may not be employed directly by schools and, therefore, not eligible for funding, may find the financial implications of this (as well as the capacity issues caused by multiple staff members undertaking any intensive training programme of this nature) to be a barrier. We strongly recommend that the funding eligibility for the NPQLTD is updated to state “all teachers employed in state schools **or** by accredited ITT providers” if this requirement is taken forward in the final requirements.

We must also recognise that the NPQs themselves are, as yet, untested for quality purposes and have not been written with ITT provision in mind – they may, therefore, not prove to be fit for purpose without significant development which could create delays and barriers for providers to meet this requirement. Many providers already offer high-quality programmes which have undergone rigorous quality assurance processes and have proven impact on the quality of mentoring – we would urge that sufficient piloting and testing of the NPQ is undertaken before these high-quality programmes are made redundant in favour of an untested alternative.

Assessment

- 14. 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.**

We are fully supportive of this recommendation. Our experience of working with members is that many have already developed/are developing assessment and progression frameworks which meet these requirements, and we continue to work with all our members on refining and developing these over time in an iterative, evidence informed way.

Quality assurance

- 15. 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 are fully supportive of this recommendation. Our experience of working with members is that many have already developed/are developing quality assurance arrangements which meet these requirements, and we continue to work with all our members on refining and developing these over time in an iterative, evidence informed way.

Structures and partnerships

- 16. 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.**

In principle, we have no objections to these requirements. Providers will already be able to articulate these aspects of their provision as partnership working is a key component of all ITT provision. Many of the recommendations in the report are already built into partnership agreements (e.g. 5.5, 5.6, 5.7, 5.9 and 5.10) and others are required by the DfE as part of accreditation arrangements and permission to recruit (e.g. 5.3). Almost all of these requirements already form part of the cycle of inspections undertaken by Ofsted (particularly 5.1, 5.2, 5.6 and 5.8) and providers will be able to articulate them both for the purposes of inspection and for their SED and Improvement Planning.

We are, however, concerned that the implication of this section, the wording used and the structures it describes (e.g. lead partners) is suggestive of an intended structure of ITT providers which has not been explicitly articulated in the report but which is evident throughout, particularly when considered in conjunction with the section on reaccreditation which we deal with later in this response. Whilst not explicitly stated, there appears to be a clear preference, signalled in multiple places throughout the report, for large providers, operating at scale, with local, contracted 'delivery partners' operating at a local level. This represents a significant threat to school-based provision which, by its nature, operates at a smaller, local level. Whilst the report identified that it wishes SCITT provision to continue to have a place in the new system, we have interpreted this to signal (given the language used throughout the report) that this is likely to be under circumstances which are very different from the ones in which they currently operate, most likely as delivery partners to larger organisations. If the intention is for the majority of smaller providers to lose their individual accreditation and instead operate as 'lead delivery partners' to larger, centralised organisations, this represents a significant risk on a number of fronts:

1. A move to a structure which relegates SCITT providers to a contracted delivery partner role would dismantle ten years of government policy which has worked towards placing the autonomy and ownership of ITT provision firmly in the hands of partnerships of schools. We firmly believe this would undermine the school-led approach to ITT which is so central (and internationally recognised) to our country's unique and high-quality approach to ITT.
2. SCITT providers have chosen to become accredited providers (and undergone an extensive accreditation process and Ofsted inspection cycle) because they passionately believe that they can offer locally designed and delivered programmes which meet the needs of their partnerships of schools. Removing their accreditation will undermine their ability to develop provision which is truly local in approach, and which genuinely involves their partner schools in its design and delivery.
3. Accreditation brings with it a large degree of security in terms of length of tenure within the system. This gives providers the confidence to invest time, resource, capacity and money into the development of staff, buildings, curriculum design and quality assurance processes. It also allows them the time and space to develop deep, lasting relationships built on trust with partner schools. The removal of accreditation and an expectation to work under a contractual arrangement with a larger organisation removes this security and leaves local providers much more vulnerable. This will, in turn, lead to a reduction in the investment that can be given to the provision and an erosion of the partnerships they have developed, in many cases over many years.
4. Providers who wish to continue to deliver ITT, and who do so exceptionally well, will be reliant on the availability of larger providers who are willing to enter into partnership with them. Local conflicts of interest and potential for exclusive arrangements (which we have already started to see between some MATs and ITT providers) could mean that exceptionally high-quality provision is lost from the system.
5. Similarly, local providers may choose to exit the system if they are unable to negotiate terms which are acceptable to them with an accredited provider. In both cases, this could mean teacher supply is adversely affected in localised areas due to the lack of provision to support them.
6. School placement capacity within the system is extremely limited and, as we saw with the onset of the pandemic, is fragile and susceptible to break down in times of crisis. Smaller providers, who have extremely close networks of schools within their partnerships, are more able to manage these types of changes and are able to maintain continuity of provision. The loss of small providers who hold their own accreditation will erode these relationships and mean the system is much less agile in the face of unexpected change. Furthermore, many schools offer ITT placements as a direct result of the trusting relationships they have with local partnerships. We fear that a move towards larger, more distant (both in terms of geography and philosophy) institutions may prove to be a barrier to some schools continuing to engage, representing a further threat to placement capacity.

Qualified Teacher Status and the PGCE

17. Please provide any comments you have on this proposal.

Broadly, we agree with this proposal, although we do not consider that it is a deviation from the avenues that are already open to accredited providers who are already able to (and in nearly all cases do) partner with an HEI to offer an academic award.

In a recent survey of NASBTT members, 81% told us they were very happy with their PGCE provider (*NASBTT Survey of members, February 2021: collated responses from 62 providers*).

We would urge the government to carefully consider the international recognition given to any new PGCE programmes they may introduce through the IoT or elsewhere. It has been our experience that, even with close partnerships between HEIs and SCITTs leading to an academic award alongside QTS, many countries will not recognise the qualification if the two parts are awarded by two separate organisations. International recognition does not follow automatically from the inclusion of an academic award and the status of the IoT, which is as yet untested, may exacerbate rather than improve this challenge.

Routes into teaching

- 18. 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.**

In respect to employment-based routes in particular, we anticipate that the biggest barrier to overcome may be the intensive placement requirement. Schools who employ trainee teachers in an unqualified role are, understandably, reluctant to release them from their paid responsibilities and additional time spent in an alternative placement represents time in which they cannot undertake their paid duties in their employing school. The report's recommendation that providers of salaried routes consider replacing the second placement with an intensive placement could provide a solution to this, but we must be careful not to design a deficit into the employment-based route which sees trainees receive a less rich ITT experience which limits their experience and subsequent employability.

Accreditation

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

We fundamentally reject the recommendation for all providers to undergo a reaccreditation process and believe that it represents a serious threat to teacher supply and the sufficiency of provision.

The report presents no credible evidence that current provision does not have the capacity to deliver the quality reforms recommended in this report. There are significant risks attached to a process of reaccreditation and no measurable reward that we can see that would make taking these risks worthwhile. We believe that existing accredited providers are well placed to deliver the quality reforms set out in this report without the need for widescale structural reform. We recognise that, in some cases, adaptation and collaboration will be needed but are confident that the sector can work in this way and rise to the challenges posed by the recommended approaches to curriculum design and delivery.

The risks associated with enforcing a reaccreditation process are wide ranging and, most notably, present a real and immediate threat to the teacher supply chain. The speed at which implementation is being suggested exacerbates this risk enormously and could lead to a catastrophic lack of provision nationally, the decimation of local provision and the loss of shortage and specialist training routes from the ITT landscape.

Accredited ITT providers are already subject to a cycle of robust and rigorous quality assurance through their initial accreditation, DfE auditing and the Ofsted inspection cycle. There is no evidence presented in this report, or elsewhere, to suggest that this cycle of quality assurance is failing. By forcing an additional lengthy, costly and burdensome process on ITT providers, the government would be undermining the sector and calling into question its own quality assurance mechanisms. It would also introduce an enormous burden on a sector which is already under immense strain following the need to support two successive cohorts of trainees through the global pandemic with all the disruption it brought to the sector, and the introduction of the CCF which has involved entire curriculum redesign and implementation.

A reaccreditation process runs the risk of losing exceptional providers from the system in one of two ways: it is possible that some ITT providers will simply not have the capacity and resource to be able to dedicate additional time to a burdensome process. The school system is under immense strain, with CEOs and headteachers making difficult choices about the systems they can continue to support. The introduction of a reaccreditation process at the same time as the sector is attempting to recover from the pandemic and facilitate the national roll out of the ECF, may well mean that providers simply choose not to submit to an unnecessary process of reaccreditation, with the loss of high-quality providers from the system as a result. Alternatively, providers may attempt to undertake the reaccreditation process but, given the unachievable timescales in which they will have to do so, may fail to meet the requirements of a paper exercise, despite being high-quality providers of ITT.

We would further urge the government to set out a fully costed model for the reaccreditation process and consider whether it would represent good value for money given that all accredited providers are already subject to a robust and rigorous quality assurance process. We would also wish to see the plans for where the capacity exists within the DfE to undertake such an enormous process at such short notice and seek to understand how this process will be designed to identify quality ITT provision from a paper-based exercise more effectively than Ofsted are able to do through their full inspection process.

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

This does not represent a significant deviation from arrangements that already exist and, in principle, we would support this recommendation. However, we would require more detail of the nature and circumstance under which mergers may be brokered before we can comment in full.

22. 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.

If a reaccreditation process is introduced, the timescale will, in our opinion, pose an enormous threat to the teacher supply pipeline and will risk the loss of high-quality provision from the system. The quality requirements set out in this report are, by the authors' own admission, ambitious ones. If they are genuinely to be achieved, there will need to be sufficient time and

resource provided for curriculum design and development, the development of new partnerships and relationships with key stakeholders and robust internal quality assurance measurements. The current proposals allow just five months for providers to undertake all of this work and complete the accreditation process itself. We do not believe that high-quality outcomes can be achieved in this timescale and a rushed approach runs the real risk of low-quality provision, the loss of key providers from the sector and large gaps in provision by phase, subject and geographical location.

If reaccreditation is removed from the proposals, we believe that delivery of the quality requirements can be achieved by September 2023. If the quality requirements were published in full in November 2021, this allows almost a full academic year for partnership development, contract negotiation, curriculum design and quality assurance in time to have a clear understanding of the programme structure in time for recruitment to start in 2022. There would then be a further full academic year to test the new curriculum and learn what works well and where improvements need to be made, leading the way to a full roll out in 2023 with all quality measures fully embedded and partnerships firmly established, allowing for a smooth transition and proven, quality assured, high-quality programmes in place.

Teaching school hubs

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

We fully support the involvement of Teaching School Hubs as partners within high-quality ITT partnerships. Some Teaching School Hubs already have a key role within local ITT provision and others are exploring ways to support existing provision within their regions. We would encourage the sector to continue to work in this collaborative, collegiate way; recognising where expertise, experience, credibility and capacity already exists and working within existing structures and partnerships. Careful consideration will need to be given to the capacity of Teaching School Hubs, particularly in their first few years of operation as they become established, so that the strategic roles assigned to them are not burdensome and do not detract from their other key priorities. It will also be important to work closely with existing providers, acknowledging that there is extensive expertise and ITT experience that exists across a number of different configurations of organisations and partnerships.

ITT as a system-wide responsibility

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

Whilst we broadly support any efforts to increase school involvement in ITT, we would urge caution in taking blanket approaches to incentivise partnership working without very carefully testing these conditions with schools and trusts first. There may be very valid reasons for a school or trust to choose not to engage with ITT for a period of time: they may not have the capacity or expertise to support effectively, could have other key strategic priorities which must take precedence, or they may feel that they are supporting large numbers of ECTs which is limiting the mentoring capacity they can offer to an ITT provider. School placement opportunities are one of the most fragile aspects of ITT provision and so we fully support the

ambition to encourage more schools to engage more frequently and at a deeper level; however, we must take care not to introduce compliance measures which inadvertently lead to a surface-level 'tick-box' approach to ITT involvement which, in the long run, would undermine rather than improve provision. We, therefore, support this recommendation with caution and advise that significant additional testing and consultation takes place before the recommendation is adopted.

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

A more measured approach might be to encourage schools who have been identified as having expertise and capacity (either through their Ofsted inspection or through local knowledge through the Teaching School Hub or Regional Schools Commissioner) to engage in ITT as part of their cycle of improvement priorities. Schools might also be encouraged to engage in ITT through additional funding, which would allow them to build the capacity and expertise needed to effectively support the system. More broadly, there is an important role for government and the wider education sector to play in developing cultures within schools which recognise the value that involvement in ITT can bring: offering broad and deep partnerships with other schools; access to up-to-date research and approaches to support school improvement priorities and opportunities to develop and retain staff by offering additional roles and responsibilities beyond traditional career paths. Government, Regional School Commissioners and the Teaching Schools Council could be doing more to celebrate school involvement in ITT, showcasing its benefits and celebrating schools and system leaders who make a difference in this space.

Recruitment and selection

29. 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.

We do not see any proposals in the report which would directly improve, streamline or remove barriers from the recruitment and selection process. If the intent of this report (not directly expressed) is to significantly reduce the number of accredited providers in the system, it does not automatically follow that the recruitment process will be any less complex or demanding on time and resource. The simple fact is that robust recruitment processes take time and significant resource. If a model were to be introduced which had large, centralised, accredited providers at its core, there would still be a need to provide a venue, staff and administrative time for the same number of recruits, at a local enough level that travel times do not become an additional barrier to potential applicants. Irrespective of who holds accreditation, the same number of people, the same amount of administrative work and the same number of venues will be needed to achieve this. In fact, the reality of adding additional layers into provision could exacerbate costs as some administrative functions will be multiplied (for example, the checking of documentation would need to be done at the point of interview, collated and then shared in a suitable format to the lead provider who will need to process and store this data, in line with GDPR arrangements, at a location separate to the one in which the interview took place). The additional need to communicate processes between different parties within a large partnership adds administrative burden rather than reducing it.

We are further concerned, as expressed elsewhere in this response, that a move away from local provision, which is attractive to local applicants, will bring an additional barrier to applicants who are unlikely to wish to travel further distances for central training or intensive placements. Many small providers serve a very specific need which offers the opportunity to train to be a teacher to a diverse range of applicants who would be unwilling, or unable, to attend training at a distance from their localities. If the recommendations in this report are moving the sector towards a model which encourages economies of scale, rather than localised provision, many applicants may be unable to apply, posing a further risk both to teacher supply and to the diversity of applicants we attract to the profession.

These risks can be mitigated by recognising the vital role that small accredited providers play within the larger ecosystem, and ensuring that the sum total of these recommendations do not lead to a system where local provision is relegated to operating in a junior delivery role to larger institutions who will not be able to meet local needs due to financial, efficiency-driven approaches to the provision of ITT. Smaller, school-led providers must be enabled to retain their accreditation and continue to offer the high-quality provision they have established within their local communities.

Impact assessments

30. 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.

Whilst we do not believe the quality requirements themselves will have a direct impact on equality or rural schools, we do have grave concerns that the proposals for implementation, and in particular the introduction of a reaccreditation process, could have an enormous detrimental effect.

We are extremely concerned that the language throughout the report leans towards a suggestion that the quality requirements can only be delivered effectively if they are developed at scale. We have set out elsewhere in this response our firm belief that providers of all sizes will be able to deliver the requirements, providing they are given the time and support (through collaborative working) to do so. However, we remain concerned that, as it is currently pitched, and in particular if a reaccreditation process is to be taken forward, small providers will be disproportionately affected by the proposed changes. The loss of small providers as accredited ITT providers would represent a huge loss to the ITT sector as a whole but, in particular, could be catastrophic for rural and hard to reach communities. In many instances, the smallest providers, who we believe are at most risk from the proposed reforms, exist because they fill a very specific local need. In many cases, they may be the only supply of teachers into the schools in their area and are heavily relied upon to provide local solutions to local applicants who go on to work in local schools.

We know from DfE research that applicants are most likely to make a choice about their ITT provider based on its geographical location. Put simply, they are concerned with whether they can travel to their provider and placement schools in a reasonable timeframe and at a reasonable cost. The loss of small, local providers will significantly reduce the supply of applicants from hard-to-reach, disadvantaged and rural areas who will not be able to travel longer distances, or pay for expensive means of transport, if their local provider is no longer available to them.

Equally, rural schools, schools in hard-to-reach areas and schools in disadvantaged areas are unlikely to be attractive to applicants who have applied to a large provider who is geographically local to them, but at a distance to those schools. If local providers were to lose their accreditation, they are unlikely to be able to partner with larger institutions who are located at a distance from them (even if they are their next-nearest provider) as individuals applying to those providers will be seeking placement opportunities closer to home. Those rural, hard-to-reach and/or disadvantaged schools will then lose their supply of trainees, ECTs and, potentially, experienced staff who were attracted to working as mentors. This, in turn, will disproportionately impact the pupils in those schools.