

## Initial teacher training (ITT) market review: Russell Group response

NB Numbers on the online form do not tally with the numbers in the pdf you can download – so in the online version number 7 below is number 11.

### Part One – About You

Questions 1-6 are for gathering data about the respondent.

### Part Two: The Quality Requirements

**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.**

All Russell Group universities are continually working to sustain and further improve the quality of their Initial Teacher Education (ITE) programmes as part of a cycle of quality assurance and development. In high-quality ITE provision these discussions are framed around the programme as a whole and quality in this context is defined as the process through which people are inducted to become professional and competent teachers.

We endorse the UCET<sup>i</sup> statement on the intellectual base of teacher education and the aspiration that ITT programmes should be designed and delivered in such a way as to equip new teachers to be:

- **competent and confident professionals** who recognise and understand that educating is a professional, thoughtful and intellectual endeavour and who are able to learn from research, direct experience, as well as other sources of knowledge.
- **epistemic agents, acting as independent thinkers** who are able to analyse and interrogate evidence and arguments, drawing critically and self-critically from a wide range of evidence to make informed decisions in the course of their practice.
- **able to engage in enquiry-rich practice** and have a predisposition to be continually intellectually curious about their work.
- **responsible professionals** who embody high standards of professional ethics.

We would question that the list of themes set out in the Market Review (MR) report and detailed above is reflective of the current evidence base for high-quality professional learning for teaching and how the best international teacher education systems support such professional learning.<sup>ii,iii</sup> **It would be helpful if Government could identify the evidence base behind these themes in its response to the MR; especially in cases where Government decides to base its recommendations on the premise that these are drivers of quality.**

**We are also concerned that in listing these themes there is an implicit assumption that high-quality provision can be reduced to individual elements of delivery that themselves indicate quality and would recommend the Government takes a more holistic view.**

## **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?**

Instead of the list described, **the premise of this review should be a clear articulation of the Government's vision for high-quality coherent ITT provision.**<sup>iv</sup> In doing so, we would encourage Government to consider the internationally recognised evidence base to understand what quality ITT provision looks like and build on the excellent practice that already exists.

We believe that as well as an ambitious curriculum, high-quality ITT is based upon mutually empowering professional partnerships and collegiality. High-quality teacher education is also sufficiently flexible to be constantly evolving and responsive to both what is established in the field and emerging knowledge generated by national<sup>v</sup> and international evidence.<sup>vi</sup>

**In its approach to improving quality, we would urge the Government to focus not on the 'how' of provision but instead to consider the benefits of principles-based regulation of the market that focuses on outcomes rather than prescribing an approach.** This would be in line with the OfS' approach to regulating higher education providers.<sup>vii</sup>

We acknowledge the need for agreed national standards for example, as set out in the MR, such as those required for the award of qualified teacher status (QTS), and agree that ITT partnerships need to design and develop a curriculum that prepares trainees to meet these standards. **However, providers should have autonomy over how they meet these standards especially in regard to the curricula they set and the manner in which courses are taught, supervised or assessed. The right for autonomy in these areas is protected for all English higher education providers through the Higher Education and Research Act (2017).**<sup>viii</sup>

The model suggested in the MR proposals is problematic as it encroaches on this autonomy and threatens our universities commitment to academic freedom. Specifically, our concerns relate to the high level of prescription proposed around what is considered to be appropriate knowledge, a learning sequence and a model of delivery, assessment and mentor training.

We are also concerned about the MR's over-reliance and focus on the Core Content Framework (CCF), especially given the proposed regulatory requirements associated with this. It is crucial that there is enough flexibility for providers, when setting curricula, to consider local partnership needs and to reflect and contribute to an evolving and emerging international research base.

Our final reflection on this question is that it will be important for Government not just to identify the challenges to achieving its vision for high-quality, coherent ITT but to consider where in the

market these issues exist. **We would question the need for widespread change, when it may be quicker and more effective for Government to focus on areas of the market which are not satisfactory.** This would enable Government to achieve its goals in a less expensive, disruptive and burdensome manner and in a way that would be more likely to get buy in from schools and the ITT sector.

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

See answer to question 8 for our suggested alternative approach for Government to achieve high-quality coherent ITT provision. On the challenges specifically (or the list of themes identified by the MR as being important features of ITT that are often challenging to achieve), the evidence base behind these is unclear and so it is difficult to suggest meaningful alternatives to overcoming these.

## **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.**

a) We question the evidence base that the envisaged intensive practice placements lead to high-quality ITT and to professional learning that will underpin the realities of life in the classroom. The model appears on the surface to relate to skills development through repeated practice. There is evidence to suggest that such an approach does not lead to sustained professional learning, especially when learning to be a teacher<sup>ix</sup> and the approach has been critiqued by experts in the field of teacher education.<sup>x</sup>

We also question the premise that providers can isolate techniques and assume that practising a particular approach will then be effective in all classrooms in all contexts. This would only be effective if all schools that the trainees go on to work in follow the exact same approaches to classroom management and to pedagogy. We believe this counters the Government's agenda to support school autonomy and a self-improving school-led system.

b) We consider the lack of an evidence base to be the principal barrier to implementing this proposal. In terms of practical barriers, we would be concerned about the capacity of schools, in particular primary schools, to host these placements. There would also be many logistical challenges for providers, schools and trainee teachers, for example to arrange accommodation and travel. The requirement also might be a barrier to undertaking the training for those trainees with family or caring responsibilities.

We are concerned that this model would create a hierarchy of schools, where those larger (and likely urban-based) schools able to host intensive placements would be perceived as higher quality. There is a danger this could impact on the attractiveness of schools in more rural areas, with knock on consequences for the pipeline of teachers in these locations. **We do not believe this is Government's intention and would strongly recommend it reconsiders the proposal of intensive practice placements to avoid this outcome.**

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

The time allocations proposed by the MR would be problematic to many Russell Group universities providing ITE and could jeopardise their school partnerships. Current requirements state that postgraduate trainees spend 120 days in schools on placement. The proposals would increase this to 140 days, and also set out minimum time allocations for other aspects of the course in a granular and prescriptive way.

The evidence base behind the minimum time allocations as set out in the MR is not clear. We also don't believe that the MR has given adequate consideration to the impact on university-based training. We are concerned that the reduction in time spent in university-based training (by approximately two weeks given the planned increase in course length to 38 weeks) will erode subject and age-specialist teaching. The proposals will also compromise the ability of our universities to ensure consistently high-quality provision for trainees undertaking placements in a wide range of different settings.

Furthermore, this approach limits the ability of our universities to work in high-quality partnerships to design programmes that reflect the needs and priorities of each member of the partnership. The minimum time allocations could also likely cause capacity issues for our partner schools and there would be funding implications for both providers and schools.

The time allocations also fail to consider individual learner needs. There are many examples of partnerships working to develop a bespoke approach to the needs of individual trainees to allow them to make progress towards the teacher standards over time. By not allowing for these individual considerations there is a risk of trainees failing to complete the course.

Increasing the course length to 38 weeks would require revised internal accreditation, which may not be possible given the short time frames proposed and in the context of an institution's own regulations, Statutes and Ordinances.

Taken together, we think the minimum time allocations would be very difficult for many Russell Group universities and could jeopardise the continuation of their ITE provision, with knock-on implications for teacher supply in England. **We would therefore strongly encourage Government to further consult the sector before introducing any minimum time allocations to ensure these are reasonable and sufficiently flexible to accommodate different partnerships.**

**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.**

We acknowledge the need for agreed national standards, as set out in the MR, such as those required for the award of QTS, and agree that ITT partnerships need to design and develop a curriculum that prepares trainees to meet these standards. However, providers should have autonomy over how they meet these standards especially in regard to the curricula they set and the manner in which courses are taught, supervised or assessed. The right for autonomy in these areas is protected for all English higher education providers through the Higher Education and Research Act (2017).<sup>xi</sup>

We are concerned that proposals around how the CCF should be used in curricula design encroach on this legal right of institutions to have autonomy over the content of their courses. We also consider that the proposals may be interpreted in a way that restricts the ability of providers to support individual learners' needs, the needs of local partner schools, and to reflect and contribute to an evolving and emerging international research base. Whilst we don't think is the intention of

the proposals, it could be an unintended consequence and Government should take steps to mitigate this.

For example, recommendation 1 of the MR states that ‘providers of ITT should develop an evidence-based training curriculum as a condition of accreditation which allows trainees to understand and apply the principles of the CCF in a *controlled, cumulative and logical manner*, as set out in the Quality Requirements’. We are concerned that such a proposal could be interpreted as not allowing for curriculum design that can adapt to support trainees with a range of different professional and personal skills and experiences. This is contrary to the design principles within the National Professional Qualification for Leading Teaching (NPQLT) where there is emphasis on the need to design professional programmes that diagnose ‘what teachers know and can do’<sup>xii</sup>.

**Government should reassure institutions that sufficient flexibility exists in the application of the CCF to enable them to develop curricula that support individual learners, high-quality partnerships and to accommodate emerging international evidence.**

#### Special educational needs and disabilities (SEND) specialists

The MR also mentions provision for the development of SEND specialists (paragraph 30, page 12). Whilst we are supportive of a specialist pathway in order to solve unfilled vacancies in special schools, without a full review of how to resource infrastructure of specialist teachers in every school, we would be concerned that schools and families would be set up to fail. There are four fundamental challenges that need to be addressed:

- **We should not circumvent the SEND review:** the SEND Review<sup>xiii</sup> is still ongoing. Government should wait for the recommendations of this review before making changes to ITT in this space.
- **The principle of ‘Every teacher is a teacher of SEND’ must not be put at risk:** much work has been done to improve the universal offer to integrate SEND into ITT practice, and there is opportunity for far more to be done in this area. Whilst in the short term we can see the desire for a funding amount to be applied to a specialist pathway, this must not be done at the expense of inclusion and SEND in the universal offer. This would put at risk the ambition for every teacher to be a teacher of children with SEND, creating a potentially divisive two-tier system and exacerbating the current postcode lottery of provision.
- **‘Separate’ pedagogy will not scale:** how will the pedagogy be distinct from the universal offer? We need a system that teaches the child, whatever the context. We need ITT courses that will stretch, challenge and develop teachers to work in both settings.
- **Labelling teachers reinforces current systemic biases against SEND pupils:** the evidence from the classroom, where labelling, segregating and separating creates poorer outcomes for children, must not be hard wired into the system.<sup>xiv</sup>

#### **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.**

All providers within the Russell Group ITE network have developed sustained ways of working with mentors in their partner schools. A key component of this is a shared understanding of the programme content and structure which has been usually co-designed with representatives from all elements of the partnership. Mentors are based in schools and have subject and/or phase expertise, as do the university tutors. It is important to state that, whilst we value the importance of mentoring

it is only one of a range of approaches that we draw upon to support beginning teachers to learn to teach.

Proposed requirements in the MR are problematic because they jeopardise these established relationships between providers, schools and mentors. We are especially concerned about requirements set out in 2.1 (that providers must demonstrate how they will recruit and train sufficient mentors to ensure that every trainee receives their entitlement of 2 hours per week of mentor support) and 2.7 (providers must ensure that mentors receive enough time to attend the required training and discharge the mentoring entitlements). These requirements are beyond the scope of university providers who have no authority over staffing decisions within schools. School leaders select mentors based on a range of factors. Partnership agreements will stipulate the amount of mentoring time that each mentor spends with their mentee and the requirement for attendance at mentor training, and whilst providers can monitor this the ultimate decision about how far this entitlement is being realised resides with the school leaders. We also have concerns that the model underpinning the proposed mentor training programmes would be problematic for schools given they often work with a range of providers. **We therefore strongly recommend that the Government reframes the proposed quality requirements as set out in 2.1 and 2.7 (page 44) of the MR to ensure that these are set out as ambitions that schools should be encouraged to meet but to remove any requirement on providers to be responsible for these aspects of mentor training.**

The proposal for Lead Mentors also risks creating a perceived hierarchy among schools, with those larger, and likely urban-based schools, being more likely to host Lead Mentors (who would have responsibility for intensive placements) and therefore potentially being seen as higher quality training destinations. The proposals state that the Lead Mentors would be responsible for the quality assurance of other mentors and oversight of trainee progress throughout the year (2.7, Box 3). This would mean Lead Mentors having a role in schools they do not work in and again creating a perceived hierarchy within our partnership schools. This could put at risk the reputation of smaller schools and those in rural areas and impact on future teacher supply. **We would ask Government to reconsider the proposals for Lead Mentors and if it does intend to proceed then to work with schools and providers to ensure any unintended consequences are minimised.**

We agree that mentors should have an entitlement to mentor development and training and we support the recommendation for this to be funded. Many Russell Group ITE providers have already developed long-standing, high-quality and highly regarded mentor training programmes, some with Master's level accreditation. Where our school partners feel that these existing programmes are more appropriate, and higher quality, than the NPQLTD this should be supported as these will be more reflective of the needs of the local partnership and responsive to regional priorities.

We are therefore concerned about the prescriptive approach for mentor training as proposed in the MR. For example, 2.7 box 3 describes the requirement that all Lead Mentors must complete National Professional Qualifications (NPQs). We do not believe that this approach will allow for mentoring that will support professional learning tailored to the training teacher's individualised needs.<sup>xv</sup> The proposals in the MR are a missed opportunity given the wealth of expertise and evidence about approaches to mentoring and coaching that are not reflected in the evidence cited in the MR documents.<sup>xvi,xvii,xviii</sup> **We would ask that Government considers this evidence base and supports a flexible approach to mentor training.**

## 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.**

All Russell Group ITE programmes have developed appropriate assessment frameworks for both progression towards the Teachers' Standards<sup>xix</sup> and for demonstration of learning required for the academic award. Recall of knowledge of the CCF and practising teaching techniques, as proposed by the MR, is insufficient for assessing the development of learning to teach and becoming a teacher. The complex nature of the specialised knowledge and understanding a teacher develops, requires the assessment of student teachers in a holistic manner. The proposed model of assessment also does not accord with expectations of what is necessary to meet the standards of learning at level 7 in higher education settings.<sup>xx</sup>

It is notable that the proposals effectively re-orientate current formative assessment practices towards trainees' demonstration of knowledge of the planned curriculum and away from the Teachers' Standards. The proposals seem to assume that the ability to evidence knowledge of the curriculum will lead to progression towards the Teachers' Standards (para 3.3, page 48) and contradict the CCF which states that 'Trainee teachers will not be expected to collect evidence against the ITT CCF, and they will continue to be assessed against the Teachers' Standards only.'<sup>xxi</sup> Recent inspection of ITT provision suggests that Ofsted are now judging providers on their assessment practices following the model within these proposals rather than the CCF which is a concern given Government has yet to respond to the MR and has not endorsed these proposals.

**The prescriptive nature of the proposals threatens the autonomy that higher education providers have in regard to assessment which is legally protected through HERA (2017).<sup>xxii</sup> We recommend that Government does not endorse recommendation 6 of the MR.**

### **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.**

Existing high-quality ITT is predicated upon models of systematic quality assurance and evaluation. Russell Group providers have well-regulated mechanisms of quality assurance for professional learning and progression towards QTS and for academic learning at Master's level. Paragraphs 4.1-4.8 (page 51) of the MR are usually incorporated into partnership agreements. To impose a highly centralised model of quality assurance would jeopardise established and successful ITT partnerships.

### **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.**

The MR does not fully acknowledge that existing high-quality provision is based upon high-quality partnerships. Put simply it is impossible to offer high-quality teacher education without strong partnerships. These partnerships have developed over time and are based on mutually reciprocal relationships with commitment and investment from all stakeholders. The proposals and recommendations pose significant threat to these models of partnership through both the

imposition of the intensive placements in selected partnerships schools, the work of lead mentors from selected schools in other partnership schools, and the restructuring of partnerships in the three-tier model. If these existing partnerships are destabilised, high-quality provision will also be destabilised.

Paragraphs 5.1-5.10, page 51 of the MR contain details that would be developed in collaborative discussions with key stakeholders in Russell Group ITE partnerships and are encapsulated in partnership agreements which are regularly reviewed by representatives of all stakeholders to ensure that the needs of all involved in the training programme are met. It is difficult to say much more at this stage until more detail is revealed about the intended size and scale of the reformed ITT landscape but there are real risks to losing providers and school partners and placements which could have an impact on teacher supply.

## **Qualified Teacher Status and the PGCE**

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

We believe that it is right that all trainee teachers should have the opportunity and fair access to gain an academic award alongside QTS, particularly at the Master's level. It is already the case that university ITT providers are able offer both undergraduate and postgraduate qualifications.

The quality of Russell Group universities' PGCE programmes is recognised at local, national and international levels, as highly effective models of teacher education and training. PGCE programmes are supported by the research infrastructure of universities, where innovation and international collaborations facilitate high-quality research-led teacher education. **We do not believe that a similar research infrastructure exists at the Institute of Teaching and would therefore be concerned about the academic integrity of these awards and the potential impact on the UK's international reputation for high-quality PGCEs. We recommend that Government rejects recommendation 8 in the MR and does not give postgraduate awarding powers to the Institute of Teaching.**

The content of academic awards is beyond the scope of this MR, and we would resist any prescription to the content of an academic award as implied by paragraph 67, page 22 of the report.

It is concerning that these proposals might undermine PGCE delivery at Russell Group universities by suggesting that courses are not value for money and that alternative providers are more cost effective. A 2021 survey by NASBTT found that 81% of SCITTs were very happy with their PGCE provider.<sup>xxiii</sup> We consider that references in the consultation document on the costs and benefits associated with existing accreditation arrangements are misleading and inaccurate. Postgraduate ITE programmes often cost the same to deliver whether they are associated with an academic award or not.<sup>xxiv</sup>

## **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.***

The majority of the Russell Group ITE provision is postgraduate ITT fee-funded. Through consultation with colleagues our response to this question concurs with the UCET response which is as follows:

“The scope for student teachers on employment-based programmes to participate in intensive school placements will be limited because of their teaching responsibilities and the legitimate expectations of their employing schools. For those on apprenticeship programmes, care will have to be taken to ensure that the new requirements do not conflict with the detailed, inflexible and byzantine rules that apply to apprenticeships more generally. Employing schools will, if they are to continue their involvement in salaried ITT programmes, have to be compensated for any additional time (over and above existing 2-school placement requirements) their employees spend in other schools.

A number of employment-based providers, including some universities, provide high-quality and bespoke ITT in partnership with employing schools, sometimes at a modest scale. These programmes make an invaluable contribution to teacher supply and quality in their areas. It is difficult to see how such provision would fit to the proposed market structures.

The implications for undergraduate programmes are complex and will have to be subject to careful and detailed discussion. Increasing the amount of time undergraduate ITT students spend in schools will have implications for the configuration of whole programmes, and will reduce the amount of time available in university for students to spend on the development of subject knowledge and expertise in key areas such as SEND and child development.”

**19. Please provide any comments on any indirect impacts on provision of a) early years ITT and b) further education ITT if these recommendations were to be implemented.**

We agree with UCET’s response to this statement. Around 34 education departments in higher education institutions are responsible for training around 5,000 teachers for the further education and skills sector each year at Level 5 or above.<sup>xxv</sup> In addition, accredited ITT providers train some 500 EYITT teachers each year. If universities withdraw from providing ITT for prospective school teachers, because they either voluntarily withdraw or do not meet the new accreditation criteria, most of this provision will be at risk, as it is unlikely that education departments with HEIs would continue to operate in the absence of QTS programmes.

**Accreditation**

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

The need for previously accredited providers to “reapply” for accreditation would require ITT programmes to go through a robust business case analysis at the university level. This involves financial scrutiny, and should the programmes not be deemed to be financially viable (or less financially viable than other programmes – it should be noted that recruitment of an undergraduate student brings 3 years of tuition fees and fewer compliance and placement costs), the risk is that the university will withdraw and not seek accreditation. This will have a negative impact on teacher supply for the localities in which that university is located and currently serves.

We would be concerned about the level of burden imposed on providers, that comes with a re-accreditation process. Re-accreditation takes time but with the proposed timescale it appears to be a ‘tick-box’ exercise that will bring unnecessary cost and burden to providers, schools and

Government and will cause uncertainty and anxiety for current and prospective trainee teachers. **To avoid this, we would ask Government not to proceed with a reaccreditation process but instead use existing mechanisms (through Ofsted) to identify and target low quality providers.**

**Russell Group institutions want to work with Government to ensure high-quality provision across the sector and to find a solution that raises the standards of lower quality providers.** Establishing and funding a system of provider-to-provider support to enhance provision where low-quality is identified could bring about more immediate improvements.

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

It is difficult to imagine a scenario where universities' governance structures would allow them to be mandated into working with other providers in the ways suggested in paragraphs 90-91 of the MR (page 28). We would also question the legal basis of Government requiring this. It is crucial that universities are able to retain autonomy over decisions about whether to accept or provide support to another institution. **We believe that there are already sufficient levers in place to intervene when providers are failing to comply with aspects of the Quality Requirements, such as re-inspection by Ofsted, and these should be used instead of mandating partnerships or directions from the DfE. We recommend Government rejects these recommendations of the MR.**

**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.**

The planned timescales, especially if ITT providers have to go through a re-accreditation process, are unworkable as programmes will need to be re-designed and submitted through institutional validation processes. At Russell Group universities this can take between 9 months and 2 years, which means it may already be too late for a September 2023 start.

Furthermore, under Competition and Markets Authority (CMA) regulation, programme details must be published before students apply for courses. For the 2023/24 cohort who would be starting in September 2023, we would need to have programmes approved and be marketing these to prospective students from autumn 2022.

### **Teaching school hubs**

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

Russell Group institutions work in partnership with a range of schools and Multi-Academy Trusts (MATs) and in many cases with Teaching School Hubs (TSHs). We would hope and expect to maintain these relationships in their current form (i.e. for the differing roles of individual stakeholders within these partnerships to continue to be negotiated at the local level), but as noted elsewhere in this consultation response, several of the MR's proposals would threaten this. In considering the future role of TSH's, Government should be mindful that the geographical limits of their activity does not inadvertently impose barriers on ITE providers working across different regions.

### **ITT as a system-wide responsibility**

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

Our response accords with question 26.

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

The best incentive is for programmes to be negotiated at the local level, as is the case in most Russell Group ITE partnerships. In this way all elements of the partnership are co-designed to consider the individual needs of partners and ensure the ITE programme best serves the needs of the region.

**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 are concerned that the MR proposals will destabilise the ITT landscape and negatively impact prospective student confidence in ITT. This could lead to fewer providers operating in the market and decrease student demand for ITT (especially in rural areas for reasons identified in our answers to questions 10, 13 and 30 of this consultation). Taken together these outcomes would have a detrimental impact on teacher supply.

**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.**

**(b) We are concerned that the MR proposals will have a detrimental impact on teacher supply to rural areas, particularly in deprived rural communities, which would go against Government's 'levelling up' agenda.** These are already areas to which it is challenging to recruit teachers and schools serving these communities do not always have the capacity to engage in teacher training.

These challenges will be exacerbated if teacher training placements within these areas are reduced, as a) trainees who are from the local area may need to move elsewhere to train, whereas they currently can train locally and are then employed locally, and b) trainees from out of area who are placed in schools in rural communities are known to take up employment and settle in these regions.

It is for these reasons that Russell Group universities currently work in partnership to support teacher training placements that respond to local needs without the need for students, often mature career-changers already living in the region, or local students returning 'home' from university, to relocate to train to teach.

**As discussed in our response to question 10 and 13, the MR proposals around Lead Mentors and intensive placements in particular are likely to have a greater negative impact on smaller schools**

**and those in rural locations and may jeopardise their involvement in ITT and we would recommend that Government does not proceed with these proposals.**

### **Final thoughts**

**31. 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**

The Russell Group ITE network has engaged closely with national debates and discussions around ways in which to ensure that ITT in England is high-quality and subject to robust and transparent quality assurance mechanisms. We support the MR’s emphasis on the importance of relevant and robust research underpinning ITT programmes; that mentors should be recognised for their important role and that they should have an entitlement to funded high-quality professional development and training; and the recognition of the importance of coherence between centre-based and school-based training.

However, we have concerns which move beyond issues around operationalising the recommendations and proposed timelines for this process and which are about the substance of the proposals themselves. The proposals confuse quality with uniformity and propose a prescriptive training model which threatens existing high-quality provision and teacher supply.

The proposals are predicated upon a prescribed model of teacher training covering curriculum, content, partnership activity, assessment and mentor training which equates to a national curriculum for teacher education. This is underpinned by adherence, monitored by Ofsted, to the CCF, Early Career Framework (ECF) and NPQs for which the evidence base is restricted and partial. Subject experts across the sector have critiqued the generic approach within these frameworks arguing that it is only by firstly acquiring subject and phase specialist pedagogical expertise that a teacher can consider aspects of the CCF in any meaningful way.<sup>xxvi</sup>

Professional learning is based upon critical engagement with research, both that which is already established and that which evolves during a teacher’s career. An over centralised model of teacher training based on limited evidence threatens the professional status of teaching and the nation’s contributions to the international research and evidence base in the field. The international reputation of English teacher education will suffer as a result, with high-quality applicants choosing to study in the other UK nations or abroad.

There is a very clear risk that, in England, the professional body of teachers will in future generations be replaced with a body of executive technicians.<sup>xxvii</sup> Such an outcome would make teaching an occupation that is unlikely to attract high-quality graduates; would provide a limited and limiting capacity for schools to respond to new challenges as they arise; and would have significant long-term impacts on teacher retention and wellbeing.

Another key concern we have around the proposals is that taken together they threaten the autonomy of institutions and their commitment to academic freedom. This autonomy has enabled the development of ambitious and innovative programmes of teacher education which are highly regarded internationally. Universities have a strong commitment to teacher education through their civic aims and values. The prescription, interwoven throughout the proposals, is likely to lead to a reduced, restricted and lower quality programme of training which would not meet this civic

commitment and could lead to some universities and other high-quality providers pulling out of initial teacher education.

The MR also fails to fully acknowledge and consider that existing high-quality provision is based upon high-quality partnerships. Put simply it is impossible to offer high-quality teacher education without strong partnerships. These partnerships have developed over time and are based on mutually reciprocal relationships with commitment and investment from all stakeholders. The proposals and recommendations pose significant threat to these models of partnership through both the imposition of the intensive placements in selected partnership schools, the work of lead mentors from selected schools in other partnership schools, and the restructuring of partnerships in the three-tier model. If these existing partnerships are destabilised, high-quality provision will also be destabilised.

Russell Group universities are committed to the development of professional teachers in our regions. We work alongside, in locally negotiated and nuanced ways, other providers of teacher training in our localities contributing towards a more diverse supply of teachers in our regions. If the MR's intention to rationalise the number of providers is realised, this will be a threat to teacher supply in the regions.

Russell Group universities partner with schools in rural areas and across a wide geographical area as well as schools in identified Government priority or opportunity areas. Any threat to existing provision could pose a real threat to teacher supply in the very areas that need high-quality teachers the most.

A high-quality teacher education system should be based upon a considered discussion of the purposes of education and schooling and what kind of teachers are needed to fulfil that ambition. Ultimately, we believe that high-quality ITT programmes aim to support teachers to be able to make a sustained commitment to the profession, to inspire their pupils, and to be able to teach, and for many to lead, in contemporary and in changing contexts throughout a fulfilling career. This is what our pupils, schools and our society deserve.

As we reflect on the work of the ITT sector and our partnership schools and their commitment to their staff and pupils throughout the turbulence of the last eighteen months, we believe this is the time to celebrate and recognise the work of those in education. This is not the time for a review and potential whole scale disruption of teacher education. We join others in a call for a pause to the consultation and a reassessment of the MR's aims and approach. In so doing, we commit to working with Government, the Department of Education and the ITT sector to recognise what is working well and to collaborate where improvement is needed in our ongoing aspiration to provide outstanding teacher education.

August 2021

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<sup>ii</sup> Biesta, G (2020) *Educational Research; An Unorthodox Introduction*. London: Bloomsbury; Cochran-Smith, M. (2021) Exploring teacher quality: international perspectives, *European Journal of Teacher Education*, 44:3, 415-428, DOI: [10.1080/02619768.2021.1915276](https://doi.org/10.1080/02619768.2021.1915276).

<sup>iii</sup> Darling-Hammond, L. (2017). *Empowered Educators: How High-performing Systems Shape Teaching Quality around the World*. Palo Alto, CA: Stanford Center for Opportunity Policy in Education.

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- <sup>iv</sup> Brooks, C. (2021) *Initial Teacher Education at Scale: Quality Conundrums*. Abingdon: Routledge.
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- <sup>vii</sup> Office for Students (2020) [A matter of principles: Regulating in the student interest](#).
- <sup>viii</sup> See Part 1 (the Office for Students), section 2 (General Duties) (5) (page 2) in the [Higher Education and Research Act \(2017\)](#)
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- <sup>xi</sup> See Part 1 (the Office for Students), section 2 (General Duties) (5) (page 2) in the [Higher Education and Research Act \(2017\)](#)
- <sup>xii</sup> Department for Education. (2020) *National Professional Qualification (NPQ): Leading Teacher Development Framework*. Available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/925511/NPQ\\_Leading\\_Teacher\\_Development.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925511/NPQ_Leading_Teacher_Development.pdf). Accessed 22.7.21.
- <sup>xiii</sup> <https://www.gov.uk/government/news/major-review-into-support-for-children-with-special-educational-needs>
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- <sup>xv</sup> The frameworks underpinning the proposals for the NPQs are based upon a specific model of sequenced learning and instructional coaching rather than supporting the professional development of mentors to equip them to provide bespoke mentoring and coaching as appropriate at different stages of the trainees' development.
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- <sup>xxii</sup> See Part 1 (the Office for Students), section 2 (General Duties) (5) (page 2) in the [Higher Education and Research Act \(2017\)](#)
- <sup>xxiii</sup> <https://www.nasbtt.org.uk/wp-content/uploads/2021/07/NASBTTs-Response-to-the-Initial-Teacher-Training-ITT-Market-Review-Consultation-July-2021.pdf>

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<sup>xxiv</sup> <https://www.ucet.ac.uk/downloads/13250-UCET-Market-Review-Response-%28July-2021%29.pdf>

<sup>xxv</sup> <https://www.ucet.ac.uk/downloads/13250-UCET-Market-Review-Response-%28July-2021%29.pdf>

<sup>xxvi</sup> The CCF's reliance on cognitive science is problematic and its relevance to learning in classrooms across all subjects has been recently called into question. For example: Education Endowment Foundation (2021) *Cognitive Science approaches in the classroom: [A review of the evidence](#)*

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