

Consultation on Initial Teacher Training Market Review: Recommendations

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to a consultation on the important issue of initial teacher training (ITT). However, the brevity and timing of the current consultation has made it impossible for us to respond meaningfully by seeking the views of our members. We have made official representation to the Department for Education (DfE) for a change to the consultation period timeline and length which would mean that we, and other consultees, were given the courtesy of a meaningful consultation period: this request was declined.
3. Our following response, therefore, should not be taken as a comprehensive position on these important issues, but rather as a holding position pending the opportunity to consult with our members in the autumn.
4. We have declined to submit a response via the Online Portal as we are obliged to share our consultation responses with members, and the Portal does not allow for the necessary transparency.

B. Consultation Questions

About You

1) What is the name of the organisation you represent?

Association of School and College Leaders

2) Please tell us which of the below options apply to your organisation. You may choose as many as apply.

- a. A higher education institution (HEI) providing undergraduate ITT
- b. An HEI providing postgraduate ITT
- c. An accredited provider of school-centred ITT
- d. A School Direct lead school offering salaried training
- e. A School Direct lead school offering unsalaried training
- f. A School Direct partner school offering salaried training
- g. A School Direct partner school offering unsalaried training
- h. An organisation providing early years ITT

- i. An organisation providing further education ITE
- j. A primary school hosting ITT placements
- k. A secondary school hosting ITT placements
- l. A school not hosting ITT placements
- m. A teaching school hub
- n. A sector representative body
- o. Other interested party – please specify

We are a sector representative body

- 3) If your organisation is currently an accredited provider of ITT, how many trainees did you have in 2020/21? Please give your answer as a numeric value, providing an estimate if you are unsure of the precise figure. If your organisation is not an accredited provider of ITT or a School Direct lead school, please answer N/A.

N/A

- 4) If your organisation is currently an accredited provider of ITT, how many a) subjects and b) phases did you offer in 2020/21? If your organisation is not an accredited provider of ITT or a School Direct lead school, please answer N/A.

N/A

- 5) Which of the Regional Schools Commissioner regions are you or the organisation you represent based in?
- a. East of England and North-East London
 - b. East Midlands and the Humber
 - c. Lancashire and West Yorkshire
 - d. North of England
 - e. North-West London and South-Central England
 - f. South-East and South London
 - g. South-West England
 - h. West Midlands

We are a national organisation representing members across England, as well as elsewhere in the United Kingdom and Crown Dependencies.

- 6) Please tell us which of the below options apply to you. You may choose as many options as apply.
- a. I am currently undertaking ITT
 - b. I have completed an ITT programme within the last 5 years
 - c. I am currently employed as a teacher
 - d. I am currently an ITT mentor
 - e. I have an interest in ITT for another reason – please specify

I have an interest in ITT for another reason.

We are a professional association that represents members who both deliver ITT and provide placements for ITT students.

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

None of the above

Please provide any additional details to explain your selections.

We have not highlighted any of the key areas you have identified as we wish to consult with our elected representatives as to the priority, and importance, they place on the themes the Report has highlighted and the consultation timing has not allowed us to do that prior to the submission of our response.

It is the case, however, that all the themes are linked and will need to be considered in relation to one another rather than in isolation.

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?

We think identifying if there are key areas for improvement is crucial.

We are concerned that the evidence base for the conclusions reached in the Report has not been widely shared. This will make it difficult for us to comment on the identified themes and determine their importance.

It is our view that the identification and relevant priority of key areas for improvement in the ITT system should have formed the basis for the first engagement with stakeholders prior to recommendations being proposed.

Taken together, the review's proposals set out an overall approach to addressing the challenges identified in paragraph 18 of its report.

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

As we are not satisfied that the evidence base is available, we are not in a position at this stage to suggest alternative approaches.

This should not be taken as agreement that the proposed approaches are appropriate. The overarching principle must be that proper time is given for consultation and that proper investment is given in money and time to enable the profession to implement successfully whatever is agreed.

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.

Given the short nature of the consultation period, coupled with the fact the majority of the consultation period has been during the summer closure, we are not able to comment meaningfully on this issue at this time but reserve the right to respond in detail in the autumn.

In any event, the consultation does not provide sufficient information about what these placements will entail, and we will need to understand this in some detail before being able to ascertain whether there are implementation issues that are of concern.

To support this, we are keen to understand what independent research the DfE has considered as to the effectiveness of an 'intensive' ITT placement, and how this compares with other placement models.

We also wish to understand what assessment the DfE has done of the logistical implications of intensive placements and how this will be practicable in rural areas and in the Early Years and Primary phases. It is essential that any proposals are able to be adopted across the country.

ITT providers would also be required to design a curriculum that reflects the minimum time allocations for pivotal aspects of ITT programmes set out in the table below and on page 43 of the review's report.

ITT minimum time allocations	Postgraduate	Undergraduate
Total weeks of course	38	N/A
Minimum weeks in school placements (including general and intensive placements)	28	40
Minimum weeks in intensive placements (not necessarily consecutive)	4	6
Minimum hours in classrooms (including observing, teaching, co-teaching, etc.) each week during general school placements	15	15
Minimum hours mentoring each week during general school placements	2	2
Minimum planned and supported hours per week during intensive placement	25	25
Minimum hours of expert support per trainee per week during intensive placement	5	4
Minimum hours initial training time for general mentors	24	24
Minimum hours initial training time for lead mentors	36	36
Minimum hours annual refresher training for mentors	6	6
Minimum hours annual refresher training for lead mentors	12	12
Minimum ratio of lead mentors:trainees (FTE)	1:50	1:50

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

We are not in a position to respond to this question at this time, due to the brevity of the consultation and its timing. The proposed timings need due scrutiny and the implications of for ITT students and mentors given careful consideration.

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.

The content of the training curriculum is key. Proper time needs to be given to consultation with the profession, as well as universities and other research organisations (such as the Education Endowment Foundation) so that there is proper ownership of the profession by the profession.

That has not been possible in the consultation period, and we believe that the implementation date should be put back to allow for proper consideration.

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.

Given the short nature of the consultation period, coupled with the fact the majority of the consultation period has been during the summer closure, we are not able to comment at this particularly important issue at this time but reserve the right to comment in detail later in the autumn.

To support this, we would like to see the evidence base which supports the proposed approach of 'expert' mentors supporting trainees with the translation of research into classroom.

We must also flag that whilst we are generally supportive of high-quality mentoring there are significant implementation implications in the proposals from a school's perspective. We would like more detail from the DfE on where the time, funding and expertise will come from to ensure that the lead mentor and all mentors are trained to the required standard.

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.

The assessment of trainees is core to the success of ITT programmes. However, because of the short consultation period and its timing, we are not able to comment in detail on the proposals. To comment meaningfully we would want further clarity on the assessment responsibilities of schools offering placements.

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.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this.

In any event we would need to have a better understanding of the arrangements around the assessment of mentors and placement schools before being able to respond meaningfully.

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.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this.

We are, however, concerned about how partnerships will work effectively and have significant concerns about the fact that we will not know what the proposals will look like until successful providers' bids are available, which will be very close to changes being implemented. We believe this poses significant and unnecessary risks to the system and adds weight to the argument for a revised implementation date.

Qualified Teacher Status and the PGCE

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

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

In any event, it is our belief that these proposals would benefit from a specific consultation to allow for full engagement with the sector.

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.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

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

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

However, it must be the case that in order to support effective implementation the DfE must engage in meaningful consultation with both further education (FE) employers and FE providers of training for FE ITT. For clarity, we do not consider the current consultation to be meaningful engagement.

These organisations have many years of experience of supporting highly experienced and skilled individuals from a wide variety of industrial and commercial backgrounds into teaching at post-16 and FE levels. This includes graduate apprenticeships. We would want to consider their views before coming back with a fuller response.

A similar approach should be taken to early years ITT provision.

Accreditation

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

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

However, in order to formulate a position on this we would need to understand what evidence there is that scale through mergers can bring improvement in a cost effective and sustainable form. We would want to be assured that any system builds in effective responsiveness to local needs, not least as this has been a feature of current outstanding provision.

The review recommends that DfE formally notifies accredited providers that have failed to continue to meet all aspects of the Quality Requirements, as set out in the ITT criteria. Where providers receive a negative Ofsted judgment, it is also recommended that DfE should mandate support, or in some cases, broker mergers, between providers to ensure improvement. Further detail can be found at paragraphs 90-91 of the review's report.

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

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

DfE's view is that, if they were to be implemented, the earliest that first delivery of the Quality Requirements in a reformed ITT market could take place is the autumn of 2023. This would involve the department launching the accreditation process in autumn 2021 and potential providers establishing partnerships, gathering evidence against the Quality Requirements and applying for accreditation or re-accreditation by spring 2022. The department would then assess and recommend accreditation in summer 2022, before the end of the 2021/22 academic year. Providers would then have a further year to recruit trainees and prepare for first teaching of the new ITT courses by September 2023. An indicative timeline is set out below.

Month	Activity
Early November 2021	DfE publishes revised ITT criteria and accreditation process opens for applications
November 2021 – March 2022	Potential providers establish partnerships and gather evidence against criteria as needed
End March 2022	Deadline for receipt of applications for accreditation by DfE
Early April 2022 – Early July 2022	DfE assesses applications for accreditation

Month	Activity
Mid July 2022 (by end of summer term)	DfE notifies providers of the outcome of their applications
Early August 2022 – September 2023	Accredited providers recruit trainees and prepare for teaching of new curriculum
September 2023	First delivery of Quality Requirements

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 implementation deadline is not realistic and will put significant strain on the system at a time when schools are already focussed on education recovery.

We are concerned that the implementation target takes no account of the existing churn in the system or the practicalities.

For example, ITT partnerships would need to brief schools, engage them as stakeholders and broker their involvement at a time when their focus will be elsewhere. This will place a burden on schools that is unreasonable both from a post pandemic perspective and as they get to grips with the early career framework (ECF): which is a huge undertaking for some schools.

The unintended outcome of this is the risk that schools turn away from providers and placement numbers fall, which will have a longer-term impact of reducing teacher supply.

We will respond fully on this in the autumn when we have had the opportunity to assess all of the risks.

23) Having read 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' and the anticipated timeline, if you think that your organisation would wish to deliver ITT in the future, would your organisation be likely to apply to become an accredited provider, seek to become or remain as a lead partner, or seek to become or remain as a placement school? As stated by the review, organisations may in some cases wish to take more than one role – as such, please select as many options as apply.

- a. Accredited provider
- b. Accredited provider under certain conditions – please state what these are
- c. Lead partner
- d. Lead partner under certain conditions – please state what these are
- e. Placement school
- f. Placement school under certain conditions – please state what these are
- g. Would choose to withdraw from ITT
- h. N/A

N/A

24) If adopting a future model such as the one set out by the review, would you be looking to add more organisations to your current partnership?

- a. Yes
- b. No
- c. N/A

N/A

25) If you answered yes to Q24, would your organisation require support to identify potential partners? Please also explain what support would be needed and what barriers this would overcome.

- a. Yes
- b. No
- c. N/A

N/A

Teaching School Hubs

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

Our concern is that Teaching School Hubs are not overwhelmed in the early years of operation and want to consult with our members on what they perceive to be the risks, or indeed opportunities.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

ITT as a System-wide Responsibility

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

The issues and recommendations raised here are significant and should not be underestimated. We have concerns about how the proposals would work in practice and the impact on workload as well as the potential to distract schools from their core purpose.

However, due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

That said, in order to respond to the recommendations made by the Report on this issue, we would require more information. For example, what impact assessment has the DfE done on what the addition of another responsibility to the education inspection framework (EIF) will be on the 20% of schools which are rated currently less than 'Good'.

We would also need to understand what is meant by a multi academy trust's (MAT) 'involvement' in ITT. For example, if, 'involvement' means that MATs have to offer intensive practice placements then this is potentially problematic, and we need to understand what levers the DfE proposes to use to require involvement.

Of significant concern is that the proposals include making involvement in ITT a condition of funding for trusts. We wish to discuss this proposal with the DfE as a matter of urgency so that we can better understand their intentions and, if appropriate, put on the record our concerns about this.

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

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

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.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

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.

Due to the brevity and timing of the consultation we are not in a position to respond meaningfully to this question at this time but will consult with our members and submit comments to the DfE in the autumn.

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.

Whilst we can agree in principle to the logic of establishing a shared and minimum standard for the quality and implementation of teacher training through an agreed curriculum and training model, this will involve wide reaching system change.

The implementation proposals do not allow for meaningful engagement with all stakeholders, and the strategy appears to grossly underestimate the proper consultation, time and investment needed to ensure a measured, collaborative, and successful process of change.

Whilst this would be the case at any time, to attempt to do this in the proposed time frame at a time when schools and colleges are focussing on education recovery and recruitment and retention within the profession is reckless..

C. Conclusion

5. The issues identified and recommendations made in the Report are of huge significance to the profession and represent a fundamental change in current practice. The time allowed for consultation does not reflect the significance of the proposals. The overall timeframe for implementation is not only unrealistic but represents a significant risk to the supply and retention of teachers into the profession. This at a time when recruitment and retention is poor, and schools and colleges are in an unprecedented period of education recovery.

6. Our strong recommendation to Government is that the implementation deadline is delayed and that full and meaningful consultation in each of the core proposals is undertaken. ASCL would be happy to be involved in developing meaningful consultation and implementation proposals.
7. We look forward to discussing this in more detail as and when we have consulted with our membership.

Sara Ford
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Association of School and College Leaders
13 August 2021