

Dear Colleague

URGENT and IMPORTANT action needed re consultation on the ITT Market Review

At the end of a difficult year, we **urgently** need you to respond to the DfE's consultation about the ITE Market Review by:

- Responding to the consultation as an individual yourself (the rest of this document has support to help you to do this)
- Responding to a very short survey to inform the HA and HTEN organisational responses via this link:
<https://www.surveymonkey.co.uk/r/ITTMarketReview>.
- Writing to your MP using the templates you will find at <https://www.teachbest.education/>

We are concerned about the unintended consequences that this review may have on subject specific teacher training, and in particular on history ITT. The issues are complex and the perspectives may be varied therefore, we are collating thoughts and ideas from across the history teaching community. This is ongoing work, but we are also aware that schools are about to close for the summer and that we need to share some interim thoughts with you now.

Beneath the links given below we have provided a list of all the questions you will find in the online consultation. We suggest that you refer to this list as you work through the online consultation form. In the second column, next to each question, we have given initial thoughts and responses from some HA and HTEN members. Of course, our perspective is contestable; some colleagues will disagree with us. Specific perspectives will be shaped by the training partnerships within which we each work. Whatever you think, please do give this attention and engage with it, as the implications of what is proposed may be very far reaching.

We hope history teachers, mentors, ex-trainees and anyone else with an interest in the future supply of history teachers will be able to reply. It is likely that the subject report from Ofsted about Secondary History will be released in the coming days. You may want to consider this consultation in the light of what that report says when it is published.

Thank you for taking the time to respond.

Katharine Burn, Ailsa Fidler, Alison Kitson, and Helen Snelson, members of the HA and Vic Crooks, David Ingledew, Laura London, and Clare Stow on behalf of HTEN.

Responding to the consultation as an individual yourself

The market review report is here: <https://www.gov.uk/government/publications/initial-teacher-training-itt-market-review-report>

The link to the online consultation is here: <https://consult.education.gov.uk/itt-policy-unit/initial-teacher-training-itt-market-review-recomme/>

In this table are the questions from the online consultation in column 1 and some first thoughts and perspectives from some members of the HA and HTEN involved in initial teacher education in column 2. These will continue to develop and we will feed any thoughts/comments that you send directly to HA and HTEN into the final and considered organisational responses to the consultation. However, please also respond yourself, and consider writing to your MP (see above).

The comments below have been compiled by Katharine Burn, Ailsa Fidler, Alison Kitson, and Helen Snelson, members of the HA and Vic Crooks, David Ingledew, Laura London, and Clare Stow on behalf of HTEN. You may find these helpful to consider when formulating your own response:

Our main concerns with the proposals centre around the lack of focus on the subject (in our case, history), in the thinking that underpins these proposals, and therefore on the ways that the proposals would work out in practice.

We welcome the recent focus on subject and curriculum from Ofsted, both in schools and ITT, but we do not think these proposals will strengthen trainees' capacity to plan and teach as subject specialists at secondary level or with sufficient subject knowledge and confidence at primary level - quite the opposite. Although it may be claimed that subject teaching is intended to be at the centre, the proposals actually have the effect of undermining effective learning about how to teach history.

There are things that need to be said that are not easy to fit into the questions asked. We have tried to suggest in the 2nd column where these concerns might be expressed - though, there is a final question, allowing you to make any other comments. You will also find that some of the response boxes are divided into three, each saying 'response required'. Here we have not divided the responses, though they could be. Or you could simply write 'see above' to move on within a question

Survey question (Numbered as they appear in the online consultation as you complete it, rather than in the PDF of the consultation that you can download)

HA/HTEN - initial perspective on this question

11. Which of the themes set out in the report do you particularly recognise as key area(s) where there is an opportunity to

**11.
This question seems designed to elicit support for the DFE proposal that radical change is needed to address poor quality**

further increase the quality of ITT? You may choose as many themes as apply.

- Consistency across partnerships and between providers in the content and quality of the training curriculum
- Rigorous sequencing of the training curriculum
- Alignment between the taught curriculum and training environments, in particular teaching placement schools
- Sufficient opportunities for trainees to benefit from highly focused practice of, and feedback on, essential components of the curriculum
- 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
- Clarity about the way in which the market operates for potential trainees
- A supply of enough high-quality placements with the capacity to fully support the delivery of the trainee curriculum
- None of the above

Please provide any additional details to explain your selections.

provision. Please don't just tick the box unless you unequivocally agree with the statement. There is a danger that headline stats will be taken from the consultation, regardless of the ways in which you may then have qualified your response in the comment box. Therefore, it might be wise to tick 'none of the above' and then clarify your thinking in the text box.

From our perspective, the list focuses on the mechanics of ITT and not on the substance of the learning that should take place.

For example, we are concerned that the 4th point, as it stands, suggests that parts of the curriculum ('essential components') can be isolated from others. It suggests that, for example, one could separate out focus on behaviour management. While, of course, there are specific strategies for setting expectations and dealing with inappropriate behaviour, that need to be learned during ITT, behaviour management is also about (for example) strong subject knowledge to enthuse and engage pupils, and about planning purposeful learning that is well adapted to the learners, the topic and the context. Strong behaviour management is developed over time in the context of specific schools, with specific pupils and the developing teacher persona.

We would add (in the section asking for additional details) that a focus on the subject i.e. on the underlying substance and structures of learning within that subject should be at the forefront and that the mechanics of how we achieve this (for example, by drawing on particular theories from cognitive science) need to be understood at subject level, rather than assuming that they can be learned in a generic way.

In the additional detail section, we would also note that two of the concerns identified (high quality mentoring and supply of enough high quality placements) are likely to be exacerbated rather than improved by the proposals.

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

- 12.
1. Adequate funding to enable ITT and CPD partnerships for teachers to be built around subjects so that they can draw upon subject associations, build strong professional networks and access the best possible research base - both in the subject itself and in the teaching of that subject.
 2. It is a problem that the current emphasis on the CCF (as a generic model of good teaching) makes it possible for providers to offer a course that ignores the importance of building the subject-specific knowledge of teaching that is required to plan and teach a knowledge-rich curriculum effectively.
 3. As a result of the emphasis on generic models of good teaching, there are considerable inconsistencies between providers in relation to the extent of subject-specific input.
 4. Too little time within primary programmes has been dedicated to helping trainees to teach subjects other than the core subjects. More time should be allocated to training to teach 'foundation subjects' such as history.

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

- 13.
1. Prioritise the importance of learning to teach specific subjects - rather than treating teaching (and learning to teach) as a generic process in which the subject is only incidental.
 2. Ensure that every trainee teacher has extended time to learn from a dedicated teacher educator in that subject who:
 - a) understands what needs to be learned about curriculum design and how to teach the specific subject;

b) understands (because teacher training is their central to their professional role) how beginning teachers learn; and
c) is able to support trainees' subject knowledge development because they are well-connected with the latest academic scholarship. Only access to this kind of subject-specific professional knowledge (and connections into the subject communities and collaboration with academic historians from which it is built) will enable trainee teachers to achieve the aspirations and aims for history as a subject as set out in Ofsted's [imminent/recently published] research report on effective history teaching.

3. Pay greater attention to the role that strong, local, subject-specific professional networks can play not just in developing excellent subject-specific mentors, but also in creating mentoring cultures across whole departments. This needs an approach that seeks to build on - rather than to disrupt - existing subject-level partnerships.

4. Recognise the importance of carefully tailored local provision and close partnerships which can help in addressing specific needs in particular areas and specific developmental needs for particular trainees. Providers with direct knowledge of their local schools, and of their subject strengths and development needs can work over the longer term to build partnerships of colleagues with a shared understanding of what is needed in order to build a culture of continual improvement in the teaching of history.

5. Ensure that all trainees are taught how to adopt a critical approach to any suggestion for practice that they are offered. The report has proposed that any course that meets its quality requirements should be entitled to award certification at postgraduate level. Criticality is a distinctive requirement of any award at postgraduate level. It is therefore inappropriate to mandate certain content to be learned as fact. Trainees should be taught to establish the grounds on which particular theories are based and the contexts in which particular

suggestions have been found to be effective.

In relation to this last point (and in the later question asking about the award of a postgraduate qualification by bodies other than universities it may be helpful to refer to the Framework for Qualifications in Higher Education and the expectations of students awarded a qualification at Masters level:

<https://www.gaa.ac.uk/docs/gaa/quality-code/qualifications-frameworks.pdf>

As the report itself acknowledges (in Box 4 of the Quality Requirements) there are ongoing 'debates affecting the teaching of subjects' to which successful trainees are expected to learn to contribute. They need to develop the capacity to explore the basis for the recommendations offered to them - as the EEF itself is doing through a current review of evidence related to particular applications of ideas from cognitive science (to be published shortly).

<https://educationendowmentfoundation.org.uk/evidence-summaries/evidence-reviews/cognitive-science-approaches-in-the-classroom/>

It is possible what is widely regarded as 'accepted wisdom' to be refined or even discredited by future research and trainees need to develop the critical skills that will enable them to determine what constitutes reliable evidence - particularly in relation to the way that ideas developed in research contexts are applied in practice.

Quality Requirements for ITT providers: Curriculum

The review concludes that all ITT courses should centre on an evidence-based training curriculum which allows trainees to understand and apply the principles of the CCF in a controlled, cumulative and logical manner. To achieve this, the review recommends the adoption of the requirements set out in section 1 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 39-43 in the review's report). Accredited providers would still have freedom to design their curriculum and programme as long as these requirements are met.

Intensive practice placements

Under section 1 of the Quality Requirements, providers will be required to incorporate intensive practice placements, which are designed to provide opportunities for groups of trainees to practise selected, sequenced components of their training curriculum, and receive highly targeted feedback.

Minimum time allocations

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.

14. Please provide any comments you have on
a) the proposed approach to intensive practice placements,
b) any barriers to implementation, and

14 a-c: We have considerable concerns about this proposal because:

- **It seems to assume that teaching can be learned and practised as a series of isolated components.**

c) any support you would need to overcome these barriers.

Obviously it is important to provide opportunities for trainees to examine and observe different aspects of teaching in theory and as practised by effective teachers. But trainees cannot learn to practise discrete aspects of teaching in isolation, as these placements seem to imply. Effective behaviour management for example depends not only on strategies for setting and reinforcing expectations - but also on pitching lesson content appropriately for the learners in a class; effective planning of individual lessons depends on an understanding of long-term curriculum plans. Atomised experiences at a prescribed moment for all trainees in school is much less helpful (and disruptive to) careful and deliberate work with individual ITT trainees to develop their subject specific practice as a whole.

- **Intensive placements ignore the fact that different subjects have more or less time within the curriculum and that subject departments vary significantly in size.** This makes it extremely difficult to create intensive placements for groups of history teachers and would place an enormous pressure on the schools/departments involved.
- **It fits the trainee to a system, not the system to the trainee:** Development needs vary and need to be addressed at different times in the training year as they arise. The best courses have leaders and mentors who respond to their individual learners' needs - including consideration of which particular placements may be appropriate for them given their particular needs. It is not clear within these proposals who would have oversight of that kind of individual trainees' subject-specific development needs.

15. Please provide any comments that you have on the minimum timings set out in the table above (*This is the table on page 43 of the report*)

15. The proposed timings pay no attention to the issue of subject teaching.
There are no clear considerations as to how much mentoring (or which kind of mentor should be a subject specialist.)
There is also no mention of the funding that would be needed to make this kind of time allocation feasible and no consideration of what the impact would be of allocating so much time to mentoring, thereby removing expert teachers from the classroom. Smaller schools that lack the capacity to allocate so much time to mentoring are likely to withdraw from ITT.

In terms of the undergraduate primary ITT route, we have significant concerns about the number of weeks that trainees are expected to spend in school, which raises questions as to whether they will have sufficient time to complete the requirements of an UG degree. This is a matter of considerable concern given the need for subject specific input across the full range of subjects that they will be expected to teach.

16. Please provide any comments you have on any of the other curriculum requirements (excluding those requirements relating to intensive practice placements and minimum time allocations covered above), referencing by number any of the specific requirements included in the Quality Requirements that you wish to comment on.

16. The approach to designing a teacher training that begins with 'translating the evidence-informed principles into a subject-specific context' starts in the wrong place. The design of a training curriculum needs to start with what it means to teach a subject well, and then examine how the generic principles outlined in the CCF help to address the specific demands of teaching that subject.

	<p>The notion of alignment and the idea that alignment must be mandated and imposed by the lead provider ignores the existence of the acknowledged 'debates affecting the teaching of subjects'. There are legitimate debates (and a current lack of strong evidence as the EEF report will acknowledge about whether/how particular insights into cognitive science can be applied effectively in classrooms). Centralised control is likely both to damage relationships between lead providers and schools and to threaten the development of the 'conceptual understanding that enables the student to critically evaluate current research and advanced scholarship' in the discipline [of teaching history] that is one of the requirements of a postgraduate qualification at Master's level.</p>
<p>Quality Requirements for ITT providers: Mentoring The review identifies effective mentoring as a critical component of high-quality ITT and recommends the adoption of the requirements on mentoring set out in section 2 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 44-46 in the review's report). This would include a requirement for providers to develop a detailed training curriculum for mentors at all levels, including elements to subject or phase. It also suggests that lead mentors should take either the NPQ in leading teacher development, one of the other 2 specialist NPQs or training with the equivalent content and quality, and that each school that hosts a trainee should have at least one member of staff who is undertaking or has completed one of these courses.</p> <p>17. Please provide any comments you have on a) the proposed approach, b) any barriers to implementation, and c) any</p>	<p>17. We recognise the importance of mentor quality and training but there is a lack of clarity within the proposals about whether the role of lead mentor is a subject-specific or a generic one. Operation on the scale proposed seems to imply a generic lead mentor role and a generic</p>

<p>support you would need to overcome these barriers.</p>	<p>qualification for mentoring which ignores the need for subject-specific expertise.</p> <p>The requirement for lead providers to consider working with Teaching School Hubs as a kind of intermediary between them and the schools in which trainees undertake most of their training, combined with the idea of (generic) lead mentors overseeing the work of subject mentors in individual schools appears highly disruptive. It is likely to destroy the effective subject communities that have been built by effective subject tutors in university-based courses and that have begun to develop around subject-specialist providers within school-based programmes (where those specialists have been given sufficient time for their work).</p> <p>The plans for mentor training and the allocation of time to mentoring roles are not costed and there is no consideration of how this level of mentoring can be provided for trainees alongside the demands for mentor time created by the implementation of the ECF.</p>
<p>Quality Requirements for ITT providers: Assessment The review recommends adoption of the requirements set out in section 3 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 47-48 in the review's report), which would require providers to develop an assessment and progression framework which is aligned to the planned and sequenced curriculum and assesses trainees with appropriate frequency both on knowledge of the content of the curriculum and ability to apply it in classroom practice.</p> <p>18. Please provide any comments you have on this proposed approach to assessment of trainees undertaking ITT,</p>	<p>18. We welcome the focus on formative assessment of trainees' learning</p>

referencing by number any of the specific requirements included in the Quality Requirements that you wish to comment on.

as outlined in the proposals and the endorsement of processes that imply the targeting of training to address trainees' particular needs. We also welcome the clear emphasis (in Requirement 3.8) that insights from assessment feed into programme delivery. We would suggest that they should also feed into programme planning.

Any system of assessment needs to acknowledge clearly the particular demands of the subject being taught and this seems to be acknowledged in Requirement 3.3.

We are concerned, however, that the reference (in Specific Requirement 3.5) to assessing 'trainees' knowledge of the training curriculum and their ability to apply it in practice' might imply two separate forms of assessment, one of which was about testing trainees' knowledge of a series of propositions.

We are also concerned that the emphasis on alignment in other recommendations and the failure adequately to acknowledge 'debates within the teaching of subjects' and the changing evidence base in relation to some aspects of the CCF (such as the insights from cognitive science as they are applied in the classroom) may mean that trainees are unfairly penalised within assessment systems for following legitimate policies and practices within their placement school/department contexts.

<p>Quality Requirements for ITT providers: Quality assurance The review recommends adoption of the requirements set out in section 4 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 49-50 in the review's report), which would require providers to design and implement rigorous quality assurance arrangements.</p> <p>19. Please provide any comments you have on this proposed approach, referencing by number any of the specific requirements included in the Quality Requirements that you wish to comment on.</p>	<p>We do not believe that making lead providers solely accountable for the practice of the mentors across their partnerships is an effective way of building the close collaborative partnerships on which effective provision depends. We would suggest following the new Welsh model that holds both schools and universities (which is the form that all their partnerships take) jointly responsible for quality. It is inappropriate for one partner to carry all the responsibility and for 'partners' to be dictating the practices of others in ways that will sour relationships.</p>
<p>Quality Requirements for ITT providers: Structures and partnerships The review recommends adoption of the requirements set out in section 5 of 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' (pages 51-52 in the review's report), which would require providers to set out the essential features of their structures and partnerships that enable them to deliver teacher training in the way described in sections 1 to 4 of the same document.</p> <p>20. Please provide any comments you have on this proposed approach, referencing by number any of the specific requirements included in the Quality Requirements that you</p>	<p>20. High quality integrated curriculum planning needs close partnerships and that depends on close lines of communication between lead providers and the schools in which trainees spend most of their time - creating additional layers within the partnership and thus attenuating the</p>

<p>wish to comment on.</p>	<p>lines of communication makes this kind of close communication impossible.</p> <p>The disruption to existing structures that is implied by this large-scale radical reform is likely to risk the loss of existing expertise, particularly at the subject-specific level and to damage the partnerships that specialist subject leads have developed and nurtured over many years. This would be a severe blow given the recent strengthening of subject-specialism through the appointment of a new generation of history-specific lead tutors (in universities) and subject-specialist leads (within larger school-based programmes) as the School Direct route has bedded down, and as the new Education Inspection Framework has stressed the importance of curricular and subject-specific expertise.</p>
<p>Qualified Teacher Status and the PGCE</p> <p>The review concludes that all accredited providers should be able to offer teacher training leading to QTS within a recognised postgraduate academic course at a regulated and manageable cost and with any additional training content aligned with and complementary to the content required for a curriculum which meets the requirements for the award of QTS. It therefore proposes that DfE should facilitate any accredited providers which wish to do so to partner with an institution, such as the Institute of Teaching when it is ready, to offer a postgraduate award. Further detail can be found at paragraphs 64-67 of the review's report.</p> <p>21. Please provide any comments you have on this proposal.</p>	<p>21. The idea that any accredited provider should be allowed to award a postgraduate qualification in teaching is highly problematic in the context of the current proposals which represent the curriculum (and particularly the Core Content Framework as a list of the content to be learned). Since</p>

criticality is a distinctive requirement of any award at postgraduate level, content cannot be mandated within it as something to be learned as fact and reproduced. Trainees qualifying with a postgraduate award should be taught to explore the grounds on which particular theories are based and the contexts in which particular suggestions have been found to be effective.

The Framework for Qualifications in Higher Education which sets out the expectations of students awarded a qualification at Masters level: (<https://www.qaa.ac.uk/docs/qaa/quality-code/qualifications-frameworks.pdf>) requires that students demonstrate conceptual understanding that enables them to:

- 'evaluate critically current research and advanced scholarship in the discipline -
- to evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses.'

The FQHE also states that holders of the qualification will be able to:

- 'deal with complex issues both systematically and creatively, make sound judgements in the absence of complete data,
- demonstrate self-direction and originality in tackling and solving problems, and
- act autonomously in planning and implementing tasks at a professional or equivalent level'

The award of a postgraduate qualification can only be made on this basis.

The idea of allowing bodies other than universities to award such qualifications risks divorcing the teaching of education from research in education and cutting off trainee history teachers from the scholarship within academic history departments that serves both to deepen their subject knowledge and enrich their practice.

Routes into Teaching

The recommendations apply to all 3 core routes into teaching: undergraduate ITT, postgraduate ITT fee-funded (both PGCE and QTS only) and postgraduate employment-based ITT. They do not, however, apply to early years ITT or further education ITE. Further detail can be found at paragraphs 68-72 of the review's report.

22. Do you think that there are any specific considerations that a) providers of undergraduate ITT and b) providers of employment-based ITT would need to account for when implementing the Quality Requirements? In your answer, please include the approaches providers might take to address these.

Please describe any specific considerations that providers of undergraduate ITT would need to account for.

Please describe any specific considerations that providers of employment-based ITT would need to account for.

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

Please describe any indirect impacts on provision of early years ITT.

Please describe any indirect impacts on provision of further education ITE.

22. For employment-based ITT routes there is a huge cost implication in implementing the recommendations of the review for a group of student teachers who are contracted to work while training. There are no indications that the recommendations of the Review have been costed. In relation to undergraduate Primary ITT routes, the impact of the Review will be significant for primary schools, and specialist history support, particularly smaller primary schools, where staff may feel that they do not have the time/capacity to support UG Primary placements.

As noted above, the number of weeks expected to be spent in school raises important questions about whether students will have sufficient time to complete the requirements of an UG degree, especially given the need for subject specific input across many subjects.

There is no acknowledgement of the particular demands of placements within small rural primary schools where mixed age classes are common and a single teacher/mentor is responsible for subject leadership across a wide range of subjects.

The long-standing focus of Ofsted and the DfE on the 'core' subjects in primary education (prior to the introduction of the new Education Inspection Framework) has damaged the place of foundation subjects (such as history) within the primary curriculum and the training of primary teachers with sufficient subject-specific professional knowledge. This situation is now being rectified but cannot be addressed quickly. It needs time and adequate resourcing. Schools do not necessarily have the subject expertise required to develop subject specific mentoring *at this*

	<p><i>point</i> in time. There has to be a long-term plan to rectify the damage caused by the previous narrowing of curriculum, caused by the dominant focus on pupil outcomes in SATs tests. Teaching from 'bought in' schemes (which many schools are currently using) has not supported the development of existing teachers' subject knowledge and expertise, leaving them poorly equipped at present to develop critical and effective primary history teachers.</p> <p>Education in the 3-7 age group on the undergraduate route follows an entirely different model to that in other phases. The recommendations of the Review do not reflect the realities of training for UG trainees preparing for work with children aged 3-7, or their mentoring needs. Should the guidance be implemented as it stands, many EYFS providers will not be able to support it and will withdraw.</p>
<p>The accreditation process and monitoring</p> <p>The review recommends that all accredited providers of ITT should be required to undergo accreditation or reaccreditation against the Quality Requirements. It acknowledges that, as a result of the raised standards, some providers will need to form different partnerships in order to have the capacity to meet the requirements for accreditation. The review identifies some key roles and responsibilities that will need to exist within each ITT partnership: accredited provider, lead partner, and placement school. This is not envisioned as a one-size-fits-all model – for example, in some cases, a single organisation may wish to take both the accredited provider and lead partner role. Further detail can be found at paragraphs 77-81 and 86-89 of the review's report.</p>	

The review also 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.

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

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

24 & 25. As institutions representing history we are, of course, concerned about the centralised, mechanistic nature of the Quality Requirements. We cannot see how this system will encourage evidence-informed debate and creativity in the ITT system so that it remains responsive to the needs of pupils and schools.

When Ofsted is already inspecting ITT, the adding of another highly bureaucratic and frequent accreditation process must surely distract funding and staff time away from the important work of developing ITT that effectively prepares new colleagues to be excellent teachers of their subject.

It is also the case that a particular subject department in a school may offer an excellent placement for a trainee, but that the whole school does not wish to/ cannot go through accreditation. It also may be that different providers use the same school for placements in different years (often by agreement). These practical realities do not seem to be acknowledged and provided for in what is proposed. The finding of placements can be challenging enough, without adding further constraints.

Timelines

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.

Top of Form

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

26 a&b. The timeline:

- Implies a lack of regard for genuine consultation and for careful consideration of the implications of changes at this scale.
- Takes no account of the time required for the detailed planning of a high quality curriculum on the basis of partnerships between lead providers, TSHs and schools.
- Does not acknowledge the processes of curriculum development and approval required within universities.
- Does not take into account the impact of the pandemic across the education system and on pupils.

Role of Teaching School Hubs

As they are particularly well-placed to act as a lead partner, the review recommends that teaching school hubs should be required to partner with an accredited provider to deliver ITT (unless they are operating at accredited provider level). In addition to working with accredited ITT providers, teaching school hubs will need to support local ITT delivery as an advocate for high-quality ITT in their respective areas,

undertaking specified strategic roles as required. This could include building school capacity for ITT by building an active mentor network in the local area, providing specific support for schools serving disadvantaged communities to enable them to engage with ITT, or modelling high quality intensive practice placements for other schools undertaking this aspect of ITT for the first time. Further details can be found at paragraphs 82-85 of the review's report.

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

30. In many regions Teaching School Hubs may be entirely appropriate partners - and many already have well-developed roles. But a requirement to work through TSHs creates an additional chain within partnerships that threatens the close lines of communication required for a carefully planned and tightly integrated curriculum that works effectively at the subject-specific level. It also could cut across established and effective subject-specific partnerships.

Schools designated as Teaching School Hubs are likely to have strengths in different areas and an overall designation as a TSH does not necessarily imply particular strengths in every subject across the curriculum. The requirement for lead providers to consider partnering with TSHs limits the scope for providers to work with those subject departments where subject-leads already know that practice is of high quality and where they have already built strong partnerships.

ITT as a system-wide responsibility

The review argues that schools and trusts should see participating in ITT and mentor training as one of their core responsibilities and that it can bring many benefits to

participating schools. To increase participation of trusts in ITT, the review proposes that regional schools commissioners should consider involvement in ITT as a condition of growth of trusts and that DfE should also make ITT involvement part of the eligibility for academy funding streams, such as the Trust Capacity Fund or sponsor grants. Further details can be found at paragraphs 99-104 of the review's report.

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

31. Funding is a blunt tool for incentivisation. Rather, it should be seen more as a necessity to be provided for all areas (including rural areas). See answers to Q32 for responses re incentives.

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

32. There is nothing in the documentation about funding all these proposals. In many areas there is already a struggle to find suitable subject-specific mentors and for schools to fund the release of these teachers from their classroom timetables in order to be mentors - both to have time to work with a trainee and time to be part of a mentoring community. Funding is not an incentive, but a necessity to make it possible for mentoring to happen and for mentors to develop and take on responsibility for trainee development.

In terms of actual incentives, schools are being inspected by Ofsted with a strong focus on curriculum and subject coherence. They would be more likely to participate in ITT if they could see that this participation enabled them to gain subject-specific CPD for all staff and to develop a knowledge rich curriculum with a high level of subject specificity. The access to this sort of CPD via ITT partnerships is one reason for schools taking part in partnerships that have built up a rich subject-specific CPD community around the PGCE. These partnerships bring subject knowledge and expertise to schools, with a transformative effect that reaches beyond trainee and mentor. For example, they provide access to the latest academic subject scholarship, and they operate teacher and pupil networks around subjects. There is nothing in the report that

	<p>suggests these sorts of partnerships will survive and thrive under what is proposed. And there is no suggestion of something offering an equal incentive to schools that will be put in its place. To encourage, rather than jeopardise this rich subject CPD provision, could incentivise participation linked to the Ofsted EIF for schools.</p>
<p>Recruitment and selection</p> <p>The review suggests that the proposed reforms should create an ITT landscape that is more easily navigable for potential trainees, building on the work already done to streamline the application journey. DfE’s view is that a future model that includes the key roles and responsibilities identified by the review as needing to exist within each ITT partnership (accredited provider, lead partner, and placement school) could help to simplify the landscape for applicants and provide opportunities to disseminate good recruitment practices.</p> <p>33. Please provide any comments you have on a) the impact of the proposed reforms on the recruitment and selection process, including potential for streamlining of the recruitment process and sharing of recruitment practices, b) any barriers to implementing the proposed reforms at the recruitment stage, and c) support that would be needed to overcome these barriers.</p>	<p>33. Streamlining recruitment processes in an area would be possible if responsibility for ITT was shared. When there is competition, there is fragmentation that makes it hard for applicants to navigate systems. Providers need the systems to support the recruitment of subject specific trainees with the involvement of subject specialists. The model suggested appears to be less streamlined, and appears to be developing a highly complicated and complex model in terms of the providers’ relationships with school partners.</p>

<p>Impact assessments</p> <p>In order to inform its decisions on the proposals made by the review, DfE will undertake both an Equalities Impact Assessment and a Rural Impact Assessment on the proposals.</p> <p>34. Please use this space to raise any a) equality impacts and b) any impacts specific to schools in rural areas that would result from the implementation of the proposed Quality Requirements. Please describe any equality impacts.</p> <p>Please describe any impacts specific to schools in rural areas.</p>	<p>34 b) The report does not address the needs and realities of all types of schools in rural areas. There is no acknowledgement of the particular demands of placements within small rural primary schools where mixed age classes are common and a single teacher/mentor is responsible for subject leadership across a wide range of subjects.</p>
<p>International Qualified Teacher Status</p> <p>To note, DfE has recently concluded a public consultation on International Qualified Teacher Status (iQTS), a new UK government-backed international teaching qualification. iQTS will be closely aligned to English methods and standards of initial teacher training. DfE therefore reserves the right to amend certain parts of the iQTS framework in line with any future changes in domestic requirements, where appropriate.</p>	
<p>35. Please use this space to give any comments you have on</p>	<p>35. We would suggest a reassertion of some core messages can happen</p>

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.

here. From an HA/HTEN perspective:

- ITT must always be improved and developed, but this will be best achieved with an incremental, collaborative approach that builds on, and spreads more widely, existing best practice. This approach should have at its heart the needs of trainees, the needs of local settings and the needs of different subjects.
- Effective ITT system reform will avoid imposing more intermediary layers and mechanisms, in order to avoid the risks of genericism, lack of criticality, inflexibility, and inability to continue improvement and development.
- Effective ITT creates and sustains a critically engaged professional training environment with subject specific knowledge and coherence of subject curricula at its heart.
- We think the approaches suggested will make it harder to develop best practice in subject-specific teacher education, will neglect the development of professional criticality, and will destroy effective local history teaching partnerships built up over many years.