

**Department for Education
Initial Teacher Training Market Review Report
22 August 2021**

1. The NASUWT welcomes the opportunity to respond to the Department for Education (DfE) consultation on the initial teacher training (ITT) market review report ('the Report').
2. The NASUWT is the teachers' union, representing teachers and headteachers across the UK.
3. The NASUWT's response makes clear at the outset its concerns about the manner in which the consultation is being conducted and the risks that implementation of the review's recommendations could create for teacher supply. The response, therefore, calls for work on the Report to be paused to allow for these potential implications to be assessed and evaluated thoroughly and for more appropriate arrangements for engagement with stakeholders to be put in place.
4. Notwithstanding these concerns, the Report raises important issues about the ITT system and makes potentially significant recommendations about how the perceived problems it has identified might be addressed. The NASUWT's initial views on these recommendations and the analysis on which they are based are also set out in this response.

GENERAL COMMENTS

5. The NASUWT supports the aspiration set out in the Report's foreword to create 'a truly world-class system of initial teacher preparation grounded in robust and up-to-date evidence, which equips teachers with the professional knowledge and expertise they need to help begin their careers'.

6. The NASUWT also insists that a world-class system of ITT should operate on the basis that teaching should be regarded as a high status, inclusive and democratic profession with professionals who develop knowledge and skills that enable agency and resilience.
7. It is entirely legitimate that the Government keeps the operation of the ITT system under review to assess the extent to which this aspiration is being realised in practice. Where objective review identifies problems or opportunities to enhance the system's performance further, it is right that the Government takes steps in partnership with stakeholders to implement reforms. It is also vital that the Government considers how the ambition of a high status, inclusive and resilient profession can be better supported through ITT and access to CPD throughout the teacher's career.
8. The NASUWT does not insist that current arrangements for ITT are optimal and rejects assertions that the system does not have any scope for further enhancement. For example, while surveys of newly qualified teachers indicate that satisfaction levels with ITT remain relatively high, feedback from those teachers who qualified recently highlights areas of concern and potential improvement to the structure and content of programmes.¹
9. Teachers and school leaders who work to support teachers in training also face significant challenges and obstacles. The NASUWT's long experience of engagement with trainees and the school workforce on ITT matters has informed many of the observations in this response, and it is of critical importance that the Department also demonstrates that the voices of teachers, school leaders and trainees are central to the outcomes of this review.
10. The critical importance of the ITT system means that the Government must develop potential reforms through inclusive, careful and meaningful engagement with all those with a stake in the system's success. Consultation on this basis ensures that those responsible for the system's operation gain the sense of ownership of reform required to implement change successfully. It also ensures that potential problems associated with any proposals can be identified and addressed before implementation.

¹ See, for example: Department for Education (2018). *Newly Qualified Teachers (NQTs): Annual Survey 2017*. Available at: (<https://www.gov.uk/government/publications/newly-qualified-teachers-nqts-annual-survey-2017>), accessed on 15.08.21.

11. The arrangements the DfE has put in place for consultation on the recommendations in the Report fall substantially short of these requirements. It is important to recognise that the review's recommendations have been developed without the formal engagement of representatives of the workforce, including teachers in training and those with recent experience of training, or a representative sample of ITT providers.
12. In such circumstances, it is deeply concerning that proposals set out in the Report, which, if implemented, would have profound consequences for the system, are subject to a public consultation held over the summer holiday and with an extremely short period in which to submit responses. As a result, there is an evident risk that the Government will adopt the review's recommendations without meaningful and informed assessment of their relative potential merits and shortcomings. Such an approach to reform in this critical area of education policy is not acceptable and should be avoided.
13. This flawed approach to consultation and engagement on the Report has served not only to alienate many stakeholders but has raised concerns across the sector that the Department must guarantee that any proposals will be subject to genuine debate or discussion with stakeholders before moving to implementation.
14. It is regrettable that this review and associated proposals for the reaccreditation of ITT providers has already prompted some existing providers to indicate that they may withdraw from the ITT system. Such withdrawals would risk losing highly effective providers from the system, many of which lend it considerable currency and status domestically and internationally. They could also have profoundly adverse implications for teacher supply if suitable alternative provision is not available to make up any resulting shortfall in ITT system capacity. While significant, sudden and unplanned reductions in capacity would be difficult to manage in any circumstances, they would be especially problematic currently while the causes of the longstanding teacher recruitment and retention crisis have yet to be addressed effectively. It would also be profoundly unhelpful if this were to impact adversely on progress towards building a more diverse and inclusive teaching profession.

15. Detailed consideration needs to be given to the proposals to introduce a reaccreditation regime for all providers and to the particular potential implications of such a regime on teacher supply (including the quantum of teachers and the diversity of the profession), how it would operate in practice, and the functions it would be intended to fulfil.
16. In particular, the review's proposals for monitoring ongoing compliance with its recommended accreditation requirements appears to depend to a large extent on the outcomes of Ofsted's inspections undertaken on the basis of the current ITT inspection framework and handbook. In such circumstances, the establishment of a quality requirements-linked accreditation regime would appear to be redundant, given that the Secretary of State currently has powers to intervene in cases where providers are found to be inadequate following an inspection.
17. The review suggests that the Secretary of State should 'retain' strong monitoring powers to evaluate provider performance between inspections. However, it fails to set out the basis on which such monitoring should be undertaken, identify triggers for intervention or explain why any changes to expectations on providers could not be set out in a revised version of the DfE's current ITT Requirements scheme.
18. It is unclear how the risks of some existing providers being excluded or withdrawing from the ITT system have been assessed or anticipated by the DfE and whether such assessments have been undertaken in a meaningful way.
19. The NASUWT, therefore, calls on the DfE to work towards developing plans for reform of the ITT system in a way supported by a more inclusive and informed debate on the review's proposals among relevant parties. This debate should be supported by a more precise articulation of the rationale underpinning the recommendations set out in the Report. It should permit the review's case for change to be subjected to informed and constructive test and challenge.

SPECIFIC COMMENTS

Teacher professionalism and initial teacher training

20. The content and organisation of programmes of ITT, and proposals for reform of it, should reflect a clear understanding of the skills, knowledge and expertise associated with teacher professionalism. Reforms must be evaluated to ensure that they do not result in either a deliberate or unintended diminution of the

professional standing of teaching. The Government needs to demonstrate how the outcomes of this review will impact on levelling up rather than contribute to levelling down in terms of the status of teachers and the quality of teacher education.

21. Respect for the professionalism of teachers is a hallmark of an education system genuinely committed to raising standards and extending educational opportunities for all pupils.
22. Therefore, systems of initial teacher education must serve to support the ability of teachers in training to begin to establish the skills and attributes associated with professional practice and use their professional judgement to select and apply approaches to teaching and learning that best meet the needs of children and young people.
23. Indeed, pupils learn best when teachers are given the time, resources and scope to make the fullest possible use of their professional talents, expertise and knowledge. An education system that does not give practical effect to this core guiding principle cannot expect to provide children and young people with the full range of high-quality learning opportunities to which they are entitled.
24. Effective approaches to ITT must, of necessity, involve trainee teachers being given the opportunity to build on the understanding gained through their degree-level study by developing a secure knowledge of the subjects and curriculum areas in which they intend to practice. It is also clear that all routes to qualified teacher status (QTS) must give teachers in training the ability to apply their developing skills and expertise in a range of practical contexts over an extended period in which they can work alongside established teachers to observe approaches to teaching and learning in classrooms and thereby consolidate and extend their developing skills and expertise.
25. However, in light of the standing of teaching as a professional activity, the NASUWT believes that these critical aspects of teacher formation and teacher professionalism do not describe the totality of an effective process of ITT. Secure subject knowledge and practical experience, while important, are insufficient to ensure that teachers in training are prepared for the full range of responsibilities that they will be required to discharge on entry to the profession.

26. In this context, the NASUWT urges the Government to take particular note of international evidence of effective approaches to initial teacher education in education systems regarded as high performing and fast improving.
27. Evidence published by the Organisation for Economic Co-operation and Development (OECD) confirms that high performing systems adopt approaches to ITT that balance and integrate practice and theory rather than emphasising one or another aspect to a disproportionate extent.
28. The Government should accept that theoretical elements of ITT, secured through the effective engagement of higher education institutions (HEIs) in training programmes, play a critical role in effective programmes of teacher formation by:
 - i. providing teachers in training with the conceptual means by which they can develop understanding and experience of how specialist subject or curricular knowledge must be re-contextualised pedagogically to support the provision of engaging and relevant learning experiences that meet the needs and the aspirations of the pupils for whom they are responsible;
 - ii. allowing teachers to develop their understanding of key aspects of relevant disciplines that transcend established subject boundaries, including, for example, child development and educational psychology, and which play a critical role in supporting teachers' understanding of how pupils approach learning and are supported to make progress;
 - iii. supporting the development of teachers in training as reflective professionals by providing them with a framework of evidence and research material within which they can evaluate their practice critically;
 - iv. enabling trainees to understand the essential role that teachers play in contributing to research and developing thinking and understanding about education, teaching and learning; and
 - v. taking forward the understanding of teachers in training of the broader social, cultural, legal and economic context within which the education system operates and hence securing their acquisition of professional attributes that allow teachers to recognise the purpose and value of the education system and to engage constructively with policy development processes at national, local and school level, including through the legitimate activities of their trade unions in this respect.
29. The NASUWT remains concerned that the Government's approach to ITT policy continues to downplay to an unacceptable extent the important theoretical, conceptual and reflexive aspects of teacher formation, instead giving preference

to subject knowledge and classroom management experience gained alongside established practitioners. This approach reflects a conceptualisation of the teacher as 'technician' rather than as a professional, able and empowered to use their expertise and specialised understanding to meet the needs of learners.

30. Therefore, it is concerning that important aspects of teacher formation reflected in the analysis set out in the Report appear to be based on this inappropriate view and do not accurately reflect the respect for teacher professionalism asserted in its foreword. These views are particularly evident in the review's description of teachers' understanding of research and evidence in developing their professional expertise and the role of HEI-accredited learning as part of ITT programmes. These matters are considered in further detail below.

The centrality of the trainee curriculum

31. The review is right to acknowledge that ITT providers must design coherent and effective curricula to ensure that trainees can acquire a secure basis on which they can continue their careers as qualified teachers. Currently, expectations on providers in terms of the organisation and content of their programmes are set out in the Core Content Framework (CCF) and the DfE's ITT Requirements. Assurance of the effectiveness of these programmes is currently secured through Ofsted inspections undertaken within the context of a framework and handbook that reflect these expectations.
32. A core concern for the review is that the CCF, the ITT Requirements and the Ofsted framework and handbook do not prescribe a curricular model that providers must adopt if they are to be accredited as fit to offer programmes of ITT. Its recommendations reflect its view that accreditation of providers should be dependent on their development of curricula that reflect its proposed quality requirements.
33. However, it should be acknowledged that the importance of providers developing effective curricula is recognised in existing requirements. In particular, while it is the case that the CCF was designed deliberately not to serve as a complete ITT curriculum, it is clear that it is intended to act as a basis on which providers' should construct their curricula, augmented by 'additional analysis, critique of theory, research and expert practice as [providers] deem appropriate'.
34. As noted above, the NASUWT is clear that pedagogy and practice should be underpinned by research as well as by the capacity to test and critique research

findings and assertions about their implications for teaching and learning. The Union, therefore, supports this critical element of the CCF's expectations on the design of ITT curricula.

35. Therefore, the NASUWT is concerned that the review seeks to establish a system in which curricula stipulate that trainees are taught that 'evidence' is a fixed, unchallengeable body of knowledge and understanding against which the efficacy or otherwise of particular practices should be judged. The review proposes that providers would not be able to secure accreditation without curricula organised on these lines.
36. This view is not consistent with the principles on which the CCF is based. The CCF sets out a clear expectation on providers that evidence can, and should, be subject to an ongoing process of challenge and test and that developing trainees' ability to consider evidence in this way is a core objective of high-quality ITT programmes. ITT curricula should ensure that teachers understand the importance of practice grounded in the best available current research and that practices may need to be revised or replaced if more robust evidence is identified.
37. The NASUWT is clear that it could not support the imposition of curricular requirements on providers that misrepresent the appropriate role of evidence and research in programmes of teacher formation.
38. In addition, the review seeks to justify its proposals for accreditation of ITT providers' curricula with reference to the need to apply provisions in the CCF around, for example, cognitive load theory, designing appropriately sequenced curricula for pupils and the application of specific subject knowledge.
39. However, the review provides no evidence that providers lack the capacity to design curricula that reflect these provisions. The DfE should note that the CCF has been in place for less than one year. This relatively recent introduction, and the extraordinary circumstances in which it took place due to the pandemic, mean that it has not yet had time to become embedded fully across the ITT system. It is, therefore, not credible for the review to assert that the discretion given to providers to design their curricula against the CCF's requirements will not result in trainees benefitting from the learning experiences the CFF was introduced to secure.

Qualified teacher status and the postgraduate certificate in education

40. Reflecting the principles of effective teacher formation and teacher professionalism set out elsewhere in this submission, the NASUWT believes that it is essential that all programmes of ITT should include study towards an academic award, such as the current HEI-led postgraduate certificate in education (PGCE). This was an important development and milestone reached in the last half-century, and it is important that the post-graduate status of teaching is retained and enhanced. The Union also notes that the vast majority of non-HEI based ITT providers currently work with HEIs to accompany their programmes with an academic award at masters level.
41. The NASUWT is concerned to note the, at best, ambivalent stance taken towards the role of academic awards in programmes of ITT. The Review attempts to describe significant non-HEI provider dissatisfaction with HEI providers of postgraduate qualifications on the grounds of poor value for money and the irrelevance of these qualifications' content. This characterisation is not substantiated by evidence. For example, a 2021 survey of non-HEI providers by the National Association of School-Based Teacher Trainers (NASBTT) found that 81% were 'very happy' with their HEI-based qualifications partners. The DfE will also be aware that the overall costs of award-bearing and non-award-bearing programmes of ITT are broadly similar
42. Any review of the ITT system in England concerned to maintain and further enhance teacher professionalism should confirm the value of accredited postgraduate academic study in programmes of teacher formation and the critical role of HEI providers in supporting such programmes. Unfortunately, this review has chosen not to do so. The DfE should clarify that it supports the academic dimension of teacher training in its policy development in this area.
43. It is also essential that in considering the outcome of this consultation, the Government should confirm how any proposed reforms to ITT will contribute to building a more inclusive and diverse teaching profession with enhanced intercultural skills and competencies, and that the ITT system will operate with due regard to eliminating discrimination against, and advancing equality for, current and future teacher trainees with particular protected characteristics.

The ITT system's capacity for maintaining and enhancing quality provision

44. Notwithstanding the concerns set out above about key aspects of the review's vision for the future of ITT, its Report places significant emphasis on the need for far-reaching structural change in the current system if its recommendations are to be implemented. The review's Report states that '[it has] concluded that significant reform in the ITT market is essential if quality reforms are to be delivered successfully'. As noted elsewhere in this submission, these 'quality reforms' are underpinned to a large extent by a proposed set of quality requirements on which accreditation of current and future providers would be based.
45. While it is incumbent on the review to set out coherently the reasoning that has led it to reach this conclusion, its Report fails to do so.
46. A core element of the stated rationale for the review's recommendations is to address variability in ITT course content and quality. As the review notes correctly, this was a key issue highlighted in the report of the Carter review of ITT, published in 2015. However, the review fails to acknowledge that the CCF was explicitly designed to address these issues by defining a minimum, common entitlement for trainee teachers while recognising the need for some flexibility in the organisation of curricula which, however, must be grounded in the CCF's provisions.
47. Given the relatively recent introduction of the CCF and the highly atypical circumstances surrounding its introduction, it appears premature for the review to conclude that it will not address the quality and variability issues identified by the Carter review. Any meaningful conclusion on these lines could only be reached once the CCF has been in place for sufficient time to allow for it to be evaluated effectively. Therefore, those recommendations based on the review's assertion that the CCF will not achieve its functions do not withstand serious scrutiny.
48. Further, the review seeks to justify its proposal to introduce a system of quality requirements as the basis for provider accreditation on the need for the CCF to be aligned with the Early Career Framework (ECF) for new teachers.
49. However, it is clear that the requirements designed into the CCF and the ECF are already in deliberate alignment. In light of the relatively recent introduction of both

frameworks, it is not possible at this stage to determine, as the review attempts, if any further steps are needed to secure better alignment between them.

50. The review seeks to question the quality of provision across much of the ITT system by drawing on the findings of Ofsted's programme of remote research visits to 75 ITT providers undertaken between January and March 2021. Its Report asserts that Ofsted found that 'too often, curriculums were underpinned by outdated or discredited theories of education'. However, the Report misrepresents these findings, given that Ofsted suggested only that 'some' ITT curricula might be described in this way. The NASUWT notes that Ofsted cited just one instance, concerning the advocacy of learning styles, where the weight of evidence did not support a provider's approach to teaching and learning.
51. It should be further noted that Ofsted undertook its remote research visits in highly atypical circumstances. A clear understanding of its view of provider quality under the CCF cannot be reached until it has completed a significant number of inspections of a representative sample of providers under its revised ITT inspection framework and handbook.
52. The review asserts that significant restructuring of the current ITT market would be required to improve the overall quality of provision in line with the requirements set out in its proposed quality requirements.
53. The NASUWT would not object in principle to any thorough and objective assessment of the current configuration of the ITT system if it is informed by a clear understanding of the principles on which effective ITT is based and identifies how any reconfiguration would assist in further reflecting these principles in practice.
54. However, notwithstanding the appropriateness or otherwise of the proposed quality requirements, the basis on which the review has concluded that the current ITT system would be unlikely to meet these requirements is not clear. In any circumstances, it would be highly inappropriate to seek to implement potentially far-reaching reforms without a clearer rationale for them than the review has offered.
55. Of specific concern is the implication in the Report that the quality of provision can only be enhanced with fewer, relatively large 'accredited providers', working in partnerships with a limited number of schools designated as 'lead partners'. Under this model, other schools in the system would be relegated to a role in

which their principal function would be to provide in-school trainee placements to these partnerships.

56. No explanation is given in the Report for review's promotion of this model nor how many providers, partners and schools would be required for the system to secure high-quality training of an adequate number of participants.
57. Without a more comprehensive and convincing case for an ITT system constituted on this basis, the NASUWT could not support its inclusion in any programme of ITT reform.

Intensifying the impact of practice placements

58. The NASUWT shares the view set out in the Report that programmes of ITT should be designed so that trainees can directly appreciate the link between theory and practice through direct experience of working in authentic classroom contexts.
59. The Union notes in this context the review's recommendation that all ITT courses that lead to QTS should include a specific intensive practice placement of at least four weeks in single year courses and six weeks for undergraduate courses. The review recognises that such intensive placements would be in addition to the general school placements required on all accredited programmes.
60. The Report indicates that the purpose of intensive placements would be to provide a tightly structured experience for trainees with specific practice focus areas and extensive feedback to reinforce the practical implementation of pedagogic understandings acquired previously in their courses.
61. The DfE should not attempt to mandate or encourage intensive placements without further research and careful piloting. Particular attention would need to be given to how such placements would cohere with other school placement time that would continue to be a substantial component of ITT programmes.
62. Further investigation would also need to explore the practical barriers to the effective implementation of intensive placements. It is likely that they would have significant implications for teachers involved in supporting trainees, particularly regarding the management of their existing responsibilities and the workload pressures they continue to face, considered in further detail below.

63. The implications for individual trainees would need to be considered carefully. The inclusion of intensive placements in all programmes of ITT would require trainees to access them in all cases. As the review acknowledges, given that the number of schools able to provide such placements would be relatively small, many trainees would have to travel significant distances to access them. Extensive travel requirements could deter many people from applying for ITT, particularly those with family commitments or other caring responsibilities, who might otherwise be capable of completing ITT successfully.
64. It should also be recognised that the intensive placement model set out by the review would involve participating schools managing a large number of trainees simultaneously and many other additional personnel with responsibilities for supporting and assessing them. In general, school accommodation is not designed to accommodate significant numbers of additional staff and trainees straightforwardly. These physical constraints, as well as other financial and resource considerations, would need to be addressed in any further investigation of this proposal.

Mentoring and professional support

65. The NASUWT shares the review's acknowledgement of the importance of high-quality mentoring in effective programmes of ITT.
66. The Union notes that the review proposes that every school that agrees to participate in ITT arrangements would be given funding to allow one staff member to receive training to act as a 'lead mentor', while those offering intensive placements would be provided with two training places. It is further proposed that this training is based on the National Professional Qualification on Leading Teacher Development (NPQLTD).
67. The review suggests that the lead mentor's role would be 'to ensure that trainees receive mentoring and support across placement schools which (are) aligned with the [provider's] curriculum and informed by practice'.
68. Although enhancing the capacity of the system to secure effective mentoring for all trainees is critical, the review has not assessed some of the barriers that would need to be addressed if the DfE implemented its proposals.
69. Feedback from NASUWT members working as ITT mentors highlights the significant challenges they often face in undertaking this role. Among the most

notable of these challenges is the underprovision of time and support for mentors to undertake their roles effectively. As the DfE will be aware, pressures associated with excessive and unnecessary workload remain the most significant concern that teachers and school leaders report about the quality of their working lives.

70. Increasing mentoring capacity in schools would require profound changes in the levels of support for, and expectations of, those schools in which mentors are employed. In particular, those serving as mentors need contractual and statutory entitlements to sufficient time to undertake their duties effectively. Any attempt to increase expectations on teachers to take on more demanding mentoring roles without action to tackle the unacceptable workload burdens they already face would not be sustainable and would undermine the quality of ITT provision, particularly in schools in which intensive practice placements might occur.
71. There is a clear risk that seeking to introduce a lead mentor role without clear entitlements to support could encourage many schools to withdraw from the system, especially in cases where they conclude that they do not have the resources or capacity to support mentors effectively. There is also a risk that schools would seek to impose additional mentoring requirements on already overburdened teachers.
72. It should also be recognised that mentoring is a highly skilled activity that requires mentors to undertake additional duties and responsibilities that are not required of the generality of teachers. It is, therefore, clear that in addition to an entitlement for adequate time to undertake mentoring duties, access training and engage with providers, a strategy for mentoring would need to address the need for all mentors to be remunerated appropriately for undertaking this role.
73. On the nature and extent of mentor training, it should be noted that the NPQLTD was not explicitly designed for the purposes the review proposes for it. Before it is identified as the basis for ITT mentor training, its contents would need to be reviewed carefully to assess its fitness for purpose in this respect.
74. As the review notes, while formal mentoring roles are essential in providing effective support for trainees, other staff, including subject experts, school leaders, and the teachers of classes in which trainees are placed, also have a critical role. Addressing the barriers these members of the workforce face in supporting trainees, particularly those related to workload, must also be a core element of any ITT reform programme.

Assessment

75. The review is correct to note the importance of effective in-course and terminal assessment of trainees in ITT programmes.
76. The NASUWT recognises that the CCF includes no provisions on assessment and that conditions on assessment in the DfE's ITT Requirements are focused mainly on terminal assessment against the Teachers' Standards rather than in-course formative assessment and feedback.
77. However, the review presents no evidence of any widespread current failure by ITT providers to undertake effective formative assessment to justify its recommendation that the DfE should include a requirement in this respect in reaccreditation criteria.
78. The NASUWT notes the inclusion of in-course assessment as an area of focus in the revised Ofsted ITT inspection handbook. Therefore, it would appear more appropriate to appraise the evidence gathered in future through inspection to assess whether further action to improve in-course assessment is required and, if so, the form any action should take.

Quality assurance

79. The NASUWT agrees with the importance attached by the review to the need for providers to reflect systematically on the quality of their provision and use the outcomes of this reflection to refine and improve their programmes and the support they offer to trainees.
80. However, the NASUWT is concerned that the review proposes that providers should be required to design and implement 'rigorous quality assurance arrangements' to secure their accredited status.
81. Experience of mandatory, high-stakes and prescriptive self-evaluation regimes, such as the self-evaluation form (SEF) imposed previously on schools as part of the Ofsted inspection framework, or the self-evaluation dimensions of the former Further Education and Funding Council's (FEFC's) inspection methodology for colleges, is instructive in this respect. Both the SEF and the FEFC's inspection processes resulted in schools and colleges engaging in highly bureaucratic evidence gathering practices to support their claims about the quality of their

provision. The organisational time, resources and effort associated with these practices created unnecessary burdens and added no value to their work with learners. Similar internal quality assurance requirements should not be imposed on ITT providers.

82. The review fails to note that requirements on providers to develop and implementation of improvement plans by providers are an established feature of Ofsted's inspection of ITT provision and that it has not to date identified internal quality assurance failures as a systemic issue. In the absence of any concerns identified through inspection, the NASUWT is clear that current arrangements are sufficient to secure public and professional confidence in providers' internal quality assurance processes.

The length of postgraduate programmes

83. The NASUWT is not clear that the review has set out an adequate rationale to support its proposal to change the current time requirements for ITT programmes or that the potential implications of doing so have been evaluated meaningfully.
84. In particular, while the length of the taught school year in maintained schools equates to 38 weeks, it is not evident why the review proposes that a similar minimum requirement on the length of ITT programmes should be imposed or what purpose would be served by doing so. The NASUWT understands that, in practice, most providers, particularly those in the school-based sector, currently have programmes that would meet this criterion. While some HEI providers do not have programmes of precisely this length, any increase to 38 weeks is likely to lead, at most, to marginal changes in programme lengths.
85. Although the NASUWT would not rule out a minimum programme length requirement in principle, it would be incumbent on the DfE in putting forward any such proposal to set out a more detailed rationale and description of its intended purposes than has been produced to date.
86. The review's recommended increase in the current minimum school placement duration from 24 to 28 weeks in all ITT programmes seems to be intended to allow for the proposed four-week intensive placement considered above. It appears that no assessment has been made of the higher costs providers would face as a result of the increased fees they would have to pay to schools to secure additional placement time or how the funding to cover these increased costs would be made available.

87. The NASUWT would not support changes to programme lengths on the basis proposed by the review before a thorough assessment of these implications has been undertaken.

ITT as a 'system-wide responsibility'

88. The review is right to recognise that an effective ITT system cannot operate without the support of schools and the in-school placements they provide.
89. It is clear that through their recruitment of new teachers, individual schools benefit from the willingness of others to support these teachers during their training. Through this activity, schools contribute to the effective functioning of a national education system, in which teachers are trained to serve in any setting where their skills are required and valued. For this reason, the NASUWT rejects the suggestion in the Report that schools and employers should be incentivised to take part in ITT by the prospect of developing teachers who will move on to work only in their settings.
90. Developing means of maintaining and further enhancing the ability and capacity of schools to participate in the training of teachers is a critical dimension of policy in this area. It should be central to any effective reform programme for the ITT system. Therefore, it is unfortunate, as noted elsewhere in this submission, that many of the proposals set out by the review could disincentivise rather than encourage schools to engage in ITT-related activity.
91. The Review's apparent support for adopting coercive measures to secure greater involvement of schools in the ITT system is highly inappropriate. Such proposed measures include, for example, reflecting schools' participation or otherwise in ITT in their Ofsted inspection outcomes or denying access to additional funding streams or national initiatives to schools not deemed to be contributing sufficiently to the ITT system.
92. The NASUWT is clear that a strategy for maintaining and enhancing the quality and extent of schools' participation in ITT should begin by seeking to remove the impediments they can face to engaging manageably and effectively in ITT programmes. As noted above, tackling the workload crisis in schools, providing support for mentors and other staff in terms of time, resources and training and providing appropriate remuneration for staff with responsibility for leading schools'

work on ITT would clear impediments that can prevent schools from playing their part in supporting the training of the next generation of teachers.

93. Such action would create conditions in which the Government and stakeholders could explore the appropriate contribution that schools might reasonably be expected to make to the ITT system more effectively.

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