

## **Initial Teacher Education Market Review Consultation – UCU response**

### **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?**

UCU is not convinced that any evidence has been produced to demonstrate a need for the wide ranging and disruptive proposals contained within the review. There are multiple sources of evidence that show that the quality of teacher education in England is good or outstanding, and rather than see an improvement in current standards, we are extremely concerned that by implementing the proposals in the review at haste, and without proper scrutiny or debate, we actually risk damaging the quality of the education that trainee teachers engage with.

UCU also does not feel that we can pick and choose from a list of themes without reference to the wider context of teacher education, the financial resources available, staff workload or pay and conditions. Without addressing these we will not be able to make sustainable improvements for the long term.

For these reasons we cannot comment on the themes set out because we do not agree there has been a 'case for change' made in the report as claimed.

UCU is not against identifying areas for improvement, as of course improvements could always be made, but we believe that this should be done in collaboration with the sector as a whole, with a sound rationale and evidence base, meaningful consultation and debate. As mentioned above we also cannot do this in isolation without considering the wider context.

**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.**

We note the recommendations are completely uncoded. The hours required for mentor training are completely unrealistic without funding, yet there are no commitments to increasing funding within the report. And although we support investment in the education of teachers, better support to beginning teachers and their mentors, and a simplification of the routes into teaching, we cannot support the timing of this consultation. We urge the department to listen to the sector, pause and take stock before pressing ahead at speed with unnecessary and destabilising proposals.

## Quality Requirements for ITT providers

Please provide comments on the proposed approach to intensive practice placements:

The consultation does not provide sufficient information about what these placements would entail, and we would need to understand how they differ from current practice and follow through with the implications for providers, students and mentors. Independent research into the effectiveness of intensive placements should be provided, along with an assurance from the school sector that they have the capacity and willingness to host such placements before we could comment.

Please provide comments on barriers to implementation:

Issues of capacity, resource, workload and applicability across all phases and regions are likely to form barriers, but we cannot comment in depth because of a lack of detail in the proposal.

Please provide any comments that you have on the minimum timings:

UCU does not believe that such a prescriptive approach is consistent with the principles of partnership nor will it allow providers to shape their offer to meet the needs of local schools or students. We also note there is no commitment to providing increased financial resources to deliver the increased minimum timings.

Please provide any comments you have on any of the other curriculum requirements:

The proposals go beyond the requirements of the core content framework. They seem to imply that in order to be high quality, all ITE programmes should follow fairly similar curricula. UCU is concerned that by moving toward the provision of narrow, less diverse curricula that essentially restricts student choice, this will also in turn lead to a less diverse cohort of student teachers being attracted to the profession.

It is essential that links to subject specialists and research expertise are maintained. If we jeopardise the future of education departments, where will the research evidence come from that effective practice can be based on, and how will improvement be evaluated? The report talks about evidence based practice and yet proposes reforms that undermine the basis upon which we can gather evidence.

Furthermore, the restriction of academic freedom and a prescriptive curriculum for all providers means that there will be fewer opportunities for student teachers to engage in criticality and reflective practice, and the quality of new trainees will therefore diminish. The deprofessionalisation of the sector is a very real threat from these proposals, and UCU is unable to support any reforms that devalue the professional work and skill of our members.

Please provide comments on the proposed approach to mentoring:

Given the timing of the consultation period during the summer closure, we do not believe that the department will be able to develop an approach that the whole sector can implement in the proposed timescales.

High quality mentoring is an essential part of good ITE but it needs time, resources, expertise and experience. We do not believe that the report sets out where the capacity for this will come from given the pressures within existing funding arrangements and workload demands.

Please provide any comments on the proposed approach to assessment of trainees undertaking ITT:

ITE providers already develop appropriate assessment and progression frameworks to assess their trainees. Therefore we are unclear as to why such a proposal is necessary.

Please provide any comments you have on the proposed approach to quality assurance:

ITE providers of course already develop their own internal quality assurance arrangements and are subject to external quality assurance through Ofsted, and in the case of higher education institutions, the QAA. We are therefore unsure why such a proposal would be deemed necessary. Does the department not have confidence in existing quality assurance arrangements? In which case this would stretch much further than just to ITE programmes. Or does the department wish to exert extra control over the delivery of ITE compared to other education programmes? In which case the report should set out why this might be.

In any event UCU are concerned that the proposal means a duplication of quality requirements, increased administration and bureaucracy, increased cost and resource implications, and a confusion over the lines of accountability and overall responsibility for quality. This would all be for little or no gain, given the current quality standards to be found in ITE.

Please provide any comments you have on the proposed approach to structures and partnerships:

UCU are very concerned about the effects of the proposal on existing partnerships. Very successful partnerships are in operation that have been developed over a number of years and have evolved organically to meet the needs of their communities and students. By requiring the implementation of a new system across all providers at the same time we risk destroying these partnerships that are working well and satisfy all parties involved.

Programmes need to be flexible enough to meet local needs, and the needs of their schools and students. The upfront spelling out of structures and partnerships would be a hindrance to the responsive and flexible delivery that provides the best outcomes for all involved.

Furthermore one of the strengths of the existing system is that schools and ITE students have access to a wide range of providers through existing partnerships. If the reforms result in fewer, larger, less local providers being involved in ITE, then we lose this feature.

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

UCU would like to state very strongly our support of the PGCE as an integral part of teacher education. QTS and the award of an academic qualification should be linked and are mutually beneficial because teacher education is at its best when schools and higher education work in partnership.

Teaching is more than a practice based craft. To deliver excellence a teacher needs a theoretical and professional knowledge of education, an understanding of how children learn, including the development of critical thinking skills, problem solving and collaborative working; alongside an expert knowledge of their subject discipline. A teacher needs an understanding of all aspects of child development to recognise and analyse educational needs and adapt their teaching practice accordingly. As such the very best teacher education incorporates school based learning and higher education working together in partnership to fully integrate theory, research and practice.

If these proposals result in providers withdrawing from the market we risk losing the academic qualification, the PGCE, as an integral part of teacher education. Education research, upon which teacher education and CPD for the existing workforce depends, will be greatly diminished should education departments no longer be engaged with delivering education for new and beginning teachers.

### **Please describe any indirect impacts on provision of Further Education ITE**

The FE sector already finds it challenging to recruit and retain enough teachers. The pay gap between college and school teachers now stands at £9,000 and around 25,000 teachers have been lost to the sector over the last decade. The department is simultaneously presiding over a skills and post-16 education bill which is designed to increase the numbers of adults and young people learning in FE without addressing long term funding shortfalls or capacity in the sector.

These are fundamental issues that need urgent attention if FE is going to play the role marked out for it by the department in the levelling up agenda, rebuilding from the covid-19 pandemic and addressing long term skills gaps and the shortage of workers in sectors particularly affected by the UK leaving the EU. If we lose capacity in the sector to train new

FE teachers then this will have a devastating impact on all these agendas, yet the already stretched and undervalued existing workforce will be expected to deliver.

### **The accreditation process and monitoring**

The report lacks any evidence to show why a reaccreditation process is needed. The process will be costly, complex and disruptive. Providers are already subject to rigorous external and internal quality assurance regimes. We risk providers choosing to withdraw from the sector (and indeed some have already signalled their intention to do so) rather than engage with an onerous bureaucratic process of little benefit to themselves or their students. If providers do withdraw from the market, this will lead to a lack of training places, and ultimately a shortage of teachers. This would be a catastrophic outcome for our schools and colleges. The department must make the case for the need for, and the benefits of reaccreditation, and then should engage meaningfully with providers to understand what this would mean for their delivery of training places, and whether they would continue to provide initial teacher education or operate wider education departments. The department would then be able to understand what consequences the proposals would have on the availability of training places across England, subject impacts and future teacher supply.

UCU is extremely concerned about the idea that the department could broker mergers between providers. A supportive and constructive improvement process should not use the threat of forced mergers. Of course providers could choose to work with each other to improve, but requiring mergers, or the transfer of trainees from one provider to another will lead to fewer providers, less coverage of training places across the country and the formulation of larger providers unable to respond sensitively to local need.

We do not see the need for additional monitoring outside of the existing internal and external quality assurance that already exist. If these processes are not sufficient to ensure the quality of ITE, the department should set out why, and explain how ITE differs from other professional education programmes to the extent it needs central oversight directly from a government department.

### **Timelines**

The timescales are not realistic. Schools and colleges are focussing on education recovery from the pandemic. With the significant impact on children and young people's mental health and the widening of inequalities this should be the priority for the department too. Instead these proposals will place significant strain on the sector when previous reforms such as the early careers framework and core content framework are still bedding in.

The consultation has taken place over the summer closure meaning that many institutions and staff will have been unable to give their views. We urge the department to consult

more widely in the new academic year, and accept that a target of September 2023 is too rushed.

Higher education institutions would need sufficient time to redesign and revalidate their programmes to meet new requirements, notwithstanding any reaccreditation procedure they might have to undertake. Trying to rush implementation makes it all the more likely they will decide that it is not possible to meet the requirements and instead withdraw from the sector.

### **Equality impacts**

UCU would welcome an equalities impact assessment undertaken for each recommendation to fully assess the implications for each proposal. If ITE students have less choice over providers and curriculum then those with particular needs or requirements may find it more difficult to access appropriate provision.

UCU would also note that the direction of travel of the proposals are towards homogenisation and uniformity across the sector. In initial teacher education exposure to a diversity of ideas and experiences are of crucial importance to developing subject expertise, engaging in challenging and reflective learning, having the ability to appropriately respond to the needs of students (particularly for those with protected characteristics or special educational needs), and we are concerned that this plurality of experience and thought will be lost if we proceed with implementing the report.

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