



NSEAD's Response to the Initial Teacher Training (ITT) Market Review Consultation

NSEAD's response to the ITT Market Review consultation is shared on the following pages.

We encourage **all** members with an interest in ITE to submit a response to the consultation.

Useful links to read in conjunction with the NSEAD response

[Initial teacher training \(ITT\) market review: recommendations - Government consultation](#)

[Initial teacher training \(ITT\) market review: overview](#)

[Initial teacher training \(ITT\) market review report](#)

The Quality Requirements

The case for change

Q: Which of the themes set out in the report do you particularly recognise as key area(s) where there is an opportunity to further increase the quality of ITT? You may choose as many themes as apply.

- a. Consistency across partnerships and between providers in the content and quality of the training curriculum
- b. Rigorous sequencing of the training curriculum
- c. Alignment between the taught curriculum and training environments, in particular teaching placement schools
- d. Sufficient opportunities for trainees to benefit from highly focused practice of, and feedback on, essential components of the curriculum
- e. High-quality mentoring to ensure that mentors both know and understand the training curriculum and have a sufficient level of influence over the progress of trainees
- f. Clarity about the way in which the market operates for potential trainees
- g. A supply of enough high-quality placements with the capacity to fully support the delivery of the trainee curriculum
- h. None of the above

Q: Please provide any additional details to explain your selections.

As the subject association and professional body for UK based art and design teachers we are committed to ensuring that training in our subject is of the highest possible quality. We recognise that there is always room for improvement in any system, no matter how well-performing. Curriculum design and pedagogy within art, craft and design is complex and an evolving and creative practice; we support the principle of review and continuous improvement. However, we are concerned that this report ignores current successful practice, which is very disappointing for those involved in the sector – it demonstrates a lack of professional recognition.

We call for a more holistic view of learning within our subject, recognising that quality of trainee outcomes and impact on children and young people's learning are as important, if not more so, than the teacher training curriculum itself. ITE should be on a constant upward trajectory, but the bottom line is what difference will these recommendations make to children and young people?

a&c.) Regarding quality assurance, we argue that current QA systems in place in ITE provision, especially in HEIs, have been overlooked. QA is essential, but we disagree with this being dictated at a national level. However, we do recognise that smaller providers may need support in achieving this. Some of our members argue that in order to ensure sufficient quality, consistency and rigour, all ITE should be HEI-based.

b.) The autonomy of subject experts in high-functioning ITE providers should be enabled with regards rationales and process of ITE in art, craft and design.

e.) We recognise that high quality mentoring is essential within ITE. However, we question the value of generic mentoring and wonder how subject-specific mentoring will be supported.

f.) Clarity about the way in which the market operates for potential trainees is a technical matter that could be improved with sharper communications and a more coherent search facility for potential applicants, with clear information that allows them to make an informed choice within the existing routes to QTS, i.e. through an undergraduate route, a postgraduate tuition fee route or a postgraduate employment-based route.

g.) It is certainly the case that lack of placement supply is a problem in the potential capacity of the sector to train more teachers. There is focus on this report on the advantages of operating 'at scale', It is proposed that regional school commissioners should consider involvement in ITT as a condition of growth for trusts. We agree with this in theory but there is a lack of clarity in the report as to what this might look like in reality. There is no consideration in this report about what we believe to be the key to high quality placements, building capacity that is sustainable – investing in quality partnerships based on trust and mutual respect, developed over time and based on common goals.

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

It is not clear how we ensure we get a high quality and calibre of ITE applicants and how selection and time for this is to be made.

There is a need for a greater focus on subject specialty and developing expertise, both for mentors and trainees.

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

We are unconvinced that these proposals, including the CCF, acknowledge the complexity and richness of teaching and learning in art, craft, and design. Generic training is no substitute for subject expertise, either for trainees or mentors.

We are concerned about the proposed requirement that all ITE providers go through 'a new, rigorous accreditation process'. Teacher training providers are already rigorously accountable through formal and informal procedures. The proposed highly proscribed and generic curriculum and model of mentoring will not meet the needs of subject specialists in art, craft and design. Teachers are not simply technicians whose role is to perform specific actions and tasks and implement the ideas and procedures determined by others

The autonomy of subject experts in high-functioning ITE providers should be enabled with regards rationales and process of ITE in art, craft and design.

The proposals will bring significant disruption to the market and could in fact exacerbate existing challenges, whilst creating new ones. The prospect of key HEI providers leaving the market should concern us all.

We do not support an expensive, untested and enormously disruptive reaccreditation process, based on insufficient evidence. As they stand these proposals lack academic integrity, and will result in a diminished quality of provision, focused on supplying technicians not educators.

We advocate a simpler approach, building on the good practice that already exists within the system. This should be adequately costed, tested, refined and informed by robust research evidence.

Quality Requirements for ITT providers Curriculum

Q: Please provide any comments you have on a) the proposed approach to intensive practice placements, b) any barriers to implementation, and c) any support you would need to overcome these barriers.

We strongly disagree with the proposal that providers should design and deliver an intensive placement experience of at least 4 weeks (20 days) for single-year courses and 6 weeks (30 days) for undergraduate course. This is particularly problematic for primary when so many different curriculum areas need to be addressed in the classroom. Does this mean that the focus will become narrowed even further than it is now? We question the evidence that supports this proposal and find the concept confusing. Providing and supporting an intensive placement is likely to place enormous strain on schools to achieve and will not support a deep engagement with pedagogy and curriculum.

NSEAD supports a focus on subject specialty. We believe that the logistical and geographical challenges of intensive placements will compromise any drive towards programmes being designed around subject and phase specific training opportunities.

It is not clear how these intensive placements would be delivered or resourced, despite the fact that the report identifies the supply of enough high-quality placements with the capacity to fully support the delivery of the trainee curriculum to be a serious challenge. This proposal does not appear to have been thoroughly researched. We believe that providers will be unable to meet the quality requirements of intensive placements, and that schools will not be in a position to provide them.

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

We reject the proposal that 'single-year ITT courses that lead to QTS should be required to be of 38 weeks' duration, as a condition of accreditation, of which the minimum spent in schools should be 28 weeks'. There is no evidence to support this requirement. Importantly, we feel that this would place

subjects like the arts in even further threat of marginalization and the quality of education for all will be further reduced as a result.

We strongly disagree with the proposal that providers should design and deliver an intensive placement experience of at least 4 weeks (20 days) for single-year courses and 6 weeks (30 days) for undergraduate course.

Regarding minimum hours in classrooms, this is broadly in line with the experience of many trainee teachers. As with other aspects of proposals however, there is a need for greater detail and clarity about expectations to ensure equity of provision across programmes.

Whilst we support the increased focus on mentoring support in principle, we also feel it is important to recognise that trainees' needs, as individuals, need to be given sufficient attention in the mentoring process – indeed, these should be the starting point for discussion and support.

Any increase in time will of course require additional resources, capacity and funding.

Q: 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.

As a subject association focused on art, craft and design education, we are concerned at a lack of awareness of the diversity of pedagogy that exists depending on a subject area or a particular curriculum, particularly in secondary education. We would like to see art, craft and design lead mentors but do hold concerns related to resources, time and money to facilitate this.

Mentoring

Q: Please provide any comments you have on a) the proposed approach, b) any barriers to implementation, and c) any support you would need to overcome these barriers.

In principle, we agree with the proposal that providers offer suitable mentor training. However, we are concerned that generic mentor training is insufficient to support trainee art, craft and design teachers. If subject-specific training is to be provided, who will offer this?

We agree that high quality CPD for ITE mentoring is essential but are uncertain of the necessity for lead mentors to hold specific qualifications: either the National Professional Qualification for Leading Teacher Development (NPQLTD), one of the other 2 specialist NPQs, or training with the equivalent content and quality. Again, we have questions regarding resources, time and money.

NSEAD recommend exploration of models for mentoring communities that support collegiality rather than a top-down approach.

We cannot support the implementation of an untested alternative to the current provision. We urge that any proposal builds on the high-quality programmes that already exist, which have undergone rigorous

quality assurance processes and have proven impact on the quality of mentoring. Any alternative must be evidence based and subject to extensive testing and piloting.

Assessment

Q: Please provide any comments you have on this proposed approach to assessment of trainees undertaking ITT, referencing by number any of the specific requirements included in the Quality Requirements that you wish to comment on.

The proposal that providers develop their own assessment frameworks is problematic. How will high standards and parity be achieved? Assessment frameworks focusing on fixed outcomes rather than continual developmental process will weaken the long-term development of the teaching profession. Some providers may be unable to design a framework with the necessary suitability and rigour. We also hold reservations about the need to include 'the priorities as set out in the Quality Requirements'. These priorities are unlikely to be universally supported.

Regarding quality assurance, we argue that current QA systems in place in ITE provision, especially in HEIs, have been overlooked. QA is essential, but we disagree with this being dictated at a national level. However, we do recognise that smaller providers may need support in achieving this.

Structures and partnerships

Q: 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.

Regarding the suggestion that schools should be expected to be involved in ITE, we hold mixed views. It is certainly the case that lack of placement supply is a problem in the potential capacity of the sector to train more teachers. However, schools that feel compelled to offer placements may not be well disposed to offer trainees the necessary support.

It is proposed that regional school commissioners should consider involvement in ITT as a condition of growth for trusts. Again, we agree with this in theory but there is a lack of clarity in the report as to what this might look like in reality.

Qualified Teacher Status and the PGCE

Q: Please provide any comments you have on this proposal.

Postgraduate awards require consistency in standards and academic rigour. Some of our members feel that PGCE qualifications should only be awarded by HEIs. The proposal to create an 'Institute of Teaching' appears to be unfounded and raises, yet again, important questions regarding resourcing and funding. We do not support the creation of a national 'Institute of Teaching'; instead, we suggest that

more attention should be given to raising standards within the existing system and promoting the current good practice of outstanding providers.

Accreditation

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

We do not agree with the proposed requirement that all ITE providers go through ‘a new, rigorous accreditation process’. Teacher training providers are already rigorously accountable through formal and informal procedures. New accreditation is a good idea if it removes poor providers from the system, but for others it serves no real purpose and creates unnecessary bureaucracy. Indeed, one could argue that an affront to the professionalism of the ITE sector and the Ofsted’s auditing capacity.

An enforced reaccreditation process presents a serious threat to the teacher supply chain, and the withdrawal of some providers who will not accept the potential compromise of academic standards that may be the result of the standardised format presented in this report.

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

If ITE providers are found to not respond to mentor-type support to continually improve, then the DfE should be formally notified. Improvement is a negotiable and continuous journey, not a tick box exercise. Again, we do hold concerns about the ‘Quality Requirements’.

Q: Please provide any comments you have on a) the proposed target of September 2023 for first delivery of the Quality Requirements and b) DfE’s proposed timeline as set out above.

We do not believe that the proposed timescale is achievable nor desirable. We have particular concerns about the proposed re-accreditation process and the generic nature of much of what is set out in the Quality requirements. Without further review, based on evidence research, the proposals in their current form will be disruptive and damaging. The future supply and quality of provision is at risk.

Teaching school hubs

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

The Teaching Schools Hubs initiative lacks clarity. If we do not fully understand the role and purpose of Teaching School Hubs, we cannot comment on their potential role in ITE. Again, some of our members argue that in order to ensure sufficient quality, consistency and rigour, all ITE should be HEI-based.

ITT as a system-wide responsibility

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

It is proposed that regional school commissioners should consider involvement in ITT as a condition of growth for trusts. Again, we agree with this in theory but there is a lack of clarity in the report as to what this might look like in reality.

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

Recruitment and selection

Q: Please provide any comments you have on a) the impact of the proposed reforms on the recruitment and selection process, including potential for streamlining of the recruitment process and sharing of recruitment practices, b) any barriers to implementing the proposed reforms at the recruitment stage, and c) support that would be needed to overcome these barriers.

We do not see any proposals in the report which would directly improve, streamline or remove barriers from the recruitment and selection process. Reducing the range and breadth of provision and number of providers will not in itself streamline the recruitment process.

Closing comments

As closing comments, we would like to highlight our concern that there is no mention of resources, time and money to realise the report's proposals. This lack of clarity raises deep concerns. Current successful practice is ignored, which is very disappointing for those involved in the sector – it demonstrates a lack of professional recognition. We are unconvinced that these proposals, including the CCF, acknowledge the complexity and richness of teaching and learning in art, craft, and design. Generic training is no substitute for subject expertise, either for trainees or mentors. Additionally, there is no mention of how we ensure we get a high quality and calibre of ITE applicants and how selection and time for this is to be made. ITE should be on a constant upward trajectory, but the bottom line is what difference will all of these recommendations make to children and young people?