

6th July 2021

Rt. Hon Gavin Williamson MP Secretary of State for Education Sanctuary Buildings Great Smith Street London SW1P 3BT

Dear Secretary of State,

## ITT Market Review: A Risk to Teacher Supply

We are writing in response to the recommendations outlined in the consultation on the ITT Market Review published on 5th July 2021.

There are parts of the Market Review proposals which we are pleased to support. Broadly speaking, the aims of the recommendations to build on existing quality in provision is to be welcomed. The quality requirements include a number of elements which we would champion, including well-sequenced and evidence informed curricula, a recognition of the vital role played by mentors and the importance of high-quality assessment systems and quality assurance processes. We are confident that existing accredited providers are excellently placed to rise to these new requirements. In the vast majority of cases, in preparation for the introduction of the Core Content Framework and the new Ofsted Inspection Framework, providers are already delivering, or are a long way along the journey to delivering, many of the recommended requirements.

We do, however, have a number of grave concerns about some of the recommendations around structures and partnerships, the speed of implementation and, in particular, the recommendation for all providers to undergo reaccreditation. Our primary fear is that these recommendations taken collectively represent an immediate and catastrophic risk to the teacher supply chain and to the quality and availability of provision. We set out these risks below:

- The proposed timescale for reaccreditation offers just five months for providers to redesign
  partnerships, develop high quality curriculum plans and undertake the administrative work
  involved in reaccreditation. We do not believe this is sufficient time for genuinely high
  quality, well planned approaches and could lead to *poorer* rather than stronger quality
  provision.
- The proposed timescale runs a high risk of high-quality providers being lost from the sector because they are unable to submit applications in sufficient time, or because rushed applications are not of sufficient quality to meet the requirements. This will, inevitably, lead to gaps in provision at a regional level, could lead to some shortage subjects without

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- providers to offer them and will, as a consequence, have a catastrophic impact on teacher supply as a whole.
- The report offers no evidence to suggest that the existing sector is unable to meet the quality requirements set out in the recommendations. We strongly believe it can meet these requirements, rendering a reaccreditation process redundant.
- The costs of an extensive reaccreditation process have not been set out in the consultation document. We believe that a fully costed plan, setting out the capacity of the Department to undertake an unprecedented volume of reaccreditation applications in a short timescale, must be published and consulted on *in full* before public money is assigned.
- By its nature, a reaccreditation process is a paper-based exercise. We do not believe that this is an efficient or sufficiently robust way to measure the quality of ITE provision. It is our view that reaccrediting all ITT provision is less reliable than established and robust quality assurance mechanisms, notably, Ofsted inspection cycles.

In short, we do not understand why the Review Group's suggestions on the content and structure of ITE programmes could not be achieved through changes to the existing ITE criteria, inspected by Ofsted in the usual way, without going through the turmoil and risks that a wholesale restructuring of the ITE market would entail.

There are potentially huge implications for teacher supply at a time when it is clear that the boost to ITE recruitment resulting from the pandemic is coming to an end. The current organisational structure has been extremely effective in supplying this country's schools with a large number and diverse range of new teachers each year. This should not be put at risk. One of the key factors in determining an applicant's choice of ITE provider is location. If SCITT and HEI providers lose their accredited status (for example because of expectations in terms of scale) some potentially excellent teachers will be lost. The uncertainty associated with accreditation and reaccreditation procedures, added to increased prescription over how resources within partnerships are allocated, could mean providers and schools conclude that it would be in their interests to divert their attention to other areas of activity. It cannot be assumed that existing providers will be content to act as junior delivery partners.

The increased involvement of schools in ITT is one of education's success stories in recent years. Schools are often involved in ITT partnerships because of the relationships they have developed with their partner providers over a number of years. There is no guarantee that they will be willing to partner with other, potentially remote, organisations, especially if this leads to a loss of flexibility and ownership and increased prescription about what they do and how they do it. The withdrawal of schools from partnerships will lead to fewer placement opportunities. That, in turn, will act as a further constraint on recruitment.

Yours sincerely,

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Emma Hollis

**Executive Director** 

The National Association of School-Based Teacher Trainers

CC: Nick Gibb