

# Initial Teacher Training (ITT) Market Review Consultation

Representation from the Royal Society of Chemistry

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## About Us

With around 45,000 members in more than 100 countries and a knowledge business that spans the globe, the Royal Society of Chemistry is the UK's professional body for chemical scientists, supporting and representing our members and bringing together chemical scientists from all over the world. Our members include those working in large multinational companies and small to medium enterprises, researchers and students in universities, teachers, and regulators.

### Initial Teacher Training (ITT) market review: recommendations

The Department for Education appointed an expert group to undertake a review of the ITT market for courses that lead to qualified teacher status. The aim of the review was to enable the provision of consistently high quality training, in line with the ITT core content framework (CCF), in an effective and efficient market.

Following its publication, the department sought views on the recommendations made in the report through a public consultation.

## Comments on the review report

If the market review recommendations are taken forward, we are concerned that existing connections between teacher training and academic education research will be weakened. HEI providers have told us that their autonomy in deciding how they arrange their curriculum, partnerships and structures is vitally important. In some cases, the recommendations could not be implemented within their existing HEI governance structures which means that they would have to withdraw from offering ITT. We believe that strong links between research and ITT can help teachers to become critical evaluators of evidence which will be useful throughout their careers.

In addition, we have concerns about capacity. The market review report points out that HEIs train 75% of total trainees - 31,027. We also note that the Russell Group universities train more than 5,500 teachers each year, and in 2018/19 this included 24% of all new chemistry teachers. We are therefore concerned that there will not be capacity in the reformed ITT system to train the required number of chemistry teachers if some universities pull out. There is potential for this to be particularly problematic at a regional level.

In conclusion, we recommend that DfE pause plans for any implementation of changes and engage further with the profession. Unfortunately, the consultation period time has been short, and during the summer holidays which has made it hard for some in our community to contribute. To prevent any unintended consequences, as well as significant damage to stakeholder relationships, we feel it is of vital

importance to pause and work with the sector to find viable ways to ensure that all ITT is sufficiently high quality.

## Consultation Response

*Note: Any questions not answered are listed at the end of this document for reference.*

### The case for change

11. 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.

Alignment between the taught curriculum and training environments, in particular teaching placement schools, 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, A supply of enough high-quality placements with the capacity to fully support the delivery of the trainee curriculum.

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?

Subject Knowledge Enhancement (SKE):

We are disappointed that SKE has not been included as part of the market review of Initial Teacher Training (ITT) - with the exception of a reference to primary trainees developing subject knowledge. SKE is a valuable part of teacher training preparation, building or refreshing existing knowledge that often sets the foundation for ITT. SKE courses are particularly valuable for the sciences, to support recruitment, and as a tool to address subject knowledge gaps and misconceptions early in the process. We are concerned that the value of SKE courses has been overlooked and strongly believe that it needs to be incorporated into DfE's policy planning, particularly as part of recruitment and retention strategy.

In addition, we recommend a more robust subject-specific quality assurance process for SKE, as the Institute of Physics highlighted in their Subjects Matter report 'some of these courses are excellent; however, there is little standardisation, and the link between these courses and in-service training is weak' (Institute of Physics, 2020).<sup>1</sup> As chemistry is a practical subject, it is of vital importance that practical skills development is a mandatory part of SKE training process. The Government should encourage all SKE providers to include at least 10% of laboratory work in their SKE courses in chemistry.

Subject-specific focus:

The Carter review of initial teacher training, identified gaps in areas such as subject knowledge and subject-specific pedagogy (Carter review, 2015 ).<sup>2</sup> Whilst the Core Content Framework (CCF) sets a minimum requirement that highlights the importance of subject and curriculum knowledge, the recommendations in the ITT market review could be further supported with recommendations on the subject-specific aspects of teacher training.

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<sup>1</sup> Institute of Physics, December 2020, Subjects Matter: <https://www.iop.org/sites/default/files/2020-12/Subjects-Matter-IOP-December-2020.pdf>

<sup>2</sup> Carter review of initial teacher training, January 2015;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/399957/Carter\\_Review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/399957/Carter_Review.pdf)

The subject-specific variation between ITT providers, initially noted in the Carter review, is not addressed by the recommendations in the ITT market review. Providers expressed concerns that if the recommendations do not explicitly mention subject-specific content, there is a risk of it being lost in the design of teacher training programmes. For chemistry, this could mean reduced access to laboratory space for trainees to develop their practical skills.

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. Please describe any alternative approaches to addressing these challenges in the text box below.:

Mentoring:

We welcome the focus and emphasis on mentoring as part of the teacher training experience. However, we are concerned as to how partnerships will be able to secure and train these mentors. Chemistry is a shortage subject, and the issue of teacher supply is particularly pronounced for schools in disadvantaged areas (Education Policy Institute, March 2020).<sup>3</sup> HEI providers have raised concerns that placement schools are likely to withdraw from their partnerships due to the additional mentoring requirements. Similarly, SCITTs are concerned about how they will resource the additional mentoring capacity. In order to implement the mentoring recommendations successfully, additional funding would be needed for schools to cover the extra time required for mentoring and mentor training. We are open to discussing the support we and other subject associations could provide to help ensure that mentors have appropriate subject and pedagogical content knowledge before embarking on their mentor training.

ITT and school placements:

We agree with the suggested approach of aligning the taught curriculum and training environments. Since schools are not mandated to host trainee teachers, providers are conscious that to maintain good relationships, they need to ensure they do not over-burden their placement schools. We see the benefit of having a more structured approach, including incentives for schools engaged with the process.

### Quality requirements for ITT providers: Curriculum

14. 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.

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

We believe the approach of intensive practice placements, needs further consideration and input from the profession. Providers we have spoken to have expressed their concerns, specifically about:

- how to incorporate intensive placements into existing heavily-packed curricula;
- how they could work logistically;
- resourcing the additional time for planned and expert support;
- the approach of adopting specific focus areas, stating that teaching is complicated and needs to be considered in a more holistic fashion, drawing on school contexts, curricula, and communities; and
- that the intensive placements will be implemented without testing or piloting the approach.

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<sup>3</sup> Education Policy Institute, March 2020, Teacher shortages in England: analysis and pay options, <https://epi.org.uk/publications-and-research/teacher-shortages-in-england-analysis-and-pay-options/>

Some providers thought that intensive placements could work if they were subject-specific - focusing on Pedagogical Content Knowledge (PCK) and were appropriately funded. We therefore would like to see more information and discussion, in collaboration with the profession, on bringing clarity to the intention of intensive placements.

[Please provide comments on barriers to implementation.:](#)

The implementation of this recommendation will likely be a challenge for providers. Partner schools are focused on delivery of the Early Career Framework (ECF) and may have limited capacity to offer ITT placements. In addition, training providers feel they have only recently incorporated the Core Content Framework (CCF) into their curricula and connected it to the ECF. If intensive placements are mandated, curricula will need to be re-designed again. In addition, these requirements have taken place during an exceptional time of a global pandemic. We recommend that any changes to reform ITT further should be delayed.

[Please provide comments on any support you would need to overcome the barriers identified above.:](#)

With this understanding of the current context, in order to make intensive practice placements viable additional funding would be needed to cover lead mentor and mentor time. We also recommend a delay to any changes and discussion with the profession on the purpose of intensive placements, building a plan together of how they could work.

[15. Please provide any comments that you have on the minimum timings set out in the table above.](#)

Subject-specific study:

We have heard about considerable variation, across providers, on the time given to subject-specific study, for example, in a quick poll we conducted at one of our science ITT provider meetings, a range of 0 – 18 days was reported. We recommend the DfE consults with providers to establish what an ideal amount of subject-specific study time might be, and whether a sensible ‘minimum’ requirement could be specified. We would be happy to contribute to these discussions.

Minimum hours:

Providers are concerned that the minimum requirement for mentoring may deter those interested in becoming a mentor because of the additional time commitment without sufficient funding to enable a reduction in their other duties.

Extending the course length to 38 weeks may have the unintended consequence of reducing providers’ flexibility in responding to the needs of their trainees. For example, a provider shared with us that the time between the end of their PGCE course and the end of the school term, is sometimes used for trainees who need more time in school to meet the required standards. In addition, some providers have shared with us that they will need to fit material into the timetable rather than sequencing it appropriately, due to the reduced time they will have when their trainees are all together.

## Quality requirements for ITT providers: Mentoring

17. 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.

Please provide comments on the proposed approach.:

We agree with the proposed approach of mentoring based on a deep understanding of the curriculum and for trainees to have access to mentors who have experience in subject and phase specific approaches. However, securing subject-specific mentors in shortage subjects, including chemistry, could be challenging for some schools.

Please provide comments on barriers to implementation.:

We are concerned that the recommendations will be difficult for schools to implement without additional funding to cover costs associated with more mentoring and mentor training. A recent NFER report identified increased financial support as a key strategy to encourage schools to offer more ITT placements (Worth, J, 2021).<sup>4</sup> This suggests to us that financial incentives for schools could help resolve mentoring capacity issues. SCITTs that we have spoken with have raised concerns on the additional time required for lead mentors to complete National Professional Qualifications (NPQs), time taking them away from working with trainees. It is unclear whether current lead mentors who have existing NPQs will need to take another NPQ or if their existing qualification will be sufficient. The Early Career Framework (ECF) requires additional mentoring capacity and the message from providers is that schools do not have additional capacity for placement mentors, as well as the ECF.

Please provide comments on any support you would need to overcome the barriers identified above.:

In order to meet the needs of the ECF and ITT, we suggest funding for schools to recruit staff to cover the extra off-timetable requirements needed for mentoring. In the case of shortage subjects, like chemistry, where recruitment is challenging, we suggest a system of sharing subject mentors between schools or having remote subject-specific mentoring. Providers informed us that remote sessions over the course of the pandemic were positive and productive.

## Quality Requirements for ITT providers: Structures and partnerships

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 wish to comment on.

We are concerned about the reference to scale and quality level in paragraph 5.1: Providers must set out... At what scale they will operate, and, recognising the quality level set out in this document, demonstrate that they have sufficient capacity to be able to meet the requirements for training in all subjects and phases offered.

The report appears to be suggesting a move towards larger scale partnerships. We are concerned that this could reduce the ability to respond to individual needs, risk local knowledge being lost, and prevent the development of personal relationships. HEI providers have told us that they have relationships with mentors, in some cases across 35 schools and 45 mentors.

In addition, we are concerned that the partnership requirements risk destabilising the supply of science trainees. Our analysis of DfE's ITT census data on new entrants to postgraduate teaching training courses

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<sup>4</sup> Worth, J. (2021). Initial teacher training placement capacity in English schools: Analysis for MillionPlus. Slough: NFER <https://www.nfer.ac.uk/initial-teacher-training-placement-capacity-in-english-schools-analysis-for-millionplus/>

in 2020-2021, identifies 119 SCITT providers who train 10 or fewer science trainees.<sup>5</sup> There is a risk that smaller SCITT providers may withdraw from teacher training of the sciences, reducing the provision of science teacher training in regions across England. SCITTs that we have been able to speak with over the summer have expressed their concern about the recommendations in the market review. Specifically, the additional capacity required to meet the Quality Requirements (QR), the need to re-accredit – which is a demand on time and resources – and the uncertainty about the autonomy that might be lost through the need to develop partnerships. With all these considerations and changes, they have expressed genuine concern about the viability of their SCITTs.

## The accreditation process and monitoring

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

We are concerned about the unintended consequences of the re-accreditation process and recommend a delay to implementation. Training providers have spent the last year and a half adapting to the pandemic, as well as incorporating the Core Content Framework (CCF) to their curricula and aspects of the Early Career Framework (ECF). We believe that a re-accreditation will be an additional burden for the profession at a time when stability is needed. In addition, providers have noted that a re-accreditation process would be both costly and time-intensive, removing expertise away from teacher training to the more administrative aspects of re-accreditation. The profession would benefit from a period of stability after the impact of Covid-19.

## Timelines

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 as set out above.

Please provide comments on the proposed timeline set out above.:

The feedback from providers is that the timeline of November 2021 to March 2022 - 5 months, including holidays - is an unrealistic time frame for providers to establish partnerships, gather evidence against the Quality Requirements (QR) and apply for accreditation or re-accreditation. We would like to see the time frame extended to allow providers to implement the changes that will be announced in November and have a period of testing out and making adjustments as needed, before going through any accreditation or re-accreditation process.

## Questions not answered

*Note: Questions 1-10 regard identifying the person submitting their response and so are not included here.*

## Quality Requirements for ITT providers: Curriculum

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.

## Quality Requirements for ITT providers: Assessment

18. 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.

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<sup>5</sup> ITT Census data 2020/21 Provider tables, <https://explore-education-statistics.service.gov.uk/find-statistics/initial-teacher-training-census/2020-21>

### **Quality Requirements for ITT providers: Quality assurance**

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.

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

21. Please provide any comments you have on this proposal.

### **Routes into teaching**

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 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.:

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

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

### **Timelines**

27. Having read 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' and the anticipated timeline, if you think that your organisation would wish to deliver ITT in the future, would your organisation be likely to apply to become an accredited provider, seek to become or remain as a lead partner, or seek to become or remain as a placement school? As stated by the review, organisations may in some cases wish to take more than one role – as such, please select as many options as apply.

Please specify the conditions under which you would apply for the role selected above.:

28. If adopting a future model such as the one set out by the review, would you be looking to add more organisations to your current partnership?

29. If you answered yes to the previous question, would your organisation require support to identify potential partners? Please also explain what support would be needed and what barriers this would overcome.

Please explain what support would be needed and what barriers this support would overcome.:

### **Teaching school hubs**

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

### **ITT as a system-wide responsibility**

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

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

### **Recruitment and selection**

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.

Please provide comments on the impact of the proposed reforms on the recruitment and selection process.:

Please provide comments on barriers to implementation.:

Please provide comments on any support you would need to overcome the barriers identified above.:

### **Impact assessments**

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.:

Please describe any impacts specific to schools in rural areas.: