

Response ID ANON-QAGS-6JY4-S

Submitted to Initial teacher training (ITT) market review: recommendations
Submitted on 2021-08-16 15:37:23

Foreword by Nick Gibb MP, Minister of State for School Reform

Introduction

Personal details

1 What is your name?

Please provide your name.:

Professor Martin Williams, Pro-Vice Chancellor for Education

2 What is your email address?

Please provide your email address.:

martin.williams@admin.ox.ac.uk

3 Are you completing this consultation as an individual or on behalf of an organisation?

Organisation

4 Would you like us to keep your responses confidential?

No

If applicable, please provide your reason for confidentiality.:

About you

5 What is the name of the organisation you represent?

Please provide the name of your organisation.:

University of Oxford

6 Please tell us which of the below options apply to your organisation. You may choose as many as apply.

An HEI providing postgraduate ITT

If you selected 'other interested party', please provide further details.:

7 If your organisation is currently an accredited provider of ITT, how many trainees did you have in 2020/21?

Please provide the number of trainees you had in 2020/21.:

195

8 If your organisation is currently an accredited provider of ITT, how many a) subjects and b) phases did you offer in 2020/21? Please give your answer as a numeric value, providing an estimate if you are unsure of the precise figure.

Please provide the number of subjects offered in 2020/21.:

9 secondary subjects (including 3 sciences)

Please provide the number of phases offered in 2020/21.:

1 phase: secondary 11-18

9 Which of the Regional Schools Commissioner regions are you or the organisation you represent based in?

North-West London and South-Central England

10 Please tell us which of the below options apply to you. You may choose as many options as apply.

N/A - I am responding on behalf of an organisation

If you have selected 'I have an interest in ITT for another reason', please provide further details.:

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.

None of the above

Please provide any additional details to explain your selections.:

We have chosen not to highlight any of the above, but to provide a written response (see detailed response below).

We agree with the premise that all initial teacher education should be of high quality, with the drive to sustain and further improve quality within programmes needing to be part of a continuous cycle of quality assurance and development. It is difficult, therefore, to isolate particular features in the way that the above list suggests, since it is at programme level that high-quality provision is addressed.

As a high-quality partnership that has been recognised as outstanding by every Ofsted inspection that has been undertaken, we do not accept the premise that radical changes on a national scale will serve in any way to address issues of quality identified in relation to specific teacher education partnerships. The framing of the question seems to assume that particular approaches advocated in the proposals are in themselves features of quality provision. We would challenge this assumption. Statements a-e and g, for example, do not of themselves indicate high-quality ITT provision since it is possible to have a poorly conceived curriculum that is structured and delivered with consistency across providers.

Alignment, as conceived in the Market Review document, seems to pre-suppose a model of teaching in which all schools and all teachers plan and teach in exactly the same way. Our partnership accepts that there are legitimate differences between the policies of one school and another and in the extent to which particular practices are prescribed. The course programme (which is jointly reviewed by university and school partners in relation to each curriculum subject and our wider 'professional development programme') is intended to prepare prospective teachers to negotiate such differences, learning to work within existing school policies while asking critical questions of the rationale that underpins them and their effectiveness in that context.

We would argue that the provision of high-quality placements and high-quality mentoring depends on stable provision, allowing for joint planning and the nurturing of relationships over time; this would be severely damaged by rushed and radical changes.

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?

Please provide any other key areas for improvement.:

The premise on which any proposals are based should be a vision of what high quality coherent ITT provision looks like (Brooks 2021). We would begin by asking questions about values underpinning any reforms alongside a detailed consideration of the purposes of education for public good: for the individual, for local communities, for the nation state and for the global community (Biesta, 2020, Cochran-Smith 2021, Darling-Hamond 2017). We would contest any assumption that the list reflects what the evidence tells us about high-quality, evidence-based professional learning for teaching, or how the best international teacher education systems support such professional learning.

A focus on the mechanics of classroom practice inevitably leads to more generic approaches to ITT and reflects a conception of the teacher as an 'executive technician' (Winch et al 2015) rather than as a professional. We advocate models of professional learning which enable teachers to analyse evidence presented from different sources, both theoretical and practical, and make informed choices in the different contexts in which they work, throughout the length of their professional career (BERA-RSA, 2014).

It is important to clarify what is understood by the term 'quality' in relation to the preparation of teachers, which starts – as we have argued – with a clear vision of the kind of teacher that we are seeking to produce. Here we would endorse the following list of characteristics set out by the Universities Council for the Education of Teachers (UCET, 2020):

- competent and confident professionals who recognise and understand that educating is a professional, thoughtful and intellectual endeavour and who are able to learn from research, direct experience, as well as other sources of knowledge.
- epistemic agents, acting as independent thinkers who recognise that knowledge is contestable, provisional and contingent and thus search for theories and research that can underpin, challenge or illuminate their practice. They are able to analyse and interrogate evidence and arguments, drawing critically and self-critically from a wide range of evidence to make informed decisions in the course of their practice.
- able to engage in enquiry-rich practice and have a predisposition to be continually intellectually curious about their work with the capacity to be innovative, creative and receptive to new ideas emerging from their individual or collaborative practitioner enquiries.
- responsible professionals who embody high standards of professional ethics. They recognise the social responsibilities of education, such as working towards a socially just and sustainable world and understand the responsibilities of educators and education as a whole. Teachers are self-aware and aware of, and sensitive to, the needs of others, always acting with integrity.

Any improvements to the system of initial teacher education should therefore be focused on developing professionals who share these characteristics. However, we see little indication in the report and its recommendations of such an aspiration. Furthermore, improvements should also work effectively at a subject-specific level rather than risk reducing teaching to a list of generic procedures. Again, we see little in the proposals that addresses the issue of subject-specific and phase-specific teacher preparation.

Overall, we believe that high-quality teacher preparation programmes support teachers who will make a sustained commitment to the profession, inspire their pupils, and be able to teach (and eventually to lead) in contemporary and in changing contexts throughout their career. These are the teachers who are likely to remain in the profession.

References

BERA-RSA. (2014). Research and the Teaching Profession: Building the Capacity for a Self-Improving Education System. Available at: <https://www.bera.ac.uk/project/research-and-teacher-education>

Biesta, G (2020) *Educational Research: An Unorthodox Introduction*. London: Bloomsbury.

Brooks, C. (2021) *Initial Teacher Education at Scale: Quality Conundrums*. Abingdon: Routledge.

Cochran-Smith, M. (2021) Exploring teacher quality: international perspectives, *European Journal of Teacher Education*, 44:3, 415-428.

Darling-Hammond, L. (2017). *Empowered Educators: How High-performing Systems Shape Teaching Quality around the World*. Palo Alto, CA: Stanford Center for Opportunity Policy in Education.

UCET. (2020) *Intellectual Base of Teacher Education report* (updated February 2020). Available at: <https://www.ucet.ac.uk/11675/intellectual-base-of-teacher-education-report-updated-february-2020>.

Winch, C., Oancea, A. & Orchard J. (2015) The contribution of educational research to teachers' professional learning: philosophical understandings, *Oxford Review of Education*, 41, (2), 202-216.

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.:

We believe that the Oxford Internship Scheme offers a viable model of partnership with a highly ambitious curriculum, underpinned by strong principles (Benton, 1990). We argue that high-quality initial teacher education has to be based upon mutually empowering professional relationships and collegiality. It is a collective, co-constructed endeavour to which each partner brings unique forms of expertise and perspectives. For us, an ambitious ITE curriculum requires sufficient flexibility and autonomy for providers to design, with their partners, content, modes of delivery, modes of pedagogy and a curriculum structure which moves beyond statutory minimum entitlements and which also fits the needs of the partnership (Brisard et al., 2005; Mutton et al., 2018). This is the way in which the Oxford Internship Scheme currently operates. Any plans for improvement (where it is deemed to be required) should nurture genuine partnerships that are capable of designing and developing an ambitious curriculum that prepares trainees to meet the national standards for QTS, but that is also cognisant of localised partnership needs and takes account of what is known about professional learning. At the heart of the Oxford programme is a model of research-informed clinical-practice (Burn & Mutton, 2015) that has been recognised both nationally and internationally and has, most recently, been influential in driving the reform of initial teacher education in Wales. While this is a model that has developed at Oxford and been reviewed and refined over many years, it is one that could inform the development of high-quality ITE across England, regardless of type of provider, size or location.

Conversely, the current proposals, if implemented, would make models such as the Oxford Internship Scheme impossible to operate.

References:

Benton, P. (Ed.). (1990). *The Oxford internship scheme: Integration and partnership in initial teacher education*. London: Calouste Gulbenkian Foundation

Brisard, E., Menter, I., & Smith, I. (2005). *Models of partnership in programmes of initial teacher education*. General Teacher Council for Scotland. Research Publication N.

Burn, K., & Mutton, T. (2015). A review of 'research-informed clinical practice' in initial teacher education. *Oxford Review of Education*, 41(2), 217-233.

Mutton, T., Burn, K., Hagger, H., & Thirlwall, K. (2018). *Teacher education partnerships: Policy and practice*. Critical Publishing.

Quality Requirements for ITT providers

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.:

The suggested intensive practice placement model appears to relate to an idea of skills development through repeated practice. There is little evidence that repeated practice of isolated skills is appropriate for a model of professional learning. We question the premise that providers can isolate particular techniques to be practised in particular contexts on the assumption that they will then be effective in all classrooms in all contexts for the following reasons:

- Such an approach would only be effective if all the schools in which the student teachers continued their learning (or in which they took up their first professional posts) followed exactly the same approaches to classroom management and to pedagogy. This insistence on specific practices to be replicated in all schools counters policy moves to support school autonomy and the principles of a self-improving school-led system.
- There is a lack of independent research into the long-term effectiveness of the intensive placement model.
- The intensive placement model seems to assume that teaching can be learned and practised as a series of isolated components. Obviously it is important to provide opportunities for novice teachers to examine and observe different aspects of teaching in theory and as practised by effective

teachers. But beginners cannot learn to practise discrete aspects of teaching in isolation, as these placements seem to imply. Effective behaviour management, for example, depends not only on strategies for setting and reinforcing expectations, but also on pitching lesson content appropriately for the learners in a class; effective planning of individual lessons depends on an understanding of long-term curriculum plans. Atomised experiences, in a particular school, at a prescribed moment for all developing teachers, is much less helpful (and disruptive to) careful and deliberate work with individuals to develop their subject specific practice as a whole.

• The intensive placement model seeks to fit each prospective teacher to a system, not the system to the particular individual. Development needs vary and need to be addressed at different times over the course of the ITE programme as they arise. The best courses have leaders and mentors who respond to their individual learners' needs – including consideration of which specific placements may be appropriate for them given their particular needs.

Please provide comments on barriers to implementation.:

To answer (b) and (c) implies that the model of intensive practice within the proposals is unproblematic. Given the concerns that we have identified with the model, it is not possible for us to respond to questions about the barriers to implementation.

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

To answer (b) and (c) implies that the model of intensive practice within the proposals is unproblematic. Given the concerns that we have identified with the model, it is not possible for us to respond to questions about the barriers to implementation.

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

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

The timings are unreasonable and are highly prescriptive. Such prescription does not accord with the ways in which high-quality partnerships collaborate on programme design, in ways that reflect the needs, strengths and priorities of each of their members.

While the Oxford Internship Scheme operates on the basis of a partnership agreement that stipulates the minimum time that school-based subject mentors and professional tutors (who coordinate other aspects of the school-based programme) must commit to their work with student teachers, it is not at all clear how this would map onto the prescribed model of 'lead mentors' and others.

Looking across the sector, at a point when the implementation of the Early Career Framework will impose additional demands on mentor time and capacity, there are obvious challenges for partner schools, which need to be carefully negotiated. The imposition of such rigid requirements may also create funding issues for providers and for schools, jeopardising the supply of places, and thus threatening teacher supply.

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.

Please provide any further comments.:

The risk inherent in the specified curriculum requirements is that ITE providers will be required to abandon extremely high-quality, ambitious provision for a curriculum and placement experience that is of substantially lower quality. The model of learning that underpins items 1.1 – 1.5 within the Curriculum Requirements (which includes heavy reliance on a 'deliberate practice' approach) does not align with the types of professional and academic learning required for a PGCE with QTS in university settings. The Framework for Qualifications in Higher Education, which sets out the expectations of students awarded a qualification at Masters level, requires that students demonstrate 'conceptual understanding that enables the student to:

- evaluate critically current research and advanced scholarship in the discipline
- evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses...
- deal with complex issues both systematically and creatively, make sound judgements in the absence of complete data,
- demonstrate self-direction and originality in tackling and solving problems, and
- act autonomously in planning and implementing tasks at a professional or equivalent level
- continue to advance their knowledge and understanding, and to develop new skills to a high level' (QAA 2014, p. 28)

The FQHE specifies that holders of a level 7 award will have 'the qualities and transferable skills necessary for employment requiring:

- the exercise of initiative and personal responsibility
- decision-making in complex and unpredictable situations
- the independent learning ability required for continuing professional development.' (ibid)

Overall, we re-iterate our view that it is the development of research-informed clinical-practice models of initial teacher education that will result in the preparation of teachers with the necessary levels of adaptive expertise to meet the challenges of a career in teaching.

Reference:

QAA (2014). UK Quality Code for Higher Education. Available at: <https://www.qaa.ac.uk/docs/qaa/quality-code/qualifications-frameworks.pdf>

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.:

The University of Oxford has developed sustained ways of working with mentors over many years. Our approach is rooted in a substantial body of research around effective mentoring (research emanating from the programme itself which has had international recognition, see for example, Hagger & Burn, 1995; Hagger & McIntyre, 1996; McIntyre & Hagger, 1993) and is truly collaborative in that mentors and professional tutors co-design, co-deliver and co-evaluate the programme, as well as having equal responsibility for the assessment of student teachers within the programme. While we agree that mentors should have an entitlement to high quality training, we therefore reject the suggestion that there should be only one valid qualification for assuming a lead mentor role (especially one that operates at a generic rather than a subject-specific level). The University of Oxford's own Masters in Teacher Education, which includes a strong subject-specific focus where relevant, offers one example, of an international research-based programme of professional learning relevant both to school and university-based teacher educators.

The proposals make very little reference to the wealth of research that has been conducted into mentoring, including that which points to the dangers of highly mechanistic models (such as that implied by the Quality Requirements) within which forms of 'judgementoring' (Hobson & Malderez 2013) can lead to novice teachers' fabrication of their actual professional needs (Hobson & McIntyre, 2013).

Our partnership agreement already includes formal commitments in terms of engagement in mentor induction and on-going professional development within the role, as well as specific time allocated by our school partners to supporting student teachers' learning. While we can monitor this engagement, intervening where needed to remind schools of their obligations, or moving student teachers where particular schools or individuals prove unable to honour their obligations, universities do not have the authority over staffing decisions within schools that would enable them to guarantee adherence to requirement 2.7. Central prescription of this nature counters the principles of collaborative working and partnership and such a heavy-handed approach across the sector could post significant risks both to placements and partnerships, especially given the new demands on mentors in the implementation of the ECF.

The fact that many schools (including those within our own partnership) work simultaneously with a number of providers further complicates the lead mentor model proposed in Box 3 and points again to the need for flexibility and local negotiation. The lack of clarity about whether the role of lead mentor (within secondary programmes) is understood to be a subject-specific or a generic one. The scale on which lead mentors are expected to operate seems to imply a generic lead mentor role which again ignores the need for the kind of subject-specific mentoring expertise which is fundamental to the Oxford model.

References:

Hagger, H., & Burn, K. (1995). *The School Mentor Handbook: Essential skills and strategies for working with student teachers*. Psychology Press.

Hagger, H. & McIntyre, D. (Eds.). (1996). *Mentors in Schools: Developing the Profession of Teaching*. Routledge.

McIntyre, D. & Hagger, H. *Teachers' Expertise and Models of Mentoring* in H. Hagger, D. McIntyre & M. Wilkin (Eds.). (1993). *Mentoring: Perspectives on school-based teacher education*. Routledge.

Hobson, A.J. and Malderez, A. (2013), "Judgementoring and other threats to realizing the potential of school-based mentoring in teacher education", *International Journal of Mentoring and Coaching in Education*, 2 (2), 89-108.

Hobson, A.J. and McIntyre, J., (2013). 'I have to give the impression I know what I'm talking about': how teacher fabrication impedes professional learning and development, and external mentoring offers an antidote, *Oxford Review of Education*. 39 (3), 345-365.

Please provide comments on barriers to implementation.:

Please see above

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

See above

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.

Please provide any comments.:

We welcome the focus on formative assessment of student teachers' learning as outlined in the proposals. We also welcome the clear emphasis (in Requirement 3.8) that insights from assessment feed into programme delivery. We would suggest that they should also feed into programme planning.

We also welcome the endorsement of processes that imply the targeting of provision to address student teachers' particular needs, but note that these expectations seem to contradict the emphasis in other aspects of the Quality Requirements on a prescribed curriculum, presented effectively as a linear learning track that every beginning teacher is expected to follow. This contradicts what is known about beginning teachers' learning (see, for example, Timperley, 2007, Burn et al., 2003) and research in assessment (Black & Wiliam, 2009) which promotes transparent formative assessment processes to support progression towards criteria that will be used in a high-stakes summative way.

Given that it offers an academic programme leading to a postgraduate award (the PGCE) alongside QTS, the University of Oxford has already developed a well-balanced and appropriately sequenced assessment framework for progression towards both awards. Recall of knowledge of the prescribed curriculum and practising teaching techniques as set out in the Quality Requirements are insufficient as the basis for assessing the development of learning to teach and becoming a teacher. The complex nature of the specialised knowledge and understanding that a teacher develops (Bransford et al.,

2005) requires the assessment of student teachers in a holistic manner and cannot be simply atomised into the knowledge of individual curriculum components or the practice of specific classroom techniques.

It is notable that the proposals effectively re-orientate current formative assessment practices towards trainees' demonstration of knowledge of the planned curriculum and away from the Teachers' Standards. This seems to assume (in specific requirement 3.5) that ability to demonstrate knowledge of the curriculum will lead to progression towards the Teachers' Standards. This is a flawed assumption that is put forward without any supporting evidence. As the Russell Group universities have also noted in their response, such an approach also appears to contradict the statements in the CCF that 'Trainee teachers will not be expected to collect evidence against the ITT Core Content Framework' and 'will continue to be assessed against the Teachers' Standards only' (DfE 2020, page 4).

References:

Black, P. & Wiliam, D. (2009). Developing the theory of formative assessment. *Educational Assessment, Evaluation and Accountability (formerly: Journal of Personnel Evaluation in Education)*, 21(1), 5-31.

Bransford, J., Darling-Hammond, L. and LePage, P. (2005) Introduction, in Darling-Hammond, L., Bransford, J., LePage, P., Hammerness, K. and Duffy, H. (eds) *Preparing Teachers for a Changing World: What Teachers Should Learn and Be Able to Do*. San Francisco: Jossey-Bass.

Burn, K., Hagger, H., Mutton, T. & Everton, T. (2003). The complex development of student-teachers' thinking. *Teachers and Teaching*, 9(4), 309-331.

Timperley, H. (2008). *Teacher Professional Learning and Development*, Educational Practices Series-18. UNESCO International Bureau of Education.

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.

Please provide any comments.:

Existing high-quality ITE is predicated upon models of systematic quality assurance and evaluation which are already built into our own Partnership Agreement.

While we therefore accept the need for effective quality assurance and, we would question whether it is appropriate for one partner to carry all the responsibility for that quality assurance, or for one partner to be dictating the practices of others in ways that could potentially sour relationships and lead to the withdrawal of placements. More widely, across the sector, this represents another serious threat to teacher supply.

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.

Please provide any comments.:

The range of points set out in made in specific requirements 5.1 – 5.10 encompass the kind of details that are set out within existing partnership agreements, including our own. They are a matter for collaborative discussion and negotiation and subject to regular review by all stakeholders. Overly specific central prescription of the kind presented here threatens the flexibility that providers have to negotiate partnership arrangements and thus the potential to damage long-standing programmes, such as our own, threatening teacher supply.

Qualified Teacher Status and the PGCE

21 Please provide any comments you have on this proposal.

Please provide comments below.:

It is entirely appropriate that all those entering the profession should have the opportunity to gain an academic award alongside QTS. There should, however, be no prescription in relation to the content of that academic award, which should be left to the discretion of the individual institution making the award, subject to the nationally and internationally agreed standards for accreditation at Masters level.

In response to this question, we reiterate the specific expectations of students awarded a qualification at Masters level, set out in the Framework for Qualifications in Higher Education, that they should develop 'conceptual understanding' enabling them to:

- evaluate critically current research and advanced scholarship in the discipline
- evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses...
- deal with complex issues both systematically and creatively, make sound judgements in the absence of complete data
- demonstrate self-direction and originality in tackling and solving problems, and
- act autonomously in planning and implementing tasks at a professional or equivalent level
- continue to advance their knowledge and understanding, and to develop new skills to a high level' (QAA 2014, p. 28)

PGCE courses, such as our own, delivered within the context of a university-school partnership, are supported by the University's existing and extensive research infrastructure. Our university-based teacher educators' expertise is rooted in deep research engagement – related not only to learning and

teaching within specific subjects but also to the processes of professional learning. We do not believe that a similar infrastructure exists at the Institute of Teaching, and therefore question whether postgraduate awards validated by the institute will carry the same reputational rigour. The University would be deeply concerned about the academic integrity of awards, that did not follow current sector standards and the potential reputational risk (nationally and internationally) that this would carry for graduates of Oxford's own PGCE programme.

Reference:

QAA (2014). UK Quality Code for Higher Education. Available at: <https://www.qaa.ac.uk/docs/qaa/quality-code/qualifications-frameworks.pdf>

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 undergraduate ITT would need to account for.:

Since the University of Oxford only offers one route into teaching at secondary level – the postgraduate fee-funded PGCE – we cannot draw on direct experience in responding to this question. After consulting with colleagues across the sector, we would endorse the response made to this question by UCET, in that:

- The scope for student teachers on employment-based programmes to participate in intensive school placements will be limited because of their teaching responsibilities and the legitimate expectations of their employing schools.
- For those on apprenticeship programmes, care will have to be taken to ensure that the new requirements do not conflict with the detailed, inflexible and byzantine rules that apply to apprenticeships more generally.
- Employing schools will, if they are to continue their involvement in salaried ITE programmes, have to be compensated for any additional time (over and above existing 2-school placement requirements) their employees spend in other schools.
- The implications for undergraduate programmes are complex and will have to be subject to careful and detailed discussion. Increasing the amount of time undergraduate ITE students spend in schools will have implications for the configuration of whole programmes, and will reduce the amount of time available in university for students to spend on the development of subject knowledge and expertise in key areas such as SEND and child development.

Please describe any specific considerations that providers of employment-based ITT would need to account for.:

- A number of employment-based providers, including some universities, provide high-quality and bespoke ITE in partnership with employing schools, sometimes at a modest scale. These programmes make an invaluable contribution to teacher supply and quality in their areas. It is difficult to see how such provision would fit to the proposed market structures.

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.:

Again, the University of Oxford is not directly involved in the provision of ITE either for early years or for further education, although our Department of Education conducts world-leading research within these fields [examples]. We are therefore deeply concerned that those learning to teach in both phases continue to benefit from partnership programmes in which universities work alongside FE colleges, nursery schools and other settings in the planning and delivery of the ITE curriculum.

As the Russell Group has pointed out, many of the 34 universities currently involved in providing accredited provision for 500 early years' teachers and 5000 FE teachers offer those programmes alongside their primary and/or secondary provision. If universities withdraw from providing ITE for prospective school teachers, either because their governing bodies refuse to accept the new requirements or because they do not meet the new accreditation criteria, most of this additional provision will be at risk. It is highly unlikely that university education departments would continue to engage in teacher education if they were not simultaneously involved in larger-scale programmes leading to the award of QTS.

Please describe any indirect impacts on provision of further education ITE.:

Again, the University of Oxford is not directly involved in the provision of ITE either for early years or for further education, although our Department of Education conducts world-leading research within these fields [see, for example, <http://www.education.ox.ac.uk/our-research/research-groups/language-cognition-development/child-development-and-learning/>; and <http://www.education.ox.ac.uk/our-research/research-groups/policy-economy-and-society/skills-knowledge-and-organisational-performance/>]. We are therefore deeply concerned that those learning to teach in both phases continue to benefit from partnership programmes in which universities work alongside FE colleges, nursery schools and other settings in the planning and delivery of the ITE curriculum.

As the Russell Group has pointed out, many of the 34 universities currently involved in providing accredited provision for 500 early years' teachers and 5000 FE teachers offer those programmes alongside their primary and/or secondary provision. If universities withdraw from providing ITE for prospective school teachers, either because their governing bodies refuse to accept the new requirements or because they do not meet the new accreditation criteria, most of this additional provision will be at risk. It is highly unlikely that university education departments would continue to engage in teacher education if they were not simultaneously involved in larger-scale programmes leading to the award of QTS.

The accreditation process and monitoring

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

Please provide any comments.:

No previous approaches to the reform of initial teacher education in England have required the whole-scale reaccreditation of the entire sector, which makes this undertaking extremely risky. The suggested timescale reveals very little understanding of the careful and systematic processes of curriculum development and quality assurance processes (both internal and external) that are required by universities such as Oxford when new courses are introduced or substantially altered.

The timescales as proposed are therefore unworkable both for Oxford as an individual university and for those carrying out the reaccreditation process across the sector. The fact that no details have been provided about how this process would be undertaken or who might be involved, despite the fact that reaccreditation of the whole sector is expected to be undertaken within a period of a few months, reveals the serious risks posed to the continuation of teacher supply.

As we have made clear in our previous responses, the Quality Requirements, as they stand would require the complete reformulation of existing high quality programmes such as the Oxford Internship Scheme. We see little point in dismantling existing provision of this nature and replacing it with an entirely untried and untested model.

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

Please provide any comments.:

The governance structures of the University of Oxford mean that the University could simply not accept any mandate to work with other providers as set out in paragraphs 90-91, related to monitoring arrangements. The University would insist on retaining autonomy over decisions about whether to accept support or to develop the provision to meet compliance criteria and if such autonomy were not guaranteed under any new Quality Requirements, the University would be forced to withdraw from the provision of initial teacher education leading to QTS.

No evidence has been cited in support of the idea that mandated partnerships from the centre serve to improve the provision of initial teacher education. Where we have previous evidence of systems that have been effective in supporting quality improvement across a sector, such as in the London Challenge, it points to some very different kinds of mechanisms as being effective, including the need to test models before they are implemented and to invest in creating shared purpose and strong relationships (Kidson & Norris, 2014). As we have explained in our previous responses, the levels of prescription inherent in the Quality Requirements will serve only to disrupt existing close relationships and jointly planned curricula, replacing high levels of trust and close collaboration with imposed contractual obligations for which only one partner carries any formal responsibility.

Reference:

Kidson, M. and Norris, E. (2014) Implementing the London Challenge. London: Institute for Government

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 target of September 2023.:

Before engaging at all with the question of timelines, it is important to reiterate that the University regards the proposals as they stand as unacceptable. In emphasising the need for more time (to allow for a more measured and genuinely consultative process, as well as for the re-accreditation of courses) the University emphatically rejects any interpretation of its response as an endorsement of the Quality Requirements set out in the consultation document.

The proposed target of September 2023 for the first delivery of the Quality Requirements is completely unworkable. This is both because it precludes any scope for genuine consultation with the sector and because it pays no attention whatsoever to the timescales on which universities operate in relation to the validation of new programmes.

On the first point, no serious opportunity has been given for school leaders even to engage in the consultation process – with the consultation open for only seven weeks, five of which fell during the school holidays. For this reason alone, the consultation process should be paused. Once all partners had been fully consulted time would then need to be given to thorough evaluation of the results, and careful reconsideration of the original proposals in light of the views of all stake-holders. The DfE's suggested timescale makes a mockery of this process and could only have been proposed on the assumption that the proposals would be accepted and implemented with little, if any, amendment.

On the second point, the timescale for institutional validation of new courses, mean that it is already too late for a September 2023 start.

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

Both the proposed target of September 2023 for first delivery of the Quality Requirements and the DfE's proposed timelines are therefore clearly unworkable and threaten the continuation of teacher supply.

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.

Would choose to withdraw from ITT

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

The University would wish to consult very seriously across its whole teacher education partnership about the nature and viability of our continued engagement in ITE given the levels of prescription contained in the proposals. The proposals as they stand would force the University of Oxford out of initial teacher education; a position that would be deeply regrettable and detrimental.

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?

Yes

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.

No

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

We are unable to speculate on any potential involvement within the model set out by the review since we have serious reservations about its viability for a provider such as the University of Oxford.

Teaching school hubs

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

Please provide any comments.:

Teaching School Hubs clearly have an important role to play in teacher education and development at all levels, but their role may be different depending on local contextual factors. It is therefore entirely appropriate to expect accredited providers to consider the 'existing teacher development architecture (such as Teaching School hubs)' as they plan and review their partnership arrangements, but further levels of prescription about how TS hubs should work in relation to teacher education should be avoided. Decisions should be made through negotiation at local level at a local level.

In the case of Oxford, our local teaching school hub (The Cherwell School) already operates as an accredited provider in its own right, but also works in partnership with the University within our jointly-planned PGCE programme. Imposing additional requirements on either partner seems counter-productive. As noted previously, there are significant risks to existing partnerships such as ours in the introduction of a new and untested structure for ITT provision. Additional layers within the proposed hierarchy are likely to reduce, rather than augment, the tight integration of all aspects of the programme which is a feature of our current partnership.

ITT as a system-wide responsibility

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

Please provide any comments.:

Having a strategic overview of ITE provision at a regional level would be advantageous and might help engage schools that are currently reluctant to engage for a number of reasons. We would not, however, encourage the forced involvement of trusts in ITE as part of any condition of growth since this would be unlikely to establish collaborative partnership working. Participation of schools in ITE should be because they recognise the value of partnership working in its own right.

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

Please provide any comments.:

We would welcome measures to encourage schools to have greater involvement in ITE, but such involvement should be mutually agreed and school should not be forced where there are specific reasons for not being engaged. Schools recognise the advantages of being involved when the benefits are seen to extend beyond ITE itself. Strong ITE partnerships are often at the heart of wider teacher professional learning networks where providers work with schools to develop appropriate CPD opportunities and to support teachers' engagement both with and in research.

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.:

The proposals themselves would not seem to have any direct implications for recruitment processes. Clearly, were the revised structure to be implemented, then applicants would need sufficient information about where responsibilities for the delivery of the ITE programme might lie, but that is not to say that any of the proposed reforms would make the 'ITT landscape more navigable'.

At a more general level we would reject the proposed model comprising accredited provider, lead partner and placement school since such a model risks

replacing existing strong partnership arrangements in favour of an explicit contractual arrangement between partners. The review report and the Quality Requirements show little understanding of the nature of ITE partnership working and the way in which partners currently work together, as in the Oxford Internship Scheme, to co-plan, co-deliver, co-assess and co-evaluate the ITE programme. Effective collaborative partnerships are, at heart, pedagogic models whereas the hierarchical model encapsulated in the report's recommendations characterises partnership as a transactional arrangement. The latter only serves to impoverish teacher education since it risks ignoring the epistemological and pedagogic underpinning of individual programmes and instead 'reduces teacher education to technical rationalist tasks' (Furlong et al., 2006: 43).

Reference:

Furlong, J., Campbell, A., Howson, J., Lewis, S. & McNamara, O. (2006) Partnership in English Initial Teacher Education: Changing Times, Changing Definitions- evidence from the Teacher Training Agency National Partnership Project. *Journal of Teacher Education*, 57, 32-45.

Please provide comments on barriers to implementation.:

N/A

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

N/A

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.:

The University of Oxford has a good track record of recruiting students from a diverse range of backgrounds, and of providing targeted support through the provision of central services, including support for students with disabilities and providing networking and pastoral support for different groups. Partnership work also often involves placement schools and providers negotiating additional support for trainees with particular needs and this could potentially be disrupted by the proposed intensive placement structure.

We also have a good balance between local and national recruitment and would not want any changes to affect our capacity to recruit in this way. Our partnership is well-balanced and incorporates schools in city, urban and rural settings. Again, we would not want such a balance to be adversely affected by any systemic change.

Beyond our own immediate context, we have concerns about the wider implications for providers nationally. Mandated intensive placements will be difficult for rural schools to provide (particularly primary schools). Many rural communities are relatively high on scales of social deprivation and with low social mobility; schools serving these communities do not always have the capacity to engage in ITE given the range of challenges with which they are already working. Evidence suggests that working closely with local training providers in partnership, who provide additional support tailored to meet local needs, enables such schools to engage in teacher education. Local SCITTs and HEIs work hard to engage and maintain these schools in partnerships and destabilisation of the market places at risk these carefully developed partnerships serving geographically distant and often socially (and economically) deprived areas.

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

International Qualified Teacher Status

Final thoughts

35 Please use this space to give any comments you have on any aspect of the report of the review or the 'Initial teacher training (ITT) review – draft Quality Requirements for ITT providers' document that you have not had the opportunity to provide in response to any of the other questions.

Please provide comments below.:

The University of Oxford takes seriously its role as a leading institution with a responsibility to quality in teacher education. The quality of the Oxford Internship Scheme (OIS) (the name given to Oxford PGCE programme) is recognised locally, nationally and internationally as being a highly effective model of initial teacher education. While teacher education policy over the past decade in England has tended to encourage a simplistic conception of either university-led or school-led provision, such a view obscures the fact that high-quality ITE provision is based on a partnership model with providers and schools working together to support the development of the beginning teacher. The Oxford Internship Scheme does this in a number of ways:

- It is, at its heart, a fully collaborative partnership model which recognises and values the distinct contribution that both the university and schools make to the education of new teachers.
- It is research-informed at all levels. Not only are interns able to draw on up-to-date research in relation to both their own subject area and learning and teaching more generally, the design of the programme is also informed by research into teacher professional learning and development. Furthermore, the partnership aims, through the OIS itself but also through the wider work of the Oxford Education Deanery (see Fancourt et al., 2015) to support interns and teachers as practitioners engaged both with and in research.
- The Department of Education at Oxford is recognised as a world-leader in educational research and interns have access to and are able to draw on the expertise and experience of our academic staff in a range of different areas.
- The partnership is effective because it draws on the knowledge, expertise and experience of teacher-educators, both at the university and in partnership

schools, in an integrated way.

- The majority of the schools currently working in the partnership have been members of the Oxford Internship Scheme for over three decades, working within a tried and tested model to produce high-quality teachers for our schools
- Each year, a significant proportion of those completing the PGCE course go on to teach in local schools. Ex-interns can be found at every level in our local schools – including those currently working as headteachers, senior leaders, heads of department, as well as those who have joined the profession more recently. Once here, a great many tend to stay.

We are proud of the quality of our partnership, and it is important to highlight that this quality has been recognised consistently by Ofsted. In every inspection where grades have been awarded (i.e. since 2005) the University of Oxford has achieved an 'outstanding' designation, with the most recent inspection report indicating that the only area for development was to 'continue to promote and embed its compelling vision for teacher education at local and national levels' (Ofsted, 2019).

Like other Russell Group universities, we have concerns which extend beyond issues around operationalising the recommendations and proposed timelines for this process and which are about the substance of the proposals themselves. The proposals confuse quality with uniformity and conformity and are predicated upon a model of training which we consider will be a threat to the professional status of teaching, to already existing high-quality provision and to teacher supply. Our key concerns are as follows.

- The development of a model in which accredited ITT providers work with 'lead partners'. From the Market Review report it is currently unclear where the OIS might fit within such a model which appears more dependent on a contractual arrangement rather than a model of collaborative partnership. The emergence of such an infrastructure will significantly challenge university involvement in ITE. We fear that current university-school partnerships, even those as well-established as the Oxford Internship Scheme, could be 'squeezed out' in a model which would make it difficult for established local partnerships to operate.
- The proposals are predicated upon a prescribed model of teacher training covering curriculum, content, partnership activity, assessment and mentor training which equates to a national curriculum for teacher education. This is underpinned by adherence, monitored by Ofsted, to the CCF, ECF and NPQs for which the evidence base is restricted and partial. Subject experts across the sector have critiqued the generic approach within these frameworks arguing that it is only by firstly acquiring subject and phase specialist pedagogical expertise that a teacher can consider aspects of the CCF in any meaningful way. The CCF's reliance on cognitive science is problematic and its relevance to learning in classrooms across all subjects has been recently called into question (EEF, 2021). Rushed publication of the CCF (just before the dissolution of the last parliament) curtailed important debates about the most effective ways of equipping all teachers to adopt a genuinely inclusive approach to the teaching of students with SEND, while experts within the University of Oxford's Rees Centre (which researches the experience of children under the care of social services) have expressed serious concerns about the lack of attention paid to the way in which particular approaches to managing students' behaviour promoted by the CCF impact on children who have experienced trauma or attachment difficulties.
- The evidence base for the Market Review's focus on intensive placements is similarly contestable and making this a compulsory requirement of all provision could lead to significant threats to existing partnership arrangements. It is unclear how far the Market Review has drawn on the best available evidence for high quality initial teacher education and ongoing teacher professional learning - the sources cited in the document are limited and narrow in their focus.
- The implied national curriculum for initial teacher education does not accord with models of adult learning that underpin the development of a profession. Professional learning is based upon critical engagement with research, both that which is already established and that which evolves during a teacher's career. An over-centralised model of teacher training based on limited evidence threatens the professional status of teaching and the nation's contributions to the international research and evidence base in the field. The international reputation of English teacher education will suffer as a result, with high quality applicants choosing to study in the other UK nations.
- There is a very clear risk that, in England, the professional body of teachers will, in future generations, become replaced with a body of executive technicians (Winch et al., 2015). Such an approach would make teaching an occupation that is unlikely to attract high quality graduates, would provide a limited and limiting capacity for schools to respond to new challenges as they arise, and would have significant long-term impact on teacher retention and well-being (Gallant & Riley, 2017; Worth & Van den Brande, 2020). Ultimately, such an approach would be detrimental to pupils, their achievements and would limit education's potential to improve the lives of young people.

All of the above threatens high-quality university provision as the level of prescription does not accord with a commitment to academic freedom. Universities have a strong commitment to teacher education through their civic aims and values. The prescription, interwoven throughout the proposals, is likely to lead to a reduced, restricted and lower quality programme of training which would not meet this civic commitment and could lead to some Universities and other providers pulling out of initial teacher education. The report does not fully acknowledge that existing high-quality provision is based upon high-quality partnerships. These partnerships have developed over time and are based on mutually reciprocal relationships with commitment and investment from all stakeholders. The proposals and recommendations pose significant threat to these models of partnership.

We would call for a halt to the consultation but would also want to re-affirm our commitment to working the Department for Education and the sector more broadly in order to sustain and develop quality in teacher education. As indicated, we would identify the development of research-informed clinical-practice models as being key to promoting quality across the whole sector.

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Fancourt, N., Edwards, A. and Menter, I. (2015). Reimagining a School – University Partnership: The Development of the Oxford Education Deanery Narrative, *Education Inquiry*, 6:3.

Gallant, A., & Riley, P. (2017). Early career teacher attrition in Australia: Inconvenient truths about new public management. *Teachers and Teaching*, 23(8), 896-913.

Ofsted (2018). University of Oxford ITE Partnership. Initial Teacher Education Inspection Report. Available at: <https://reports.ofsted.gov.uk/provider/41/70057>

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