

Consultation response by the Geographical Association



Government consultation on Initial teacher training (ITT) market review recommendations: response from the Geographical Association (August 2021)

August 2021

7. 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?

h. None of the above

Additional details to explain your selections.

As the national association for the teaching of geography, the Geographical Association (GA) works in close collaboration with a wide range of providers, subject tutors and subject mentors of Initial Teacher Education (ITE, referred to in this consultation as Initial Teacher Training or ITT). It counts thousands of schools, teachers and trainee teachers amongst its membership and supports the geography teacher educator community through the provision of events, online guidance, specialist newsletters, publications and through its [Teacher Education Phase Committee](#) (TEPC), made up of geography ITE experts.

The GA recognises that Initial Teacher Education must be subject to a continuous process of improvement and development and that the government, through its regulatory authorities, has a responsibility to hold ITE providers to account and to ensure a measure of consistency across the sector. However, Ofsted evidence shows that almost all ITE providers are of at least good quality and many are outstanding. This is a record we should be proud of. It has been hard won and there are many dedicated educators involved in this achievement. Against this background, it is our view that further, continuous improvement is best achieved through an incremental, collaborative approach that builds on, and spreads more widely, existing best practice. The report by the ITT expert group fails to establish a secure evidence base for the wide-ranging and experimental changes it recommends. It also fails to recognise that the continuous improvements the sector requires can be secured through existing mechanisms for quality assurance, through existing partnerships and via better communication to prospective trainees regarding routes into teaching.

Despite the frequent and welcome references to subject specialism contained within the report, the GA remains concerned that its recommendations would not raise the subject teaching expertise of trainees and that the ambitions for subject-specific mentoring and high-quality placements need reviewing, so that trainees with appropriate qualifications to teach a subject are recruited and mentors are supported to develop good subject knowledge.

8. 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-specific/phase-specific expertise and support

Our evidence¹ suggests that, since 2010, the maintenance and development of subject expertise within ITE has come under strain in several respects:

- some very effective school-HEI partnerships, with many years of experience, have disappeared. Expertise has been lost and in many cases finding sufficient placement schools for trainees has

¹ GA (2015) Geography Initial Teacher Education and Teacher Supply in England: A national research report by the Geographical Association. Available at: https://www.geography.org.uk/write/MediaUploads/Advocacy%20Files/GA_ITE_REPORT-final_web.pdf

become more difficult. Maintaining established current school-HEI partnerships is essential if we are to train sufficient teachers for the future;

- small cohorts of trainees in secondary subjects, in some cases a solo trainee in a subject area, have a negative impact on trainees who miss out on the rich experience of working and learning with a peer group of subject specialists;
- mentors in school are often placed under added pressure to contribute all the subject-specific training – often on a volunteer basis and without sufficient expertise, experience or confidence;
- subjects like geography have a limited and constrained base of research evidence and capacity, which relies heavily on geography ITE tutors and researchers based in HEIs. We note, with regret, how much of the research evidence being promoted in schools today originates in the US, rather than the UK, and how little of it relates specifically to geography education.

For secondary phase trainees, further support is needed to strengthen knowledge of subject-specific aspects of geography teaching (such as geography fieldwork and the use of Geographical Information Systems) and to ensure that generic requirements contained within the CCF and Ofsted frameworks are applied rigorously to the teaching of geography and with due regard to the fidelity of the subject. In the primary phase, too little time is dedicated to supporting trainee primary teachers to teach non-core subjects. Catling (2017)² has identified that the provision of teaching time for geography is low and declining in England’s primary ITE courses. The proposals mention the importance of subject specialism but do not propose reforms to further support it. Rather, they risk undermining the very partnerships that will have a long-term impact on geography education as a specialism.

Managing teacher supply

The supply of geography teachers has been an area of concern to the GA for several years³. The policies used to secure an adequate supply of teachers with appropriate subject specialist knowledge (the DfE Teacher Supply Model [TSM], the use of bursaries and Subject Knowledge Enhancement [SKE]) have not successfully addressed the issue: in 2020-21, geography was the only subject that recruited fewer trainees than the previous year, and this recruitment shortfall appears to have continued for 2021-22. Recruitment of teachers has been guided by the TSM. This pays no attention to the large numbers of non-specialists teaching geography in secondary schools in calculating the number of new teachers required each year because the DfE does not collect accurate data about non-specialist teaching. In addition, the TSM fluctuates from year to year, because it adopts a ‘stock replenishment’ approach that does not take account of wider factors affecting recruitment and retention. Nor have bursaries been used judiciously to manage supply. Bursaries of tens of thousands of pounds have been made available without an obligation for the recipient to remain in the profession, with the result that too much of this funding has been wasted to the system. Frequent and significant changes to the amount paid (if any) through bursaries, to the availability of SKE funding and to the TSM recruitment target have failed to secure a sufficient supply

² Catling, S., 2017. Not nearly enough geography! University provision for England’s pre-service primary teachers. *Journal of Geography in Higher Education*, 41(3), pp.434-458.

³ GA (2018) Geography Initial Teacher Education (ITE) and Teacher Supply in England: 2018 update. Available at: https://www.geography.org.uk/write/MediaUploads/Advocacy%20Files/GA_Geography_ITE_training_and_supply_2018.pdf

Biddulph, M. & Kinder, A. (2020). Training and retaining geography specialists for schools in England, *Geography*, 105(2), 101-107.

of teachers and have added to an impression of instability and complexity for providers and prospective trainees.

Professional agency

Since teaching is a professional undertaking, ITE providers need to use approaches that enable trainees to adopt a critical, discerning approach and to avoid an overly simplistic view of teaching in which mandated content is regarded as uncontested. This requires a grounding in theory and critical interrogation of the contexts in which approaches have been found to be effective, in order to develop the flexibility to determine what constitutes evidence and to understand the way that ideas developed in research contexts can be refined over time and applied in practice, particularly with context/subject sensitivity. We note that the capacity to critically evaluate current research and advanced scholarship in the discipline of teaching geography is one of the requirements of a postgraduate qualification at Master's level.

We are therefore concerned by the level of prescription and limits to academic agency within the report, which risks undermining a critically-engaged professional ITE environment that allows for subject/phase-specific development of geography teachers. Longer-term, this would have significant implications for the status and professionalism of geography teaching.

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

The GA does not agree with the main proposals contained in the report and believes that, if implemented, these would likely result in the withdrawal of a number of high-quality school and HE providers from ITE provision, exacerbating the challenges the sector already faces. In response to the issues we identify above, the GA recommends:

- there should be greater attention given to ensure high quality subject-specific/phase-specific development of new teachers:
 - teacher educators and mentors should to be provided with support so they can design and implement ITE curricula that focus on the development of subject-specific and phase-specific knowledge of teaching that is worthy of 'world class ITT'. Teacher educators who are well-versed and engaged in the latest academic scholarship/research in their subject area are most valuable resource for subject ITE, which must be conserved and sustained;
 - at the same time, the up-to-date subject expertise so often brought into the system by recent graduates could also be better acknowledged (by ITE frameworks and programmes);
 - the role of high-quality mentoring across whole departments/phase groups should be better recognised, strengthening mentoring partnerships to move beyond individual subject-specific/phase-specific mentors. This would require investment by ITE partnerships and an acknowledgement that 'lead mentors' need knowledge of the relevant subjects/phases they are involved with.
- consideration should therefore be given to funding greater support for trainees and mentors in respect of their subject-specific knowledge of teaching;

- the Teacher Supply Model be reviewed or amended to take account of evidence around the use of non-specialists to teacher secondary subjects and wider evidence around the factors likely to affect teacher recruitment in the future;
- Subject Knowledge Enhancement courses should be reinstated for geography and made more readily available to trainees;
- ITE bursaries should be linked to a commitment to teach for a number of years, with recognition of teachers serving in shortage areas.

10. 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.

The consultation provides insufficient information about what these placements will entail. However, we note the concerns raised by NASBTT that there is ‘very limited research that exists into the effectiveness of intensive teaching placements of the kind described in the report is highly contested and, therefore, the wholesale adoption of such a fundamental change to the structure of ITT programmes must be carefully scoped and tested before it is implemented’⁴. We share these concerns. The GA cannot support the wholesale adoption of such a fundamental change to the structure of ITE without sufficient research evidence *at scale* of the effectiveness of intensive practice placements. We also are aware that ITE providers have already developed contextually-specific approaches to supporting trainees’ development with subject/phase-specific sensitivity, which are more fit-for-purpose.

Furthermore, we have concerns that this proposed approach:

- presupposes that teaching can be learnt as isolated components;
- foregrounds genericism, taking time away from valuable subject-specific/phase-specific training opportunities and therefore limiting opportunities for trainees to examine and observe different aspects of subject teaching;
- fails to recognise that trainee development needs vary and need to be addressed at different times across the course. Both geography teacher educators and mentors are well placed to respond to the trainee teachers they are working with to ensure this bespoke development;
- does not take account of variations in curriculum time allocation and subject department scale in the secondary phase, which make it difficult to create intensive placements for groups of geography teachers without placing an undue burden on departments/schools and/or requiring trainees to travel unreasonable distances to reach available placements.

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

The GA’s key concerns are:

- the lack of consideration for the significant funding implications to the time allocations set out, especially with respect to the funding and capacity needed to increase the time allocation for mentoring;
- excessive focus/time dedicated to generic training for mentors and the lack of detail as to how much mentoring and expert support would be undertaken by subject specialists;

⁴ NASBTT (2021) Response to the Initial Teacher Training (ITT) Market Review Consultation

- the impact of longer and more expensive postgraduate ITE programmes on the willingness of HEIs and smaller school-led providers to continue their involvement in ITE;
- for undergraduate primary ITE routes, the number of weeks that trainees are expected to spend in school could lead to insufficient time to complete the requirements of an undergraduate degree, limiting the subject specific input that students would have across the range of subjects that they are expected to teach.

12. 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.

The GA does not agree that the principle of ‘translating the evidence-informed principles into a subject-specific context’ is sufficient for high-quality teaching, as the design of an ITE curriculum needs to be shaped by *what it means to teach geography* in addition to generic principles.

We note the concern raised by UCET that the ‘challenges associated with securing precise alignment between ITE curricula and what student teachers experience in school should not be underestimated. ITE providers often work with a large number of schools, and ITE providers, quite rightly, cannot dictate to schools what they teach and when they teach it’⁵.

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The idea that alignment must be imposed by the lead provider ignores the existence of the debates affecting the teaching of subjects. It also means there is limited capacity for trainees to develop the conceptual understanding that enables the student to critically evaluate current research and advanced scholarship.

13. 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.

The GA is particularly concerned that there appears to be no consideration of costing or capacity issues around mentoring, especially given that schools will need to manage this alongside the increased requirements for mentoring Early Career Teachers, when the Early Career Framework (ECF) is introduced in Sept 2021. We suggest that, where a mentor takes on new ECF responsibilities, they may be less willing to retain their ITE role. If this happens on a significant scale it would impact negatively on the availability of good ITE placements with expert teachers as mentors. There is only so much teachers can be expected to do on a voluntary basis to contribute to ITE. The GA recommends that the role and status of mentors is properly acknowledged and rewarded, for example by giving mentors access and support to high-quality subject-specific development.

⁵ UCET (2021) DfE consultation on the review of the ITE Market: Draft UCET response

As they stand, the proposals risk marginalising the significance of subject mentoring. In our view, 'lead' school mentors and subject mentors have different, distinct roles. Requiring all lead mentors to undertake NPQLTD prioritises generic development over the high-quality subject-specific/phase-specific mentoring development that already exists. The NPQLTD was not designed with ITE provision in mind and so we cannot make a judgement yet on whether it will be fit for purpose. However, in the secondary phase, the proposal for generic lead mentors to oversee subject mentors in individual schools risks undermining the subject communities of mentors across partnerships that are currently led by geography teacher educators and lead geography mentors.

14. 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 GA supports the focus on formative assessment of trainees' learning and the endorsement of process that allow for the targeting of training to address trainees' particular needs.

In relation to requirement 3.5, we are concerned that assessing 'trainees' knowledge of the training curriculum and their ability to apply it in practice' might imply two separate forms of assessment, and would not see it as appropriate for this to be considered in such a way as there are significant dangers of trainees' learning being atomised.

The focus on alignment within the recommendations appears overly prescriptive and does not pay due consideration to the debates that existing with the teaching of particular subjects like geography, the need to be able to respond to a changing evidence base and the need to apply this with subject/phase specificity.

15. 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 acknowledge that ITE providers already develop and review QA arrangements. In the context of the proposed approach, there could be better consideration for how both schools and universities can be jointly responsible for the practice of mentors through close, collaborative partnerships.

16. 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 that the proposed approach would significantly disrupt existing structures, risk the loss of existing expertise at the subject-specific level and damage the partnerships that subject/phase specialist teacher educators have developed and continue to strengthen. This loss of capacity would have a significant impact on the curricular and subject-specific expertise emphasised within Ofsted's Education Inspection Framework. Adding additional complexity to partnerships could restrict the quality and quantity of communication that enables high quality integrated curriculum planning between lead providers and their partner schools.

17. Please provide any comments you have on this proposal

The GA draws a distinction between a professional qualification and a higher degree specification. The idea that any accredited provider should be allowed to award a postgraduate qualification in teaching is highly problematic in the context of proposals which represent the curriculum (and particularly the Core Content Framework) as a list of the content to be learned. Since criticality is a distinctive requirement of any award at postgraduate level, content cannot be mandated or received in this manner. The Framework for Qualifications in Higher Education⁶, which sets out the expectations of students awarded a qualification at Masters level, requires that students demonstrate conceptual understanding that enables them to 'evaluate critically current research and advanced scholarship in the discipline' and 'evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses.' The FQHE further states that holders of the qualification will be able to:

'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'.

It is the GA's view that the award of a postgraduate qualification continue to be made on this basis. Should the proposed Institute of Teaching be awarded the power to confer higher degree in the future, we assume that a condition of this power would be to maintain this standard of scholarship and not to undermine it or conflate professional qualifications with academic ones.

18. 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.

The number of weeks expected to be spent in school raises important questions about whether students will have sufficient time to complete the requirements of an undergraduate degree, especially given the need for subject specific input across many subjects. There is no acknowledgement of the particular demands of placements within small primary schools, where a single teacher/mentor might be responsible for subject leadership across a range of subjects.

19. 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.

Undergraduate ITE routes for the education of 3-7 year olds follows a very different model to that of other phases and so the recommendations of the review do not reflect the realities of training for undergraduate trainees preparing for work with children aged 3-7, or their mentoring needs.

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

The GA strongly disagrees with the recommendation for all providers to undergo a re-accreditation process as set out in the report, and believes that this proposal represents a threat to geography

⁶ Available at: <https://www.qaa.ac.uk/docs/qaa/quality-code/qualifications-frameworks.pdf>

teacher supply and the quality of ITE provision. We are particularly concerned that this could lead to the loss of some excellent, high-quality subject-specific providers from the system, some of whom have been providing high-quality ITE for decades. Their withdrawal would risk the appearance of ‘cold spots’ in provision and a loss of expertise and research capacity that geography ITE can ill afford.

We believe that this proposal neglects the following considerations:

- the proposed re-accreditation system represents a degree of ‘over-engineering’ in that the tools and systems for further developing quality (such as Ofsted’s inspection regime) are already in place;
- a world-class ITE system needs sufficient stability so that providers can build and maintain capacity and expertise in support of quality provision. This proposal introduces additional uncertainty to providers, alongside additional costs, that are unnecessary and likely to act in the opposite direction to the aims of the review;
- high-quality ITE also depends on collaboration and cooperation. Partnerships, whether led by schools, universities or other institutions, need to be sustained over time, during which communities develop and good practice is shared. Competition, particularly local competition, between providers needs to be managed carefully if high quality ITE is to thrive;
- the system benefits greatly from genuine partnerships with HEIs – not from sub-contracting discrete elements of provision to this sector. As UCET have pointed out, 80% of the current teacher supply base involves HEIs as lead or partner providers and the proposals appear to place this provision at particular risk. ITT must continue to incorporate academic study alongside practical experience. We note also that the full participation of HEIs within ITE also brings:
 - access to a rich range of departmental resources acquired over time: maps, visual, textbooks, professional journals, curriculum documents, books on teaching geography, books on generic issues, e.g., assessment, behaviour management
 - access to journals and books in well-resourced university libraries, including up-to-date resources on disciplinary knowledge, e.g., in geography departmental libraries
 - access to, and support in the use of, ICT.

To further develop this last point, around HEIs:

- stability (of allocations) and continuity (of tutors and mentors) are important to develop expertise, resources, knowledge of local contexts and to establish good working relationships with schools. Short term contracts and partnerships are not suitable, as it takes time to develop expertise as an ITE tutor, supervisor and mentor;
- in geography education, much of the new thinking in the teaching the subject has been developed by, researched by or analysed by HEI subject tutors who have the expertise and the capacity to engage rigorously with research. This is not to downplay the contribution of practising teachers or others to the examination and exchange of research evidence. If tutors and ITE students are to develop their thinking and practice, then opportunities to take part in research are also important. ITE students should have opportunities to carry out small scale research during the ITE course, to continue to Masters level and to have access to expert advice on research methodologies. All ITE tutors should be further encouraged to undertake their own research;

- HEI-led ITE courses generally give a lot of attention to teaching the subject, which is supported by the appointment of highly qualified and experienced subject tutors, the allocation of time on subject-specific issues and reading and assignments that draw on the breadth of literature and research evidence;
- England's excellent international reputation for educational thinking related to school education has been enhanced by the work of HEI subject tutors involved in ITE. The contribution of ITE subject tutors is valued at international conferences and in international initiatives, and publications by ITE subject tutors are widely cited in books and leading peer reviewed international educational journals.

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

It is difficult to see how such a prescribed system will, over the long term, encourage evidence-informed debate and creativity in the ITE system so that it remains responsive to the needs of pupils and schools. As we commented in our response to question 20, the proposed monitoring system fails to acknowledge the potential of the current arrangements for accrediting and inspecting ITE, that could be used to pursue the aims of the review. Adding another accreditation process would distract funding and staff time away from the important work of developing ITE and be a poor use of public resources.

The proposed system is also likely to reduce flexibility and choice. For example, where subject departments in a school offer an excellent placement for a trainee, participation is currently possible (and desirable). A system of lead and delivery partners appears to require the decision to participate to be made at least at the scale of the whole school, which may not be possible or desirable. In other words, the proposal may also reduce the availability of suitable placements and the participation of some schools in ITE, which runs counter to the aims of the report.

22. 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.

If the reaccreditation process is introduced as proposed, we have concerns that the proposed timeline would risk of the loss of high-quality provision from the system, because it underestimates the time and work that would be required for the detailed, integrated planning of a high-quality curriculum on the basis of partnerships. Whilst this statement would be true in any circumstances, it is even more pertinent given the recent and likely future impact of the COVID-19 pandemic across the education system.

23. n/a

24. n/a

25. n/a

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

Teaching School Hubs will take time to bed in, since their success will depend on developing effective working relationships with schools in their areas. They have multifaceted responsibilities for ECF, induction and CPD. The transition to a full role needs to be carefully paced, especially where the new hub has limited prior experience of managing ITE.

At the same time, in many regions TSHs may be entirely appropriate partners - and many already have well-developed roles in ITE. However, the nature of those partnerships should be a matter for local discretion, and should not be driven by centrally imposed KPIs for Teaching School Hubs.

As a national organisation that is well aware of these regional and local variations, the GA is concerned that a *requirement* to work through TSHs could create an additional chain within partnerships that would hinder effective subject-specific/phase-specific partnerships and the close communication needed to plan for an integrated, effective ITE curriculum.

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

At a particular point in time, schools might not be suitable for training teachers within a subject. The subject staff might not be sufficiently qualified in the subject or sufficiently experienced in teaching all age groups. The quality of teaching might be unsuitable or the departmental staff might be unable to devote the time necessary to support students. Therefore, we question the proposed approach as there must be thorough consideration of the advantages for the school or the trainee to be in such a school, rather than a blanket approach that could produce low-quality provision.

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

Positive recognition of involvement in ITE by Ofsted would encourage more participation by schools. However, as we made clear in our response to question 27 above, at a particular point in time, schools might not be suitable for training teachers within a subject. It is therefore important to acknowledge that is not always appropriate to incentivise schools/Trusts to participate in ITE without taking account of these considerations.

In terms of incentives, schools would be more likely to participate in ITE if they could see that this participation enabled them to gain subject-specific CPD for all staff. Stable partnerships can bring subject knowledge and expertise to schools, beyond the trainee and mentor. For example, they provide access to the latest academic subject scholarship, support subject education community activity, and enrichment for school pupils.

There needs to be full consideration of funding of any proposals. Funding is not an incentive, but a necessity to make it possible for mentors to develop themselves and to take on responsibility for trainee development. In many areas there is already a struggle to find suitable subject-specific mentors and for schools to fund the release of these teachers from their classroom timetables.

29. 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.

In our view, the current, over-complex system of routes into teaching confuses applicants and wastes provider time and resources. Simplification of information for applicants would therefore be welcome. Unfortunately, we do not see any proposals in the report which would improve, streamline or remove barriers from the recruitment process. We note the suggestion by NASBTT for a technical improvement to the current system of information for prospective teachers, which would direct applicants to the accredited provider of the programme they have chosen, rather than offering a full list of the schools they may work with.

30. 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.

We are concerned that these proposals, if implemented as suggested, would increase prescription, uncertainty and the costs of running courses for ITE providers, without proportionate compensation. This could lead to the withdrawal of high-quality ITE providers, particularly smaller partnerships and HEIs, exacerbating teacher-supply cold spots and harming the recruitment and retention of geography teachers.

We are therefore concerned about the impact of the proposals on equality, diversity and inclusion within the teaching profession. The outcomes of this proposal would reduce choice for prospective teachers. Family, financial and other personal reasons affect the routes that prospective teachers can consider, and we believe that proposals would limit these choices and lead to the loss of prospective teachers to the sector. We acknowledge that larger ITE providers are often well placed to recruit student teachers from a range of backgrounds, and that HEIs are able to provide targeted support (for example through centrally-provided university services) to meet the particular needs of students from different groups, including those with disabilities.

31. 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.

Concerning the lessons of the last 10 years and the rapid expansion of school-led ITE provision, it is clear that one of the key benefits has been to draw more schools into the system and to secure their commitment to ITE. This brings benefits to the whole school, because teachers are continually having to deconstruct, justify and explain their own practice as they train the next generation. The means they reflect on and improve their own teaching.

In light of that experience, the GA questions the substance and underpinning rationale for the proposals, particularly the need for a re/accreditation system, which does not appear to consider the needs of trainees, local settings or different subjects. We urge that lessons to be learned from

the rapidity of reforms since 2010: the system will not benefit from more intense competition, with providers competing for applicants. Local competition over ITE places between SCITTs, School Direct schemes and Higher Education Institutions means that in some cases cooperation has ceased between long-established partners, and resource and expertise sharing have declined.