



Department  
for Education

# **Further Education (FE) Initial Teacher Training (ITT) reform**

**Government consultation response**

**January 2024**

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## Introduction

The Further Education (FE) sector requires a strong supply of high-quality teachers to ensure the best possible education and training. This will be vital to securing our commitment to driving reforms across the skills system and transforming post-16 education with the introduction of the new Advanced British Standard, announced by the Prime Minister in October 2023. In recent years, teacher recruitment and retention have become increasingly challenging for FE colleges and other providers in the sector, with vacancy rates in priority subject areas remaining persistently high.

The initial teacher training (ITT) system plays a critical role in ensuring that new teachers are well-equipped to succeed in their roles. Tens of millions of pounds of public money are spent each year supporting students to undertake ITT courses for the FE sector. In spite of significant growth in the availability and take-up of FE ITT courses in recent years, and a corresponding increase in the amount of public money expended on these programmes, there has been little positive return in alleviating the teacher recruitment pressure experienced by colleges. Furthermore, emerging evidence – including from Ofsted inspections<sup>1</sup> – suggests that some providers delivering large-volume, publicly-funded, FE ITT courses are not securing appropriate quality standards or supporting their students to progress into teaching roles in the FE sector. This represents poor value for money – both for government and for individual trainees looking to invest in their future careers – and poses a significant risk to securing standards and confidence in FE teacher training.

Working collaboratively with the FE sector, we have made good progress in recent years towards improving standards in FE ITT. This has included the development of a new occupational standard, underpinning a high-quality apprenticeship route into FE teacher training, as well as a new core FE ITT qualification. We have also introduced legislation giving the Secretary of State greater powers to secure and improve the quality of FE ITT. This consultation set out our proposals for the next phase of FE ITT reform, including proposed changes to funding eligibility for some FE ITT courses from academic year 2024 to 2025. It also set out our longer-term ambitions for a well-managed, quality-focused ITT system underpinned by better data and evidence.

The consultation opened on 26 September 2023 and closed on 7 November 2023. Respondents were invited to complete the consultation online via the Citizen Space portal. Responses could also be submitted via email. A series of conversations with key stakeholders, including individual ITT providers, colleges and representative bodies also took place in the run-up to the consultation and throughout the period in which it was live.

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<sup>1</sup> A summary of the issues identified during two inspections of private providers delivering publicly-funded FE ITT courses is given in Ofsted's Annual Report: [Education, Children's Services and Skills 2022/23 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk), p.71.

Feedback received through all of these channels is reflected in this government response.

## Summary of responses received

A total of 76 responses to the consultation were received via the online Citizen Space portal. Two (2) further responses were received by email.

The majority (43, 55%) of submissions received were from those responding in an individual capacity; a further 35 (45%) submissions were made on behalf of organisations (listed in **Annex A**). Respondents, both individual and corporate, covered a variety of stakeholder types including FE colleges, universities, awarding bodies, unions, other learning providers, and representative bodies (including both the Association of Colleges (AoC) and the Universities' Council for the Education of Teachers (UCET), which provide representation across the breadth of both the statutory FE and higher education sectors).

The detailed question analysis that follows is grouped into three sections, to support analysis of consultation responses against the main themes of the consultation.

**Section 1 focuses on questions 1 to 4** from the consultation. These questions relate to proposals to remove the eligibility of some FE ITT courses for student finance, and to continue offering public funding for the new Diploma in Teaching (FE and Skills) in certain circumstances. Respondents were asked to what extent they agreed with the proposals outlined in the first two questions and were given the opportunity to provide free-text responses in two further questions.

| Question  | Number of Responses received (rate) |
|---|-------------------------------------|
| To what extent do you agree/disagree with the following statement: "From AY24/25, access to student support for pre-service FE ITT courses should be limited to higher education providers with degree awarding powers and their validated partners"? | 78 (100%)                           |
| To what extent do you agree/disagree with the following statement: "From AY24/25, the Diploma in Teaching (FE and Skills) should have access to public funding when delivered via in-service training programmes such as Taking Teaching Further"?    | 78 (100%)                           |
| For those FE ITT trainees best suited to a pre-service course of study, what further steps could government take to support their progression into teaching employment in the statutory FE sector?  | 66 (84.6%)                          |
| Do you wish to submit any additional evidence to show how the proposals outlined here would impact on the provision of FE ITT courses, and how that could affect potential students seeking employment as FE teachers?                                | 42 (53.9%)                          |

**Section 2 focuses on questions 5 to 7** from the consultation, which covered longer-term system-level reform in the FE ITT system, including proposals for the accreditation of FE ITT providers by the Secretary of State, improvements to the collection of data and evidence relating to publicly-funded FE ITT, and the issuing of statutory guidance on quality standards. Respondents were asked to what extent they agreed with the proposals outlined.

| Question  | Number of responses received (rate) |
|---|-------------------------------------|
| To what extent do you agree / disagree with the following statement: "Providers of publicly-funded FE ITT should require an accreditation from the Secretary of State"?   | 78 (100%)                           |
| To what extent do you agree or disagree with the following statement: "Providers delivering publicly-funded FE ITT courses should be required to provide specified data relating to their programmes and students to the Department for Education"? | 78 (100%)                           |
| To what extent do you agree or disagree with the following statement: "Providers of publicly-funded FE ITT should be required to have regard to statutory guidance pertaining to quality standards"?  | 78 (100%)                           |

**Section 3 focuses on questions 8 and 9** from the consultation, which asked respondents to consider the potential impact of these policy proposals on individuals with protected characteristics, and asked how any negative impacts might be mitigated.

| Question   | Number of responses received (rate) |
|--|-------------------------------------|
| Do you have any comments about the potential impact, both positive and negative, of our proposals on individuals on the basis of their protected characteristics?<br><ul style="list-style-type: none"> <li>• If you answered "yes" to the previous question, please provide further information in the box below</li> </ul> | 76 (97.4%)<br><br>23 (29.5%)        |
| Where any negative impacts have been identified, do you know how these might be mitigated?   | 24 (30.8%)                          |

## Main findings from the consultation

Responses to the questions covered below in section 1 indicate widespread agreement that student support funding for FE ITT courses should be limited to courses delivered by higher education providers (HEPs) with degree awarding powers (DAPs) and their validated partners from academic year 2024 to 2025 (70.5% agree or strongly agree). There was also clear agreement that the Diploma in Teaching should have access to public funding via government programmes such as Taking Teaching Further (TTF) from academic year 2024 to 2025 (85.9% agree or strongly agree). A range of views were expressed on the further steps that government could take to support the progression of FE ITT trainees into teaching employment, with key themes including the availability of financial incentives for FE teacher training, access to high-quality placements and mentoring to support trainees, the availability of post-ITT (early career) support, and broader issues relating to teaching employment, such as pay, conditions and workload.

Responses to the questions in section 2 demonstrate strong support for each of the outlined proposals, with 61.5% of respondents agreeing or strongly agreeing that government should consider **FE ITT provider accreditation**; 74.4% agreeing or strongly agreeing that FE ITT providers should be required to **submit data to government** and 84.6% agreeing or strongly agreeing that FE ITT providers should have regard to **statutory guidance**.

One issue that emerged from the consultation (both in written responses and through informal conversations) was a lack of clarity and consistency around the terms 'in-service' and 'pre-service' when used to describe FE ITT courses. The terms are often – but unhelpfully and inaccurately – used as shorthand for part-time and full-time study. Furthermore, these binary descriptors are inadequate to capture the myriad flexible models used to train new teachers for the FE sector. Relatedly, the issue of course intensity also emerged from a number of stakeholder conversations. At present it is possible to undertake a 'full-time' FE ITT programme by committing to as little as one day of directed study/contact time per week, potentially leaving a trainee free to work (whether as a teacher or otherwise) in the remaining time. This further confuses the demarcation between in-service and pre-service programmes. This is in marked contrast to the situation regarding teacher training programmes for schools (i.e. leading to QTS), where the ITT Criteria (from academic year 2024 to 2025) require trainees to undertake at least 28 weeks of placement as part of a one-year, 34 week (full-time) postgraduate course<sup>2</sup>.

It is clear from our dialogue with FE colleges that they are willing and able to adapt training models to secure the best new talent and to meet the needs of their trainees and learners – and this is something that government should actively support, given the continued pressure on teacher recruitment. Funding streams and regulatory

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<sup>2</sup> [Initial teacher training criteria and supporting advice 2024 to 2025 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)



requirements do not, however, always facilitate this flexibility. This is an area government intends to look into more carefully, to see if there are ways in which we can further remove barriers to FE colleges training new teachers effectively using available public funding, whilst also securing appropriately high-quality standards. For the time being, following the funding change that we will implement as a result of this consultation, there will be no further restriction on eligible FE ITT courses' delivery being described as 'in-service' or 'pre-service', or to be considered full- or part-time courses – this will continue to depend on the practice of individual providers in line with existing funding rules.

The importance of high-quality support for students as part of all ITT programmes was highlighted in a significant number of responses. Access to mentoring and appropriate teaching placements emerged as areas of particular concern – and indeed these have been identified as areas for concern in a number of recent Ofsted inspections of providers delivering FE ITT courses. We know that even good quality ITT providers can sometimes find it difficult to secure sufficient and appropriate placement options for their trainees; at present, this is not an area where government plays any active role. The challenge of securing high-quality placements also bears on the central issue of programme delivery methods described above, with some respondents expressing concern that students completing pre-service ITT programmes may have minimal (or sometimes no) experience of working in FE colleges and delivering teaching in real-life settings (as opposed to online, or virtual delivery).

## Section 1: Proposals to amend student finance eligibility for FE ITT courses

The following analysis breaks down responses to consultation questions 1 to 4.

Where respondents were asked to what extent they agreed with a proposal, responses are shown here in terms of the proportion that agreed or strongly agreed with the statement. Where respondents were able to provide free-text answers to questions, the following summarises key points from these responses. The government response is set out at the foot of the section.

### Question 1: To what extent do you agree with the following statement: “From AY24/25, access to student support for pre-service FE ITT courses should be limited to higher education providers with degree awarding powers and their validated partners”?

This question was answered by 100% of respondents (78).

| Answer                     | Total | Percent |
|----------------------------|-------|---------|
| Strongly agree             | 33    | 42.3%   |
| Agree                      | 22    | 28.2%   |
| Neither agree nor disagree | 4     | 5.1%    |
| Disagree                   | 8     | 10.3%   |
| Strongly disagree          | 11    | 14.1%   |

Overall, 70.5% of respondents provided positive responses to this question. Respondents on behalf of the college (16 total responses, 87.5% agree or strongly agree) and HEP sectors (5 total responses, 80% agree or strongly agree) were most in favour. Of the 11 respondents that strongly disagreed, a majority (6) came from individuals.

***“We agree that programmes delivered by well-established higher education providers will support quality of provision for ITT training.”***

**Gatsby Charitable Foundation**

***“The proposals to restrict funding for pre-service programmes to either HEIs or organisations working in partnership with HEIs, should help safeguard quality and in doing so make for a better trained workforce and therefore improving employment opportunities for new teachers in the sector.”***

**Universities’ Council for the Education of Teachers (UCET)**

**Question 2: To what extent do you agree with the following statement: “From AY24/25, the Diploma in Teaching (FE and Skills) should have access to public funding when delivered via in-service training programmes such as Taking Teaching Further”?**

This question was answered by 100% of respondents (78).

| <b>Answer</b>              | <b>Total</b> | <b>Percent</b> |
|----------------------------|--------------|----------------|
| Strongly agree             | 36           | 46.2%          |
| Agree                      | 31           | 39.7%          |
| Neither agree nor disagree | 5            | 6.4%           |
| Disagree                   | 6            | 7.7%           |
| Strongly disagree          | 0            | 0.0%           |

All respondent groups (including individuals - see summary at **Annex A**) were at least 50% in favour of this proposal.

**Question 3: For those FE ITT trainees best suited to a pre-service course of study, what further steps could government take to support their progression into teaching employment in the statutory FE sector?**

A total of 66 respondents (85%) submitted an answer to this question. Responses covered a wide range of suggestions for steps that government could take to support trainee progression, covering the process from recruitment into ITT courses through to FE teacher employment.

Responses highlighted the current misalignment of the FE and school ITT recruitment cycles, and the disparity between entrance requirements for FE ITT and apprenticeship (Learning and Skills Teacher) training routes, suggesting that addressing these could impact positively on recruitment and teacher readiness.

***“We have far too many [newly qualified teachers] come from pre-service ITE and have barely stepped in the classroom”  
- response from the FE college sector***

Responses included a number of areas where additional support might be made available to pre-service trainees. Most commonly mentioned were:

- improved access to high-quality teaching placements (and the sequenced integration of practice into all training programmes, whether delivered pre-service or in-service);
- the availability of support from appropriately-trained mentors;
- local training options available that are relevant to the vocational specialism(s) of the trainee; and
- a need for greater overall investment in the FE ITT system, including through incentive schemes such as the current FE bursaries programme.

Respondents also focused on the types of ITT available, and links to professional status gained thereafter, including:

- the importance of high-quality introductory/lower-level training opportunities to support new entrants to FE teaching who might not yet be ready to undertake an ITT course at Level 5 or above, and the need for appropriate structures to support industry associates and/or dual professionals to work in the FE sector;
- ensuring that the ITT system and content be grounded in subject specificity and require an understanding of the policy background of FE;
- that FE ITT should lead to a professional status on a par with Qualified Teacher Status in schools; and
- that HEI provision delivered in colleges (whether in a franchise or a validation arrangement) does not always provide the same quality of training or depth of experience, and that addressing this could aid the progression of trainees into teaching posts.

The benefit of developing an improved research base covering the effectiveness of ITT in an FE context was identified as being of future benefit, as was the need for continued support post-ITT (similar to the Early Career Framework offered to school teachers, as well as on-going CPD). It is worth noting that the Education Endowment Foundation (EEF) will receive an additional £40m of government investment to enable us to further embed evidence-based approaches into 16-19 teaching, as we have done earlier in the system. We expect the EEF to be able to begin building on its existing 16-19 work from financial year 2024 to 2025 onwards.

A small number of responses made observations on the state of the FE teaching profession more generally, suggesting that addressing these could act as means of making teaching more attractive and improving progression from training into employment. Points raised included: FE teacher pay, conditions and workload; the need to better promote FE teaching as an aspirational career route; a perceived lack of clarity on training and professional progression routes; and the absence of a single FE teaching jobs site publicising the breadth of roles available.

*“As an FE ITT provider for over 20 years as an HEI validated partner, I do not think these proposals will alter the sector staffing wise just increase the standard of the few trainees we have, more work needs to be done around the recruitment and retention as well as the training. This is the perfect opportunity to align everything and have a ‘fresh start’”*

*- response from the FE college sector*

#### **Question 4: Do you wish to submit any additional evidence to show how the proposals outlined here would impact on the provision of FE ITT courses, and how that could affect potential students seeking employment as FE teachers?**

A total of 42 respondents (54%) submitted an answer to this question. This question provided the opportunity for respondents to outline any concerns as to the potential impacts of this proposal, and to support their reflections by the provision of substantiating evidence. The majority of responses provided the former, but not the latter.

A number of responses used the opportunity of this question to provide broader reflections on the issues and challenges facing teacher recruitment and training in the FE sector; many of these were outside the direct scope of this consultation but provide useful evidence in the wider context of our current work and future plans to support the FE workforce.

Where responses focused on the specific issues raised by the consultation, recurring themes included concern that these proposals could limit trainee choice by reducing the number of available ITT centres, suggesting that partnership arrangements can prove cumbersome for colleges to develop and manage, and may not be feasible for small centres. It was also felt by some that the proposals could disadvantage trainees who would need to travel or who do not want to undertake an ITT programme delivered or validated by a higher education provider.

A small number of respondents suggested that the impact of a reduction of access to student support-funded provision should be mitigated by a related expansion in the number of government-funded places on the Taking Teaching Further (TTF) programme<sup>3</sup> (as well as a range of wider thoughts on how that programme could be improved, such as changes to eligibility criteria and funded subjects, and the development of a route into the programme for trainees not yet prepared for a level 5 qualification<sup>4</sup>).

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<sup>3</sup> TTF (<https://www.gov.uk/guidance/taking-teaching-further-programme>) is a demand-led programme, and based on previous take-up government does not currently believe that an expansion is required.

<sup>4</sup> It should be noted that TTF includes an option for trainees who are not yet ready to undertake a level 5 qualification to obtain the level 3 Award in Education and Training (AET) prior to moving onto the level 5. Government continues to take and respond to feedback to ensure that the programme best meets sector needs.

One respondent pointed to the 2022 OECD review *Vocational Education and Training: Preparing Vocational Teachers & Trainers*<sup>5</sup> and York Consulting’s 2022 report *Research into the use of Industry Associates in further education*<sup>6</sup>, which suggest that a high performing ITT system should seek a balance between quality and flexibility in order to deliver a well-trained workforce, while ensuring that colleges have access to suitable industry experts that have received the training and support required to affect the system. Government’s view is that the high level of flexibility in the FE ITT system currently may be adversely contributing to the quality issues that these proposals are seeking to resolve. We do accept the need to find the right balance between quality and flexibility in future. We will include this consideration when engaging with the sector further around the longer-term proposals detailed in [section 2](#) for system-level reform in the FE ITT system (consultation questions 5-7) below.

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<sup>5</sup> [https://read.oecd-ilibrary.org/education/preparing-vocational-teachers-and-trainers\\_c44f2715-en](https://read.oecd-ilibrary.org/education/preparing-vocational-teachers-and-trainers_c44f2715-en)

<sup>6</sup> <https://www.gatsby.org.uk/uploads/education/research-into-the-use-of-industry-associates.pdf>

## Policy appraisal

### Size and shape of the overall FE ITT market, and the potential impact of these proposals

Until such time as FE ITT providers are required to submit specified data and information on their courses, students and partnerships to government (see [Question 6](#)), there is no single data collection that provides a comprehensive and robust picture of the FE ITT system.

As a result, accurate and timely assessments of the total FE ITT market are almost impossible to make. The assessments made below are drawn primarily from Student Loans Company (SLC)<sup>7</sup> data. It should be noted that the SLC dataset was not developed for this purpose. However, we can use this to discern key information about different aspects of FE teacher trainees, providers, and their funding. SLC data is based on the most recent complete year for which information is available, which is academic year 2022 to 2023.

We know that there is significant movement in the FE ITT provider market from one year to the next (both in terms of student numbers and also in the size and number of individual providers offering FE ITT courses). For example, during the course of this consultation two private providers of FE ITT programmes (with a combined student body of around 2450 ITT trainees based on SLC data, effective date 27th July 2023) confirmed that they would no longer be offering courses in academic year 2023 to 2024. This fluidity means that the snapshot data highlighted below must be treated as indicative and does not necessarily provide an accurate or comprehensive assessment of the system.

### Ofsted data

Ofsted data on the quality of the FE ITT system shows that over 80% of inspected provision is currently graded as 'Good' or 'Outstanding'. Ofsted inspections of private providers (categorised by Ofsted as 'ITE in FE' in the table below, alongside validated FE college provision) did not commence until spring term 2023, and as such there have only been two published inspection reports relating to this type of provider to date, both of which were deemed by Ofsted to be inadequate.

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<sup>7</sup> <https://www.gov.uk/government/organisations/student-loans-company>

**Ofsted inspection data: [Initial teacher education - inspections and outcomes as at 31 August 2023](#) (grades for ITE in FE phase only)**

|                         | HEP      | ITE in FE | SCITT                 | Grand total |
|-------------------------|----------|-----------|-----------------------|-------------|
| Outstanding             | 4 (17%)  | 0 (0%)    | 0 (0%)                | 11%         |
| Good                    | 17 (71%) | 8 (67%)   | 1 (100%) <sup>8</sup> | 70%         |
| Requires improvement    | 1 (4%)   | 2 (17%)   | 0 (0%)                | 8%          |
| Inadequate <sup>9</sup> | 2 (8%)   | 2 (17%)   | 0 (0%)                | 11%         |

## Redistribution of benefits

If proposals to amend student finance eligibility for FE ITT are adopted, this would mean that Ofqual-regulated, awarding body-validated FE ITT courses would no longer be eligible for student support from academic year 2024 to 2025 onwards. This would represent a change to the status quo, where awarding body validated FE ITT qualifications have been funded since at least 2007.

| <b>These proposals could lead to a redistribution of benefits from:</b>                       | <b>And could benefit the following:</b>  |
|---|--|
| <b>Awarding bodies</b> who develop and market pre-service FE ITT qualifications               | Higher education providers (HEPs) with degree awarding powers (DAPs), may benefit in the following ways: <ul style="list-style-type: none"> <li>• There may be an increase in trainee numbers (and associated income) for existing HEP-delivered FE ITT courses</li> <li>• There may be an increase in validation arrangements and associated income due to increased validation arrangements between HEPs with DAPs and FE Colleges and/or private providers</li> </ul>   |
| <b>FE ITT providers</b> who deliver awarding body-validated pre-service FE ITT qualifications | If an FE ITT provider currently delivering awarding body-validated pre-service FE ITT courses chooses <u>not</u> to move to a validation arrangement with a HEP with DAP, then any profit made via delivery of pre-service FE ITT courses eligible to receive student support funding may transfer to other FE ITT providers. These could be: <ul style="list-style-type: none"> <li>• HEP with DAP</li> <li>• FE colleges with existing or new validation arrangements with a HEP with DAP</li> <li>• Private organisations that develop validation arrangements with a HEP with DAP</li> </ul> |

<sup>8</sup> Bradford College

<sup>9</sup> Both HEPs judged 'inadequate' have since elected to withdraw from the FE ITT market (Birmingham City University; University of Hull). Government has not been informed of any private providers that intend to withdraw from the market following an inadequate Ofsted inspection.



## Assessment of impact on FE ITT providers

The below table summarises the likely financial impacts on FE ITT providers, by provider type. These should be seen in the context of the caveats noted above, regarding rapid fluctuations in the FE ITT system.

The analyses of impacts made below (and expanded upon in [Annex B](#)) are based on Student Loans Company (SLC) data. The SLC dataset provides a snapshot of those trainees in receipt of student support for FE ITT courses at a specific point in time (effective date 27th July 2023), meaning that this data should be treated as indicative. As FE ITT courses are not easily identifiable in the SLC data, this was obtained by the Department for Education (DfE) providing SLC with a full list of providers and courses to match against, therefore any courses outside of this list will not be captured in the snapshot. DfE have also assigned each provider to a provider type, as this is not data that SLC collect.

### Providers and/or organisations negatively impacted by the proposals

| Provider and/or organisation type  | Estimated number of trainees in receipt of student support funding per year <sup>10</sup> | Number of providers / organisations | Estimated average income per trainee (£) | Estimated total impact (£) |
|--|---|-------------------------------------|--|----------------------------|
| FE colleges who deliver awarding body-validated FE ITT qualifications                          | 160   | 32                                  | £6,000                                   | £960,000                   |
| FE colleges who franchise awarding body-validated FE ITT qualifications to other organisations | 340   | < 5                                 | £6,000                                   | £2,040,000                 |
| Private organisations who deliver awarding body-validated courses                              | 4,470   | 13                                  | £6,000                                   | £26,820,000                |

With regards to the impact of these proposals on awarding bodies, the costs incurred and income obtained are commercially determined, and are expected to vary both between awarding bodies, and from provider to provider based on a variety of factors. This information is not in the public domain and cannot therefore be accurately estimated.

## Government response and next steps

The breadth of responses received to this consultation from across the FE ITT sector (and more widely) demonstrates a lively engagement with the issues raised and has

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<sup>10</sup> Rounded to the nearest 10

provided some extremely helpful insights as to the experiences and priorities of different parts of the sector. We are grateful to all who took the time to formulate inputs.

Notwithstanding the broad support that the proposals in section 1 of the consultation have received, as detailed above, a number of respondents drew attention to potential negative consequences as they perceived them. Some queried the wisdom of potentially reducing student access to FE ITT courses at a time when FE colleges are struggling to recruit in a range of priority subject areas. Some responses pointed out that government had previously stated that qualifications aligned to the new core FE teacher training qualification (the Diploma in Teaching (FE & Skills)) would be eligible for public funding, and that these proposals appear to renege on that commitment. Finally, some argued that trainees wishing to access good quality FE ITT provision – including in FE colleges – could be unfairly penalised as a result of a quality issue identified in only a small number of private providers.

No evidence was provided through the consultation to demonstrate the existence of high-quality provision in the private provider market delivering FE ITT, or to suggest that these providers are supplying significant numbers of new teachers to work in the statutory FE sector. By contrast, Ofsted’s annual report for 2023 concludes that they are “deeply concerned” by the state of FE ITT delivery in the private providers they were commissioned to inspect in 2023, with individual inspection reports concluding that there is little or no evidence that providers are adequately preparing their trainees to secure teaching employment in the FE sector<sup>11</sup>.

Furthermore, no evidence was submitted to show that existing quality assurance arrangements (as determined by awarding bodies and required of their centres) meet the distinct needs of teacher training qualifications (as opposed to other types of vocational qualification). However, some consultation responses suggested that such mechanisms were already available and should be the preferred means of addressing quality issues where these are identified. Reports from Ofsted inspections of providers using awarding-body validated FE ITT qualifications clearly demonstrate that – where provision has been found to be inadequate – existing quality assurance processes are not sufficiently robust in identifying or remedying serious deficits in provision.

In the period between the publication of the framework for the new Diploma in Teaching (FE & Skills) in September 2022 and this consultation, significant evidence has emerged – including through Ofsted inspections – casting new light on the unacceptably poor quality of FE ITT provision in a number of organisations who have been delivering training to often very large volumes of students. The key issues identified by Ofsted – including trainees being incorrectly informed that their training would allow them to teach in primary and secondary schools, a lack of ambitious and research-informed curriculums, trainees not having access to appropriate placements and mentors, and a

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<sup>11</sup> Ofsted annual report 2023, p.71

general lack of understanding of the FE and Skills sector – suggest that some providers who have been receiving public funding for FE ITE courses lack a basic understanding of what constitutes good quality teacher training and are not, in the words of one inspection report, “preparing trainees for the realities of teaching”<sup>12</sup>. This requires urgent action by government to protect public money and to safeguard confidence in quality standards for FE teaching. It would be irresponsible for us to allow the status quo to persist, and our policy position must evolve in response to the growing evidence base.

In view of the broad approval for the proposals detailed in questions 1 (70.5% agree or strongly agree) and 2 (85.9% agree or strongly agree), **we will now update the eligibility for student support funding for FE ITT courses, effective from academic year 2024 to 2025**<sup>13</sup>. **Only those trainees at English higher education providers with degree awarding powers, or their validated partners (including FE colleges), will be eligible to receive student support funding for FE ITT courses.** For the sake of clarity, there will be no other change to FE ITT course eligibility for student support funding in academic year 2024 to 2025; providers whose courses remain eligible for student support can continue to deliver those courses as they do at present.

We expect to review the published list of FE ITT courses on an annual basis, and we will of course take account of any further evidence when considering course eligibility for future years. We expect the same arrangements to remain in place when the student finance system is replaced by the Lifelong Learning Entitlement (LLE) from academic year 2025 to 2026.

We acknowledge that taking this approach is not without risk of negative consequences for some individual providers or for the awarding bodies that develop and deliver FE ITT qualifications. Our proposals may also lead to some prospective trainees having a reduced choice as to where or how they can undertake their FE ITT – although this risk is clearly mitigated by the fact that they should, in future, have increased confidence that the choices open to them will deliver good quality outcomes and support their progression into paid FE teaching roles.

We are aware that the change to funding eligibility will mean that a small number of trainees at providers in the statutory FE sector will no longer be able to access student finance to support FE ITT courses that are delivered in a “standalone” way. We have engaged directly with the providers who will be most impacted, and we are confident that the change will have minimal impact on those providers’ ability to continue offering high-quality FE ITT – which they can do either in partnership with a university, as many already do, or through funding models that do not rely on student finance (which some providers have told us is not attractive to their trainee teachers, many of whom are likely

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<sup>12</sup> [50212239 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/50212239)

<sup>13</sup> A list of FE ITT courses that are eligible for student support funding from academic year 2024 to 2025 can be found at <https://www.gov.uk/government/publications/further-education-initial-teacher-education/recognised-further-education-teacher-training-courses-eligible-for-student-support-2024-to-2025>

to be career changers). In addition, these providers will be able to continue accessing public funding to deliver awarding body-validated qualifications as part of programmes such as Taking Teaching Further, which supports in-service FE teacher training.

The currently unregulated nature of the FE ITT system means that government has very limited levers with which to tackle quality issues when these emerge. If the proposals from [section 2](#) of the consultation are implemented in future, we would have a wider array of tools through which to drive up and assure quality (and these would have statutory force). Ahead of such longer-term systemic changes being implemented, the change that we are now making to funding eligibility for FE ITT courses will help to protect the integrity of the system, the trainees entering it, and the FE teacher training pipeline. Maintaining the status quo in the absence of suitable and effective quality assurance mechanisms is not an option given the impact on FE teacher trainees, and the cost to the public purse.

## Section 2: Longer-term proposals for system-level reform in the FE ITT system

The following analysis breaks down responses to consultation questions 5 to 7.

Respondents were asked the extent to which they agreed with three proposals. Responses are shown here in terms of the proportion that agreed or strongly agreed with the statement. The government response is set out following each question.

It should be noted that proposals relating to questions 5, 6 and 7 would require regulations to be made under section 17 of the Skills and Post-16 Education Act 2022. This section of the Act has not yet been commenced. A first set of regulations made under this section would be subject to affirmative resolution by Parliament. No timetable for commencement of the relevant section, or the making of regulations, has yet been set.

### Question 5: To what extent do you agree with the following statement: “Providers of publicly-funded FE ITT should require an accreditation from the Secretary of State”?

This question was answered by 100% of respondents (78).

| Answer                     | Total | Percent |
|----------------------------|-------|---------|
| Strongly agree             | 20    | 25.6%   |
| Agree                      | 28    | 35.9%   |
| Neither agree nor disagree | 18    | 23.1%   |
| Disagree                   | 6     | 7.7%    |
| Strongly disagree          | 6     | 7.7%    |

### Government response

The majority of responses (48, 61.5%) indicated agreement or strong agreement to the proposal that providers of publicly-funded FE ITT should require an accreditation from the Secretary of State. On the basis of this response, we intend to undertake further work to explore potential models for an accreditation system. As stated in the consultation, we would expect to consult further with the sector on details of any proposed scheme before it is implemented.

Some responses expressed concern at the potential for accreditation to create a new bureaucratic burden on providers. Other responses noted that while accreditation could

safeguard quality, the design of a high-quality process would be key to ensuring its effectiveness. Respondents also questioned whether a provider that is already accredited for the delivery of QTS ITT programmes would automatically be accredited to deliver FE ITT. These are issues and questions that will be considered as further work on these proposals is taken forward; in doing so we will take account of lessons identified during the recent re-accreditation of QTS providers following the ITT Market Review.

Some respondents raised the issue of validation arrangements appearing to imply 'senior' and 'junior' partners, with FE providers having to rely on the HE sector for quality assurance. Government is keen to support FE providers to deliver a fully "sector-led" approach to ITT where this is the appropriate model; in time, and if we were to introduce provider accreditation, we would expect that many FE providers would wish to seek accreditation in their own right (although others may of course wish to retain existing partnership arrangements with the HE sector).

**Question 6: To what extent do you agree with the following statement: “Providers delivering publicly-funded FE ITT courses should be required to provide specified data relating to their programmes and students to the Department for Education”?**

This question was answered by 100% of respondents (78).

| Answer                     | Total | Percent |
|----------------------------|-------|---------|
| Strongly agree             | 24    | 30.8%   |
| Agree                      | 34    | 43.6%   |
| Neither agree nor disagree | 13    | 16.7%   |
| Disagree                   | 2     | 2.6%    |
| Strongly disagree          | 5     | 6.4%    |

**Government response**

Almost 75% of responses to this question indicated agreement or strong agreement to the proposal. On that basis, we intend to pursue further work to explore options for improving data and evidence provided by publicly-funded FE ITT providers. In doing so we will be mindful of the principle that data should be collected once and used multiple times, minimising the creation of additional burdens on providers. We will also look at ways in which existing data collections can be better used to improve understanding of the FE ITT system.

## Question 7: To what extent do you agree with the following statement: “Providers of publicly-funded FE ITT should be required to have regard to statutory guidance pertaining to quality standards”?

This question was answered by 100% of respondents (78).

| Answer                     | Total | Percent |
|----------------------------|-------|---------|
| Strongly agree             | 33    | 42.3%   |
| Agree                      | 33    | 42.3%   |
| Neither agree nor disagree | 12    | 15.4%   |
| Disagree                   | 0     | 0.0%    |
| Strongly disagree          | 0     | 0.0%    |

### Government response

The majority of respondents (66, 84.6%) strongly agreed or agreed that publicly-funded FE ITT providers should be required to have regard to statutory guidance on quality standards, and 0 (0%) respondents expressed any disagreement.

Government does not currently issue any statutory guidance relating to FE ITT quality; our publication *Expectations for the delivery of FE ITT* (May 2023)<sup>14</sup> is, at present, advisory. On the basis of responses to this question we will explore options for developing this guidance further, and to putting it onto a statutory footing.

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<sup>14</sup> <https://www.gov.uk/government/publications/further-education-initial-teacher-education/expectations-for-the-delivery-of-initial-teacher-education-for-fe>

## Section 3: Potential equalities impacts of these proposals

The following analysis breaks down responses to consultation questions 8 and 9.

Respondents were able to provide free-text answers to questions, and the following summarises key points from these responses. The government response is set out below.

It should be noted that the response rate for questions in this section was lower than that for sections 1 and 2.

### Questions 8 & 9:

**8: Do you have any comments about the potential impact, both positive and negative, of our proposals on individuals on the basis of their protected characteristics?**

**9: Where any negative impacts have been identified, do you know how these might be mitigated?**

Question 8 was answered by 30% of respondents (23). Question 9 was answered by 31% (24).

More than half of the responses received to these questions were not directly relevant to either the public sector equality duty (PSED. See Equality Act 2010)<sup>15</sup> and the protected characteristics set out within, or to the proposals included in the consultation. However, where relevant these responses will be taken into account in future policy formulation by government.

The following concerns that were directly relevant to PSED were raised by respondents:

- **Protected characteristic data:** with regards to the proposal to require FE ITT providers to submit data to the Department for Education (Question 6), respondents noted that it was important to clearly communicate that all data relating to protected characteristics is anonymised, and that it is collected in order to help with the monitoring and prevention of discrimination.
- That existing organisational systems impact the ability of trainees with certain protected characteristics from accessing ITT, particularly where certificates demonstrating prior attainment contain birth names as opposed to chosen names following **gender reassignment**. Suggested mitigations focused on ensuring that ITT providers were flexible and supportive, with government having a role in encouraging this.

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<sup>15</sup> <https://www.legislation.gov.uk/ukpga/2010/15/section/149>



- That formal ITT systems can serve to disadvantage students with special educational needs and **disabilities** (SEND). Advisory guidance<sup>16</sup> published in 2023 makes clear that FE ITT providers are expected to make reasonable adjustments for students with SEND.
- Respondents noted that certain vocational subjects had a well-defined and ongoing **gender** imbalance, and that any reform of the ITT system should take these into account in determining access to government funded programmes, such as FE ITT bursaries and Taking Teaching Further.
- Respondents suggested that changes to student support eligibility could create a barrier to entry for prospective ITT trainees due to their **age**, as trainees undertaking ITT later on in their careers may not wish to undertake a full PGCE owing to the length of the programme. It should be noted that the proposal detailed under question 1 would continue to provide student support funding for HEP-delivered qualifications at level 5 (e.g. Certificate in Education) – which is at the same level as awarding body-validated qualifications that have been able to access student support up to this point – and level 6 (e.g. Professional Graduate Certificate in Education).

## Government response

Government will take into account the responses received that are directly relevant to our obligations under the public sector equality duty when taking forward the proposals detailed in this consultation response.

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<sup>16</sup> <https://www.gov.uk/government/publications/further-education-initial-teacher-education/expectations-for-the-delivery-of-initial-teacher-education-for-fe>

## Next steps

Alongside the publication of this consultation response, we are also publishing the list of FE ITT courses approved by the Secretary of State for access to student finance in academic year 2024 to 2025<sup>17</sup>. This list is published under regulation 2 of The Education (Student Support) Regulations 2011, as amended.

Building on the responses received to the consultation, we will take forward further work on longer-term proposals that would require regulations to be made under section 17 of the Skills and Post-16 Education Act 2022. This includes – but need not be limited to – the specific proposals outlined in the consultation: accreditation of FE ITT providers by the Secretary of State, a requirement for publicly-funded providers to supply DfE with specified data, and the issuing of statutory guidance on quality standards for providers of publicly-funded FE ITT courses. As stated in the consultation, we would expect to consult further on any such proposals once further detail and a timeline for implementation has been worked up.

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<sup>17</sup> <https://www.gov.uk/government/publications/further-education-initial-teacher-education/recognised-further-education-teacher-training-courses-eligible-for-student-support-2024-to-2025>

## Annex A: List of organisations responding to the consultation

|   |           |
|---|-----------|
| <b>Awarding bodies</b> <ul style="list-style-type: none"> <li>• Ascentis</li> <li>• NCFE</li> <li>• Pearson Education Ltd</li> </ul>  | <b>3</b>  |
| <b>Representative bodies</b> <ul style="list-style-type: none"> <li>• Association of Colleges (AoC)</li> <li>• Federation of Awarding Bodies (FAB)</li> <li>• HOLEX</li> <li>• Universities' Council for the Education of Teachers (UCET)</li> </ul>  | <b>4</b>  |
| <b>College sector</b> <ul style="list-style-type: none"> <li>• Birmingham Metropolitan College</li> <li>• City College Norwich</li> <li>• East Kent Colleges (EKC) Group</li> <li>• Exeter College / University of Exeter</li> <li>• Harlow College</li> <li>• Hugh Baird College</li> <li>• Kingston Maurward College</li> <li>• Kirklees College</li> <li>• London South East Colleges (LSEC)</li> <li>• Newcastle College</li> <li>• Newham College of Further Education</li> <li>• Northampton College</li> <li>• South Gloucestershire &amp; Stroud College</li> <li>• West Suffolk College</li> <li>• Two further colleges marked their responses as “anonymous”</li> </ul> | <b>16</b> |
| <b>HEP sector</b> <ul style="list-style-type: none"> <li>• Edge Hill University</li> <li>• University of Central Lancashire (UCLAN)</li> <li>• University of Worcester</li> <li>• Two further higher education providers marked their responses as “anonymous”</li> </ul>   | <b>5</b>  |
| <b>Unions</b> <ul style="list-style-type: none"> <li>• ASCL</li> <li>• UCU</li> </ul>   | <b>2</b>  |

|  |                        |
|--|------------------------|
| <b>Other respondents</b> <ul style="list-style-type: none"> <li>• CLEAPSS</li> <li>• Gatsby Charitable Foundation</li> <li>• Guild for Lifelong Learning</li> <li>• MEI</li> <li>• OLC (Europe) Ltd</li> </ul> | <b>5</b>               |
| <b>Individuals</b>   | <b>43<sup>18</sup></b> |

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<sup>18</sup> A high proportion of “individual” responses were from those working in the college and HEP sectors, but cannot be attributed to their employer.

## Annex B: policy assessment of impact on FE ITT providers

The above section [Assessment of impact on FE ITT providers](#) summarises the likely financial impacts on FE ITT providers. The below provides a more detailed discussion of these impacts.

All student numbers data are drawn from Student Loans Company (SLC) systems, and are based on the most recent complete year for which information is available, which is from academic year 2022 to 2023, with effective date 27<sup>th</sup> July 2023.

The FE ITT provider market fluctuates significantly from one year to the next, both in terms of student numbers and also in the size and number of individual providers. As a result, the data below must be treated as indicative and does not necessarily provide an accurate or comprehensive assessment of the system.

FE ITT course fees are set by each provider and vary significantly (for example, FE college websites suggest a range in fee costs from around £1,750 to over £8,000). Trainees can draw down student support (fee loans) for the relevant fee amount. Depending on their personal circumstances, students may also have access to maintenance loans (of up to £13,002) and grants.

### FE colleges who deliver awarding body-validated FE ITT qualifications

Student Loans Company (SLC) data for academic year 2022 to 2023, with effective date 27<sup>th</sup> July 2023, indicates that these proposals would affect approximately 160 trainees at 32 FE colleges.

If the proposals are implemented, in order for their trainees to have access to student support funding in academic year 2024 to 2025, these colleges would be required to have entered into a validating arrangement with a higher education provider (HEP) with degree awarding powers (DAPs) to deliver FE ITT programmes.

Validated ITT partnerships are provided by a range of HEPs with DAPs, and as such there is a market which determines the cost and allows FE colleges to identify the appropriate HEP for their needs. These arrangements are commercially negotiated, and government does not have access to data about the costs to providers involved in them.

If all FE colleges that currently deliver awarding body-validated FE ITT courses (where trainees draw down student support funding in the form of fee loans) elect not to develop and maintain a validating partnership with a HEP with DAPs, we estimate a decline in course fee income (assuming average course fee of £6,000) of around £960,000 per year, distributed unequally across those ~32 colleges. However, this figure is difficult to

quantify with any degree of accuracy, given that we know that many colleges already operate mixed models of ITT delivery, in which they may deliver awarding body-validated provision as well as courses delivered in partnership with one or more HEPs with DAPs, as well as non-student support funded delivery (including Taking Teaching Further). Given the mixed modes of delivery, any accurate assessment of the broader costs – for instance in relation to costs associated with course shut down – cannot be made.

These proposals will not affect FE college eligibility for the [Taking Teaching Further programme](#), under which each provider will continue to have access to their annual allocation of three places.

## **FE colleges who franchise awarding body-validated FE ITT qualifications to other organisations**

SLC data for academic year 2022 to 2023, with effective date 27<sup>th</sup> July 2023, indicates that these proposals would affect approximately 340 trainees at fewer than 5 organisations.

We assume that trainees pay an average of £6,000 in fees for each course, and therefore that they draw down the equivalent amount of student support funding.

Taken on its own, this proposal would lead to a loss of fee income of around £2 million across the organisations delivering these courses.

If the proposals are implemented, in order for their trainees to have access to student support in academic year 2024 to 2025, these organisations would be required to have entered into a validation arrangement with a higher education provider (HEP) with degree awarding powers (DAPs) to deliver FE ITT programmes.

Franchising arrangements between FE colleges and private organisations are commercially negotiated, and government does not have access to data about the costs and/or income for providers involved in them.

## **Private organisations who deliver awarding body-validated courses**

SLC data for academic year 2022 to 2023, with effective date 27<sup>th</sup> July 2023, indicates that these proposals would affect approximately 4,500 trainees at 13 private organisations.

We assume that trainees pay an average of £6,000 in fees for each course, and therefore that they draw down the same amount of student support funding.

Taken on its own, this proposal would lead to a loss of fee income of around £27 million across all private organisations who deliver awarding body-validated pre-service FE ITT courses. This total loss of income would not be distributed evenly across the providers affected as the number of students undertaking FE ITT courses at each provider varies considerably.

If the proposals are implemented, in order for their trainees to have access to student support in academic year 2024 to 2025, private organisations would be required to have entered into a validation arrangement with a higher education provider (HEP) with degree awarding powers (DAPs) to deliver FE ITT programmes.

Validated ITT partnerships are provided by a range of HEPs with DAPs, and as such there is a market which determines the cost and allows private training organisations to identify the appropriate HEP for their needs. These arrangements are commercially negotiated, and government does not have access to data about the costs to providers involved in them.

If the proposals are implemented and private organisations elect not to enter into a validation arrangement with a HEP with DAPs and/or if they have no self-funded or employer-funded FE ITT trainees, we expect that these private providers will be subject to wider non-income based costs related to course shut down, including reduced economies of scale as existing programmes are taught out. It is not possible however, for government to quantify these costs.

## **FE ITT providers expected to experience no negative impacts**

The following FE ITT providers will experience no negative impact as a result of these proposals:

- FE colleges who already partner with a HEP for validation of FE ITT.
- Private organisations or colleges delivering awarding body-validated ITT where trainees or their employer covers the cost of their qualification. This includes funded programmes such as TTF.
- Providers delivering the Learning and Skills Teacher apprenticeship (which is not eligible for student support).

It is possible that the above FE ITT providers will receive a positive benefit (in the form of increased trainee numbers) as a result of these proposals.

## Assessment of impact on awarding bodies that develop and market FE ITT qualifications that are currently eligible for student support

SLC data for academic year 2022 to 2023, with effective date 27<sup>th</sup> July 2023, indicates that around 4,970 students received student support for Level 5 Diploma in Education and Training (DET) courses using awarding-body qualifications. Data from [Ofqual's vocational qualifications dataset](#) shows that there are 23 awarding bodies currently offering a DET qualification as available for study – although it should be noted that student numbers vary considerably between different awarding bodies.

We do not hold data on the number of DET awards that are self-funded by individual trainees, or by their employers (i.e. those that are not funded through student support or other public funding streams). Income derived by awarding bodies from self-funded DET programmes would not be directly impacted as a result of the proposed changes to funding eligibility.<sup>19</sup>

Awarding bodies can continue to derive income from FE ITT qualifications used for in-service courses, whether funded by trainees, employers or by government via programmes such as Taking Teaching Further.

Assuming that these proposals do not lead to an equivalent increase in self-funded pre-service trainees, this will therefore lead to a loss of income to the awarding body sector.

As these arrangements are commercially determined – and are likely to vary between awarding bodies and from provided to provider – and government does not have access to data about the costs to providers involved in them, the total cost to the awarding body sector cannot be accurately estimated.

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<sup>19</sup> Note that the current DET will be replaced by the new Diploma in Teaching (FE and Skills) in academic year 2024 to 2025.





Department  
for Education

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