

Independent Welsh Pay Review Body (IWPRB): Remit for the 3rd Report

Response of the Association of School and College Leaders

Introduction

1. The Association of School and College Leaders (ASCL) represents over 20,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. ASCL Cymru represents school leaders in more than 90 per cent of the secondary schools in Wales. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL Cymru welcomes the opportunity to make a written submission in response to the Independent Welsh Pay Review Body's (IWPRB) call for evidence on considerations for:
 - a) implementation from September 2021; and
 - b) longer term consideration.

The IWPRB 2nd Report

Timing of the report

3. Again, we must voice concerns about the timing of the publication of the report and the Welsh Government's response to it. Whilst we appreciate that there were extenuating circumstances this year due to the COVID-19 pandemic, this had already delayed the process significantly due to the Welsh Government's inability to meet the deadlines or attend Pay Forum meetings.
4. It is not acceptable for the report to be released after schools have broken up for the summer. Schools need to know what the proposed pay award is and this needs to be well before the final Governing Body meetings of the academic year.

Content of the report

5. ASCL Cymru welcomed the recommendations made by the IWPRB in their 2nd Report¹, but were disappointed that they did not go far enough to address the severe retention crisis that the profession in Wales is facing, or to make any inroads in repairing the erosion of pay since 2010, particularly for experienced teachers and school leaders.

¹ [IWPRB 2nd Report, 2020](#)

6. In light of the recruitment issues and the repeated failure to meet ITE targets, the award of five per cent to NQTs on MPR1 was welcomed, but we remain disappointed that this was not extended to all teachers as called for in our joint union submission. The result is that the real terms cuts that experienced teachers and leaders have experienced since 2010 has not been addressed and is now around 13 per cent.

7. We were pleased to see that the Welsh Government stood by the previous First Minister’s commitment that there would be no detriment between teachers and leaders in Wales to those in England, by matching the pay award given by the Westminster Government’s Secretary of State for Education.

8. We welcome the reintroduction of pay scales into the Document, but we were dismayed to see that rather than using the joint union uprated pay scales, the ones used by some local authorities were chosen instead.

9. When there was a differentiated award to the MPR in 2017, these local authorities applied a two per cent increase to points M1 and M6 (minimum and maximum) and just one per cent to points M2 to M5.

10. A significant number of local authorities implemented the two per cent uplift across the MPR, which was in line with the joint union guidance, and reflected in the uprated pay scales. These pay scales were the ones recommended by the STRB in and accepted by the Secretary of State for Education in England.

11. The difference created in these pay scales was one of the many reasons that consultees pushed for the reintroduction of pay scales into the Document to remove the inequality created by it.

12. Introducing the lower valued pay scales has simply compounded the problem. Furthermore, this goes against the previous First Minister’s commitment to no detriment for teachers and leaders in Wales when compared with those in England.

13. The table below demonstrates that a large proportion of teachers on the MPR are indeed suffering a detriment when compared with their counterparts in England².

Point	Wales	England	Difference
M1	£ 27,018	£ 25,714	£ 1,304
M2	£ 27,018	£ 27,600	-£ 582
M3	£ 29,188	£ 29,664	-£ 476
M4	£ 31,436	£ 31,778	-£ 342
M5	£ 33,912	£ 34,100	-£ 188
M6	£ 37,320	£ 36,961	£ 359

14. We did not understand the rationale behind the recommendation to remove a point from the MPR, but what is even more confusing is the fact that there are still six points on the pay scales in the Document.

² [STPCD 2020](#)

15. The result of this change is that teachers who were on M1 last year and move to M2 this year will receive the same pay as an NQT starting on M1 in Wales this year, and £582 less than a teacher on M2 in England. This also means a reduction in the differentials to the other points on the MPR.

16. In any year this would be a frustrating situation for those teachers on M2 and above, but in what has undoubtedly been the most challenging year that the profession has seen, this must be extremely galling.

17. None of this will help with the recruitment and retention of early career teachers who are just joining the profession or are already in post.

Overview of the Welsh Context

18. In January 2020, there were 1,480 maintained schools and 75 independent schools in Wales. There were 14 less maintained schools than 2019, a reduction which was mainly due to mergers.³

19. In November 2019 there were 25,492⁴ qualified teachers in local authority maintained schools in Wales. This has dropped from 25,802 in January 2019⁵.

20. Teacher numbers had largely remained steady, with a peak in 2006 at 28,461⁶. However, they have decreased year-on-year for the last six years.

21. In contrast pupil numbers have risen steadily since 2013/14.⁷

22. The first of three annual reports, 'the Teacher Labour Market in Wales'⁸, to be carried out by the National Foundation for Educational Research (NFER), highlights some real concerns about teacher supply in Wales in both recruitment and retention, many of which have been raised by ASCL and other consultees in our evidence submissions for the 1st and 2nd remit.

Matter for recommendation

What adjustments should be made to the salary and allowance scales for classroom teachers, unqualified teachers and school leaders, to ensure the teaching profession in Wales is promoted and rewarded to encourage recruitment and retention of high quality practitioners.

Recruitment

Initial Teacher Education

23. The number of new secondary school trainee teachers missed the target by 44 per cent in 2018/19, the latest year for which figures are available.⁹ The number of primary school trainees was 22 per cent below target for a fourth year.

³ [Statistical First Release. School Census Results, 2020, Welsh Government Statistics](#)

⁴ Ibid

⁵ [Schools' Census Results: as at January 2019, Welsh Government Statistics](#)

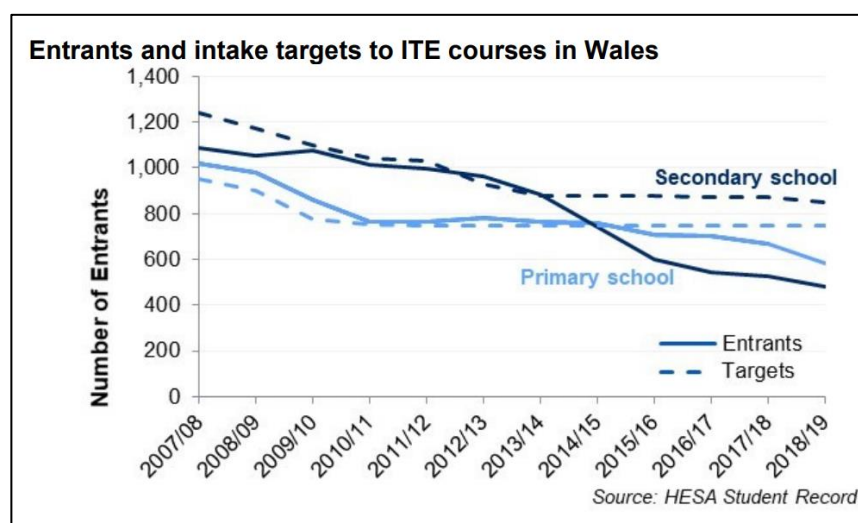
⁶ Ibid

⁷ Ibid

⁸ [Teacher Labour Market in Wales Annual Report 2020](#)

⁹ [Initial Teacher Education Wales, 2018/19](#)

24. The table below¹⁰ demonstrates that although targets in both phases have remained broadly the same since 2012/13, there has been a steady decline in both since 2015.



25. It is important to note that as the targets have remained broadly the same each year, nothing has been done to address the cumulative impact of the numbers missed year on year. For example, the numbers that were not recruited in one year have not been added to the next, so this number is significantly increasing year on year. The table below shows the impact of this¹¹.

	2014/15	2015/16	2016/17	2017/18	2018/19	Total
ITE Targets	1630	1630	1621	1621	1601	8103
ITE Entrants	1500	1310	1245	1200	1065	6320
ITE Shortfall	130	320	376	421	536	1783

26. There has also been a fall in the number of ITE students able to teach in Welsh for the fifth consecutive year¹².

27. These reductions are from students in both England (19 per cent) and Wales (9 per cent). Almost 90 per cent of ITE students beginning a course in Wales were living in Wales beforehand.¹³

28. The number of ITE entrants from Wales on secondary school courses in Wales dropped by 7 per cent (30 students) in 2018/19 compared to 2017/18; the number starting to train in England, however, increased by 5 per cent (10 students) over the same period.

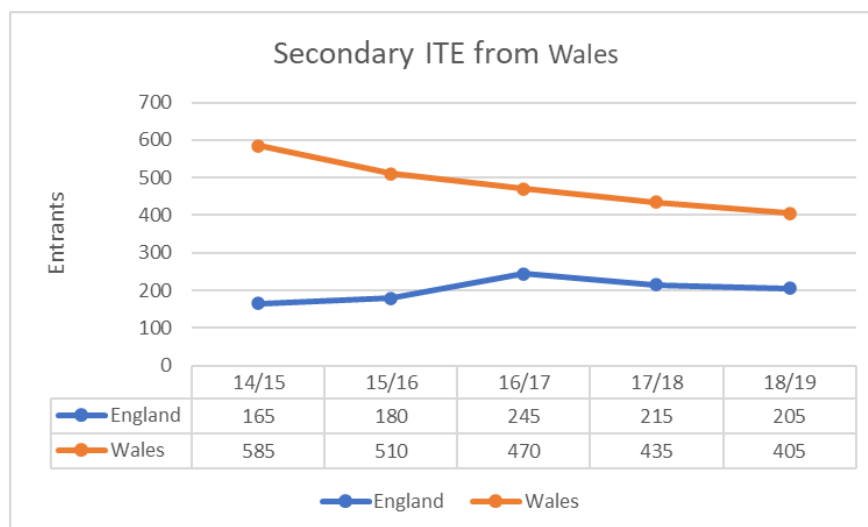
¹⁰ [Ibid](#)

¹¹ [Ibid](#) pg 3

¹² [Ibid](#) pg 1

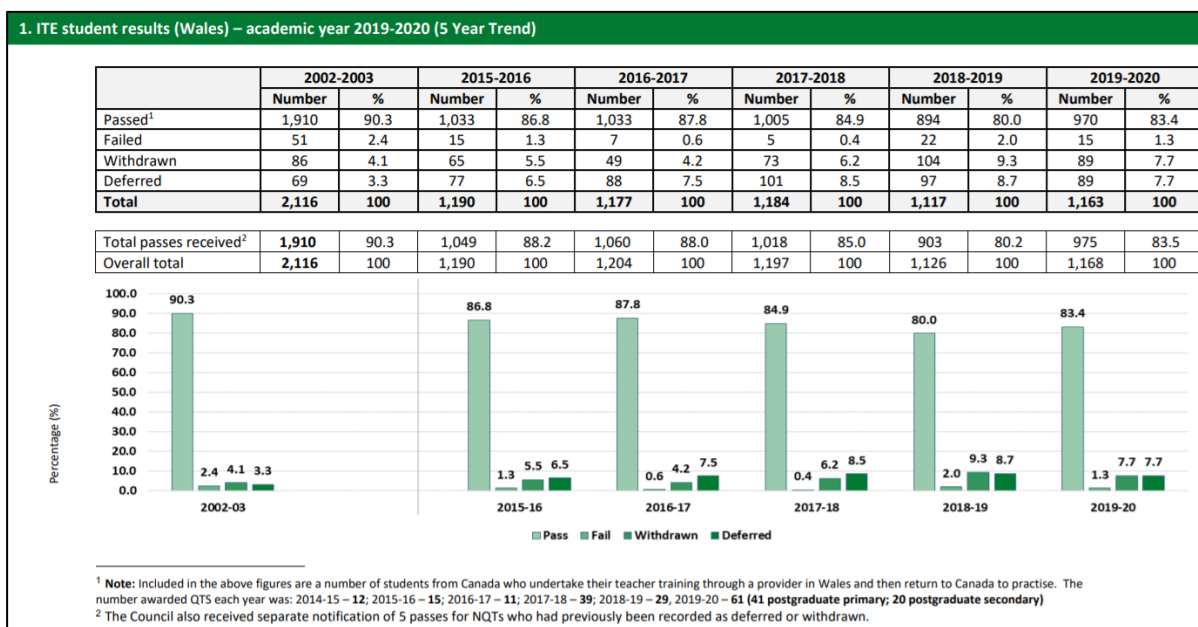
¹³ [Ibid](#) pg 4

29. As shown in the table below, there has also been a steady decline (31 per cent) in the number of ITE entrants from Wales on secondary school courses in Wales over the last five years.



30. However, over the same period, the number starting to train in England increased (24 per cent).¹⁴

31. The Initial Teacher Education (ITE) student results showed a slight increase in the pass rate from 80 per cent in 2018/19 to 84.3 per cent in 2019/20, but this still falls far short of the 90.3 per cent of 2002/03¹⁵ as the table¹⁶ below shows. It is also important to note the difference in the numbers involved, with 1,910 passing in 2002/03 and just 970 in 2019/20.



32. Of those that did qualify, only 78.5 per cent¹⁷ were registered with the Education Workforce Council (EWC) following the award of QTS (as at 8 October 2020).

¹⁴ Ibid Pg 8

¹⁵ ITE Student Results 2019/20, EWC

¹⁶ ITE Student Results 2018/19, EWC

¹⁷ EWC Policy Briefing: Teacher recruitment and retention in Wales

33. Of those who trained in England, just 149 were registered with EWC (as at 8 October 2020), down from 291 in 2019¹⁸.

34. This all paints a very worrying picture for ITE recruitment, even more so for the secondary phase.

Newly Qualified Teachers (NQTs)

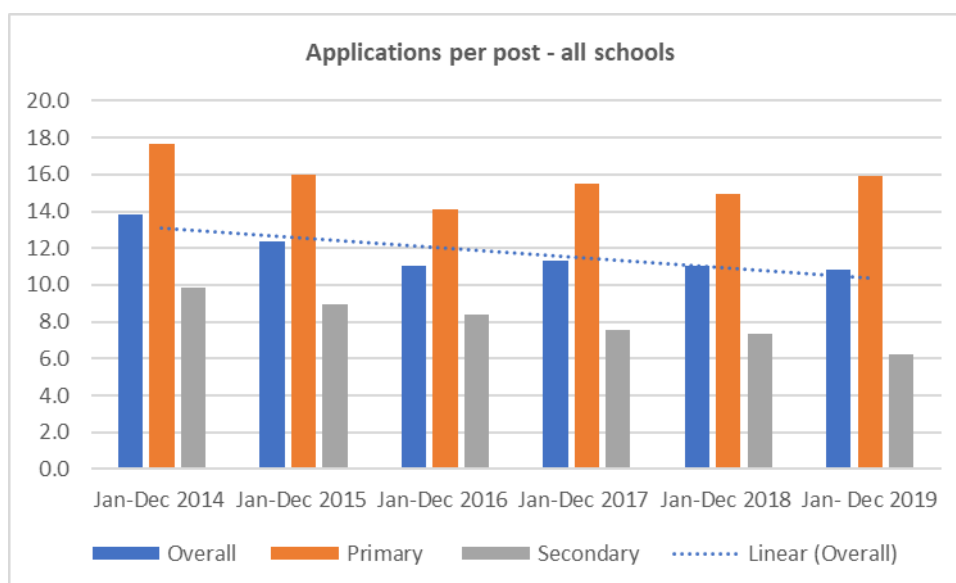
35. In our evidence for the 2nd report¹⁹, we highlighted the decline in the number of NQTs from 1,476 in March 2002, to 1,165 in March 2019, using the latest data available at the time. This has not yet been updated for the period to March 2020.

Vacancies – all schools

36. In December 2019, the number of applications received for each post advertised remained the same after declining for the previous five years²⁰.

37. For the one-year period ending December 2019, the number of applications per post for schools overall dropped from 11.1 in 2018 to 10.8, with an increase of one application per post in primary and a decrease of one application per post in secondary.

38. The chart below using the latest data from StatsWales²¹ demonstrates the overall downward trend over this period.



39. The StatsWales²² data shows a similar picture for the percentages of vacancies filled over the same period.

¹⁸ Ibid

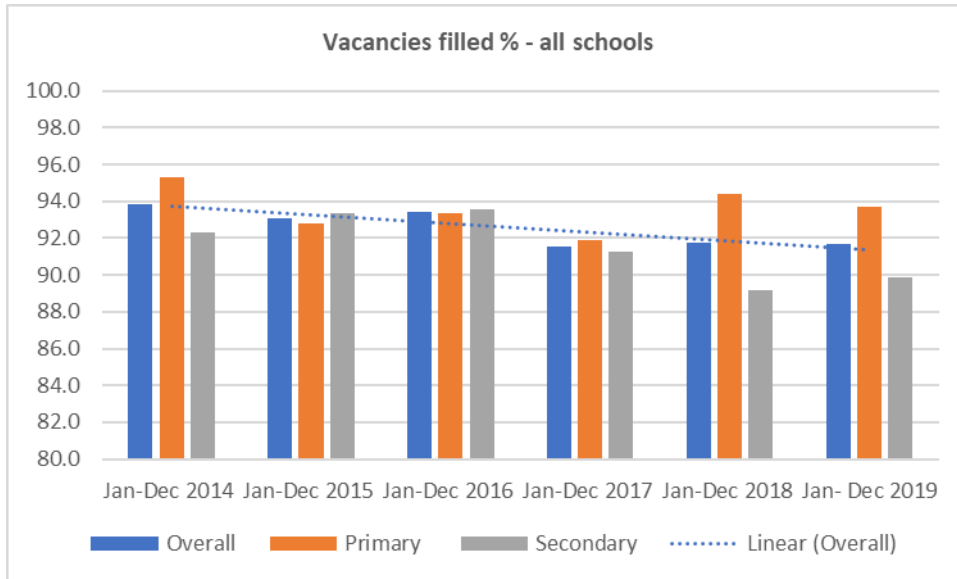
¹⁹ [ASCL evidence to IWPRB 2nd Report](#)

²⁰ [Teacher Recruitment and Retention, StatsWales](#)

²¹ Ibid

²² [Teacher recruitment and retention, Stats Wales](#)

40. Again, the chart below demonstrates the overall downward trend.

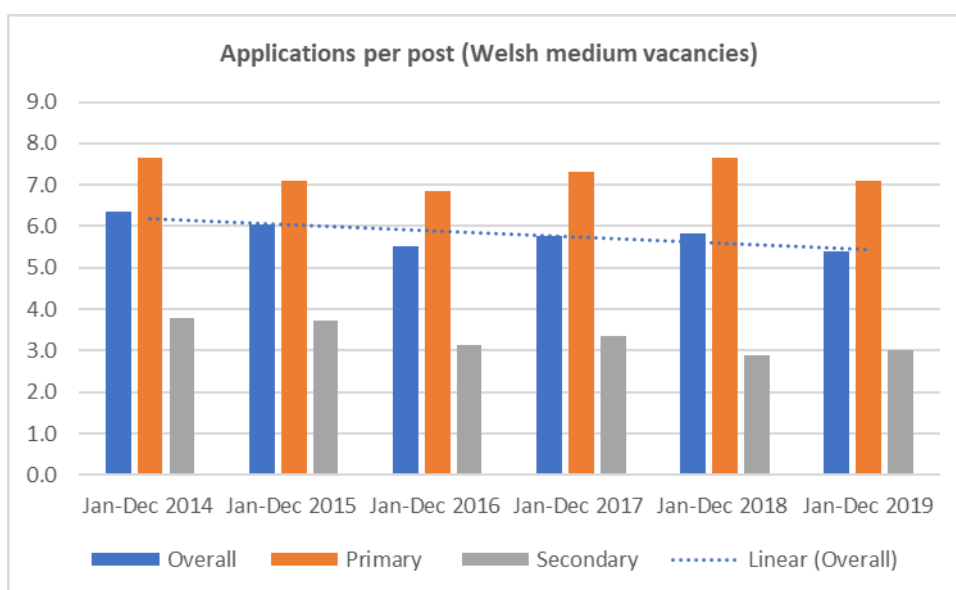


Vacancies – Welsh-medium schools

41. The situation in Welsh-medium schools is much worse and continues to deteriorate, with just 5.4 applications per post advertised in the one-year period ending December 2019²³, down from 5.8 per post in December 2018.

42. There were 7.1 applications per post in primary and just 3 applications per post in secondary²⁴.

43. Again, the chart below shows the pattern over the six-year period ending December 2019, with a clear downward trend overall.



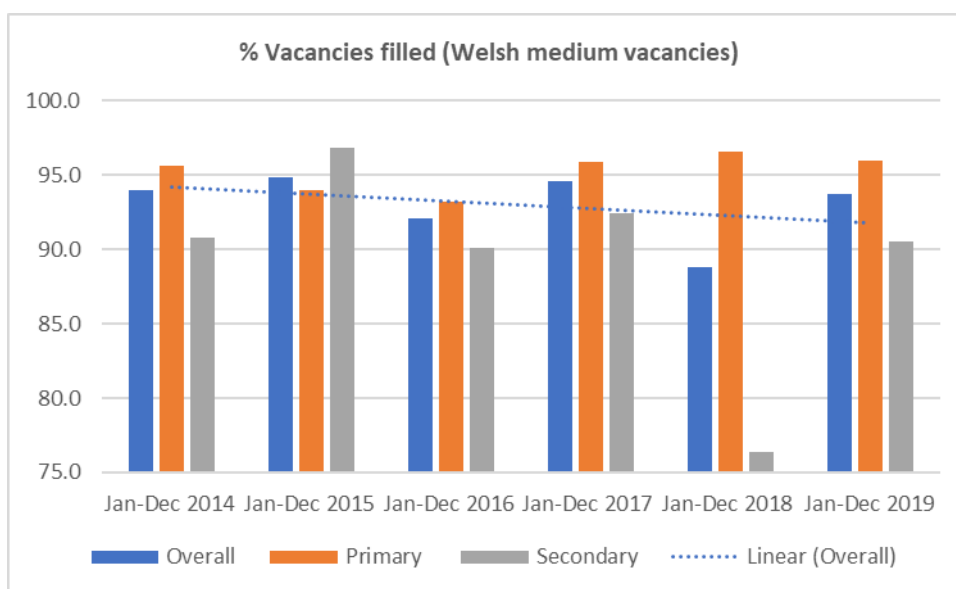
²³ Ibid, Welsh medium schools filter

²⁴ Ibid, Welsh medium schools filter

44. The proportion of vacancies filled in Welsh-medium schools had increased in December 2019, this is a result of an increase in secondary, with a slight decrease in primary.

45. For the one-year period ending December 2019²⁵, 93.7 per cent of vacancies overall were filled, representing 96 percent in the primary sector and 90.5 per cent in secondary.

46. The chart below demonstrates the downward trend over the six-year period ending December 2019, and the significant drop that secondary schools saw in 2018.



47. This all demonstrates that there is a serious recruitment issue for Welsh-medium schools, and that this is especially the case for secondary schools.

48. All of these issues are confirmed in the report 'Teacher Labour Market in Wales'²⁶, which highlights its key findings as:

- *Primary and secondary pupil-teacher ratios rose in Wales in 2018/19*
- *Entries to initial teacher education (ITE) have been below target for three years in a row*
- *secondary schools appear to be finding recruitment increasingly challenging*
- *Welsh and bilingual schools face a greater teacher recruitment challenge than English medium schools*
- *Schools in disadvantaged areas find it more difficult to fill vacancies*

49. The report also states that *under recruitment in ITE has translated into a fall in the number of applicants per vacancy across subjects.*²⁷

50. The Policy Briefing: Teacher recruitment and retention in Wales, also highlighted that rural schools also faced particular recruitment challenges, with 9.5 applications per post in primary, and just 4.3 in secondary²⁸ in 2018.

²⁵ Ibid, Welsh medium schools filter

²⁶ [Teacher Labour Market in Wales, NFER Annual Report 2020](#)

²⁷ Ibid pg 10

²⁸ Ibid, slide 9

School leaders

51. There is little new data available for school leaders, with the majority being for Headteacher posts. As we highlighted in our supplementary evidence for the 2nd remit, the vacancy data for 2018 raises concerns, and again in 2019, with just two headteacher posts advertised, and as both were appointed to, this gives a 100 per cent appointment rate.

52. This is clearly not representative of the situation, and figures for 2019/20 may well be skewed by the impact of the coronavirus pandemic.

Retention

Classroom teachers

53. Retention continues to be a problem across the sector.

54. In 2014, 1,356 students gained QTS. Following the award, just 1,012 who trained in Wales registered with the EWC. Of that 1,012 there were only 782 (58 per cent) teachers registered with the EWC in March 2015 who were still registered in March 2020. Furthermore, 87 were working as supply teachers and 65 in/out of service.²⁹

Destinations of Leavers

55. The StatsWales data³⁰ on the destination of teachers leaving the profession shows another increase in the number leaving to work outside education.

56. The table below shows the breakdown in 2007 and then for the last two reported years³¹, to December 2018 and December 2019.

Teachers Leaving	NT role in education	Outside education	Early Retirement	Other	Unknown	Total
2007 Total	68	67	479	246	53	913
%	7	7	52	27	6	100
2018 Total	55	103	183	201	59	601
%	9	17	30	33	10	100
2019 Total	40	108	169	215	80	612
%	7	18	28	35	13	100

57. It is also clear to see an increase in the numbers leaving overall since 2018.

School leaders

58. As highlighted in our previous evidence to the 2nd remit, just 6.4 per cent of teachers who gained QTS in 2008 were in a promoted role in 2019³² (Head of Year/Department or Senior Leadership).

59. Data for the period following this has not yet been published, but we have seen no evidence to believe that the situation will have improved.

²⁹ [EWC Policy Briefing: Teacher recruitment and retention in Wales](#)

³⁰ [Teacher retention: teachers who left the profession by subject and destination](#)

³¹ Ibid

³² Ibid p. 4

60. Furthermore, in light of the paltry award received by senior leaders in 2018, and the fact that this was then not redressed by the Welsh Government in 2019 or 2020, it is likely that this situation may well have worsened.

Headteachers accountable for more than one school

61. As stated in our evidence for the 2nd remit, as there are relatively few of these roles in Wales, we see this as a marginal issue.

62. The Welsh Government guidance document 'Federation process of maintained schools in Wales'³³ published in May 2014, contains this question and answer:

'How should heads of federations be paid?'

Following a recommendation from the School Teachers' Review Body (STRB) the Department for Education in England is currently updating the Teachers' Pay and Condition document to reflect interim payments for head teachers who take responsibility for more than one school.'

63. The STPCD was updated accordingly. As this took place prior to the devolution of pay and conditions for Wales, this information is still contained within the STPC(W)D.

64. We believe that the current provisions of the Document are sufficient in relation to this and again we see no evidence to suggest that change is required. However, we do feel that it may be that more guidance may be needed for employers in order to support them in implementing the provisions.

Teaching and Learning Responsibility (TLR) Arrangements

65. We believe that it is important to retain the flexibilities offered by the current structure and cannot support any move to a national fixed scale for TLRs.

66. On the whole, it is our view that the current TLR arrangements are working effectively. Indeed, we have seen no evidence to suggest that they are not working.

67. They allow employers to reward staff for relevant responsibilities and give them the optionality of reflecting the size, context and any particular challenges faced by their individual school.

68. One example of this, is in bilingual schools, where TLRs are crucial in recruiting appropriately skilled staff.

69. One area where our members do feel that the current arrangements could be improved would be for them to be less restrictive to allow for combining several responsibilities.

70. Some examples of things our members do find effective:

- Clear lines of accountability and communication
- Crucial for middle leader roles in secondary schools
- Improving teaching and learning
- Driving responsibility in areas as there is parity

³³ [Federation process of maintained schools in Wales: Guidance for governing bodies and local authorities](#)

71. It is also our view that TLR3s are very valuable in the professional learning for less experienced teachers and that they help to motivate and develop staff.

Unqualified Teachers

72. It is important to remember that an unqualified teacher is categorised as such due to not holding QTS. This does not mean that they lack professional qualifications or teaching experience. It may also be the case that they qualified abroad but that teaching qualification is not recognised in the UK.

73. Some unqualified teachers may be highly qualified and experienced in subjects such as science and technology, which can be very useful in light of the problems recruiting to STEM subjects in secondary.

74. We believe that the arrangements and remuneration contained within the Document are currently fit for purpose. We see no evidence to suggest that there is a need for change.

75. One concern that could be raised in relation to these, is that an unqualified teacher who remains on the unqualified pay range for more than three years, could progress to a higher value salary than that of a newly or recently qualified teacher.

76. However, this has always been the case and as stated earlier, we have seen no evidence to suggest that this is an issue for schools.

77. We believe that where unqualified teachers are employed in schools, they should be working towards becoming qualified teachers, with the full support of the school. However, we also believe that the value that unqualified teachers can bring should not be overlooked.

Leading Practitioners

78. The STPC(W)D defines leading practitioners as *qualified teachers who are employed in posts that the relevant body has determined have the primary purpose of modelling and leading improvement of teaching skills*.³⁴

79. This provision allows schools to reward teachers who are experts in classroom teaching but who may not wish to take up a leadership role.

80. However, the fact that these roles only account for 0.1 per cent of the teaching workforce³⁵ shows that this provision is under-utilised, with schools in just nine local authorities employing leading practitioners.

81. Feedback from our members is that they would use this flexibility more if they had sufficient funding.

82. We believe that the current arrangements contained within the Document are fit for purpose and that the pay range allows employers to appoint at the most appropriate salary for their school's size and context. To enable them to do this, the ongoing issue of school funding would need to be resolved.

³⁴ STPC(W)D 2020 para 16.1

³⁵ [SWAC 2019 Teachers by pay range by local authority](#)

83. With the recruitment, and particularly the retention crisis being as they are, we believe that the STPCD (W) needs to allow school as many flexibilities as possible to enable employers to address any contextual recruitment and retention issues they face. It may be that what is needed is more guidance for employers to enable them to utilise these provisions more.

Pay Portability

84. As stated in our previous evidence³⁶, we support and welcome the reintroduction of pay portability into the Document. This has been common practice across most local authority areas anyway and is included in their pay policies.

85. In some of these policies this is defined simply as a commitment from the employer to the principle of pay portability when making new appointments and to place no restrictions on pay ranges when advertising posts, other than the minimum of the Main Pay Range and the maximum of the Upper Pay Range.

86. Consideration will need to be given to the principle of pay portability when teachers applying from other jurisdictions are successfully appointed to roles in schools in Wales.

87. For example, those moving from the academy sector in England may be on higher values for the same point on the two pay ranges, and in some cases on different pay ranges entirely. This is now even more likely and could also be the case for teachers moving schools within Wales, due to the adoption of the lower value pay scales for the Main Pay Range into the Document, rather than the higher ones, as referred to earlier in our evidence.

88. Some pay policies do allow for this. For example, the South East Wales model pay policy commits to '*pay the teacher on the main pay range or upper pay range at a scale point which at least maintains the teacher's previous pay entitlement where the teacher has previously been paid under the terms of the Document plus any pay progression which they would have received had they remained in their previous post.*'

89. The arrangements that are implemented need to ensure consistency of approach, and the issue relating to pay scales (which we raised in paragraphs nine and ten), needs to be resolved to ensure teachers moving between schools in Wales are not penalised.

90. If schools in Wales are to be able to recruit and retain the best possible staff, then the pay portability principles reintroduced into the Document must ensure that they are able to and must not present them with further barriers.

Time Management

91. Teachers' working time is laid out in the STPC(W)D, with clear guidance on the requirements around Planning Preparation and Assessment (PPA) time. It also makes clear that there is an expectation that additional hours will be required for work outside directed time:

In addition to the hours a teacher is required to be available for work under paragraph 50.5 or 50.6, a teacher must work such reasonable additional hours as may be necessary to enable the effective discharge of the teacher's professional duties, including in particular planning and preparing courses and lessons; and assessing, monitoring,

³⁶ [ASCL evidence to IWPRB's 2nd remit](#)

*recording and reporting on the learning needs, progress and achievements of assigned pupils.*³⁷

92. However, it is not for the employer to decide or direct how many hours this needs to be, nor when or where this additional work is carried out, so it may well be that it is carried out at home over evenings/weekends/holidays as the individual teacher deems appropriate and necessary.

93. Additionally, there is no specific need for PPA to be carried out in school, and where it is possible for employers to facilitate teachers to take their PPA time off-site, we would encourage them to do so.

94. One area we do feel needs to be improved is the workload in relation to senior leaders, in particular Headteachers. It has been evident since the onset of the coronavirus pandemic that our Headteachers have been working relentlessly and will have seen very little by way of work-life balance. This is on top of what was already an overbearing workload.

95. We believe that when new initiatives are introduced for school leaders to implement, workload impact assessments must be carried out to determine the impact that the new initiative will have.

96. There then needs to be further action to decide what other initiative or task will be replaced by the new one, in order to provide the time required by leaders, as identified in the workload impact assessment.

Additional Learning Needs and Education Tribunal (Wales) Act 2018 and current SEN allowances.

97. The Additional Learning Needs and Education Tribunal (Wales) Act includes the new Additional Learning Needs Co-ordinator (ALNCo) role which comes into force in January 2021.

98. The Act requires all maintained schools, with the exception of special schools, to designate a person as the ALNCo and that the governing body must ensure that the person designated to this role, is either a school teacher or a special Educational Needs Co-ordinator (SENCO) *within the school immediately prior to the regulations coming into force.*³⁸

99. The new ALNCo roles are statutory and may have significant statutory requirements attached to them, including potentially mandatory qualifications, whereas the SENCO role is a non-statutory role.

100. This may suggest that the current SEN arrangements in the Document may not be entirely suitable for the new role. The SEN allowances have a very specific, yet somewhat narrow focus, which is reflected in the salary range attached to them.

101. The Draft Additional Learning Needs Code for Wales³⁹ states that *'while all teachers and education staff are educators of children and young people with ALN, the ALNCo is the individual who at a strategic level ensures the needs of all learners with ALN within the education setting are met. The role is a strategic one within the education*

³⁷ STPC(W)D Paragraph 50.7

³⁸ [Research Briefing, Act Summary: Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#)

³⁹ [Draft Additional Learning Needs Code for Wales](#)

setting and should therefore, either form part of the senior leadership team or have a clear line of communication to the senior leadership team'

102. However, an explanatory memorandum⁴⁰ to the draft ALN states the following:

103. *'The Regulatory Impact Assessment (RIA) for the 2018 Act noted that the SENCo role has been implemented in diverse ways in schools, with a variation in designation, from higher level teaching assistant (HLTA) to deputy heads being designated as SENCos; although we do know that the vast majority hold a teacher qualification. Consequently, it was not possible to determine the precise national salary cost. This is still the case today.*

104. *Therefore, for the purposes of estimating current costs for an ALNCo in a school, the midpoint for classroom teachers has been used. For 2020 to August 2021, the relevant salary point is £33,912 (£44,086 including on costs).*

105. *Whilst these Regulations do not directly inform the allowances paid to a SENCo or an ALNCo going forward; currently, some SENCos are entitled to a SEN allowance for undertaking SEN responsibilities. Where appropriate, regulations on teachers' pay provide for an additional annual allowance of between £2,270 and £4,479 for SEN responsibilities (within set criteria). Under the new ALN system this will apply, although any changes to teachers pay, including to SEN allowances, will need to be discussed as part of the annual teacher pay review process.'*

106. This would suggest that the current provisions of the Document will apply to the ALNCo roles.

107. In light of this, we feel it may be more beneficial for a review to be carried out once the role is place and more data is available.

Comparison with other graduate professions in Wales

Pay

108. Despite the School Teachers' Review Body (STRB) recommending a 3.5 per cent increase to all pay ranges in 2018, the Secretary of State for Westminster implemented a lower award of just 2 per cent to the upper pay range and 1.5 per cent to the leadership pay range.⁴¹

109. Although the responsibility for teachers' pay and conditions has been devolved to the Welsh Government since then, nothing has been done to remedy these lower awards. Coupled with the erosion of pay since 2010 this has resulted in experienced teachers and leaders facing real terms cuts of around 12 per cent.

110. The impact of this in comparison to other graduate professions can be seen in the recent Incomes Data Research report published in December 2019⁴². The report ranks average gross pay data from the Annual Survey of Hours and Earnings (ASHE) from teachers and nine* other non-teaching graduate professions (*eight in 2019).

⁴⁰ [Explanatory Memorandum to the Draft Additional Learning Needs Coordinator \(Wales\) Regulations 2020](#)

⁴¹ [STRB 28th report and government response, 2018](#)

⁴² [A review of school teachers' pay in Wales compared with other graduate professions, IDR, December 2019](#)

111. In 2007, secondary teachers ranked 6/10 (primary 7/10), in 2013 this rose to 5/10 (primary 9/10), but by 2019 this had dropped to 7/10 (primary remained static at 9/10).⁴³

112. The OECD report in 2019, found that ‘*statutory salaries for teachers England and Scotland – with 15 years of experience and the most common qualification – have not recovered to “pre-Great Recession highs”*. In 2018, salaries in England were 10 per cent lower than in 2005. In Scotland, the equivalent deficiency was 3 per cent.’⁴⁴

113. In 2018 teachers in England and Wales were covered by the STPCD, so the references to England in the report are also applicable to Wales.

114. As highlighted in our previous evidence, the retention rates for experienced teachers are at crisis point, with EWC data showing that just 47.7 per cent of teachers who qualified in 2008 were still in post 10 years later, and at secondary level that was just 42.8 per cent⁴⁵. In addition to this, the proportion of teachers leaving to work outside education increased again in 2019, as detailed in paragraph 23.

115. In turn, this will have a significant detrimental impact on the leadership supply pipeline, with less experienced teachers in the profession meaning less available to progress into leadership roles.

Other factors

116. Whilst pay is a very important factor for teachers at all levels, there are other important considerations when comparing with other graduate professions⁴⁶. A good example of this is ‘Flexible Working’, which can include part-time working, job sharing, staggered hours and compressed hours. Most other professions offer significant flexible working opportunities as part of their employment package.

117. Long before the coronavirus pandemic, flexible working was seen as a desirable option to the majority of the UK’s workforce with 25 per cent working part-time and a further two thirds having some form of flexibility. Adding in the ones who wanted some form of flexibility but didn’t have it, accounted for 90 per cent of the UK workforce⁴⁷.

118. However, flexible working appeared rarely to be offered routinely by schools and requests may not always have been looked on as favourably as in other professions, mainly due to the perception that teachers need to be in school to carry out their role. Whilst this is true to an extent, this only really applies to classroom teaching and any break-time supervision duties.

119. As a result of the coronavirus pandemic, across the world professions have had to quickly adapt to remote working, including schools. Meetings which previously took place face to face can be easily and effectively facilitated remotely and can be recorded to allow part-time staff who are absent to access them during their working hours. This also means that staff can attend them from home rather than needing to stay in school. PPA time can also be effectively carried out off-site. Job shares and staggered start/finish times can help schools to retain working parents who may otherwise need to leave to take up an alternative job with more flexibility.

⁴³ [Ibid](#)

⁴⁴ OECD (2019), *Education at a Glance 2019: OECD Indicators*, OECD Publishing, Paris.

⁴⁵ [ASCL evidence to the IWPRB 2nd report](#)

⁴⁶ [Ibid slide 39](#)

⁴⁷ [Flexible Working Provision and Uptake, CIPD, 2012](#)

120. In England, the Department for Education provides resources on 'Flexible Working in Schools'⁴⁸, including case studies on Co-Headships, working as a part-time after a career change and implementing job shares successfully.

121. We note that the Welsh Government has 'stated its long-term ambition to see around 30% of Welsh workers working from home or near from home, including after the threat of Covid-19 lessens.'⁴⁹ We look forward to seeing how this will apply to schools and education staff, and would want to be involved in discussions around this. We hope to see more flexible working opportunities being promoted by the Welsh Government for implementation in schools.

Longer term

Existing structure for teachers' pay, terms and conditions

122. As with several of our earlier responses, our first point in relation to this must be, what evidence is there to indicate that the existing structure isn't *fair or appropriate for all school leaders and teachers in Wales, including supply teachers within scope of the STPCD*?

123. We, along with other consultees, pushed for several improvements to the structure, including the reintroduction of pay scales and the removal of performance related pay (PRP) which have now been actioned. We feel that these have improved the structure with a view to making it fairer and more appropriate.

124. We believe that the system is appropriate, but we find that employers are reluctant to use the flexibilities it offers. As stated, some of these issues can be resolved with additional guidance and others require sufficient funding for schools.

125. We must reiterate our earlier point about the pay scales that were adopted for reintroduction into the Document, which mean that there is a disparity across the main pay range dependent on which local authority a teacher is employed in. The result of this is not fair or appropriate for those teachers.

126. It is our strong belief that the higher pay scales should have been adopted and funding provided by the Welsh Government to facilitate the assimilation process. This is something that must be addressed in order to ensure that the structure is fair and appropriate.

127. As we have also raised previously, we believe that the erosion of pay, particularly for experienced teachers and school leaders, needs to be restored. The differentials between the top of the MPR and the bottom of the UPR, and between the top of the UPR and the bottom of the LPR have significantly reduced over time. (ASCL evidence to 2nd remit). This makes it much less appealing for teachers to want to progress from the UPR into leadership roles.

128. Supply teachers within the scope of the STPC(W)D should be subject to the terms and conditions it offers. There can be issues with the application of the annual uplift, but since the reintroduction of the pay scales this should no longer be the case.

⁴⁸ [Flexible working: resources for teachers and leaders](#)

⁴⁹ [Press release, Welsh Government Aim for 30% of the Welsh workforce to work remotely, September 2020](#)

Relationship between responsibilities, workload and pay and conditions

129. We have already commented on our concerns over workload, and especially for school leaders including Headteachers. (para 93)

130. Another area that we do believe is of concern, is that due to funding cuts and recruitment and retention issues, teaching loads are heavier, class sizes and pupil-teacher ratios have increased (PTR)⁵⁰ meaning that there is less time available to be allocated to additional responsibilities, either TLRs or leadership and management time.

131. Feedback from our members has been that if they had more funding, they would employ more teachers and allow them more time for responsibilities.

Potential further research

132. Since the devolution of pay and conditions to the Welsh Government, we have found it difficult at times to access Welsh specific information in relation to pay and conditions of teachers and school leaders, and comparable graduate professions. We would welcome research that identified genuinely comparable graduate professions and the pay and conditions attached to them.

133. We would welcome research to look at recruitment and retention of school leaders, including Headteachers, to include all those who leave the profession, and the reasons for their departure. We would also welcome research that looked at the workload, responsibilities, and accountability of Headteachers and senior leaders.

Conclusion

134. In summary, we believe that a substantial increase to all pay ranges is required in order to address the erosion of pay since 2010.

135. We recommend retaining the flexible TLR structure currently contained in the STPC(W)D.

136. We see no evidence for change to the provisions for Unqualified Teachers or Leading Practitioners.

137. We have added our views on the matters for longer term consideration and look forward to working with the IWPRB and other stakeholders on any proposed changes to these areas in the future.

138. I trust that this response is of value to your consultation. ASCL Cymru is willing to be further consulted and to assist in any way that it can.

Louise Hatswell
Conditions of Employment Specialist: Pay
Association of School and College Leaders
4th January 2021

⁵⁰ [Ibid, pg 6](#)