



Independent Welsh Pay Review Body (IWPRB): Remit for the 5th Report

Supplementary comments from the Association of School and College Leaders on the evidence provided by statutory consultees (part one)

1. Following the submission of evidence provided by the statutory consultees with regard to the 5th remit of the Independent Welsh Pay Review Body (IWPRB), we wish to thank the organisations involved for the considerable thought and wisdom demonstrated in their responses.

Pay review process timeline for 5th Remit

2. As highlighted in our initial evidence and our email to the Secretariat accompanying its submission, it is ASCL's view that the timeline provided for the supplementary evidence stage of the process this year is not sufficient and is unworkable for consultees, for several reasons.
3. Firstly, a two-week turnaround would be very tight in normal circumstances, but it is unmanageable for a remit containing so many items.
4. Furthermore, out of the two-week timeframe allocated this year, one week is in the school holidays and one day of that week is a bank holiday.
5. We received copies of other consultee evidence at 12:45 on Monday 18 March, leaving fewer than five working days to complete such a huge task, as we are unable to carry out our internal clearance processes during a school holiday.
6. We will therefore provide our supplementary evidence in two stages: we will submit our supplementary evidence on the first matter for recommendation (pay award for 2024/25) by the original deadline of 28 March (as 29 March is Good Friday); and we will submit our supplementary evidence on the remaining matters for recommendation no later than midday on Friday 12 April.
7. This submission is part one of ASCL's supplementary evidence; part two will follow as detailed above.
8. We support our sister leadership union NAHT's concerns around the timing of the process and the need for the PPF to convene much earlier in anticipation of the next remit – something which we have called for in our evidence too.

Matter for recommendation – pay award 2024/25

Welsh Government Evidence

Funding/Affordability

9. We again reiterate our objection to the continued insistence of the Welsh Government to include affordability and costs within the remit of the review body. The trade union

consultees are united in their stance on this; the review body, as an independent body, should be allowed to make recommendations that it deems appropriate based on the significant evidence considered as part of each remit.

10. It is neither appropriate nor acceptable for the Welsh Government to attempt to restrain the Review Body's recommendations as it has in both the Minister's letter to the IWPRB (*'Going forward, it is vital that we continue to lead the way for teachers' pay and conditions whilst taking into account the current financial context of Wales and ensuring that any increase to the teachers' pay bill in Wales is affordable and does not place undue pressure on school and local authority budgets.'*) and in the Welsh Government evidence submission (*'The IWPRB is also requested to consider the wider economic and public sector financial context and labour market conditions, as in the current economic climate the need to make any recommendation affordable is key.'*).
11. We remain of the view that it is not the place of consultees to provide costs of any proposed changes to pay and conditions.
12. This is where there is conflation between the role of the review body and the role of the Welsh Government.
13. It is the IWPRB's role to make independent recommendations on pay awards that it deems appropriate to ensure the sufficient quantity and quality of teachers and leaders.
14. It is then a political decision for the Minister for Education and Welsh Language as to the Welsh Government's ability to fund the recommendations.
15. It is ASCL's position that all pay awards should be fully funded by the Welsh Government.

Commitment to no detriment

16. The Welsh Government has tried to use a variety of definitions of the 'no detriment' principle in recent years.
17. In the 2nd remit, the previous Minister for Education gave the comparison of the percentage increase to the total pay in Wales being equal to the increase in the pay bill in England. This contradicted her own letter to the IWPRB for the same remit which stated: *'Additionally, I have been very clear that teachers and leaders in our schools in Wales should suffer no detriment in their pay and conditions as a consequence of the devolution of pay and conditions.'*¹
18. During the pay talks in 2023, the letter sent by the Minister for Education and Welsh Language on 9 March clearly stated:

'On the 'no detriment' principle, I can confirm that should conversations in England result in an offer for teachers and leaders which is higher than any pay settlement in Wales, we would match the pay award.'
19. The pay talks in England did result in an offer for teachers and leaders for September 2023 which was higher than the pay settlement for September 2023 in Wales.
20. However, despite the assurances made in writing by the Minister, which were in relation to any payment settlement in Wales, an aggregated view of pay awards over the last three years was then taken, resulting in teachers and leaders in Wales receiving a lower pay award than those in England.

¹ [WG evidence to IWPRB 2nd Remit](#)

21. Figure One below shows the 2023 values for the main pay range in England and Wales, and the differences between them.

Figure One – 2023 salary values for the main pay range in England and Wales

Point	England	Wales	Difference
M1	£ 30,000	N/A	N/A
M2	£ 31,737	£ 30,742	-£ 995
M3	£ 33,814	£ 33,212	-£ 602
M4	£ 36,051	£ 35,771	-£ 280
M5	£ 38,330	£ 38,587	£ 257
M6	£ 41,333	£ 42,466	£ 1,133

22. Although starting salaries have been increased by the deletion of point M1, teachers on points M5 and M6 will have started on point M1 and progressed annually, so are comparable with the same points in England. The value of M5 is only marginally (0.7%) above England, not the '*at least 1.75% higher*' stated in the Welsh Government's evidence (paragraph 6.1).
23. We have repeatedly expressed our concern over the nominal 'memorable' target figure of £30,000 used in England, as this does not represent a competitive graduate starting salary, and this is particularly the case due to the delayed progress towards it.
24. The starting salary in Wales is only slightly higher than in England, at £30,742. This still falls well below the median graduate starting salary for 2023 of £33,500 reported by High Fliers², which had increased by 11.7% in two years, and is now forecast to increase to £34,000 in 2024³.

Pay award

25. We are pleased to see that there are no recommendations for targeted or differentiated pay awards in the Welsh Government's evidence.
26. However, we are stunned that its evidence includes costings modelled on pay awards of 1%, 2% and 3%.
27. Awards of this level would result in further real-terms damage to teacher and school leader pay.
28. It would also be out of step with the pay growth expected across the economy and within the private sector, which will widen the gap between the private and public sectors even further.
29. Whilst we welcome the undifferentiated approach to the pay awards, the uplifts suggested are nowhere near sufficient. They do not reflect the high levels of inflation and cost of living that our members face.
30. Even though inflation is reducing, the increase from the exceptionally high levels over recent years has been baked into prices. Members will still feel the impact of the cumulative increases; all that will happen now is that those very high prices will rise more slowly than they had been doing.
31. Furthermore, the proposals do nothing to repair the erosion of pay since 2010. Our evidence highlighted the amounts involved for school leaders, and we note that several fellow consultees have presented similar examples. These cannot be ignored.

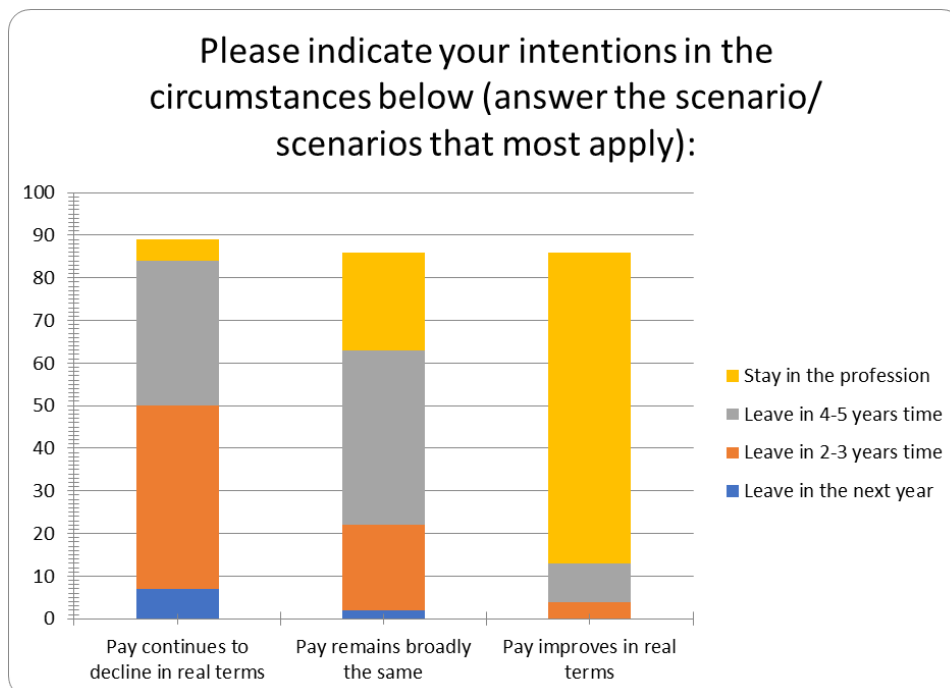
² The Graduate Market in 2023, High Fliers, March 2023

³ The Graduate Market in 2024, High Fliers, March 2024

Impact on retention

32. We are again concerned that the Welsh Government maintains the view that recruitment and retention rates across Wales show little evidence of concern. This is at odds with the evidence provided by all other consultees and the findings of the Teacher Labour Market in Wales reports.⁴
33. We also note that, on the retention data, those leaving at normal retirement age have been excluded from the calculations included by the Welsh Government (paragraph 4.5).
34. Whilst these teachers may have left at normal retirement age, when over half of the workforce is aged over 50, and almost half is over 60, this represents a real risk to the sector over the next five years, and this will particularly affect leadership roles.
35. We must refute the claim made in paragraph 6.5 that '*research by the Welsh Government suggests that pay is not a key driver for teachers.*' The research cited was published in March 2019, which was not only five years ago, but also before the impact of the pandemic and the cost-of-living crisis. It was also before the industrial unrest seen across the profession in 2023.
36. In our member survey⁵ in September 2022, when asked if salary had any bearing on their decision to stay in or leave the profession, 67.5% of respondents in Wales said yes (36.4% said yes, a lot, and 31.1% said yes, a little).
37. When asked about how changes in pay impacted on those intentions, the results were as Figure Two below:

Figure Two – ASCL member survey response, September 2022



⁴ [Teacher Labour Market in Wales, NFER](#)

⁵ [ASCL response to IWPRB 4th Report](#)

38. It is clear to see the negative impact that further decline in pay would have, but also the huge positive impact that improving pay in real terms would have.
39. So, it is fair to say that pay is a key driver for school leaders.
40. It is reassuring to see, in paragraph 6.9, that the Welsh Government shares ASCL's position that pay awards should at least keep pace with inflation: *'Whilst it is reasonable for teachers and school leaders to expect a pay award that at least equates to cost of living increases it is also important for consider the potential impact on school budgets.'*
41. This supports not only our view on annual uplifts, but also our call for a strategic plan to restore the erosion of pay since 2010, when pay awards have not equated to cost of living increases.
42. However, it is disingenuous and misleading for the Welsh Government to cite average (mean) leadership salaries as £64,269 using the 'total leadership' figure (page 70) which includes headteachers, rather than using the 'other leadership' figure of £59,292 when the average salaries for headteachers has also been cited separately.

Use of allowances

43. We note that the Welsh Government, in relation to TLRs, cites the current STPC(W)D as stating that *'the salary and any allowances, except for TLR3s, of a part-time teacher must be determined in accordance with the pro rata principle.'*
44. This was updated following the recommendations in the 4th Report, and the STPC(W)D now states: *'40.2. The allowances (except for TLR3) of a part-time teacher may be determined in accordance with the pro-rata principle and no less than contracted working hours or may be determined to be paid in full, if the teacher undertakes the full duties associated with the allowance. The duties agreed should be capable of being undertaken within the normal hours of the part-time teacher concerned. The appropriate level of allowance payment and duties should be agreed between the individual teacher and the employer.'*

Other consultees' evidence

45. **Impact of inflation:** All statutory consultees emphasise the impact of inflation. Even though inflation has come down (current⁶ UK RPI rate 4.5%), the rampant inflation of 2022-23 (October 2022 saw a 40-year high) means that even these more subdued rates become cumulative and simply add to the Retail Price Index (RPI).
46. ASCL's figures, in terms of matching RPI inflation figures, are similar to NASUWT's, but it is important to stress that an 18% increase would only ensure that teachers' pay has kept abreast of inflationary increases and take no account of pay restoration.
47. One example of the impact of inflation in recent years relates to the heralded £30,000 starting salary. This was supposed to have been applied in September 2019 but has been delayed by four years. The average inflationary impact has been a cumulative 22.7% (Bank of England inflation calculator)⁷ so the figure should have been £36,810pa.
48. Simply addressing the concerns around inflation are not enough, however, and there is a consistent view that we must return to the issue of teacher recruitment and retention and restore pay to its position in the graduate economy of 2010.
49. **Impact of taxation:** ASCL commends the work of the NEU in highlighting the concerns around how the UK's current taxation rules badly affect teachers and other public sector

⁶ [Inflation and price indices, February 2024, ONS](#)

⁷ [Bank of England inflation calculator](#)

workers. This is due to the government's refusal to change the tax threshold for higher tax payers⁸. The impact of cost-of-living pay settlements is putting record numbers of teachers with TLR responsibilities into this higher 40% tax bracket. This, along with other contributions and paying off student loans, seriously affects take-home pay, teacher morale and long-term retention.

50. **Funding methodology in Wales:** The Welsh Local Government Association (WLGA) evidence sets out, on page two, that pay awards must be fully funded by the Welsh Government. This is a principle which ASCL fully supports. However, as stated in our evidence submission, we have serious concerns about the level of funding that is then passed on to schools via each local authority. This, in addition to the 'postcode lottery' in relation to school funding generally, has meant that even when additional funding for teacher pay awards has been provided by the Welsh Government, this has not always been fully passed on to schools. So, we would support the WLGA in its view that pay awards should be fully funded by the Welsh Government but add that funding must be passed on to schools in its entirety.
51. Further to the concerns raised by Community, and as previously mentioned, ASCL has raised with the IWPRB detailed concerns around the funding methodology applied through the 22 Local Authorities, and its impact on maintained schools' budgets. The Minister also commissioned an independent report⁹ which drew similar conclusions. There is a clear and urgent need for reform which ensures that more of the education grant is forwarded to schools in a fair and transparent manner.
52. **Pay increases:** We note that several consultees call for specific pay increases of between 6.5% and 8%. Whilst it is not ASCL's practice to recommend specific increases, these recommendations do appear to align with our position of being at least in line with inflation (RPI) and beginning to repair the erosion of pay which has taken place over more than a decade.
53. As a reminder, ASCL's recommendation on pay states that a fully funded, above inflation pay increase is required for all pay ranges for September 2024, as a step towards restoring the real-terms value of teacher and school leader pay. This must be accompanied by a longer-term commitment and funded strategic plan to fully restore the erosion of pay which has taken place since 2010.
54. We note that the WLGA (page two) also shares the view of the Welsh Government that pay is '*just one factor that contributes to retention issues with teachers and school leaders.*' However, it has been clearly demonstrated, both in our survey results and in the widespread industrial unrest across the sector last year, that pay is a key contributory factor in the retention of teachers and school leaders and must not be underestimated or overlooked.
55. **Pay ranges:** Some statutory consultees are recommending a move from separate main and upper pay ranges to a single pay range as well as a reduction in the number of points on the Main Pay Range (MPR).
56. ASCL is not supportive of a move to a single pay range, or the removal of threshold assessment for progression on to the upper pay range.
57. We believe that it is important to retain two separate pay ranges, not for the sake of having two pay ranges but because they need to be seen as two distinct career stages with clearly differentiated reward packages.

⁸ [One in five workers will be higher-rate taxpayers by 2027, Guardian, May 2023](#)

⁹ [Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements: letter to the minister, Jones, 2024](#)

58. The upper pay range and the threshold standards were introduced as an aide to recruitment and retention and brought about positive impact.
59. When introduced over twenty years ago, the bottom of the upper pay range (UPR) was approximately £2,000 higher than the top of the main pay range (MPR), which represented 8.35% at that time. The top of UPR was approximately £6,500 higher than the top of MPR, which represented 25.3% at the time.
60. The difference between the top of MPR and the bottom of UPR today is £1,558, which represents just 3.7%. The difference between the top of MPR and the top of UPR today is £4,874, which represents 11.1%.
61. These differentials have more than halved due to the erosion of teacher pay over time, through public sector pay restraint and differentiated pay awards which have consistently targeted early career teachers.
62. This has undermined the purpose of the two pay ranges and has clearly reduced the effectiveness that was seen initially.
63. It is ASCL's view that, rather than return to a single pay range which was deemed to be the cause of recruitment and retention problems at the time, the differentials should be restored to allow the separation between the pay ranges, and to ensure the career stage expectation is distinct and meaningful once again.
64. In addition to the erosion of the differentials between MPR and UPR, the differentials between MPR and the leadership pay range have also been diminished. Initially, the minimum of the leadership pay range was 18.7% higher than the maximum of MPR. This has been systematically reduced by differentiated pay awards, and the difference is now just 14%; yet the responsibility and accountability faced by school leaders has never been so high.
65. This deters teachers from wanting to move into leadership roles, as the salary increases are not reflective of the additional responsibility being taken on.
66. These issues are also raised by NAHT in its evidence submission (paragraphs 42, 56 and 74).
67. The differentials between each pay range must be restored.
68. We must contest the view of the WLGA (page three), that increases in headteacher pay ranges requested by Governing Bodies lead to *'significantly inflated pay ranges in comparison to the salary range that should be paid for the size of the school.'* The provision for setting and increasing headteacher pay ranges are clearly set out in the STPC(W)D, with a robust process which must be followed. Increases to the pay range are only made where appropriate and necessary.
69. Along with size of the school, there is provision for the context and challenge of the school to be addressed. This does not necessarily equate to an 'inflated pay range', but rather one that is appropriate for the school and its circumstances.
70. **Historical PRP claims:** ASCL does not agree with the NEU's proposal that schools should assess cases where teachers were denied progression under the PRP system but would otherwise have received it, with a view to compensating such teachers (paragraph 75). This proposal is unworkable. Schools include, within their pay policies, provision for any member of staff to complain or raise a grievance with regards to their pay on an annual basis.

71. **TLR allowances:** ASCL is not supportive of the NEU's position with regards to the implementation of a directed, top-down TLR structure. The provision for awarding TLRs is delegated to the school, as set out in the current STPC(W)D. ASCL's view is that the reforms to the education funding system and the work of Local Authorities in Wales for which we are campaigning would address any areas of 'unfairness' more effectively than an imposed TLR structure.
72. **The pay of executive headteachers:** Whilst we would support clarity around the definition of the role of executive headteacher as suggested by NEU (paragraph 83), and for this to be included in the Document, we do not believe that this would require separate mandatory national provisions. Provisions within the current STPC(W)D are adequate and appropriate, and the responsibility for determining this should lie with the Governing Body.
73. **Gender pay gap analysis:** ASCL supports the concerns raised by NASUWT with regards to gender and pay in Wales. ASCL has provided evidence to show how pay differs for female teachers after 6-8 years of practice, compared with their male peers. It is also worrying that the pay for female school leaders is lower across the board in terms of years of experience. Not only does pay and promotion need to be considered for female teachers, ASCL believes that LAs and schools should be more proactive in terms of promoting flexible working practices and offering full-time TLRs to part-time workers if mutually agreeable.
74. **Equalities and diversity:** Further to concerns around gender and pay, ASCL supports the concerns raised by NASUWT with regards to ethnicity and diversity. ASCL would support an independent and thorough review of gender, disability and ethnicity.

Conclusion

75. We will address the other matters for recommendation in the next part of our supplementary evidence.
76. We look forward to discussing all of the pertinent issues with the IWPRB during the oral evidence session in April.

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