

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

Response of the Association of School and College Leaders

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Section A: Introduction

1. The Association of School and College Leaders (ASCL) is a trade union and professional association representing 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders 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 children and young people across primary, secondary, post-16 and specialist education. 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) 5th remit.
3. Our response is based on the views of our members, obtained through discussions at ASCL Council, with relevant advisory groups, and prompted and unprompted emails and messages.
4. When considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the nine protected characteristics included in the Equality Act 2010, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged. We have answered any equality impact questions on this basis.

Section B: IWPRB 4th Report and Overview of Welsh Context

The IWPRB 4th Report and STPC(W)D

5. We provided our views on the 4th Report and its recommendations in our consultation response.¹

Timing of the report

6. We voiced our concerns on the timing of the publication of the 4th Report and ministerial response to it in our consultation response².
7. It is frustrating to see further delays at various stages of the pay review process over the last two years. Whilst we acknowledge the unprecedented situation presented by the industrial dispute across the profession, in both England and Wales, this does not account for the significant delays or issues that have arisen.
8. The original pay award of 3.5% for September 2023 was rightly revised and an increase to 5% was agreed in March 2023³.
9. This gave ample opportunity for a draft STPC(W)D to be consulted on, and for the final version to be published in the summer term. This would have allowed the pay order to be laid in the Senedd in good time for the pay award to be implemented from 1 September.
10. However, despite ASCL making three separate requests, between 14 August and 3 October 2023, for a draft STPC(W)D to be shared and consulted on, no consultation took place, and a final version was published on 5 October 2023.

¹ ASCL Cymru evidence to IWPRB 4th remit

² Ibid

³ Written Statement: Teachers' Pay Award 2022/23, MfEWL, April 2023

11. Communications from Welsh Government officials to trade unions on 3 October stated that it was felt that *'detailed public consultation was not considered necessary.'*
12. We cannot agree.
13. The STPC(W)D is a statutory document affecting our members' pay, terms and conditions, and as such all changes should be formally consulted on. Consultation is part of the statutory process and cannot be arbitrarily dismissed as unnecessary.
14. Furthermore, the Education Act⁴ is also clear that such consultation is statutory and is *'an important part of the review process.'*
15. Had the statutory consultation process been followed we would have put on record our regret that the *'no detriment'* principle has been applied over a two-year period rather than within any given round of pay settlement. We maintain that the minister's commitment in his letter to unions dated 9 March 2023 has not been met. He said:
'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.'
16. The 2023 pay award in England was higher than the 2023 pay award in Wales. We cannot accept that the *'no detriment'* principle can be retrofitted and seek assurance that the dial is now re-set, i.e. that future pay awards in Wales will at least match those of pay awards in England.
17. The failure to follow the statutory consultation process has meant that union consultees have been denied the opportunity to make formal representations on the issue of *'no detriment'*.
18. There have also been several delays to the *'Strategic review of teachers' pay, terms and conditions'*.
19. In the original timeline, the IWPRB's report on the strategic review was due to be submitted to the Minister for Education and Welsh Language by 31 March 2023. Following the delays, the report was submitted to the minister in December 2023. To date, it has still not been shared with statutory consultees.
20. The review body itself had to seek clarification from the minister in relation to the items for recommendation in the 5th remit letter and those already included in its strategic review report.
21. The guidance issued to statutory consultees from the IWPRB said:

'The IWPRB is conscious that its Strategic Review of Pay and Conditions for Teachers and Leaders submitted to Welsh Government in December 2023 contains recommendations which relate to some of the matters for recommendation in this Remit Letter. Clarification has been sought, and the IWPRB has been informed that "where possible any overlap between your work in this remit and previous reports should be avoided. You will wish to note that the Strategic Review is currently being scrutinised and will likely be published in the next few weeks. you should not be required to repeat consideration of specific matters relating to salary and allowance ranges previously considered in your strategic review. Your report for 2024/25 should therefore take into account those matters referenced in the Strategic Review alongside any new evidence provided by stakeholders".'

⁴ Education Act, 2002

22. It is absurd that we are being asked to submit significant written evidence (to ridiculously short timescales) without even having sight of the strategic review and the recommendations contained within it.
23. There is clear overlap between the strategic review and the 5th remit. This is bound to lead to duplication of work for consultees who do not know whether a recommendation that they wish to see has been made, so they will need to provide evidence calling for it again.
24. Furthermore, within those short timescales, one of the deadlines has been set on a bank holiday, shortening the timeframe even further.
25. This hampers the ability of consultees to craft as full and meaningful an evidence submission as would be the case with a more appropriate timeline.
26. The inevitable result of the delays will be that the IWPRB 5th Report and ministerial response to it will not be published until late in the summer term again, leaving school leaders to set their budgets not knowing what the September 2024 pay award will be, nor how it will be funded.
27. This sends a message to teachers and school leaders that their pay is not of importance to the Welsh Government, and to the wider system that securing and retaining a sufficient supply of teachers in the profession is not a priority.
28. We must see significant improvements in the pay review process and the associated timelines.
29. This must begin with early planning discussions for the next remit to take place via the pay partnership forum (PPF) in the summer term, so that a draft remit letter can be sent to the minister much earlier than we saw this year.
30. Dates for these meetings must be set in advance; it is unreasonable to attempt to arrange a meeting of so many stakeholders at one- or two-weeks' notice.
31. The report and response to it need to be published earlier in the academic year. Schools and colleges 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.
32. This would also allow the consultation on the IWPRB report, the minister's response and the draft STPC(W)D to take place before the summer break. The pay order could then be laid in the Senedd much earlier than has been the case to date.

Overview of the Welsh Education System in Context

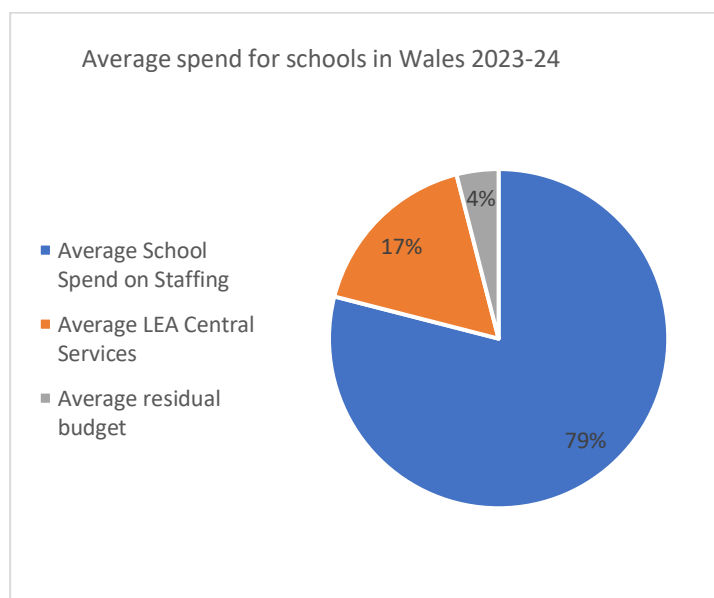
33. In January 2023, there were 1,463 maintained schools and 19 independent schools⁵ in Wales. There were seven fewer maintained schools than in January 2022.
34. Since 2018, pay and conditions have been devolved to the Welsh Government. This was an opportunity to tackle some engrained issues but few of these 'nettles' have been grasped.
35. Teacher and school leadership pay is now different from England and ASCL supports the '*no detriment*' principle in the 2018 devolution process.
36. However, because budgets are hamstrung by the funding methodology (see below), schools are struggling to pay their salary bill, leading to redundancies and poor morale.

⁵ School Census January 2023

Education policy and funding

37. ASCL remains concerned about the funding mechanisms applied across the 22 local authorities in Wales. Too much education funding is being withheld centrally by LAs, as highlighted in the report by Sibieta (2020)⁶ and the more recent review by Jones (2024)⁷, where the role of local authorities and the Regional Consortia responsible for school improvement came under heavy criticism by school leaders.
38. In addition, the lack of joined-up thinking across the LAs creates pay turbulence. For example, some LAs applied a 2% increase to points M1 and M6 (minimum and maximum) and just 1% to points M2 to M5. In 2022-23, a significant number of local authorities implemented the 2% uplift across the MPR, which was in line with the joint union guidance, and reflected in the updated pay scales. These pay scales were the ones recommended by the School Teachers' Review Body (STRB) and accepted by the Secretary of State for Education in England. As we have previously stated, 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.
39. This issue is likely to come to a head if the national model pay policy is implemented, as there will be different pay scales in use in different local authorities.
40. Further to the above, the funding forecasts for 2023-24⁸ show that the allocated average total spend per pupil in Wales is £7,327 yet the average amount each school receives is £5,998 per capita, with £1,328 retained for central services (17%). This is unacceptably high when compared with an average figure of 10% for maintained schools in England. This means that schools only receive, on average, 83% of the block funding from the Welsh Government. With the average salary bill per school equating to 79%, this leaves only 4% for resourcing the curriculum, covering IT and utility costs and dealing with essential maintenance jobs (Figure 1).

Figure 1 Average % spend in schools in Wales for 23-24⁹



⁶ [Review of school spending in Wales, Sibieta, 2020](#)

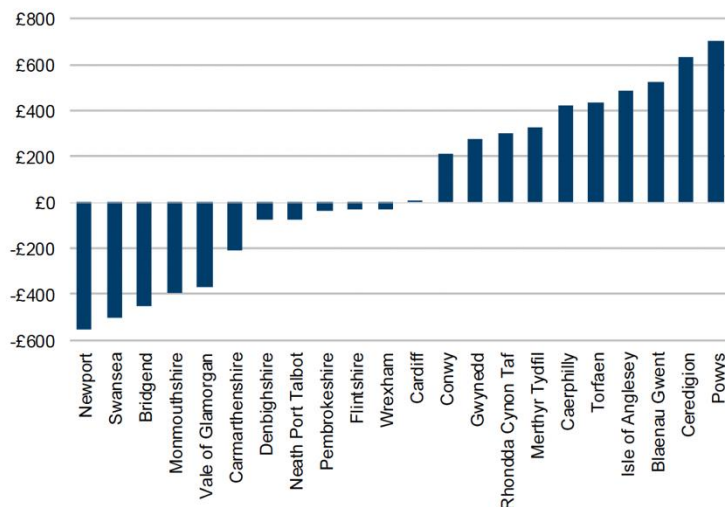
⁷ [Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements, Jones, January 2024](#)

⁸ [Local authority budgeted expenditure on schools: 2023-24](#)

⁹ [Ibid](#)

41. If variability of funding across the 22 local authorities is considered (see figure 2 below) it is hard to imagine how, for example, schools in Bridgend, Swansea and Newport make ends meet.

Figure 2. Variability in Spend per school across the 22 local authorities in Wales⁷



42. The inability for many maintained schools to set a balanced budget was reflected in a recent ASCL Cymru survey of its 1000+ members. Here, 82% reported that they would have to set a deficit budget for 2024-25, with no reserves to alleviate financial pressure. Their concern and immediate reaction to this will be to protect classroom delivery but sacrifice capacity by reducing the size of senior leadership teams. This will erode the capacity of maintained schools to manage and lead change as well as support the growing number of pupils with significant learning needs.
43. The minister’s response¹⁰ to this report states *‘the wider budget pressures are being felt keenly in our schools and as a government we have taken new action to simplify, streamline, and amalgamate funding for 2024-25’*. The minister has requested that the next phase should include a new focus and clear delivery expectations, including supporting school-to-school working at a local level, networking across local authorities and at a national level to support school improvement. ASCL fully supports this approach, providing it means that schools receive a greater share of the education grant.
44. **In summary**, the funding process for Welsh maintained schools is far too variable, causing obfuscation and confusion across the education landscape. It serves to compound the aforementioned ‘postcode lottery’ that schools in Wales face with regards to funding. It also creates confusion when teachers move between local authorities on the same pay range but to find that they receive less pay for the same pay point. This contradicts and undermines the principles of pay portability which have recently been reintroduced into the document.

Matters for recommendation

Section C pay award

Matter for recommendation

What adjustments should be made to the salary and allowance ranges 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.

¹⁰ Written Statement: The next stage in the review of school improvement - the roles and responsibilities of education partners in Wales

ASCL recommends 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.
- ✓ Once the real-terms value of pay has been restored, annual uplifts must continue to be fully funded and must at least keep pace with RPI each year, to ensure that teachers and leaders do not experience any further real-terms pay cuts.
- ✓ Sufficient funding is provided to ensure that schools can afford to implement these commitments. This must also ensure that funding is passed from all local authorities to schools using a fair, proportionate and transparent methodology.

Why are we saying this:

There has been a decline in teachers' real-terms pay for more than a decade, in excess of most other public sector workers. This gap is particularly stark for experienced teachers and for leaders, as their pay has grown more slowly than that of newly qualified teachers. While the pay awards for 2022 and 2023 were welcome, they go nowhere near reversing this decade-long decline. Furthermore, we believe that the '*no detriment*' principle should have been applied in 2023, when teachers and leaders in England received a 6.5% pay award, but those in Wales received 5%. We do not agree that the principle was intended to be applied on an aggregated basis.

This declining pay is clearly impacting on both the recruitment and retention of teachers and school leaders.

45. We believe that the IWPRB should consider a variety of factors when considering its recommendation for the 2024/25 teachers' and school leaders' pay award:
- a. The real-terms pay gap that has emerged and widened since 2010
 - b. Worsening recruitment (see also section on Recruitment to the profession)
 - c. Significant retention pressures (see also section on Retention)
 - d. The need to reward high levels of commitment and professionalism across the school sector in Wales
 - e. Record levels of pay growth across the economy
 - f. Inflationary pressures and increased living costs
 - g. Widespread evidence across the sector that dissatisfaction with pay remains a major factor in the intention of many school leaders and teachers to consider industrial action
46. We will explain our rationale behind these throughout this section.

Pay data

Real-terms impact on leadership pay

47. Teacher and school leader pay has been seriously eroded since 2010, with experienced teachers and school leaders suffering the biggest real-terms pay cuts as a result.
48. Although the responsibility for pay awards and government policy on public sector pay pre-2019 sat with the Westminster government, there has been very little improvement on this since the devolution of pay for teachers and school leaders to the Welsh government.

49. The 6.5% pay award in 2022 made no positive impact on this due to the high levels of inflation at the time, and in fact, as another real-terms cut, it simply served to compound the issue.
50. The 5% pay award in 2023 was another below inflation increase.
51. Figures 3 and 4 establish the erosion of the value of school leaders' pay based on RPI and CPI. The charts show the differences after taking into account 2023 RPI and CPI and the 2023 pay award.
52. School leaders' real pay has fallen significantly since 2010:

Figure 3 – L17 Leadership pay in August 2010 indexed to RPI contrasted with actual pay¹¹

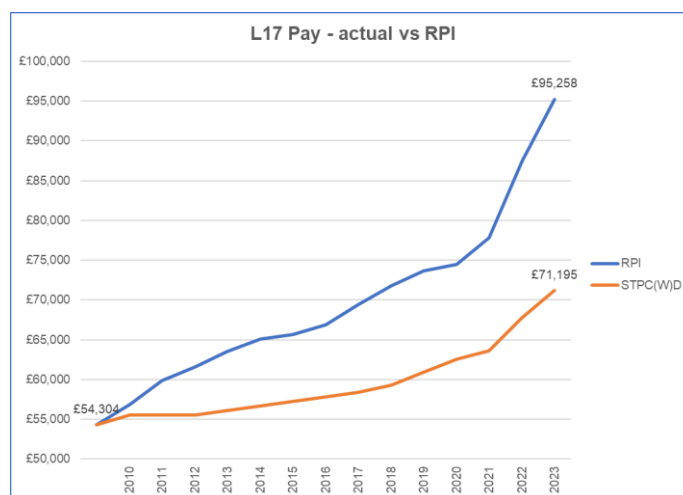
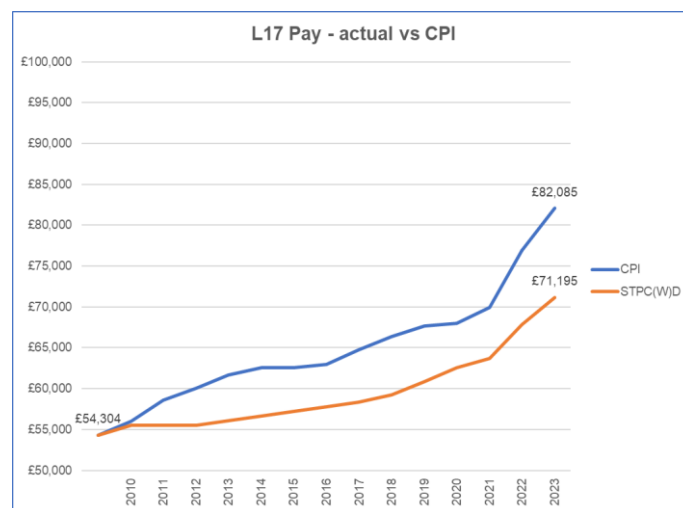


Figure 4 – L17 leadership pay in August 2010 indexed to CPI contrasted with actual pay¹²



53. Figure 3 shows the gaps between actual pay and real pay which started to emerge in 2010 with a pay increase of 2.3% whilst RPI was 4.7%. This was followed by two years of absolute pay restraint. In subsequent years every pay increase bar two has failed to match RPI. Even in these exceptional circumstances the increases were only marginally above RPI (2.75% compared to RPI of 2.61% in 2019 and 2.75% compared to 1.1% in 2020), and these marginal

¹¹ See Annex One for calculations and sources (separate document)

¹² See Annex One for calculations and sources (separate document)

increases were immediately wiped out in 2021 with another below inflation increase of 1.75% (whilst RPI stood at 4.5%).

54. A similar picture emerges in figure 4 when carrying out the same analysis but using CPI as the measure of inflation. The 2.3% increase in 2010 was at a time when CPI was running at 3.1%, and the pay award only exceeded CPI in four out of twelve subsequent years.
55. It is our view that RPI remains the most valid measure of inflation for pay. As the IWPRB will be aware, RPI is currently used for annual uplifts to items such as several pension schemes, private sector rents and commercial contracts.
56. For school leaders' pay to have the same purchasing power as in August 2010 based on RPI, a pay increase of 33.8% is required.
57. Even if the less appropriate CPI is used as a comparator, a pay increase of 15.3% is required to restore school leaders' pay to the same purchasing power as August 2010.
58. To summarise, the above analysis shows how far behind school leaders' pay has fallen since 2010. The pay award necessary to right this wrong differs according to which method of calculating inflation is used as follows:
 - a. RPI – 33.8%
 - b. CPI – 15.3%

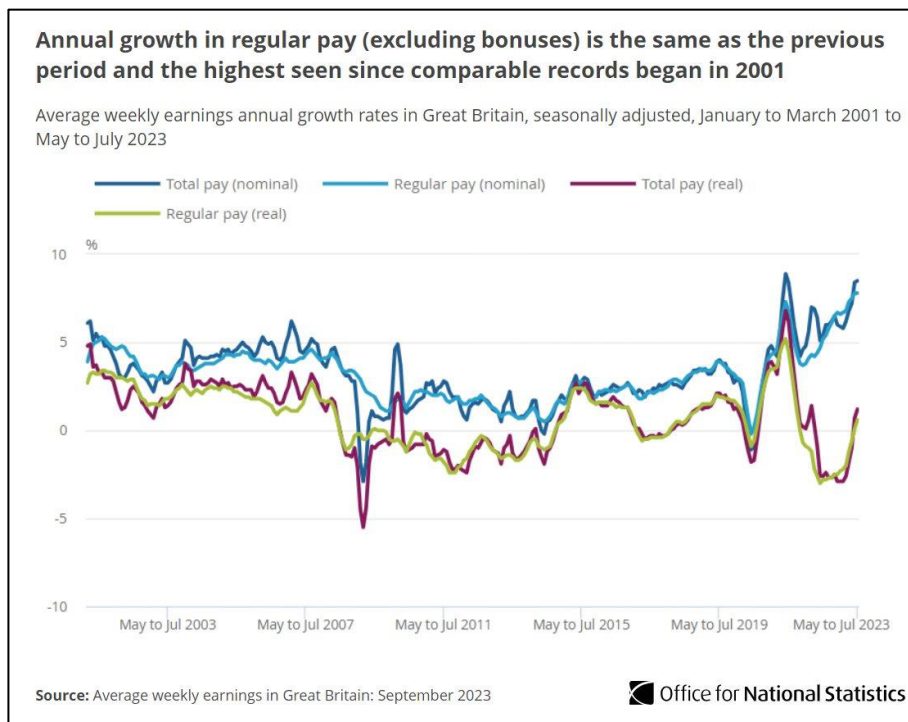
Pay growth and pay intentions

59. In 2023, we saw record growth¹³ in average weekly earnings across the UK economy, with earnings growing by 7.8% in the twelve months to June 2023.
60. ONS figures published in September 2023¹⁴ showed the same annual growth in regular pay (7.8%) as the previous period, *and 'the highest seen since comparable records began in 2001'* (see figure 5 below).

Figure 5 Annual growth in total pay and regular pay 2003-2023¹²

¹³ Average weekly earnings in Great Britain: August 2023, ONS

¹⁴ Average weekly earnings in Great Britain: September 2023, ONS



61. ONS data published in January 2024¹⁵ shows that *'annual growth in both real total and regular earnings (excluding bonuses) has risen on the year'*.
62. The ONS Labour market overview for January 2024 reported that annual growth in regular earnings between September and November 2023 was 6.6%, and annual growth in total earnings for the same period was 6.5%¹⁶.
63. Their latest report for February 2024¹⁷ states that *'nominal earnings growth remains strong, although it has eased a little in recent periods. Annual growth in regular earnings between October to December 2023 was 6.2% and annual growth in total earnings for the same period was 5.8%.'*
64. Average weekly earnings across the whole of the economy rose by 6.2% on the regular pay measure in the year to December 2023. Average earnings growth in the public sector continues to be lower (5.8% in the year to December 2023) than that in the private sector (6.2%).
65. Vacancies over the period November 2023 to January 2024¹⁸ fell by 26,000 to 932,000, falling for the 19th consecutive period. However, total estimated vacancies still remained 131,000 higher than pre-pandemic levels.
66. Results from WTW's global survey 'The Salary Budget Planning Report' published in June 2023¹⁹ suggested that although increases (by UK employers) in 2024 are anticipated to be lower than in 2023, they are still expected to be higher than budgeted for in the last ten years.
67. The main driver influencing changes in salary budgets was cited as inflationary pressure (by 71% of UK employers).
68. The survey also showed that attracting and retaining employees is still causing difficulties for almost half of employers (46%). Actions taken to address these ongoing pressures include over a third (37%) increasing starting salaries, and the same proportion have also increased

¹⁵ [ONS Labour market overview, January 2024](#)

¹⁶ [Ibid](#)

¹⁷ [ONS Labour market overview, February 2024](#)

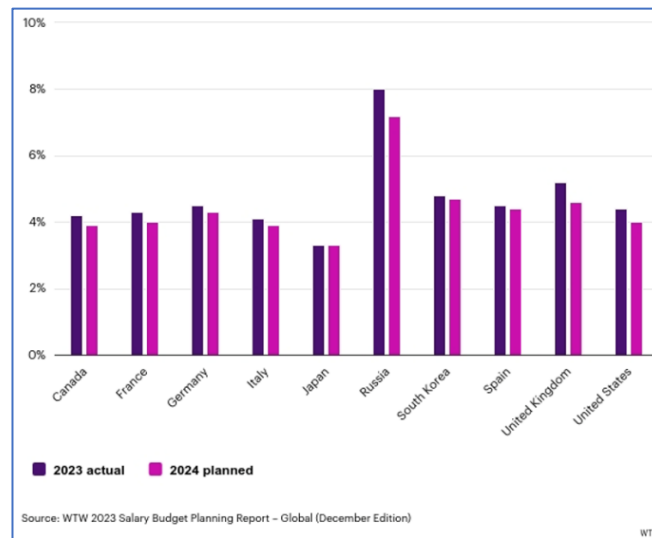
¹⁸ [Ibid](#)

¹⁹ [UK employers adjust 2024 pay raises following record rises in 2023](#)

base salaries for all employees. Employers are also turning to non-pay actions to attract and retain staff, with more than half (57%) increasing workplace flexibility.

69. A further survey in December 2023²⁰ showed a consistent picture on anticipated increases for 2024 (see figure 6 below).

Figure 6 Country comparisons of average planned salaries compared to actual salaries¹⁸



70. Incomes Data Research's (IDR) pay intentions poll in November 2023²¹ asked employers about the predicted level of pay increase in 2024. Some 46% of respondents anticipated awarding an increase of between 4% and 4.99%, and 24% said it was likely to be 5% or more.
71. The latest insights²² from IDR show *'that recent pay settlements across the economy have been around the 5% level, which is consistent with average earnings growth of 6% to 7%. However, average earnings reflect all payments made including bonuses, overtime, shift payments, and location allowances. Most private sector companies have pay review dates in January and April and the level of these awards will give an indication of the level of average earnings growth in future months.'*
72. Although teachers and school leaders received a pay award of 5% in 2023, this still represented another real-terms pay cut due to the continuing high levels of inflation.
73. Additionally, the 6.5% award in 2022 represented one of, if not the, biggest real-terms pay cuts seen by the profession.
74. The strength of feeling on this resulted in ASCL, for the first time in its almost 150-year history²³, moving to a formal ballot in England for industrial action over pay, conditions and funding.
75. It is testament to the social partnership between the trade unions and the government that we were able to work with the Minister for Education and Welsh Language so that this was not necessary in Wales due to the meaningful pay negotiations that took place and the successful resolution which was achieved.
76. So, although pay growth is important, it must only be one factor within a medium-term strategic plan to restore the real-terms value of teacher and school leader pay.

²⁰ [2024 employee pay trends](#)

²¹ [One-quarter of employers planning pay rises of at least 5% in 2024](#)

²² [Earnings growth remains strong at 6.2%, but is easing back, IDR, February 2024](#)

²³ [School leaders union to vote over strike action for first time over pay and staff shortages, Sky News, April 2023](#)

Inflation and UK living standards

77. Inflation remains an important factor in the determination of wages across the UK and cannot be ignored.
78. Although there has been falling inflation since October 2022, it has remained at high levels, and has not fallen as fast as the government had hoped.
79. Inflationary increases are always cumulative, so these more moderate increases are on top of figures in excess of 10% in 2023.
80. Office for Budget Responsibility (OBR) forecasts²⁴ place RPI at 5.1% for 2024.
81. RPI was 5.2% in December, falling slightly to 4.9% in January²⁵. CPI rose unexpectedly in December from 3.9% to 4% and remained at 4% in January 2024²⁶. It is only predicted to fall to 2.8% by the end of 2024.
82. Furthermore, the OBR suggested that inflation (CPI) will not reach the Bank of England's 2% target until 2025. The latest data²⁷ from the Bank of England suggests that CPI is projected to be 2.3% in two years' time, and 1.9% in three years.
83. The impact of high inflation on living standards has been significant, cited as 'the largest reduction in living standards since Office for National Statistics records began in the 1950s'.²⁸
84. Furthermore, the OBR has said that it does not expect living standards to return to pre-pandemic levels until 2027-28. It has also said that living standards, as measured by households' real disposable income, were expected to be 3.5% lower in 2024-25 than their pre-pandemic level.²⁹
85. Interest rates have been increased fourteen times since December 2021, leaving them at 5.25% - a fifteen-year high.
86. The cost-of-living crisis is clearly not over. The reality is, whilst inflation may have halved and energy may be slightly cheaper than it was last year, they are still higher than pre-pandemic prices. Moreover, food and housing are not cheaper.
87. A recent seminar by the Resolution Foundation showed that households are making huge cutbacks in spending to make up for the increases in costs. They can only do this on food, groceries, and energy – they cannot reduce their spend on housing costs.
88. In April 2023, Sky News³⁰ reported on the number of teachers having to take second jobs or use food banks due to their salary not covering their outgoings in the midst of the cost-of-living crisis.
89. Some mortgagors are protected for now with fixed rates, but increasingly this is a 'ticking time bomb'³¹ as they come to an end.

²⁴ [OBR Economic and Fiscal Outlook, November 2023](#)

²⁵ [ONS Inflation and price indices, January 2024](#)

²⁶ [Ibid](#)

²⁷ [Monetary Policy Report – February 2024](#)

²⁸ [Ibid](#)

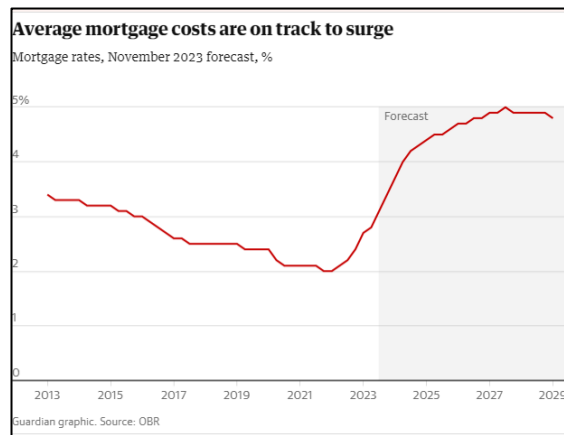
²⁹ [Ibid](#)

³⁰ [Teachers report taking on second jobs, skipping meals and using food banks to cope with costs, Sky News](#)

³¹ ['Sleepless nights': UK homeowners fear 2024 mortgage timebomb, Guardian, January 2024](#)

90. A Guardian article³² in December 2023, states that ‘about half of all mortgages have repriced since December 2021. A further 5m are expected to be hit by 2026. For the typical owner-occupier rolling off a fixed rate between the summer of this year and the end of 2026, the Bank expects monthly repayments to increase by about £240, a jump of about 39%.’ (See figure 7 below).

Figure 7 Average cost of mortgages 2013-2029³⁰



91. The economic outlook remains uncertain. The impact of conflict in the Middle East and disruption to global trade caused by events in the Red Sea remains unclear.

Recruitment and retention

92. The introduction to the 2022 Teacher Labour Market in Wales report³³ states:

‘Our analysis shows that while the Welsh school system was facing a growing challenge of ensuring there are sufficient numbers of teachers before the pandemic, this has been eased somewhat in the short term. However, there continues to be evidence of particular recruitment and retention challenges in some areas, including: shortage subjects (such as Welsh, maths, science and modern foreign languages), Welsh-medium schools and schools in areas with high levels of disadvantage. These challenges are likely to intensify again as the wider labour market recovers from the pandemic and affects the relative attractiveness of teaching as a profession.’

Teacher population

93. The number of qualified teachers and pupil characteristics in Welsh schools is changing, causing further resource pressures on an already strained and inchoate education system.
94. The number of classroom teachers in Wales decreased in 2023 from 2022 by 1.6% (22,290 in 2022, 22,150 in 2023)³⁴. This follows year-on-year increases since 2019, helped by the ‘Recruit, Recover, Raise Standards: Accelerating Learning Programme’ grant (the RRRS grant) which was part of the Welsh Government’s response to the COVID-19 pandemic. There is now widespread concern about the effect on teacher recruitment and school’s ability to fund this initiative as this grant dries up.
95. Over the last decade there has been a significant reduction in the number of registered qualified teachers (over 1800 fewer teachers) – see Figure 8.

³² [Five charts explaining the UK’s economic prospects in 2024](#)

³³ [Teacher Labour Market in Wales 2022, NFER](#)

³⁴ [SWAC 2022](#)

Figure 8 The number of registered schoolteachers in Wales since 2014 (Annual Workforce Survey 2023)

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
37,673	37,355	36,951	36,426	35,929	35,545	35,171	34,171	35,256	35,837

Pupil population

- 96. The most recent census for pupils in maintained schools in Wales was January 2023³⁵. At this point in time, the total number was 469,872 pupils which is 1,259 pupils fewer compared with April 2022.
- 97. The recent upturn in the number of pupils in maintained schools since returns levels to the previous peaks in 2020 (see figure 9). There are also increases in the number of children receiving Free School Meals (FSM) and those with significant additional learning needs (ALN) – see figures 10 and 11.

Figure 9. The total number of pupils in LA maintained schools in Wales since 2008³⁵



Figure 10 Changes to the % of Free School Meal Pupils in Wales since 2008³⁶

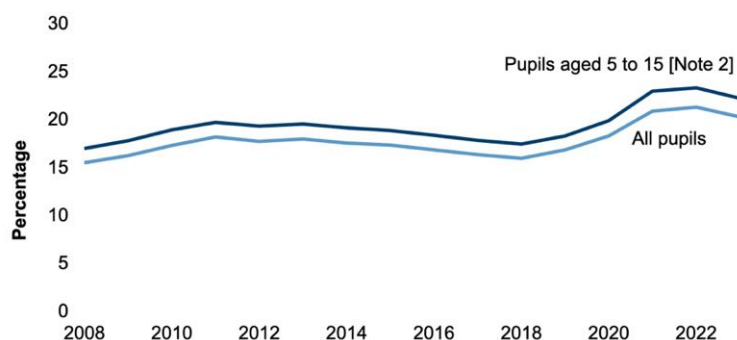
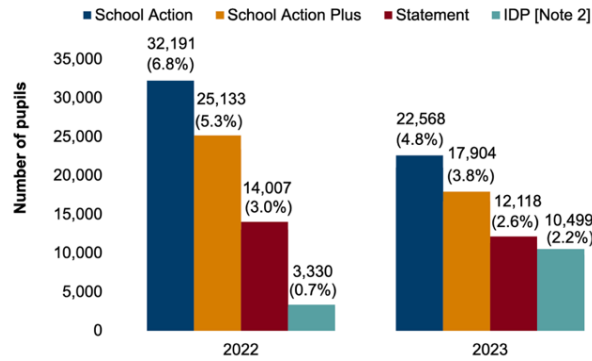


Figure 11: Changes to Additional Learning Needs (ALN) in Wales³⁷

³⁵ School Census January 2023

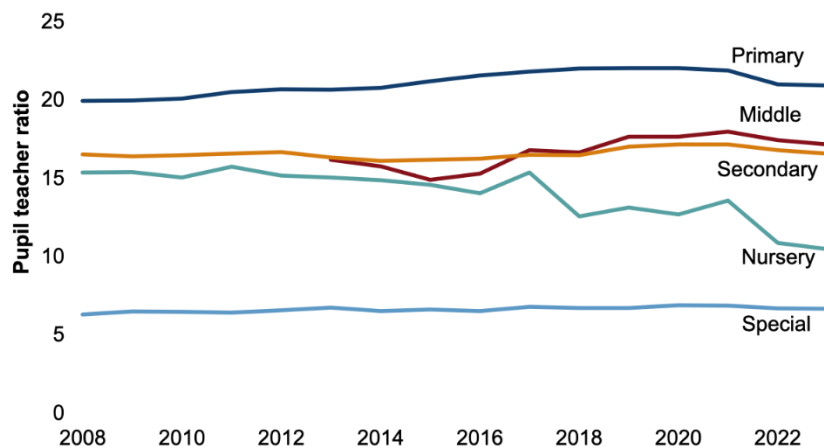
³⁶ Ibid

³⁷ Ibid



- 98. In terms of levels of deprivation, Figure 10 shows the impact of the pandemic and economic recession, with a step change in the number of pupils in receipt of free school meals.
- 99. Figure 11 compares the old and new ALN system in maintained schools so the 30% reduction in pupils with School Action (mild ALN) is in stark contrast with the increase in the number of pupils with significant and complex learning needs (those with Statements and Individual Development Plans).
- 100. Post-Covid, pupils in maintained schools in Wales have, therefore, more significant learning needs and there is a higher percentage experiencing socio-economic deprivation.
- 101. The overall Pupil Teacher Ratio (PTR) increased from 18.4 on 2015 to 19.3 in 2020. PTR has returned to 18.4 in 2023³⁸ but this is one of the highest PTRs across OECD³⁹ countries and is symptomatic of the underfunding outlined in point 16. Furthermore, this masks considerable variation across the different education sectors, with primary schools worst affected (20.9 per teacher) – see Figure 12.

Figure 12: Pupil Teacher Ratio in different education sectors in Wales



- 102. **In summary**, there are many complex and interrelated issues in relation to education performance, pupil support and school funding in Wales. Whilst the pupil-teacher ratio has

³⁸ Ibid

³⁹ OECD Education at a glance, 2021

been relatively stable in recent years, it is high in comparison to other OECD countries. In terms of pupils in the Welsh education system, the job of teachers is more demanding. Pupils in both the primary and secondary sector are more complex, with higher levels of ALN and socio-economic deprivation. Post-Covid catch-up remains a concern for many teachers, particularly with respect to these two groups of pupils, who suffered most during the periods of school closure.

103. There is also a clear and obvious need for direction and longer-term financial strategy with far too much education spend being withheld by local authorities. Each LA has its own perplexing funding methodology which results in excessive variability across the 22 authorities. With rising staff costs and the effect of inflation, school leaders, in the majority of cases, are unable to set a balanced budget and are having to make sacrifices in terms of resources, support for ALN pupils and senior leadership capacity.

Recruitment

ASCL recommends that:

- ✓ Starting salaries and whole-career earning potential must be competitive with comparable graduate salaries to attract the very best graduates into the profession.
- ✓ Limited flexible working opportunities in relation to other comparable professions must be compensated for in the rest of the compensation package.
- ✓ A holistic approach to bursaries and other incentive payments made by the Welsh Government must be taken so that they support the pay framework as set out in the STPC(W)D.

Why are we saying this?

The number of people wanting to become teachers is falling at an alarming rate. It is essential that we have a sufficient supply of high-quality teachers joining the profession if we are to achieve the national mission of high standards and aspirations for all⁴⁰.

104. We believe that the IWPRB should consider a variety of factors when considering its recommendations:

- a. Recruitment to ITE
- b. Introduction of the £30,000 starting salary
- c. Recruitment and vacancies beyond ITE (including Welsh-medium and school leaders)
- d. Flexible working (see flexible working section)

Initial teacher education

105. ASCL is concerned about initial teacher education (ITE) provision in Wales. There is urgent need for improvements for entrants into the profession. In particular, the completion of newly qualified teacher (NQT) induction in one year often leads to new teachers struggling in year 2 as they lose mentoring support and the additional 10% reduced timetable reduction.

106. ITE has been a challenge in both England and Wales. However, a comparison of initial teacher training (ITT) between England and Wales by Bryer and Sibieta (2019)⁴¹ showed a number of distinct differences and divergent policies adversely affecting ITE more so in Wales:

- a. Spend on financial bursaries to attract prospective teachers in Wales has reduced over the last three years.

⁴⁰Our national mission: high standards and aspirations for all, WG, 2023

⁴¹ A comparison of teacher training incentives in Wales and England, Bryer and Sibieta, May 2019

- b. Cross-border flows from Wales to England have been increasing over time.
- c. Teacher recruitment will need to increase in order to cater for the growing pupil population.
- d. The value of financial incentives available to trainees undertaking their ITT course in England is more generous than it is for Wales for most secondary subjects and for most levels of degree qualifications.
- e. As a result, Welsh schools struggle to recruit teachers in high priority subjects although there is evidence to suggest that the large increases in bursaries for geography, English and biology in England have increased teacher recruitment in these subjects.

107. From evidence gathered from its members, ASCL Cymru’s position is that these issues have not been addressed post-Covid and, as demonstrated in subsequent sections below, have become worse.

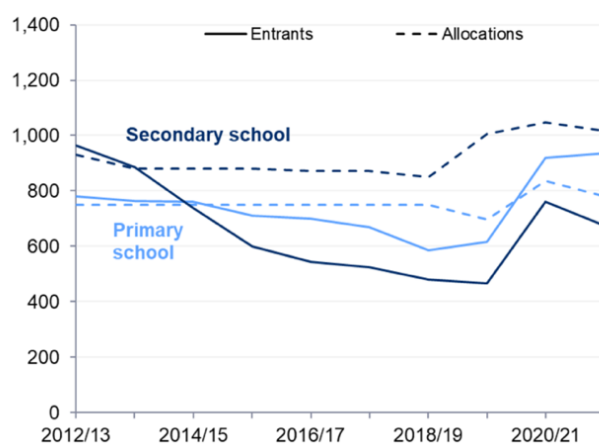
108. ASCL has previously voiced its concern over the fact that the annual targets for ITE are not increased to address the cumulative impact of the numbers missed year-on-year. This means that numbers missed in one year are not added on to the next year.

109. Over 75% of teachers in Wales are female – this pattern is set to repeat with current PGCE ratios in HE mirroring this pattern.⁴² In terms of recruiting potential teachers, therefore, more should be done to support a predominantly female labour force, including a more progressive flexible working policy across Wales. Research is also needed into how to make the profession more appealing to male undergraduates.

110. Although the table below (Figure 13) shows a pleasing increase in the number of ITE⁴³ allocations after 2019, these gains are now flatlining. The gap between entrants and targets for primary schools has closed (entrants and intakes are not the same cohorts) but continues to be significantly under target for secondary schools, where vacancies across the sector are at a record low, particularly with a number of key subject specialisms.

Figure 13 ITE entrants and allocations since 2021 for the primary and secondary sectors³⁹

Main points
Entrants and intake allocations to ITE courses in Wales, 2012/13 to 2021/22

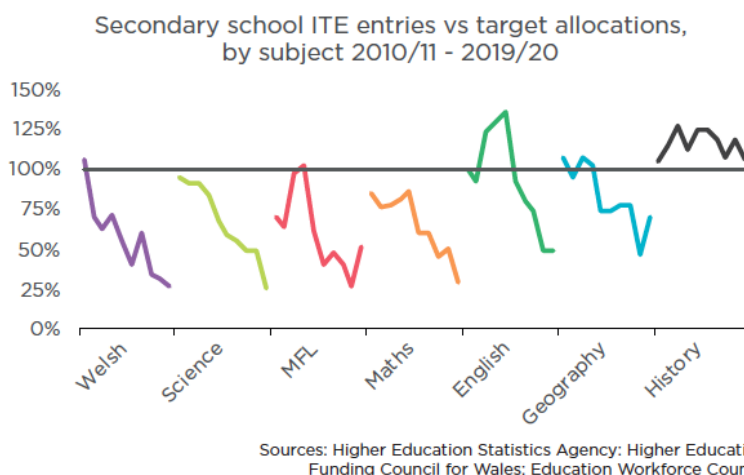


111. Moreover, there are drops in ITE entrants across core curriculum subjects as graphically shown in Figure 14, with only history bucking the trend.

Figure 14. Secondary school ITE entries compared to target (100%)³⁹.

⁴² Higher Education Statistics: Wales

⁴³ Initial teacher education: September 2021 to August 2022, WG



112. Efforts have been made to offer a range of incentives to improve overall ITE numbers as well as target specific subjects particularly in demand. Byer and Sibieta’s report³⁷ argues that bursaries should be targeted at the degree subject, not the post-graduate subject being studied, and more should be spent on bursaries to make the courses more attractive, including better marketing and advertising. Since their report in 2019, the Covid pandemic has affected ITE recruitment, but there is little evidence to show that these recommendations have been adopted since 2022.

113. The ITE student results shown in figure 15 indicate that there is a slight increase in the pass rate combined with an increase in number of applications. The gains for 2020/21 have, however, not continued year-on-year and the numbers of ‘passes’ is now declining. There is also around 20% of withdrawals and deferrals which is far too high.

Figure 15: ITE student results 2018-2023³⁹

	2018-19		2019-20		2020-21		2021-22		2022-23	
	Number	%	Number	%	Number	%	Number	%	Number	%
Passed ¹	894	80	970	83.4	1,208	79.9	1,101	82.3	1,034	82.1
Failed	22	2	15	1.3	19	1.3	12	0.9	5	0.4
Deferred	104	9.3	89	7.7	88	5.8	100	7.5	120	9.5
Withdrawn	97	8.7	89	7.7	138	9.1	121	9.0	101	8.0
WG Scheme (COVID ²)					58	3.8	4	0.3		
Total	1,117	100	1,163	100	1,511	100	1,338	100	1,260	100

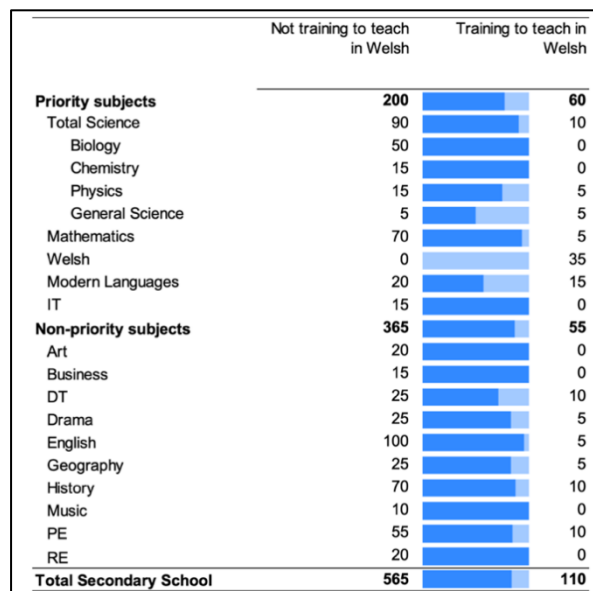
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114. The capacity to teach specific subjects at secondary level varies considerably⁴⁴ (see figure 16). Welsh-speaking schools represent 22.5% of institutions yet only 16.3% of ITE teachers are Welsh speakers and some subjects (e.g. biology) have large cohorts with no Welsh speakers.

³⁴ Entrants and intake allocations to ITE courses in Wales, 2012/13 to 2021/22

⁴⁴ Ibid

Figure 16 The number of NQTs per subject and the ratio of Welsh Speaking teachers (2023)



Introduction of the £30,000 starting salary

115. Whilst we are pleased to see the Westminster government's 2019 manifesto⁴⁵ commitment finally realised; we remain concerned about its competitiveness.
116. In 2019, £30,000 may well have been an aspirational starting salary, but by September 2023, after the impact of the pandemic and cost of living crisis, this was no longer the case.
117. IDR's Pay Benchmarker⁴⁶ shows that the median salary for trainees starting a graduate training programme in 2023 was £29,000. For trainees with a postgraduate level qualification, however, the median was higher at £31,800.
118. The Institute of Student Employers (ISE) Student Recruitment Survey⁴⁷ reports a median salary for a graduate of £32,000 in 2023.
119. High Fliers⁴⁸ expected the median graduate starting salary in 2023 to be £33,500.
120. As the next two sections highlight, the continued poor recruitment to ITE and the decline in the number of graduates entering the profession demonstrates that the £30,000 starting salary has not achieved what the Westminster government intended, and much more needs to be done.
121. We do not believe that this is just a case of looking at the year one salary. Good quality candidates will be comparing whole-career earning potentials, and the DfE's insistence on ignoring the importance of pay across the board is one of the reasons why we have not seen an uptick in recruitment.
122. This also remains relevant in Wales due to the replication of the £30,000 starting salary as a result of the 'no detriment' principle.⁴⁹

⁴⁵ [Conservative Party Manifesto 2019](#)

⁴⁶ [Pay for graduate trainees, IDR, February 2024](#)

⁴⁷ [What is the average graduate salary? ISE, November 2023](#)

⁴⁸ [The Graduate Market in 2023, High Fliers](#)

⁴⁹ [School Workforce Census for Wales 2023](#)

123. The IWPRB's 4th Report said: 'The Welsh Government evidence drew attention to the proposal in England to increase the minimum of the MPR to £30,000 outside of the London pay areas by 2023-2024. Implementation of recommendations one and two above would result in the minimum of the MPR in Wales (M2) being £29,877. Whilst not advocating differentiated increases for 2022-2023, the IWPRB believes that for 2023-2024 there is a case for matching the minimum proposed in England, in order to negate any cross-border incentives for NQTs.'

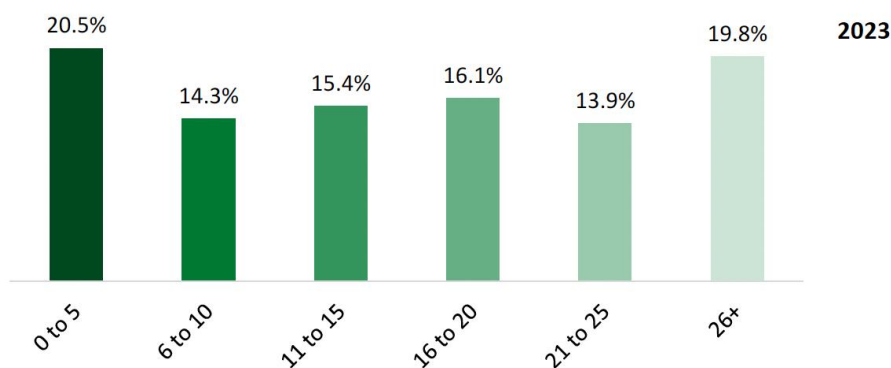
124. This was accompanied by Recommendation 3 which was: 'We recommend to the Welsh Government that the minimum of the MPR (M2) pay point is increased to £30,000 for 2023-2024.'

Recruitment and vacancies beyond ITE

125. Beyond ITE, there should be commensurate pay and conditions to ensure that progression into middle and senior leadership positions is attractive and well-remunerated. ASCL's position is that, in Wales, there has been a lack of 'joined-up' thinking, targets have been continually missed and this is resulting in an inability for schools to effectively staff their curriculum.

126. As with every profession, there is a natural 'churn' as teachers retire or leave the profession on health grounds. This rate has accelerated post-Covid, alongside record numbers retiring early, after the age of 55 – an increase of 40% across England and Wales.⁵⁰ This picture will be exacerbated due to the demographic profile of teachers in Wales with almost a fifth of teachers with over 26 years' experience (see figure 17) – this will be the next cohort of retirees.

Figure 17 The % of teachers in Wales and numbers of years of experience¹⁸:



127. In terms of the job market, there have been some significant changes pre- and post-Covid in terms of the number of advertised posts, applications received, and appointments made – see figure 18.

Figure 18 – Wales School Workforce Annual Census – July 2023⁵¹

		July 2019	July 2023	Trend
Posts Advertised	Primary	743	741	Stable
	Secondary	828	1113	34% increase
	Total	1571	1854	18% increase
Applications received	Primary	11826	11799	Stable
	Secondary	5155	6162	19% increase
	Total	16981	17961	6% increase

⁵⁰ Number of teachers in England and Wales retiring early jumps by 40%, Financial Times

⁵¹ Teachers (SWAC), StatsWales

Applications per post	Primary	15.9	15.9	Stable
	Secondary	6.2	5.5	Decreasing
	Total	10.8	9.1	Decreasing
Appointments made	Primary	696	696	Stable
	Secondary	744	960	Increasing
	Total	1440	2037	Increasing
Vacancies filled %	Primary	93.7%	93.7%	Stable
	Secondary	89.9%	86.3%	Decreasing
	Total	91.7%	88.9%	Decreasing

128. Figure 18 shows that the job market is now far more volatile with a 18% increase in the total number of jobs being advertised. This is most noticeable in the secondary school sector where the average number of applications per post has dropped to 5.5. These weakened fields are affecting the quality of appointments and in some cases leading to no appointments being made. It is a stark reminder that, at the start of the pandemic, there were 131 unfilled teacher positions for September 2019. In September 2023, there were 255 unfilled positions.
129. This has had a cumulative effect. Over 30% of pupils in Wales attend schools in which teaching is affected by lack of teaching and assisting staff, according to a recent ASCL Cymru survey, with more than 15% of teachers in Wales intending to leave the profession within the next three years.
130. The escalating alarm for teacher recruitment within the secondary sector is further nuanced when subject specialism is examined. Figure 19 illustrates the most significant shortage subjects with maths, science and Welsh first language posts the worst affected. It is also a concern that headteacher positions are only attracting, on average, fewer than five applications per post.

Figure 19 The most significant areas of staff shortages in the secondary sector⁴⁷

2022-23 Role	No. Vacancies	No. Applications	No. Appointments	Ratio of applications per vacancy	No. unfilled posts
Headteacher	87	420	78	4.8	9
Other SLT	150	1617	141	10.8	9
ICT	39	102	30	2.6	9
Design & Tech	72	204	60	2.8	12
Creative writing	159	1020	144	6.4	15
Applied science	123	516	105	4.2	18
Welsh	90	207	72	2.3	18
Mathematics	132	612	111	4.6	21

Welsh-medium vacancies

131. With 22.5% of schools operating as Welsh-medium schools, the situation here is much worse and continues to deteriorate, with just 4.8 applications per post advertised in the one-year period ending July 2023, down from 5.4 per post pre-pandemic in December 2019⁴⁷.
132. The issue is far more significant in the secondary sector. The table below (figure 20) demonstrates this.

Figure 20 A summary to show the total number of vacancies and applications in Wales in 2022/23⁴⁷

	No. Vacancies	No. Applications	Actual app	Ratio Vacancies/ Applications
Primary	237	1593	210	6.7

Secondary	87	165	69	1.9
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133. The average number of applications per vacancy for the most recent year reported in the School Workforce Annual Census (2022) varies considerably and is generally significantly lower for Welsh-medium schools. Figure 21, below, shows the overall picture is poor with very few vacancies attracting double digit numbers but also that the overall number of applications for non-Welsh-medium schools is over twice as many as their counterparts. This places great pressure on Welsh-medium schools to staff their curriculum, with many having to use expensive supply agencies.

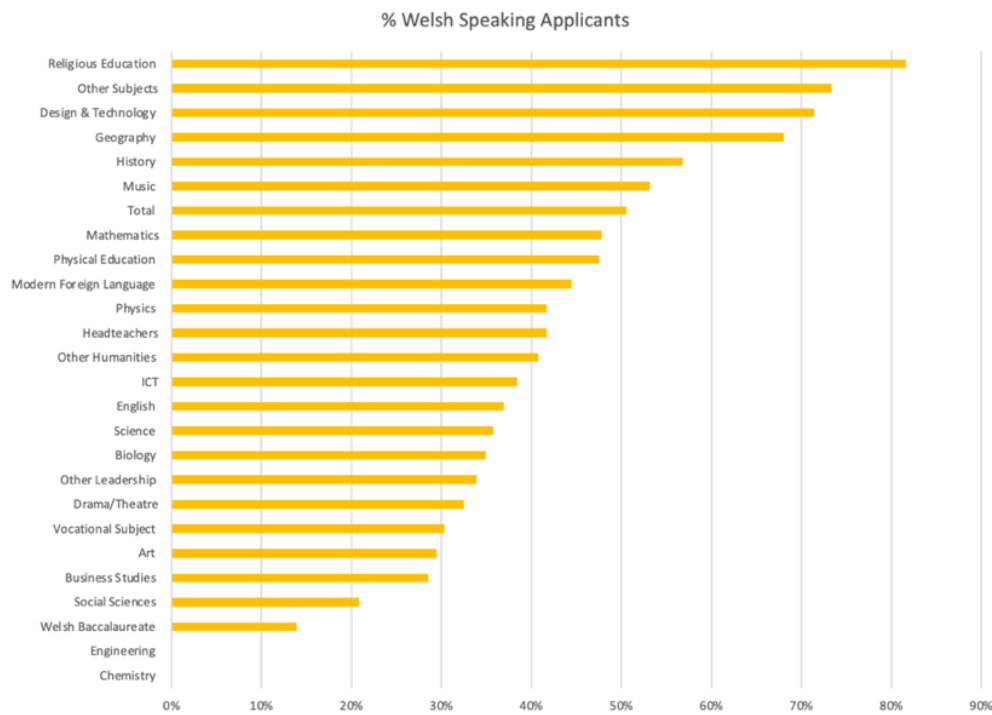
Figure 21. The average number of applications per job vacancy for 2021-2022 (SWAC 2022).

Subject	Welsh Medium	Non-Welsh	Average
Engineering	0	1.3	1.3
Welsh	2.5	1.9	2.3
Physics	1	2.5	2.4
Social Sciences	0.5	2.6	2.4
ICT	1	2.8	2.6
Design & Technology	2	3	2.8
Vocational Subject	1	3.5	3.3
Business Studies	1	3.7	3.5
Chemistry	0.	4.1	3.6
Welsh Baccalaureate	0.5	4.4	3.6
Science	1.5	4.7	4.2
Biology	1.5	5	4.3
Modern Foreign Language	2	4.9	4.5
Other Subject	3.3	4.9	4.5
Mathematics	2.2	4.9	4.6
Geography	3.2	5.2	4.7
Music	2.5	5.2	4.7
Headteachers	2	5.7	4.8
Religious Education	4	5.1	4.9
Art	1.8	7	6.1
English	2.4	6.8	6.5
Other Humanities	3.3	8.6	8.1
Drama/Theatre	2.7	9	8.3
History	5	9.9	8.8
Physical Education	4.9	11.4	10.3
Other Leadership	3.7	12.7	10.9
Not applicable	6.1	16.3	13.2
Overall average	4.6	10.5	9.1

134. Moreover, Figure 22 illustrates the percentage of Welsh-speaking applicants⁵² per specialist subject in secondary education – there is widespread variation with particular concern in the sciences. This pattern replicates the issues at ITE, compounding the staffing shortages in particular subjects.

Figure 22 The % Welsh speaking applicants for secondary school vacancies (SWAC 2022)

⁵² Ibid



135. Percentages mask sample size, with school leadership positions a particular concern. For example, there were 18 vacancies in Welsh medium schools for the academic year 2022-23, with only 27 applications, averaging 1.5 applications per post.

Deprivation

136. Deprivation affects teacher recruitment and retention in Wales. The country is relatively deprived compared with other UK countries, certainly in terms of GDP per capita. Within this context, there are areas of high multiple deprivation in both urban and rural settings, and this have been exacerbated post-Covid. In schools with high percentages of pupils eligible for free school meals, teacher recruitment is more challenging, with higher staff turnover and more schools causing concern in terms of their Estyn report (HMCI report Jan 2024).⁵³⁵⁴ Such schools are, in many cases, located in local authorities which hold on to too much education funding and where Regional Consortia, responsible for school improvement, are largely ineffective.

137. Staffing and recruitment issues vary considerably across the 22 LAs. Figure 23 demonstrates that areas such as Ceredigion, Powys, Anglesey and Conway have the most acute issues. These are more rural and coastal locations and they attract weak fields of applicants and have the highest percentage of unfilled posts. These areas are in LAs which do pass on more of the education grant to schools, showing that the issue is more deep-rooted than the schools' ability to afford a full complement of teachers.

⁵³ Estyn Annual Sector report January 2024

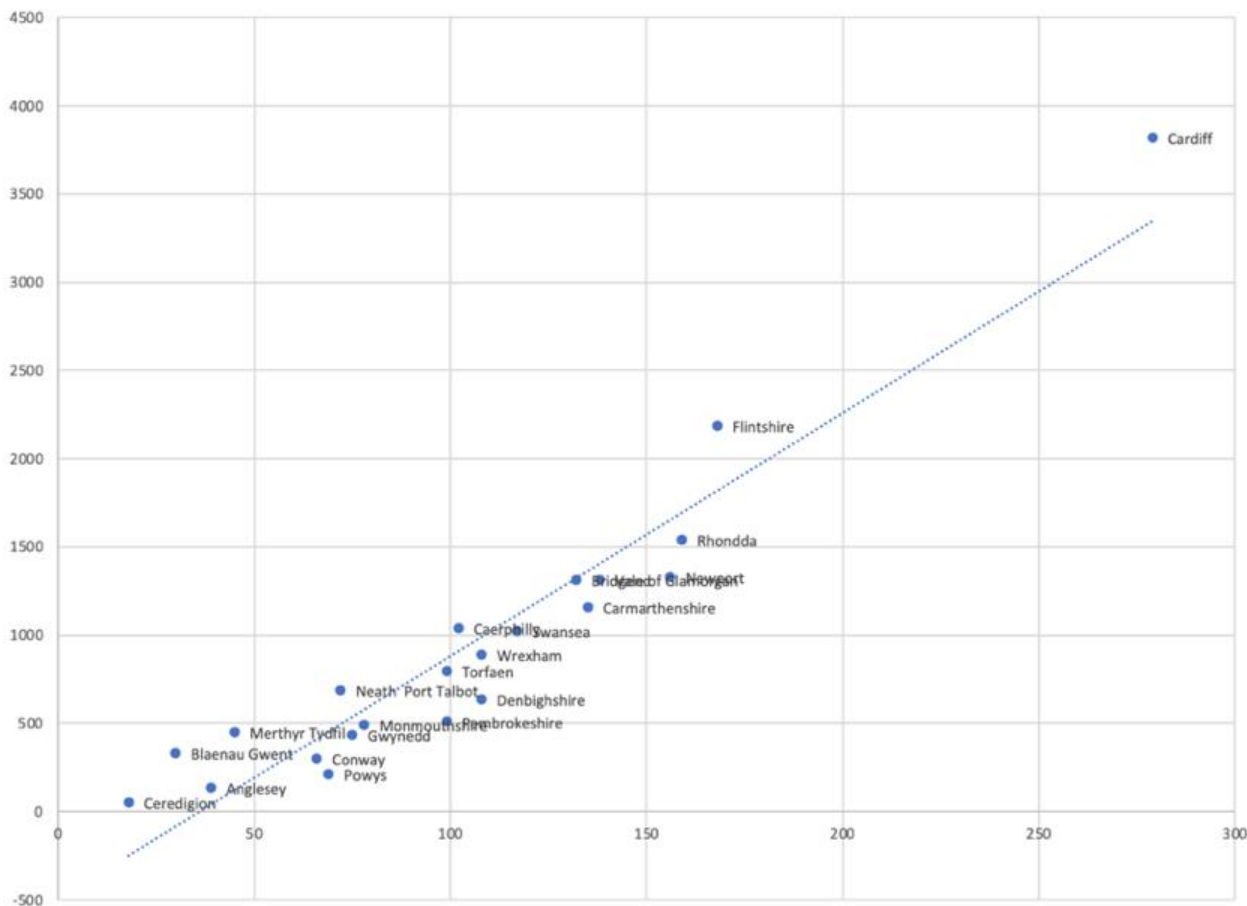
⁵⁴ Ibid

Figure 23 – The ratio of vacancies to applications per LA⁵⁵

LEA	No Vacancies	No Applications	Ratio of applications per vacancy
Ceredigion	18	54	3.0
Powys	69	213	3.1
Anglesey	39	138	3.5
Conway	66	300	4.5
Pembrokeshire	99	510	5.2
Gwynedd	75	435	5.8
Denbighshire	108	636	5.9
Monmouthshire	78	492	6.3
Torfaen	99	795	8.0
Wrexham	108	888	8.2
Newport	156	1329	8.5
Carmarthenshire	135	1158	8.6
Swansea	117	1023	8.7
Vale of Glamorgan	138	1311	9.5
Neath Port Talbot	72	690	9.6
Rhondda	159	1542	9.7
Bridgend	132	1311	9.9
Merthyr Tydfil	45	450	10.0
Caerphilly	102	1041	10.2
Blaenau Gwent	30	330	11.0
Flintshire	168	2184	13.0
Cardiff	279	3819	13.7
Average	2292	20649	9.0

138. There is an obvious correlation between the LAs with the highest numbers of vacancies in urban areas and the number of applications (figure 24), but LAs such as Powys, Pembrokeshire and Denbighshire are significantly below the best-fit line, illustrating further the issue of staffing in more rural locations.

Figure 24 Correlation between the number of vacancies (x scale) and the number of applications (y scale)



139. The process of school improvement falls to school leaders within their own communities. The support offered by the five Regional Consortia has come under severe criticism (Estyn review of improving schools through regional education consortia (2015), Sibieta report (2020), Jones report (2024)).

140. **In summary**, teacher recruitment beyond ITE is challenging. The erosion of pay and poor working conditions has made teaching a less attractive life-long career than it once was. In Wales, there are some specific issues which aggravate staffing shortages. There is a distinct difference between primary and secondary teacher shortages with the significant issues with the latter also leading to dire subject specialism shortages, particularly in remote and deprived areas. This is further compounded in Welsh-medium schools which are generally less popular for applicants.

School leader recruitment

141. It has already been demonstrated that the number of applications for the role of headteacher is inadequate (see Figure 25). This results in weak fields of candidates and non-appointments in some cases. The average leadership ‘churn’ figure across the Welsh education system is 4.8%, up from 3.8% in 2019. Whilst the fields for Welsh-medium schools are the weakest (1.5 applications per post), this figure is higher in non-Welsh-medium schools.

Figure 25 Leadership posts (Source: SWAC March 2023)³⁹.

	Welsh Medium Schools	Non-Welsh medium schools	Average (W and NW)
All schools	2.0%	5.7%	4.8%
Primary	2.0%	5.8%	4.8%
Secondary	2.5%	5.3%	4.8%

142. The funding constraints are also putting pressure on schools to cut salary bills. Headteachers are having to maintain classroom delivery at the cost of reducing senior leadership teams. This reduction in leadership headcount or replacing deputy headteachers with assistant headteachers undermines school improvement capacity and, in some cases, the ability to manage and keep the school safe for its pupils (see Figure 26).

Figure 26. The number of senior leadership positions in Welsh Schools 2018-22 (Source EWC Wales)

	March 2018	March 2019	March 2020	March 2021	March 2022
Headteachers	1,451	1,428	1,383	1,386	1,380
Deputy headteachers	1,029	1,168	1,130	1,090	1,093
Assistant headteachers	601	841	835	840	934

143. There is a wealth of academic and educational research which demonstrates that quality of leadership comes second only to high quality classroom teaching in terms of impact on pupil outcomes, which do not compare well with the other twelve regions of the UK⁵⁶.

144. The average tenure of leadership post is reducing in Wales, particularly in deprived areas or in schools with a poor Estyn report. Individual stories of headteachers struggling with stress, burnout and financial pressure have been widely reported in the media⁵⁷. These issues are affecting leadership retention rates which are further discussed below.

Retention

ASCL recommends that:

- ✓ Retention at all levels is made a key focus for the Welsh government, in order to retain the teachers and school leaders who have already chosen the profession and who are fully trained and qualified. This will in turn reduce the number of new teachers we need to recruit into the profession, bringing with it savings in recruitment, training, onboarding and mentoring costs.
- ✓ Tailored student loan repayment arrangements for all teachers and leaders should be introduced⁵⁹. This should range from no repayment for teachers in certain shortage subjects to a sliding scale of repayment rates depending on subject, phase, sector, whether the teacher or leader is in a hard-to-recruit area, and how long they stay in the profession.
- ✓ The scope of the IWPRB and the STPC(W)D is broadened to include those working in business leadership roles to ensure that they receive the recognition and remuneration for the crucial roles they hold, and which support other school leaders to deliver their core functions.
- ✓ The government works with trade unions and key stakeholders on a strategic plan to raise the profile of the education workforce.
- ✓ The workload of teachers and leaders is addressed by fully supporting the recommendations of the Managing Workload and Reducing Bureaucracy Group⁶⁰ and ensuring that they are implemented swiftly, including the provision of sufficient resources for schools to enable this.

⁵⁶ [Seven strong claims about successful school leadership, School Leadership & Management](#)

⁵⁷ [ITV Headline – South Wales Headteacher says ‘harrowing pressure of the job forced him off work’.](#)

⁵⁹ [ASCL Manifesto for the 2024 General Election](#)

⁶⁰ [Managing Workload and Reducing Bureaucracy Group](#)

- ✓ The wellbeing of the workforce is supported and improved by acting on the recommendations of multiple stakeholders, including around accountability and inspection.
- ✓ Schools are provided with the training and resource needed to enable them to fully embrace flexible working.

145. We believe that the IWPRB should consider a variety of factors relating to retention when making its recommendations:

- a. Retention rates for classroom teachers
- b. Retention rates for school leaders
- c. Equalities considerations including the gender pay gap
- d. Workload and wellbeing
- e. Flexible working

Classroom teacher retention

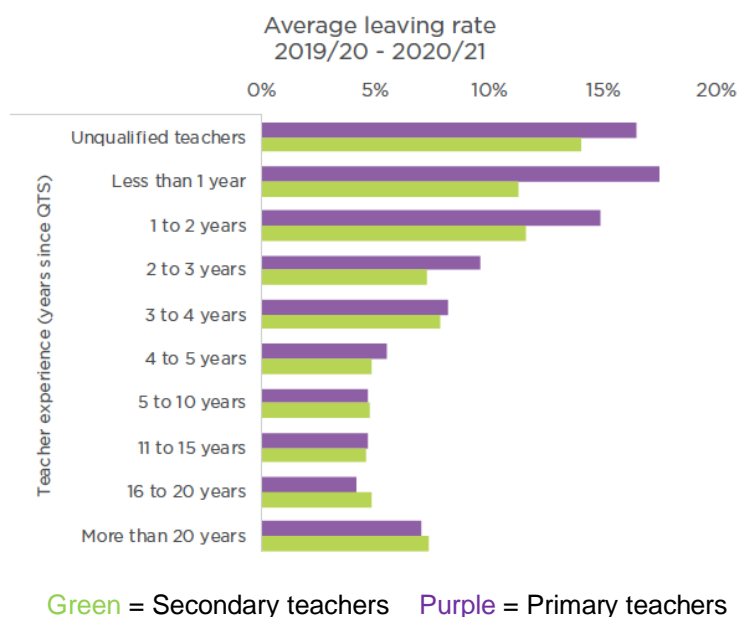
146. Teacher and school leader retention⁶¹ rates continue to be a problem across the education sector. The average retention figures (attrition rates) for teachers both England and Wales are alarming (see Figure 27).

147. Teachers at the beginning of their teaching career in Wales are more likely to leave teaching (Ghosh & Worth⁴³) with less experienced teachers having higher leaving rates than their more experienced counterparts (see Figure 28). This issue is more significant in the primary sector.

Figure 27 The % Teachers who leave the profession in the first 5 years

	Primary Schools	Secondary Schools
England	48.8%	46.9%
Wales	55.7%	42.8%

Figure 28 Average leaving rate for Primary and Secondary teachers in Wales



⁶¹ [SWAC 2022](#)

148. Compared with England, the problem of those who leave the profession within five years is relatively worse in the Welsh primary sector and relatively better in the Welsh secondary sector. The number of teachers leaving does reduce with time (see Figure 29) but in any other profession a 'drop-out rate' averaging nearly 50% after five years would be alarming. Of note, almost 30% of NQTs leave the primary sector after only two years in the classroom (24.5% in England).

Figure 29 % Teachers leaving the profession over time (left-hand graph Primary / right-hand graph Secondary)⁴²

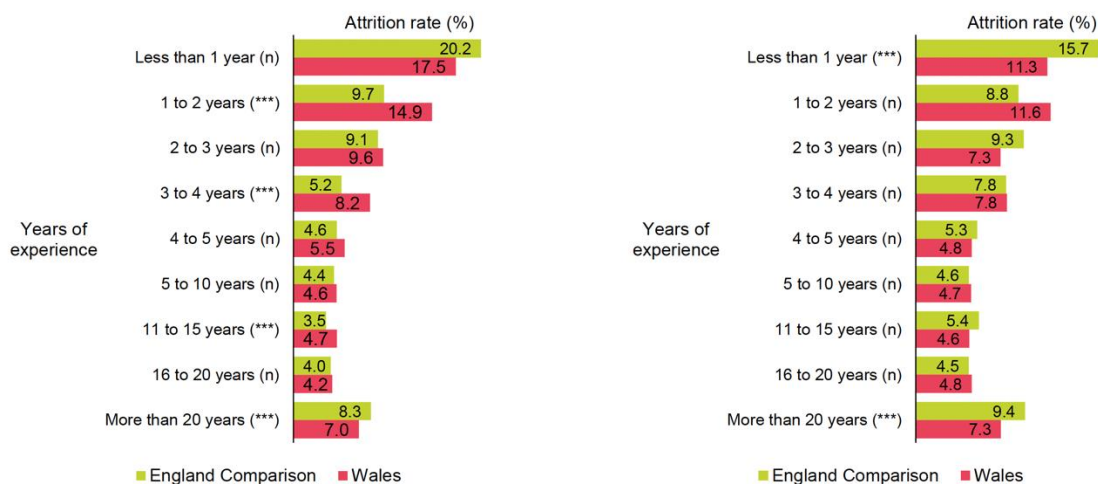


Figure 30 % Teachers leaving the profession the profession grouped by FSM school type specialism

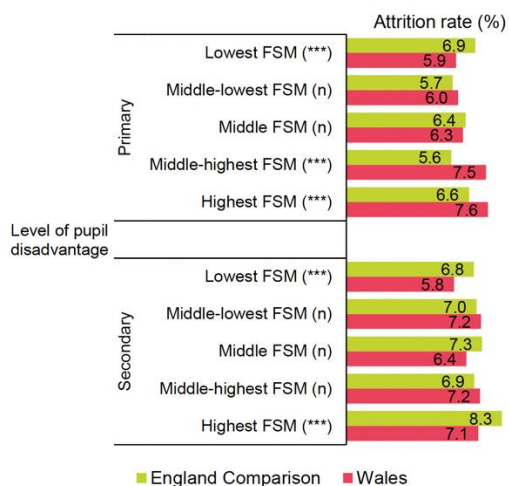
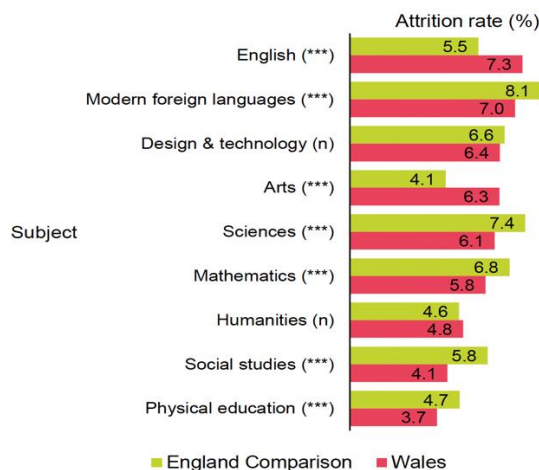


Figure 31 % Teachers leaving by secondary school



149. Figure 30 shows attrition rates in relation to FSM school type in both England and Wales. There is substantial evidence to support the hypothesis that schools in more deprived areas have higher attrition rates (Ghosh and Worth, 2022). The most pronounced effect is in Welsh primary schools, where schools struggle to retain classroom teachers more than their counterparts in England.

150. Secondary subject specialisms are causing concern in terms of teacher recruitment and there is considerable variation across the sector in both countries (see Figure 31). Further research is required to analyse the impact of ITE targets, NQT specialisms and attrition rates.

151. Exploring reasons for teachers leaving the profession, Figure 32a illustrates considerable turbulence with the largest sectors (primary and secondary) seeing over 8% of their workforce leave in one year. The most significant increase is in the early retirement category (those aged 55-60) and those moving on into other non-teaching careers (Other). Figure 32b shows trends over time. The most noticeable change is a higher percentage of teachers leaving for unknown reasons.

Figure 31a Reasons for teachers leaving the profession based on SWAC 2022-2023 (figures in % of total workforce)

Category	Employed outside					Total
	education	Early retirement	Retirement	Other	Unknown	
Nursery schools (1)	0	0	2.63	0	0	5.26
Primary schools (2)	0.62	1.07	0.41	1.76	0.36	4.69
Middle schools (3)	0.98	1.13	0.68	0.98	0.91	4.99
Secondary schools (4)	0.97	0.62	0.51	1.07	0.45	3.98
Special schools (5)	0.46	1.27	0.12	1.85	0.69	4.85
Pupil Referral Units	0	1.07	1.07	0.36	1.79	4.64
Total	3.03	5.16	5.42	6.02	4.2	23.83

Figure 31b Reasons for teachers leaving the profession based on SWAC 2007-2023 (figures in % of total workforce)

Teachers Leaving	NT role in education	Outside education	Early Retirement	Other	Unknown	Total
2007%	7	7	52	27	6	100
2018%	9	17	30	33	10	100
2019%	7	18	28	35	13	100
2020%	8	16	29	34	12	100
2023%	14	14	24	28	20	100

152. The most recent EWC workforce survey (2021)⁶² with over 3,300 responses showed very clearly that there is a dissatisfied teaching body who are over-worked and ground down by excessive administrative tasks, class size, timetable loading and bureaucracy. These are symptoms of a public sector under-resourced and under strain. Addressing these concerns alongside a review Annex 3 of Section 2 of the STPC(W)D is urgent and well overdue.

153. The most recent ASCL Cymru survey of its 1000+ members (September 2022) regarding pay demonstrated that the future intentions of teachers and school leaders continues the pattern shown in Figure 31b, but with a significant increase in the percentage considering leaving the profession for a job outside teaching (40%). The main reasons for this were pay (67.5% said that poor pay was a motivating factor to leave teaching) and working conditions (see Figure 32). It is alarming that workload, exhaustion, stress and wellbeing are the most significant reasons underlying teacher attrition.

Figure 32 ASCL Cymru survey on working conditions – September 2022

Factor	Response %
Unsustainable workload/working hours	69.3%
Exhaustion/fatigue	68.2%
Stress	46.6%
Wellbeing	46.6%
Lack of recognition of role/profession	45.5%
Lack of recognition/respect from the government	43.2%

⁶² Ibid

Pressure from funding restraints	43.2%
Government education policy	33.0%
Accountability measures	30.7%
Other (please specify):	19.3%
Impact of covid	10.2%
Limited career progression	6.8%

154. These findings are mirrored across the UK in the most recent Teacher Wellbeing Index report (2023).⁶³ Acute levels of stress (78% of the workforce feeling stressed) and high levels of mental health concern are the most significant issues. Moreover, teachers in Wales reported an overall wellbeing score of 45.1 compared to the national average of 48.2, with a variance factor of 3.1 seen as significant.
155. Over the last ten years, the erosion of pay and poor working conditions have resulted in a teacher exodus not seen before, exacerbated by the Covid pandemic. Whilst the case for more pay has been detailed in our earlier section and can be presented in a more quantifiable methodology, workload and wellbeing is more subjective. However, a recent survey by ASCL Cymru (January 2024) highlights these concerns.
156. **In summary**, with record attrition rates in the first five years of teaching and the demographic profile of nearly 20% of the workforce comprising older teachers (see Figure 16), the profession is haemorrhaging. Attrition rates in Welsh primary schools and in deprived areas are a particular concern. This, combined with poor working conditions and underfunding from LAs, is leading to inadequate induction support, mentoring and training. Furthermore, there is a poor level of service support from Regional Consortia (Sibieta 2020 / Jones 2024). There is an urgent need for the IWPRB to consider these concerns and for the Government to respond decisively if we are to avoid teacherless schools and worsening standards for children in Wales.

School leader retention

157. In previous evidence submissions we have highlighted our concerns over the retention of school leaders in Wales. There is very little new data available on this, something which we have also previously highlighted.
158. In the ASCL Cymru survey (September 2022) nearly half the sample (48%) said that the pay award was either unacceptably low or that they were extremely disappointed. 68% said that pay levels impact on their decision whether or not to remain in the profession, with very clear evidence that improving pay in real terms would encourage more school leaders to stay (85% of those considering leaving indicated they would stay if pay improved). Exactly two thirds said that other factors impacted on their decision to stay in or leave the profession, with unsustainable workload and exhaustion being the two stand-out reasons for considering leaving. 92% said that teacher pay was ineffective in attracting the best graduates to teaching, retaining existing teachers, encouraging teachers to become leaders, and encouraging leaders to remain in the profession.
159. ASCL Cymru is aware that many school leaders who may have been planning to leave decided not to for various reasons connected to the pandemic, whether that be a sense of duty of wanting to see their schools through an unprecedented situation or due to an inability to fulfil plans such as travelling in retirement.
160. This was confirmed in the key findings of the NFER's '*Teacher Labour Market in Wales 2022*⁶⁴' report which said: '*Fewer teachers left teaching in 2020 as a result of uncertainty caused by the pandemic.*'

⁶³ Teacher Wellbeing Index 2023, Education Support

⁶⁴ Ibid

161. In ASCL’s Member Pay and Conditions Survey in 2021, over 30% of respondents from Wales were considering leaving for early retirement or a role outside education within the next three years (see Figure 33). This is a statistically significant sample size and is a figure almost 10% higher in Wales, with unacceptably high workload and poor work-life balance to blame. The after-effects of the Covid pandemic are still being felt in terms of pupil catch-up and the additional workload this places on school leaders. The wider context of financial constraints made worse by the LAs’ anachronistic funding methodologies and the holding back of nearly 20% of the block funding has placed additional stress on senior leaders to make ends meet.

Figure 33 Summary findings from ASCL school leader survey February 2021

ASCL Pay & Conditions Survey February 2021	No of Respondents	Any additional hours post-Covid (weekly)					Workload manageable			Acceptable work/life balance		
		None	1-5	5-10	10-15	15+	Yes	No	Unsure	Yes	No	Unsure
Overall	1,890	29%	16%	28%	16%	11%	36%	48%	17%	20%	72%	8%
England	1,828	29%	16%	28%	16%	11%	35%	47%	17%	20%	72%	8%
Wales	62	19%	15%	32%	15%	19%	18%	52%	31%	11%	76%	13%
SBLs	213	28%	23%	27%	12%	10%	37%	47%	16%	30%	61%	9%

ASCL Pay & Conditions Survey February 2021	No of Respondents	Considering leaving role				If yes, what will next role be				Agree with pay freeze		
		No	Yes, within 1 year	Yes, within 1-3 years	Yes, within 3-5 years	In education	Normal retirement	Early retirement	Outside education	Yes	No	Unsure/ no opinion
Overall	1,890	46%	13%	23%	18%	49%	11%	22%	14%	10%	81%	9%
England	1,828	46%	13%	23%	18%	18%	39%	30%	9%	10%	81%	10%
Wales	62	45%	3%	32%	19%	29%	29%	29%	1%	8%	82%	10%
SBLs	213	51%	12%	17%	20%	22%	29%	32%	16%	16%	71%	12%

Business leader pay survey

162. Business leaders are a crucial and integral part of school leadership. Our position statement on this subject⁶⁵ says: “*Business or executive leaders who undertake whole school, college or trust responsibilities are an integral part of the leadership team. ASCL believes that this should be reflected in their status and remuneration. Where this is not the case, there should be a review of the business leader’s pay to ensure their crucial role is appropriately recognised and remunerated*”.

163. We believe that business or executive leaders who undertake whole school or college responsibilities should be paid with parity to other leadership colleagues holding the same level of responsibility, regardless of any particular route into education leadership.

164. There is no national pay framework that specifically recognises business leadership roles and pay for these roles is locally determined. As a result, there is a disparity in the level of pay and recognition in these roles.

165. The situation has been exacerbated by outdated job profiles used by some local authorities which do not always reflect how the responsibilities and accountabilities of these roles and the profession have evolved over time.

⁶⁵ [ASCL Position on policy](#)

166. local authorities operate their own job evaluation and grading framework, generally within the National Joint Council (NJC) pay scales, and this varies greatly between authorities. The result is a fragmented situation where some schools are denied access to higher pay scales which are warranted by these roles, and others are not.
167. ASCL recently surveyed our members working in business leadership roles (Annex Two⁶⁶).
168. The results show that, although 88% of respondents are members of the senior/executive team in their establishment, 70% felt that their pay was below that of their senior leadership colleagues.
169. Furthermore, 29% of respondents reported that they were paid on NJC points 1-43, meaning that their salary is lower than point L5 on the leadership pay range.
170. Some 48% of respondents feel inadequately rewarded for the role they undertake, and 12.7% feel significantly underpaid.
171. NJC pay awards in 2022 and 2023 saw those working in business leadership roles receive the lowest pay awards across the education workforce, a flat rate of £1,925 in 2022 regardless of level of salary, and a flat rate of £1,925, capped at a minimum of a 3.88% in 2023. This has widened the gap between the pay of senior leadership colleagues and business leaders.
172. Without a doubt, the most worrying, but possibly not surprising, statistic from the survey was that 50% of respondents intend to leave their role within the next three years. This has increased from 29% in our 2021 survey. This presents a huge risk to the sector. The work business leaders carry out and the responsibilities they hold are critical to the education system. Unless something changes as a matter of urgency, schools face losing the significant expertise and experience that business leaders bring. Business leaders have a wealth of transferrable skills which enable them to move to higher paid roles in other sectors and professions, often with more flexible working opportunities than are on offer in the education sector. We believe that this needs to be addressed by broadening the scope of the STPC(W)D and the remit of the IWPRB to include those working in business leadership roles.
173. These roles are not served well by the NJC arrangements, as demonstrated by our survey results, nor would they be by the reinstatement of the School Support Staff Negotiating Body as proposed by Labour. Pay would still be determined locally, so the problems would be perpetuated.
174. By bringing the role into the STPC(W)D alongside other senior leadership roles such as assistant headteacher and deputy headteacher, business leader pay would be set in the same way, giving full recognition to their whole-school responsibilities and increasing their perceived status.
175. If no action is taken, as well as losing the extensive knowledge and expertise held by business leaders, this will in turn drive up the workload of headteachers and other school leaders trying to fill the gaps.
176. We call for the review body to recommend that those working in business leadership roles be brought into the remit of the IWPRB and for the scope of the STPC(W)D to be broadened to incorporate all school leadership roles. This will help support the whole school leadership team and in turn contribute to workload reduction.
177. Since local management of schools was established in the ERA (1988), schools have seen increasing levels of financial responsibility delegated to leaders to manage income and

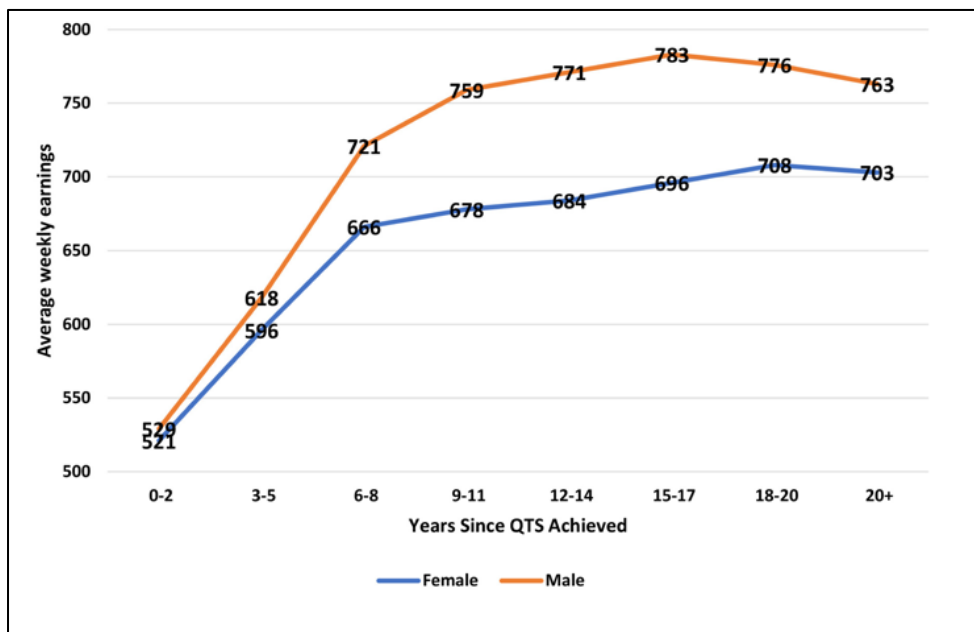
⁶⁶ Annex Two – ASCL Business Leader Survey (separate document)

expenditure. ASCL is very concerned about this pending exodus for its members as well as the detrimental effect this would have on headteachers in terms of their own workload and skillset.

Flexible working and gender pay gap

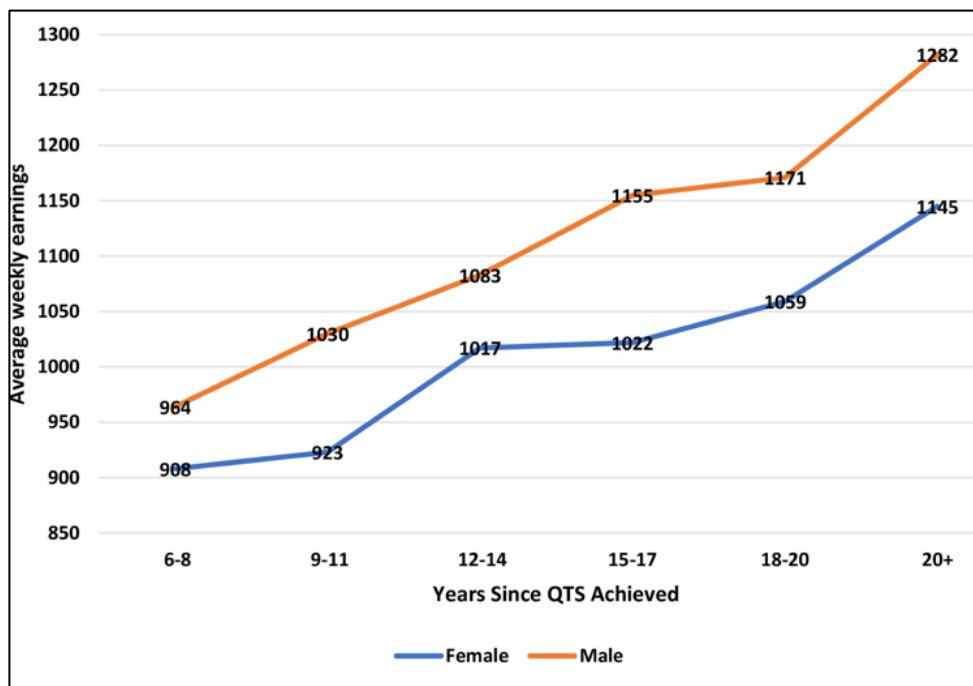
- 178. Flexible working can be used to improve the wellbeing and work-life balance of all staff. It can help with both recruitment and retention.
- 179. Whilst it is not without its challenges for some roles in education, flexible working is still not utilised as widely as it could or should be.
- 180. There is a significant gender pay gap in Wales (see Figures 34 and 35). A recent survey by ADR Wales⁶⁷ shows this gap for both teachers and senior leaders widens after six years of service and does not close. These two populations are not equal. Over 75% of teachers are female. Many have childcare responsibilities which creates work-life balance issues which also affects salary progression and career development.

Figure 34 Gender pay gap for teachers in Wales



⁶⁷ The gender progression and pay gap for teachers May 2023

Figure 35 Gender pay gap for school leaders in Wales



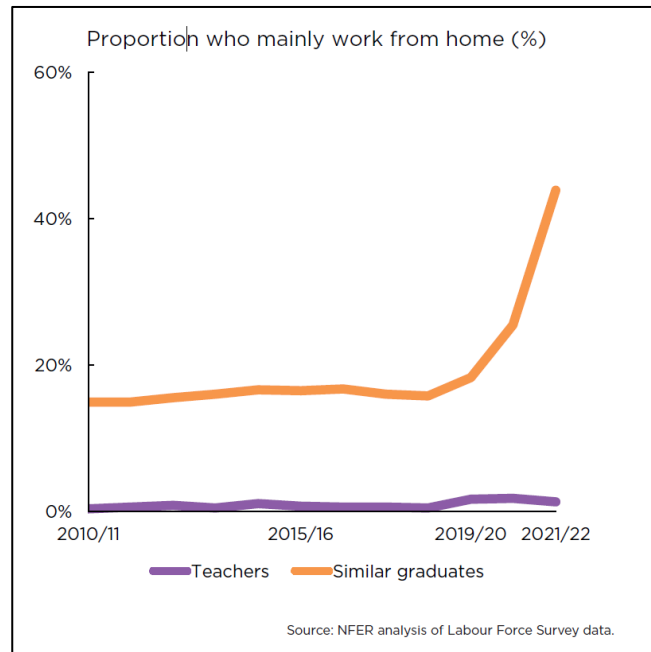
181. Nearly 20% of teachers in Wales have over 26 years of experience, with many of these in their 50s. More should be done to encourage them to remain in the classroom with offers of part-time contracts, job shares and supportive pension advice.
182. Wellbeing and work-life balance are such an important issue for the sector, as highlighted in the previous section, and as such much more importance needs to be placed on these benefits.
183. We welcome the legislative changes brought in following the government's '*Making Flexible Working the Default*' consultation.
184. ASCL believes that the Welsh Government should take greater notice of this legislation as this has the potential to support older teachers as well as those with childcare and caring responsibilities.
185. All employees have the legal right to request flexible working. Employees can request a change to the number of hours they work, when they start or finish work, the days they work, and where they work. Whilst there can be safeguarding constraints in a school setting – for example teachers need to have a pastoral role alongside their academic responsibilities, schools and local authorities in Wales have been slow to adopt flexible working practices¹³.
186. Schools rapidly discovered that they were able to incorporate so many more flexible working practices than would have been thought possible prior to the onset of the pandemic, but it appears that much of this has returned to normal pre-pandemic practice.
187. The '*Teacher Labour Market in England 2023*⁶⁸ stated that '*Flexible working arrangements have become increasingly prevalent in recent years, as widespread office closures during the pandemic led to the rapid adoption of home working across the labour market. However, while working from home may work well for many office-based occupations, it is much less well-suited to teaching. Data from the LFS shows that the pandemic did not substantively affect the prevalence of home working for teachers, while the proportion of similar graduates who*

⁶⁸ [Teacher Labour Market in England 2023, NFER](#)

reported mainly working from home increased rapidly from about 15 % up to 2018/19 to 44% in 2021/22.'

188. Figure 36 below is taken from the report and demonstrates the difference between teachers and other graduates.

Figure 36 Proportion of teachers and similar graduates who work from home (NFER 2023)



189. The report goes on to say that working from home is not completely unavailable to teachers: *'Surveys of teachers and leaders in schools show that some teachers had arrangements with their school to do activities such as lesson planning, preparation and marking off-site (CooperGibson Research, 2020).'*

190. CIPD research⁶⁹ shows that in 2023, 6% of employees changed jobs due to lack of flexible working opportunities, and a huge 12% left their profession or sector altogether. Women are more likely to have changed their profession or sector than men.

191. ONS data shows that 44% of UK workers work remotely / from home at least some of the time (hybrid or full-time remote). Over half of UK employers offered remote work in 2023. 78% of remote workers reported an improved work-life balance.

192. A report published in February 2024, *'Flexible After Fifty'*⁷⁰, showed that *'almost 75% of over-50s want to have flexibility in their work to achieve a better work-life balance, with many also having caring responsibilities.'*

193. The report also highlighted flexible working as *'the most important consideration for over-50 workers wishing to remain in their current roles'*.

194. As the research and data show, employees will change jobs, and even professions, due to a lack of flexible working options, something which was already an issue in schools even before the pandemic but is now even more so.

⁶⁹ Flexible and hybrid working practices in 2023, CIPD

⁷⁰ Flexible After Fifty, 50+ Choices Roundtable, February 2024

195. Furthermore, with better pay available elsewhere in the graduate marketplace, coupled with more opportunities for working flexibly⁷¹, teaching is clearly becoming a much less appealing option.
196. The Welsh Government must now step up their support and championing for flexible working and provide sufficient funding to enable schools to overcome some of the barriers that they face.
197. However, it must be acknowledged that even if significant improvements were made, there will be limitations due to the nature of the teaching profession and this must be compensated for elsewhere in the pay and conditions package, including by offering a much more competitive salary at all stages of a teacher or leader's career.
198. All of the above shows that the Westminster government's plan to only raise salaries for early career teachers, which has been mirrored by the Welsh government due to the 'no detriment' principle, is not addressing recruitment and will not address retention.
199. Both governments appear unable to acknowledge the fact that teacher and school leader pay has been significantly damaged by political decisions to restrain or freeze pay over the last 10-12 years.
200. This does not compare favourably with other countries. An IPPR report⁷² published in July 2023, showed that some European countries such as Sweden, Hungary and Czechia saw real wages increase by around 30% in the period from 2010-2020, even before the cost-of-living crisis.
201. The report goes on to say that *'If the government continues on its current trajectory of suppressing public sector pay, especially in key occupations such as nursing and teaching, the salary gap between the UK and other European countries will continue to widen. This has the potential to in turn exacerbate staff shortages in the UK as skilled public sector workers leave to countries where they can enjoy a much better standard of living.'*
202. One of the recommendations in the report is that *'Once the government has committed to restoring real-terms pay it must outline a plan to increase the purchasing power of public sector workers for the next five years. This will boost labour market confidence in public sector professions.'*⁷³
203. The introduction to the NFER report *'Policy options for a long-term teacher pay and financial incentive strategy: an assessment of options and their impacts and costs'*⁷⁴ states *'The intensifying teacher supply challenge, relative loss of competitiveness in teacher pay over the last decade and the research evidence showing that pay and financial incentives can be effective at improving recruitment and retention, means there is a strong case for the Government developing a long-term strategy to increase pay and incentives, and improve recruitment and retention.'*
204. This remains relevant in Wales as much of the real-terms erosion of pay happened before this was devolved to the Welsh Government. As this has not been addressed subsequently, teacher and school leader pay in Wales is still significantly lower than if it had kept pace with inflation since 2010. Furthermore, recruitment and retention also continue to be challenging in Wales.
205. The consensus on this is clear.

⁷¹ Dire teacher recruitment data should concern policymakers, Jack Worth, NFER, December 2023

⁷² The public sector needs a real pay rise, IPPR, July 2023

⁷³ Ibid

⁷⁴ Policy options for a long-term teacher pay and financial incentive strategy: an assessment of options and their impacts and costs, NFER, July 2023

Section D Section 3 of the STPC(W)D

Matter for recommendation

Consideration of the requirement for additional guidance to that currently provided in Section 3 of the STPC(W)D.

ASCL recommends that:

- ✓ A Task and Finish Group including statutory consultees is set up to review the requirement for additional guidance to that currently provided in Section 3 of the STPC(W)D after the strategic review report and Ministerial response to it have been published.

Why are we saying this?

We are supportive of the inclusion of additional guidance to that currently provided in Section 3 of the STPC(W)D. Although a significant amount of guidance was removed from the Document after 2012, it was still seen as good practice. Many changes have taken place since 2012, particularly since the devolution of pay and conditions in 2019, which mean that some of that guidance is either not reflective of current practice or is completely out of date and not required.

For a number of years, we have recommended that some of the items for consideration in remits could be addressed by providing guidance for employers, local authorities, governors and school leaders.

However, we feel that it is important that the inclusion of additional guidance does not remove the flexibilities that are included within the Document, but rather that it provides clearer guidance on how to appropriately and fairly utilise the flexibilities.

206. We believe that the IWPRB should consider a variety of factors when considering its recommendations on additional guidance for Section 3 of the STPC(W)D:
- a. The Ministerial recommendations on the strategic review
 - b. Issues relating to working time for school leaders (see later section)
 - c. Issues relating to working time for teachers (see later section)
 - d. Recruitment and retention issues
 - e. Equalities considerations
207. We note that this has been a recurring remit item, and that the IWPRB's 4th Report said: *'We have reached two conclusions in relation to further statutory guidance within the STPC(W)D. The first is that there is a need to update and clarify the STPC(W)D, so that it accurately and consistently reflects previous recommendations made by the IWPRB. Our second conclusion is that any further work on the document, including the potential to consider matters from 2012, should be deferred until after the strategic review and the Minister's determination on its recommendations.'*
208. As stated earlier, we have not yet even had sight of the IWPRB's report from the strategic review, or the Minister's response to it. This makes it almost impossible for this remit item to be fulfilled.
209. Whilst we welcome this remit item, we believe that this is too big a task to be carried out via individual responses from each consultee.

210. For example, Section 3 of the 2012 Document contained 44 pages (plus a further 27 pages containing guidance on changes to the Document resulting from the National Agreement), yet Section 3 of the 2023 Welsh Document contains just 19 pages.
211. The general language in the STPC(W)D also needs to be reviewed to ensure that is fully reflective of the Welsh context, for example, on page 75 there is a section relating to Initial Teacher Training, not Initial Teacher Education.
212. It is our view that this would be more effectively carried out collaboratively via a Task and Finish Group with the aim of reaching agreement on the items to be reintroduced and any new guidance required as a result of the strategic review outcomes.
213. We also feel that it would be helpful and appropriate to review and reinstate some of the guidance relating to the changes from the National Agreement.
214. The Task and Finish Group should focus on areas that are related to working hours and workload, and relating to clarity around pay setting arrangements, including the application of the annual pay award in relation to salary safeguarding provision.
215. We have also previously suggested that more guidance be provided for employers, governors and local authorities similar to the document '*Implementing your school's approach to pay*' produced by the DfE in England.
216. This document is actually referenced in the STPC(W)D on page 82 under '*Relevant legislation and departmental advice*', but due to the changes since the devolution of pay and conditions there is much that is not relevant. It would be helpful for a Wales-specific version of this to be created.

Section E Additional Learning Needs Coordinator

Matter for recommendation

Appropriate remuneration and terms and conditions for the newly defined statutory role of Additional Learning Needs Coordinator (ALNCo) to fairly reflect roles, responsibilities, working time and workload, with particular regard to the consistency and appropriateness of awards.

ASCL recommends that:

- ✓ The ALNCo role should be a senior leadership role.
- ✓ Clarity is provided on the strategic level to which the role should be appointed; this should be explicitly reflected in the ALN Code for Wales⁷⁵.
- ✓ Amendments are made to the STPC(W)D to enable schools to appropriately recognise and remunerate those working in ALNCo roles. This must be accompanied by significant investment by the Welsh Government so that schools can afford the ongoing costs related to this.

Why are we saying this?

We support the findings of the ALNCo Task and Finish Group⁷⁶ and have provided our response to its recommendations in Annex Three.

⁷⁵ The Additional Learning Needs Code for Wales

⁷⁶ Report of ALNCo Task and Finish Group, December 2023

The ALN Code defines the ALNCo role as *'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 setting and should, therefore, either form part of the senior leadership team or have a clear line of communication to the senior leadership team.'*

This is explicit in that this is an individual who works at a strategic level.

217. We believe that the IWPRB should consider a variety of factors when considering its recommendations on the appropriate remuneration and terms and conditions for the statutory role of ALNCo:
- a. The definition of the ALNCo role in the ALN Code
 - b. The findings of the ALNCo Task and Finish Group
 - c. The mismatch between the costings provided by the Welsh Government⁷⁷ and the level that the role should be remunerated.
218. As the ALN Code is ambiguous in its definition of where the role should be appointed, we believe that it needs to be amended to reflect that it should be a leadership role, and not just a role which has a clear line of communication to the senior leadership team.
219. It is our view that the STPC(W)D should be amended to allow schools to appoint an ALNCo on the leadership pay range.
220. We note that even now, several years since the introduction of the ALN Bill, there is no reference to the role of ALNCo in the Document, just to ALN allowances.
221. We have previously highlight that an explanatory memorandum⁷⁸ to the draft ALN Code stated: *'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. 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).'*
222. This is clearly based on a salary for a main pay range teacher, not a member of the senior leadership team, and not even with a TLR.
223. This adds to the confusion that has arisen around the role due to the ambiguity in the ALN Code, as it has been costed against a classroom teacher with no additional responsibility.
224. The mid-point salary for a classroom teacher (M4)⁷⁹ in 2022/23 was £34,067.
225. The average salary for other leadership roles in 2022/23⁸⁰ was £59,292.
226. If we uprate both of the figures by 30% as an illustrative example of on-costs, they would be £44,287 and £77,080 respectively.

⁷⁷ Explanatory Memorandum to the Draft Additional Learning Needs Coordinator (Wales) Regulations 2020

⁷⁸ Ibid

⁷⁹ STPC(W)D 2023

⁸⁰ SWAC November 2022

227. The difference between the two figures is £32,792. If an ALNCo was appointed to a leadership role in every school in Wales (1,463⁸¹), the additional annual cost of this would have been just under £4.8million.
228. Whilst this is an illustrative example, it demonstrates the additional investment that is needed by the Welsh Government to enable schools to appoint an ALNCo at the appropriate strategic level.
229. Some smaller schools may share an ALNCo, as is permitted by the ALN Code, but this still represents a significant increase in staffing costs across all schools in Wales.
230. Ongoing funding for this must be provided by the Welsh Government and fully passed on to individual schools.
231. Finally, one of the key issues relating to the ALNCo role is the sheer scale and volume of workload, and this is something which also must be addressed.

Section F Administrative and clerical tasks

Matter for recommendation

Whether any other tasks should be added to the list of administrative and clerical tasks at Annex 3 of section 2 of the STPC(W)D including any requirement for the potential inclusion of specific reference to school leaders

ASCL recommends that:

- ✓ The list of tasks at Annex 3 of Section 2 of the STPC(W)D should be further refined to better reflect the current working practices in schools.
- ✓ The list of tasks should be supported by the inclusion in the annex of a narrative that defines administrative and clerical tasks and makes clear the subsequent list is illustrative.
- ✓ The narrative at Annex 3 should make clear that the same principles outlined in paragraph 51.8 of the STPC(W)D also apply to leaders but that an illustrative list is not helpful due to the wide variety of roles and context.

Why are we saying this?

Whilst an illustrative list is helpful in fleshing out the principle of paragraph 51.8, it can never be exhaustive. It is important, therefore, that an updated narrative is also included in the annex which will allow teachers, leaders and employers to determine which tasks meet the threshold of requiring a teacher's professional skills and judgement. It is also important that it is made clear that the same principles apply to school leaders.

232. We believe that the IWPRB should consider a variety of factors when making its recommendations on the update to Annex 3 of Section 2 of the STPC(W)D:
- a. The need for any illustrative list to keep pace with changing technologies and working practices
 - b. A recognition that any list can never be exhaustive and can only ever be illustrative and that therefore the principles behind defining administrative and clerical tasks are paramount
 - c. That school leader workload is a huge recruitment and retention issue and therefore the importance of making explicit their protections under this clause

⁸¹ [School Census January 2023](#)

Illustrative examples

233. The current list at Annex 3 of Section 2 was adopted after the list previously used, over a decade before, had minor updates. In order to be helpful to teachers, leaders and employers, we believe the illustrative examples need to be more reflective of the current practices in schools.
234. We believe the illustrative examples would be strengthened by removing example four '*typing or making word-processed versions of manuscript material and producing revisions of such versions*' as this is dated and the intention can be better covered in another example.
235. We recommend amending the following examples as laid out in the table below in order to better illustrate how administrative and clerical tasks should be defined.

Current illustrative example	Proposed illustrative example
5. Word-processing, copying and distributing bulk communications, including standard letters, to parents and pupils.	Responsibility for producing, copying, uploading and distributing bulk communications to parents and pupils, including standard letters, school policies, posts on electronic platforms.
7. Keeping and filing records, including records based on data supplied by teachers.	Keeping and filing paper or electronic records and data e.g. in school management systems or physical office files.
8. Preparing, setting up and taking down classroom displays in accordance with decisions taken by teachers	Organisation, decoration and assembly of the physical classroom space e.g. moving classrooms, moving classroom furniture, putting up and taking down classroom displays.
9. Producing analyses of attendance figures.	Producing and collating analyses of attendance figures.
10. Producing analyses of examination results.	Collating pupil reports e.g. reports of pupil examination results.
12. Administration of work experience (but not selecting placements and supporting pupils by advice or visits).	Administration relating to school visits, trips and residentials (including booking venues, collecting forms and recording lunch requirements) and of work experience (but not selecting placements and supporting pupils by advice or visits).
15. Ordering, setting up and maintaining ICT equipment and software.	Ordering, setting up and maintaining ICT equipment, software, and virtual learning environments (VLEs), including adding pupils to VLEs and online subscription platforms.
18. Taking verbatim notes or producing formal minutes of meetings.	Taking, copying, distributing or typing up notes (e.g. verbatim notes) or producing formal minutes.

236. We would like the following illustrative example added as it adds unnecessarily to workload and adds nothing to either professional development or pupil learning:

Production of photographic evidence of practical lessons, e.g. for assessment purposes or to 'evidence' learning.

237. We also recommend that the following illustrative example is added in support of reducing the amount of unnecessary work generated by the inspection framework.

Creation or duplication of files and paperwork perceived to be required in anticipation of inspection, such as copies of evidence portfolios.

238. As the administration of medication on a routine or day-to-day basis does not require the professional skills of a teacher we recommend that the following illustrative example is

included in Annex 3. This would not, of course, preclude a teacher from administering medication in an emergency situation:

Administration of medical consent forms and administering of medication on a routine or day-to-day basis.

239. The same applies to wraparound care and preparation of food / meals, and so we recommend that the following illustrative example is also included in Annex 3:

Administration or data analysis relating to wraparound care and preparation of food / meals.

Defining administrative tasks

240. Any list of illustrative examples of what constitutes administrative and clerical tasks can only go so far. Each school has its own context and what teachers, leaders and employers will find more helpful is if a definition of administrative and clerical tasks included in the STPC(W)D.

241. We are of the view that following wording should be added to Annex 3 of Section 2 as a preamble to the illustrative examples:

Some administrative tasks are straightforward – filing pupil records, recording absence data, and collecting money. Others, such as administering examinations, ordering equipment, and compiling and submitting bids require more expertise, but not necessarily that of a teacher.

Many activities in schools require a mixture of professional and administrative input. For example, writing reports on pupils' progress requires the expertise of a teacher. But that expertise is not required for many of the processes involved in producing the report – for example, "topping and tailing" reports or collating them either manually or using an ICT-based system. These elements should not routinely be done by teachers. To note, tasks do not have to be done on a daily basis to be classed as routine. Many tasks, such as collating reports, may only be done once per year – this would still be classed as routine.

Tasks and activities related to the safeguarding of pupils will often require the professional expertise and input of teachers, e.g. if a safeguarding disclosure is made to a teacher, it is part of their role to record the details of that disclosure.

For the purposes of paragraph 51.8, the key tests for any task must be:

- a) Does it need to be done at all?*
- b) Is the task of an administrative or clerical nature?*
- c) Does it call for the exercise of a teacher's professional skills or judgment?*

If the answers to a) and b) are yes but the answer to c) is no, then the task should not be carried out by a teacher.

The list below contains a number of examples. It is not intended to be exhaustive.

School leaders

242. School leaders continue to face excessive workload, and this remains one of the reasons why classroom teachers are reluctant to move into leadership roles and why retention is challenging. It is therefore important that the principle of school leaders not undertaking tasks that do not require their professional skills and judgement is made clear in the STPC(W)D.

243. We think this is best done by adding wording to the narrative we have proposed for Annex C of Section 2 as follows:

Principles for leaders:

Whilst the list below applies to classroom teachers, the same principles outlined in paragraph x also apply to leaders.

The key tests for any task must be:

- a. Does it need to be done at all?*
- b. Is the task of an administrative or clerical nature?*
- c. Does it call for the exercise of a leader's professional skills or judgment?*

If the answers to a) and b) are yes but the answer to c) is no, then the task should not be carried out by a leader.

244. We do not believe an additional, separate illustrative list is useful for school leaders. This is because the nature of the role varies considerably between phase, context level of seniority and the make-up of the senior leadership team. We are of the view that the existing list plus the narrative in full is sufficient to give appropriate clarity and protection for school leaders.

Section G Leaders' conditions of service

Matter for recommendation

Leaders' conditions of service and in particular the consideration of introducing guaranteed working hours (or limits on) as well as protected holiday entitlement and weekends for leaders to be included in the STPC(W)D;

ASCL recommends that:

- ✓ The STPC(W)D is amended to include provision for school leaders in relation to working time and removes the current open-ended expectations.
- ✓ The STPC(W)D is amended to include provision for school leaders in relation to guaranteed minimum periods of break during school closure periods and weekends. This should include the strengthening of paragraph 51.1 to explicitly reference leaders.
- ✓ Actions are taken to reduce workload for school leaders including business leaders.

Why are we saying this?

The workload and working hours for school leaders have been increasing over time for a combination of reasons. These include increasing demands on leaders due to Welsh Government and Welsh Local Government initiatives and education policy reforms. Inadequate school funding and the disparity in the funding delegated to schools from local authorities has led to a reduction in school leadership roles, leaving remaining members of senior leadership teams to pick up the workload. Staff absence and the inability to either procure or afford quality supply cover has meant that leaders end up covering for absent colleagues.

We know that teachers and middle leaders are deterred from progressing into middle and senior leadership roles due to the additional workload and because, as they move onto the leadership pay range, they lose the protections of 1,265 hours and 195 days. We also know that senior leaders are deterred from progressing into deputy head and headship roles due to the additional workload, and relatively small difference in pay for additional responsibility and workload.

245. We believe that the IWPRB should consider a variety of factors when considering its recommendations:

- a. Excessive workload experienced by school leaders
- b. Excessive hours worked by school leaders
- c. Impact on wellbeing
- d. Impact on work-life balance
- e. Impact on professional learning
- f. Recruitment and retention of school leaders (see earlier sections)

246. We have provided information on this in both our written evidence and oral evidence for the strategic review. The key point is that there must be some provision within the Document which genuinely protects the work-life balance of school leaders.

247. The Document currently contains just one paragraph (51.4) in relation to work-life balance:

‘Work/life balance

Governing bodies and headteachers, in carrying out their duties, must have regard to the need for the headteacher and teachers at the school to be able to achieve a satisfactory balance between the time required to discharge their professional duties including, in particular, in the case of teachers to whom paragraphs 50.2-50.12 apply, their duties under paragraph 50.7, and the time required to pursue their personal interests outside work. In having regard to this, governing bodies and headteachers should ensure that they adhere to the working limits set out in the Working Time Regulations 1998(19).’

248. This is clearly not sufficient, or we would not be seeing the high levels of working hours reported for teachers and school leaders.

249. We note that the Welsh Government’s *Careers Wales*⁸² online page detailing the role of a headteacher quotes hours of work as 37 hours a week, with hours of work typically between 8am and 6pm. It also states: *‘Headteachers normally work at least 37 hours a week, with most working evenings and often weekends.’*

250. This shows that not only is it openly acknowledged by the Welsh Government that it is the norm for headteachers to work evenings and weekends, it is also publicised.

251. Furthermore, it is clear that 37 hours a week is vastly underestimated, and that Headteachers don’t *‘normally work at least 37 hours a week’*, but way in excess of that.⁸³

252. This must change. It does nothing to retain headteachers already in the profession, nor to attract or motivate other leaders to want to progress to headteacher roles. This is already a known issue within Wales, as reported in the EWC Policy Briefing in 2020⁸⁴, where qualitative research showed *‘Blockage in the system around middle leadership – deputies not wishing to progress to headship due to additional workload are stopping those who need to get experience as a deputy before being able to apply for headship.’*

253. The Welsh Government has a duty of care to headteachers and school leaders, and at present it is hard to see how it is complying with that duty.

254. There is no accountability measure for excessive working hours in education in the same way that there is in other public and private sectors, whereby people working additional hours are entitled to be paid overtime or granted time off in lieu. This ensures that employers are mindful of the hours worked by their staff as there is a financial cost to them for any additional hours worked, either by way of payment or to grant time off.

⁸² Job information: Headteacher, Careers Wales

⁸³ National education workforce survey, 2021, EWC

⁸⁴ Teacher recruitment and retention policy briefing, EWC, October 2020

255. This remit item needs to address two elements for school leaders.
256. The first is in relation to weekends and guaranteed periods for breaks over school holidays. The second is in relation to working time which covers working hours and working days, and includes evenings.
257. Some examples we have previously given on this would be for no expectation on leaders to be available for work between 6pm and 8am or weekends (other than for short-term emergency situations), and protected leave for the main leave periods: for example four weeks guaranteed break during summer and two weeks for both Christmas and Easter.
258. Our members employed on the leadership pay range do not expect to have the same provisions as included for classroom teachers, i.e. 1,265 hours, but they also cannot be expected to have limitless expectations on their working hours.
259. OECD averages⁸⁵ for working days for headteachers in 2021 ranged between 211 and 214 and working weeks per year ranged between 43 and 44.
260. The latest EWC national education workforce survey⁸⁶ shows that school leaders were working an average of 54 hours per week, and 64.2% felt unable to manage their workload within the agreed working hours. 70% were concerned about their workload.
261. Responses were not broken down to show differences between full-time and part-time school leaders, yet the responses for school teachers were broken down by full and part.
262. The main areas impacting on their ability to effectively manage their workload were:
- a. administration, paperwork and budgets (69.3%)
 - b. non-teaching activities relating to learners (e.g. welfare, safeguarding, extracurricular activities)
 - c. behaviour management, parental / carer contact (59.8%)
 - d. accountability (internal and external), quality assurance, inspections (47.8%)
263. 74.5% of respondents felt that the level of internal and external accountability added to the pressure they felt.
264. When asked for practical suggestions on what changes would help to make workload more manageable, the main themes were:
- a. extra time to be provided for planning, preparation and assessment (PPA)
 - b. less paperwork and bureaucracy
 - c. increased budget for a larger senior leadership team to share responsibilities
 - d. employ more staff
265. Conflict with work / not enough time was the main barrier to accessing the required professional learning for 65% of school leaders.
266. In the same survey⁸⁷, when school teachers were asked '*How do you see your teaching career changing in the next three years?*' only 21% selected '*progressing to a more senior role*'. This must be considered alongside the age demographic of the survey respondents, which were that 83% of respondents were aged 30 or over, and 52.1% were aged 40 or over.

⁸⁵ OECD (2022), *Education at a Glance 2022: OECD Indicators*, OECD Publishing, Paris.

⁸⁶ National education workforce survey, 2021, EWC

⁸⁷ Ibid

267. This clearly demonstrates the lack of interest in moving into middle or senior leadership roles as mentioned at the start of this section.
268. In ASCL's member survey in February 2021, 66% of respondents from Wales reported an increase of over five hours a week since the onset of the pandemic, with 34% of respondents reporting an increase of over ten hours a week, and 19% reporting over 15 hours extra. Only 18% of respondents reported that their workload was manageable, and 76% felt that they did not have an acceptable work-life balance.
269. This comment from one respondent summed up the situation: *'There is never a switch off from work, maybe a couple of days over Christmas.'*
270. When we surveyed members again in September 2022, we asked about their intentions to leave the profession and included a list of factors which may be influencing this decision. The two highest selected factors were unsustainable workload/working hours (69.3%) and exhaustion/fatigue (68.2%).
271. We conclude this section with a few comments from ASCL members who selected these factors:
- 'The constant feeling that no matter how hard I work it is never enough.'*
- 'Being expected to do unpaid work and taking on additional responsibility without payment.'*
- 'Very real risks to health caused by stressful posts - I have seen a number of dear colleagues dying soon into retirement. I would like to add challenging behaviour of pupils to the list above especially following Covid.'*

Section H Teachers' conditions of service

Matter for recommendation

Teachers' conditions of service and in particular reviewing guaranteed working hours (or limits on) as well as protected holiday entitlement and weekends to be revised in the STPC(W)D.

ASCL recommends that:

- ✓ Paragraph 50.7 of the STPC(W)D is amended to be clear that the reasonable hours must not be excessive and that teachers must still be able to achieve an acceptable work-life balance through term-time and school closure periods.
- ✓ Clear guidance should be provided on the calculation of directed time to ensure that teachers do not work in excess of the 1,265 hours due to inconsistent calculations and trapped time between events that are classified as directed time.
- ✓ Paragraph 50.10 of the STPC(W)D is reviewed and amended to ensure that part-time teachers are not disadvantaged by having to return to work several hours later for an after-school directed time event, or vice versa.

Why are we saying this?

Whilst there is some provision within the Document to protect teachers from being required to be available for work outside of the 1,265 hours/195 days, in reality, the reference that they must work such reasonable additional hours as may be necessary to enable the effective discharge of the teacher's professional duties has a *carte blanche* effect.

272. We believe that the IWPRB should consider a variety of factors when considering its recommendations:
- a. Excessive workload experienced by teachers
 - b. Excessive hours worked by teachers
 - c. Impact on wellbeing
 - d. Impact on work-life balance
 - e. Impact on professional learning
 - f. Recruitment and retention of teachers, ITE and beyond (see earlier sections)
273. We know from a variety of sources that workload is one of the biggest drivers of teachers leaving the profession.
274. It is the level of this workload that puts pressure on teachers to work excessive hours in order to be able the effective discharge of their duties.
275. The latest *National Education Workforce Survey*⁸⁸ found that full-time school teachers regularly work 56 hours per week (against average contracted hours of 38.8), and part-time school teachers regularly work 36.7 hours per week (against average contracted hours of 20.9).
276. The 2022 *Teacher Labour Market in Wales* report⁸⁹ also noted this, saying: ‘*The 2021 national education workforce survey highlighted the continued challenge of unmanageable workload for school teachers and school leaders (EWC, 2021). Indeed, the survey suggested that school teachers were working more hours in 2021 than they were in 2016. Progress with reducing teacher workload would likely help to improve teacher retention. Reducing teacher workload and supporting teacher well-being should therefore remain a high priority for the Welsh Government and other stakeholders.*’
277. In the workforce survey⁹⁰, teachers indicated that workload was an issue, with 70.4% disagreeing or strongly disagreeing that their workload was manageable within their agreed working hours.
278. The three main areas impacting on their ability to effectively manage their workload were reported as:
- a. administration, paperwork, and budgets (40.6%)
 - b. fitting curriculum content into available teaching hours (40.4%)
 - c. class sizes (35.8%)
279. The impact of the excessive workload on learners was highlighted in the answers to this question ‘*To what extent do you agree or disagree that you usually have enough time to cover the curriculum content and ensure leaders are fully supported (please base your answer on your ‘typical’ workload rather than experiences during the COVID-19 pandemic).*’ Some 50.6% of respondents selected disagree/strongly disagree.
280. The survey also shows that conflict with work/not enough time was one of the main barriers preventing respondents from accessing professional learning (64.8% school leaders, 60.8% school teachers).
281. On wellbeing, the survey reported that most school teachers (58.3%), felt that they were unable to take their timetabled or allocated breaks during the day.

⁸⁸ National Education Workforce Survey, 2021, EWC

⁸⁹ ibid

⁹⁰ ibid

282. All this serves to demonstrate that the provisions of the STPC(W)D do not ensure that teachers only work such additional hours which are reasonable. It is clear that most are working excessive hours.

Considerations for changing the annual pay review cycle

283. It is our strong view that the annual pay review cycle needs to be changed to align it with the financial year.

284. To be clear, this is just with regard to the cycle, not the implementation of the pay award.

285. It would be nonsensical to change the pay award from 1 September to 1 April when schools run on an academic year, when the majority of teachers' and leaders' contracts will start on 1 September, and that is when there is the biggest churn/turnover of staff.

286. We would be strongly opposed to any proposal to change the effective date of the pay award for teachers and leaders.

287. What is important is for headteachers and business leaders to be able to accurately set their school budgets.

288. This means that the pay review process needs to start much earlier, even earlier than was the case before recent years, where it has been very protracted.

289. Ideally, the remit would need to be issued early in the summer term, to allow a full and meaningful pay review process. The IWPRB report and Minister's response would need to be published early in the autumn term to allow time for stakeholder consultation to be concluded by the end of term. This would mean that schools would know what the pay award was likely to be when they are carrying out their budget planning for 1 April.

290. As this would mean recommending pay awards a significant amount of time in advance of implementation, we would want to see a re-opener clause, as was the case in the multi-year award for 2022 and 2023, to allow any unforeseen economic changes to be addressed.

Overall summary and ASCL recommendations to the IWPRB:

291. There are a number of positives since the devolution of pay and conditions in 2018, for which the IWPRB and the Welsh Government deserve credit. These include:

- a. The commitment by Welsh Ministers that there would be no detriment to pay for teachers and leaders in Wales following devolution of powers.
- b. The removal of performance-related pay – something the STRB are considering in England following Wales' lead.
- c. Maintaining post-pandemic and deprivation funding grants.
- d. The more collaborative 'producer' model, including not publishing school performance tables and not grading inspections – again something being explored by the DfE.

292. However, from the evidence presented above, ASCL Cymru urges the IWPRB to consider the following key recommendations:

- **Pay:** Teacher and school leader pay in Wales is now significantly adrift from comparable graduate jobs due to inflation, cost-of-living and the cumulative effect of weak historic pay settlements. A strong case must be made to ensure teachers' pay remains competitive, with good acceleration of salary commensurate with career development.

- **Teacher recruitment and retention:** In terms of teacher recruitment, making the M2 salary more competitive would be a start and there is evidence to suggest that NQTs should follow a two-year programme to help support and develop their practice. ITE provision through the seven main providers need to be reviewed as the 10% drop our rate is unacceptably high.

Recruitment in the secondary sector is more challenging – particularly in certain subject specialisms and in Welsh-medium schools. Subject bursaries, student loan waivers or salary enhancements should be considered.

- **School leader recruitment and retention**, including that of business leaders, has reached a point of crisis. Wales has one of the highest reported hours per week averaged across 43 OECD countries, with a recent ASCL Cymru survey showing that 40% of school leaders and 50% of business leaders are considering quitting in the next three years. The leadership pipeline is drying up, with aspiring school leaders put off in terms of pay progression and work life balance. This, combined with the fact that 50% of teachers in Wales leave the profession after five years, suggests that something is seriously wrong.
- **Funding methodology:** local authorities are retaining too much of the general funding grant for schools, with an average retention figure of 17% and a range of +/- £600 per pupil. ASCL Cymru requests a further review to the Sibieta report (2020) and action taken to simplify funding methodology and reduce ‘top-slicing.’

Increasing the amount of money to schools would help reduce average class sizes and workload for teachers. The needs of pupils post-Covid are greater – particularly those with ALN or from deprived areas. ASCL urges the IWPRB to consider recommending increasing delegated funding directly from the local authorities to schools on a per pupil basis. There is also a case for area-based uplift funding to deprived areas, particularly in rural locations.

The questionable amount of money held centrally by LAs and central services should be decreased. Reviewing the Regional Consortia, whose effect on school improvement is questionable⁹¹ should release funding to develop more effective school-to-school support, as recommended by the Minister (January 2024).

Increasing delegated funding to schools would also ensure that headteachers are able to pay the necessary uplifts in salary as well as resource their schools. ASCL Cymru recommends to the IWPRB that a further review of the current school funding model in Wales, following the findings of the Sibieta Report (2020), would be welcomed by the teaching profession. It is vital that as much as possible of the general funding for local government finds its way into schools.

- **Flexible working practices:** From the evidence, it would appear that Welsh LAs and schools have been slow to adopt flexible working practices. These would encourage the 75% of teachers who are female to be supported in terms of pay and progression and help reduce a very obvious gender pay gap. Flexible working would also encourage older teachers to stay longer in the classroom.

Section I Conclusion

293. In summary, teachers and school leaders deserve to be remunerated appropriately and fairly for the crucial role they fulfil in society. This has been made even more clear since the onset of the pandemic.
294. We believe that a significant, fully funded increase is required to all pay ranges in order to address the erosion of pay since 2010 and the impact of differentiated awards on the pay of experienced teachers and school leaders.

⁹¹ Ibid

295. The pay award must be fully funded centrally, and Welsh Government must ensure that sufficient funding is passed on to all schools by all local authorities.
296. The scope of the IWPRB and the STPC(W)D should be broadened to include those working in business leadership roles, to ensure that they receive the recognition and remuneration for the crucial roles they hold, and which support other school leaders to deliver their core functions.
297. Workload and working time for teachers and school leaders must be addressed.
298. Provision must be included in the STPC(W)D to ensure that school leaders receive some protections in relation to working time and guaranteed breaks through school closure periods.
299. We 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.

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Conditions of Employment Specialists: Pay
Association of School and College Leaders
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