

Independent Welsh Pay Review Body: Remit for the 7th 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 over 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders, ALNCo's 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) 7th remit.
3. Our response is based on the views of our members, obtained through discussions at ASCL Council, with relevant advisory groups, member surveys 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 6th Report

5. We provided our views on the 6th Report Question 1 and its recommendations in our consultation responses in March 2025. Furthermore, we supplied evidence for the 6th Remit Question 2 to support our growing concerns regarding Leaders' conditions of service in July 2025.

Timeliness of the process

6. We highlighted our concerns on the timing of the publication of the 6th Report and Cabinet Secretary's response to it in our consultation response. This hampered the ability of consultees to craft as full and meaningful an evidence submission as would be the case with a more appropriate timeline.
7. In particular, we are frustrated with the delay in considering the second question of the 6th Remit and key issue of School Leader's Conditions of Service. This could have been covered in our submission in March 2025 rather than July. This delay has affected process – for example, the STPC(W)D 2025/26 does not include any recommendations regarding leaders' entitlement to protected school holidays as directed by the Cabinet Secretary in her letter to Local Authorities in September.
8. We have additional and consequential concerns having to wait until December for the IWPRB to report back to the Welsh Government. This risks delaying implementation of any recommendations until after the Senedd elections in May 2026 when the Cabinet Secretary said she will review the recommendations. As a result, any political change would seriously jeopardise any agreements with the current Labour Government.
9. In terms of pay, whilst teachers and leaders did return to their roles in September knowing how the pay award would affect their salary, the 4% annual uplift is below the 4.8% recommended by the IWPRB, sending an unfortunate message to them that the Welsh Government does not value them as a profession. It also sends a wider message that securing and retaining a sufficient supply of teachers in the profession is not a priority.
10. We are pleased to see that the Teachers' Pay and Conditions Partnership Forum (PPF) meetings are now taking place far more regularly although attendance has fluctuated – in particular the

representatives from the Welsh Government change from meeting to meeting which does not help with the delivery of agreed actions.

11. We are also pleased to see that the 7th Remit has been published along with a timetable to ensure that a final report for publication is on 24th April 2026. It is really important that all these deadlines are adhered to and that this end point is achieved. We must also see the whole process brought forward in the future, as has been the case in England where the remit was issued in July.

Lack of action on recommendations already made

12. We have seen a series of recommendations made by the IWPRB over the last two years; 26 from the strategic review, twelve from the 5th report and eleven from the review of supply teachers. Sadly, very few have been implemented. There is a pervading sense of disjointed incrementalism with school leaders unsure about their role in terms of school improvement.
13. In relation to the strategic review, we are unclear about it as a point of reference. We were critical of some of its content when it was published as it contains a variety of recommendations and reviews ranging from systemic change to adding hyperlinks. Its credence was not helped by the Cabinet Secretary accepting, in principle, all 26 recommendations from the strategic review, but with the following caveat: *'Many of the recommendations have financial implications, therefore an important aspect of considering their impact and delivery will be affordability in the difficult financial situation faced by Welsh Government, local authorities and schools. Given these financial pressures, the implementation of any of the recommendations in the short to medium term will only occur where they can be shown to be either cost neutral or are able to be met from existing budgets.'*
14. Our position is that if a recommendation can only be implemented where it is cost neutral or met from existing budgets, then it has not been accepted.
15. However, we are optimistic that improved engagement identified in point 12 above will improve the processes of implementation and review moving forwards, providing the commitment shown by the Welsh Government, the WLGA and other statutory consultees continues.
16. Overall, we must see improvements in both the PPF and pay review processes and associated timelines to ensure that the process works for school budgets, and so that no group of teachers or leaders are negatively impacted as a result of a truncated pay round.

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.

Section C: Pay award

ASCL recommends that:

- ✓ A fully funded increase to all pay ranges and allowances is made for September 2026, which includes the following elements:
 1. An uplift that at least keeps pace with RPI each year.
 2. A proportion towards the restoration of real-terms cuts since 2010.
 3. A proportion to compensate for the lack of flexible working opportunities available within the profession compared with other sectors.

- ✓ The Welsh Government adheres to the recommendations on pay made by the IWPRB. Bearing in mind how teachers' pay continues to be 20% below its 2010 cost-of-living value, it was extremely disappointing to see that the 4.8% pay increase was lowered to the 4% pay settlement for 2025/26.
- ✓ The Welsh Government commits to a longer-term and funded strategic plan to fully restore the erosion of pay which has taken place since 2010 together with the re-establishment of previous differentials between pay ranges, particularly as classroom teachers move into leadership.
- ✓ Salaries must be competitive throughout the framework to ensure that high quality graduates are attracted to the profession, and to improve the retention of both classroom teachers and school leaders.
- ✓ 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 RPI¹ each year, to ensure that teachers and leaders do not experience any further real-terms pay cuts.
- ✓ Sufficient funding must be provided to ensure that schools can afford to implement these commitments without any negative impact on provision.

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.

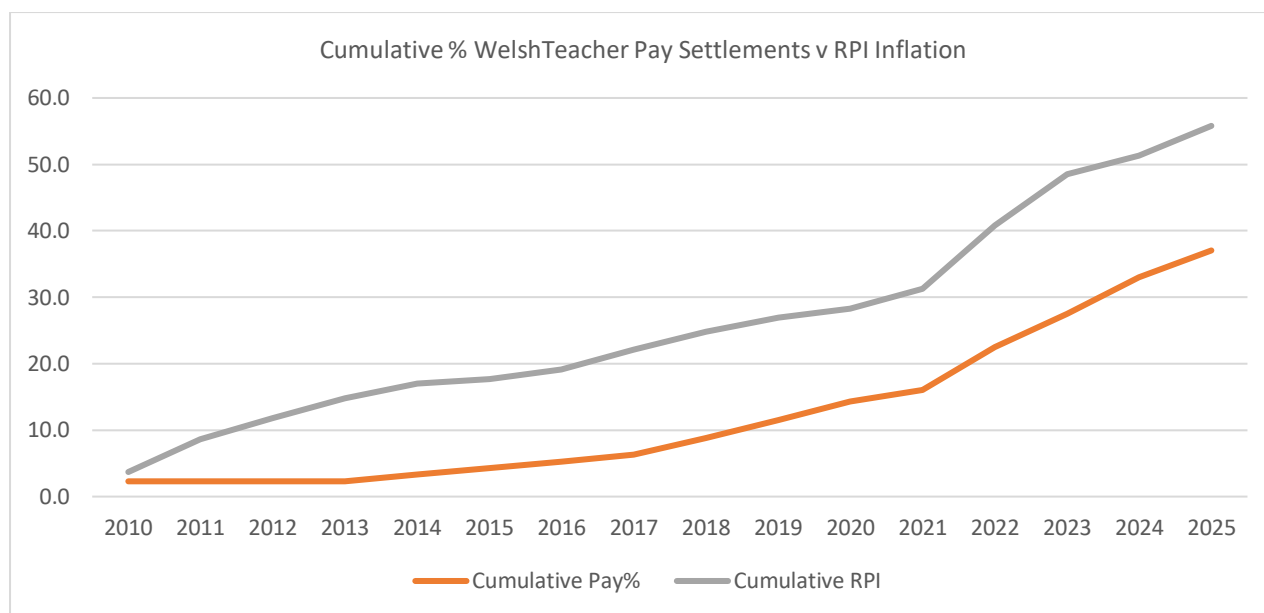
The root causes of this pay erosion lie in deliberate policy choices which took place prior to the devolution of teachers' pay and conditions in Wales. The 2010–2015 coalition government initiated a series of austerity measures, including a two-year public sector pay freeze and a shift from RPI to CPI for uprating pensions and benefits - decisions that disproportionately affected teachers.

Figure 1 shows the incremental effect of these Conservative government choices prior to 2018, with pay settlements in Wales only keeping pace with RPI inflation since devolution² and doing little to restore the value of teachers' salaries which remain, on average 20% below 2010 levels. This continues to have a detrimental effect on graduate recruitment and teacher retention rates.

¹ ASCL position on policy

² ONS Inflation and Price Index

Figure 1: Cumulative effect of RPI inflation and teacher pay settlements in Wales.



These decisions have contributed to a recruitment and retention crisis. Teacher training targets have been consistently missed, especially in key subjects like physics and computing with vacancy rates reaching record highs, and many schools report ongoing difficulties in filling posts (see recruitment section).

ASCL believes that the IWPRB should consider a variety of factors when considering its recommendation for the teachers' and school leaders' annual pay awards:

- i. The real terms pay gap that has emerged and widened since 2010.
- ii. Worsening recruitment (see also section on Recruitment to the profession).
- iii. Significant retention pressures (see also sections on Retention and vacancy rates and impact of teacher shortages below)
- iv. The shortage of teachers of Welsh and the impact this will have on the ability to achieve the government's 2050 target³.
- v. The need to reward high levels of commitment and professionalism across the school sector in Wales
- vi. Inflationary pressures and increased living costs
- vii. Vacancy rates
- viii. Impact of teacher shortages
- ix. Pupil population

23. As outlined in our recommendations, we propose that annual pay awards for teachers and school leaders should comprise three essential components during the restoration phase:

- A real-terms restoration uplift to reverse the erosion of pay since 2010.
- An inflation-linked increase, benchmarked against the Retail Prices Index (RPI), to maintain purchasing power.
- A compensatory element to reflect the limited access to flexible working arrangements compared to other graduate professions.

³ Cymraeg 2050: A million Welsh speakers

24. This approach will require above-inflation pay awards each year until the real-terms value of pay is fully restored.
25. Once restoration is achieved, annual pay awards should include two key elements:
- An RPI-linked increase to ensure pay keeps pace with the cost of living.
 - A continued compensatory uplift to address structural disadvantages in working conditions.
26. This is essential to prevent further erosion. For example, in 2022–23, despite a 6.5% consolidated pay award, most teachers still experienced a real-terms pay cut due to the record high levels of inflation.
27. This strategy is vital not only to make teaching a competitive and appealing career choice for graduates seeking fair pay, career progression, and work-life balance, but also to retain the skilled professionals who have committed their careers to education.
28. Teacher pay has declined more sharply than in other professional occupations, with median earnings for teachers 18.2% below their 2010 level in real terms, compared to 11.2% for other professions and just 2.5% for the whole economy⁴.
29. The consequences of this loss of salary against cost-of living are already visible:
- Despite some recovery post-Covid in primary, secondary ITE recruitment targets continue to be missed – compounded by an unacceptably low pass rate of only 80%. As a result, the number of primary and secondary trained ITE teachers continues to fall (only 911 total passes in 2025 compared to 1,231 in 2021)⁵.
 - There remains a dichotomy in terms of primary and secondary with the number of entrants to primary school ITE courses in Wales was 18% higher than the allocations in 2023/24 whereas the secondary school ITE uptake was 56% lower than the allocations in 2023/24⁶.
 - There were a number of key subjects which met less than 40% of their target – for example, physics (31%), computing (37%), and D&T (39%) in 2024/25.
 - Vacancy rates remain high, with almost 9% teaching posts remaining unfilled. The situation is much worse in Welsh Medium schools who receive less than half the number of applicants than non-Welsh Medium schools⁷.
 - School leaders facing increasing levels of burnout and attrition, with many deterred from leadership roles due to workload and pay pressures. Our recent survey with our members shows a leadership workforce at breaking point in Wales.⁸

⁴ Teachers' pay eroded more sharply than other professions

⁵ ITE Student Results 2024-25

⁶ Initial teacher education: August 2022 to July 2024 (headline results)

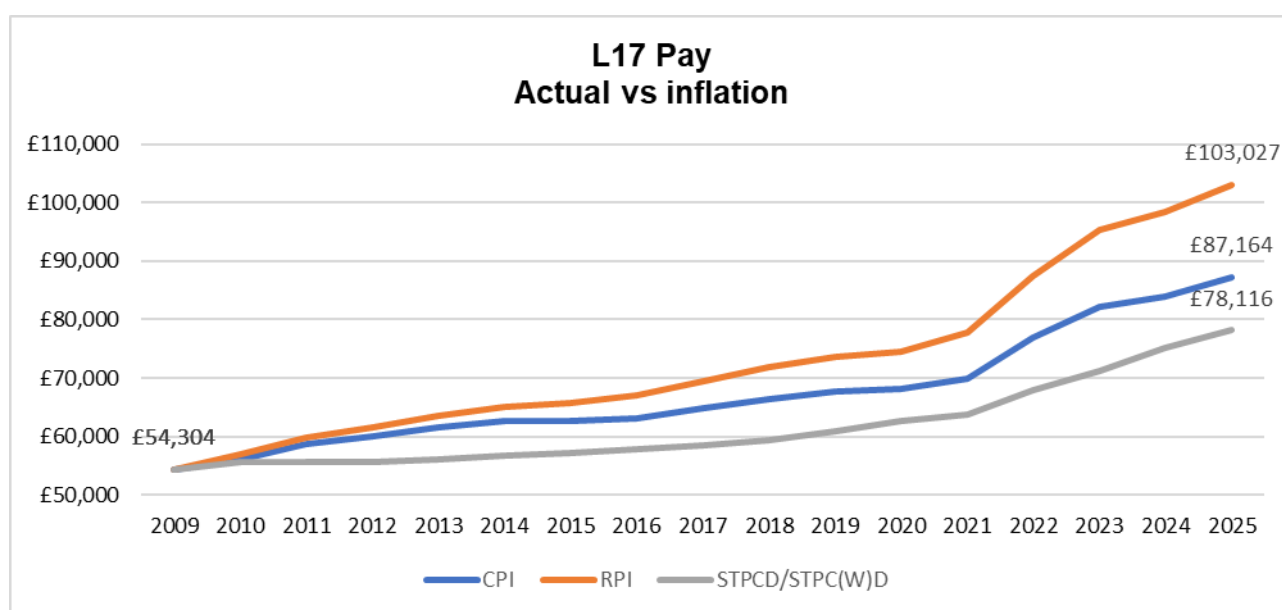
⁷ Average number of applications received per teacher post by subject and vacancy medium (2023/24)

⁸ ASCL Cymru Member Survey – June 2025

Real-terms impact on leadership pay

30. Since 2010, teachers and school leaders in Wales have experienced a sustained and substantial decline in the real-terms value of their pay. This has been largely driven by government-imposed pay freezes, sub-inflationary pay settlements, and broader austerity measures.
31. The impact of this long-term erosion has been far-reaching, contributing to significant challenges in attracting and retaining staff, and adversely affecting morale across the education workforce. This was blatantly apparent in our ASCL Cymru member survey in June 2025 (we have reported on this in the IWPRB 6th Remit Q2 submission on Leaders' Conditions of service⁷).
32. The erosion of teacher pay has been sharper than in other professional sectors. This widening pay gap has undermined the competitiveness of teaching as a graduate profession.
33. This erosion must be repaired, and we must see levels of whole career pay that are competitive and comparable with other graduate professions.
34. This will require significant (above inflation) increases over a number of years to repair the erosion of pay and bring pay up to levels which are competitive and comparable to other graduate professions.

Figure 2 – L17 Leadership pay in August 2010 indexed to RPI and CPI, contrasted with actual pay⁹



35. Figure 2 illustrates the growing disparity between actual teachers' pay and its real-terms value, a trend that began in 2010 – this is a worked example of a school leader paid on L17 of the STPC(W)D leadership pay scale.
36. This divergence was initially driven by two consecutive years of complete pay restraint. In the years that followed, pay awards have matched the Retail Price Index (RPI) only four times over a fourteen-year period.

⁹ See Annex One for calculations and sources (separate document)

37. Even in those instances, two increases were only marginally above inflation – 1% in 2015 compared to RPI at 0.96% and 2.75% compared to RPI at 2.61% in 2019.
38. These modest gains were effectively erased in 2021 with a 1.75% increase, despite RPI standing at 4.5%. The 2024 pay award marked the first substantial increase that exceeds RPI in a meaningful way.
39. However, latest figures published for September 2025¹⁰ show RPI remaining at 4.5%, meaning that the 4% increase was another below inflation pay award, thus eroding some of the gains made in 2024.
40. A similar picture emerges 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% (RPI was 4.7%). Furthermore, the pay awards only exceeded CPI in six out of fourteen subsequent years.
41. It remains ASCL's position that RPI is the most valid measure of inflation for pay, this reflects the price increases that our members experience in their living costs. Furthermore, RPI is currently used for annual uplifts to items such as several pension schemes, private sector rents and commercial contracts.
42. For school leaders' pay to have the same purchasing power as in August 2010 based on RPI, an increase of 32.1%¹¹ would be required.
43. Even using the less appropriate CPI as a comparator, a pay increase of 11.5% would be required.
44. Furthermore, this would simply restore the level of pay required, but neither of these amounts would do anything to restore the loss in real terms pay that leaders have experienced in the years since 2010.
45. To summarise, the above analysis shows the real terms damage to school leaders' pay since 2010. The table below shows the level pay award that would be necessary to right this wrong, based on RPI and CPI.

RPI	CPI
32.1%	11.5%

Pay growth and pay intentions

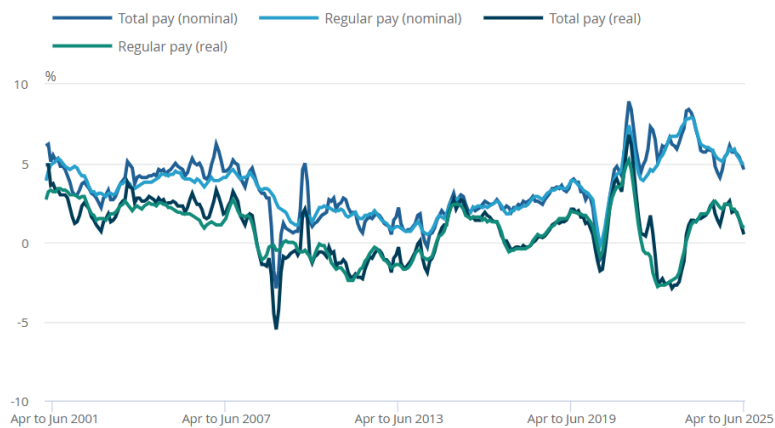
46. Although pay growth slowed in 2024 from the record growth in 2023, it still remained high at 5.4%. In 2025 it has only fallen slightly to 5%, with ONS analysis stating that annual growth rates remain relatively strong (see figure 3 below).

¹⁰ Inflation and price indices, September 2025 dataset, ONS

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

Figure 3 Nominal annual growth rates remain relatively strong

Average weekly earnings annual growth rates in Great Britain, seasonally adjusted, January to March 2001 to April to June 2025



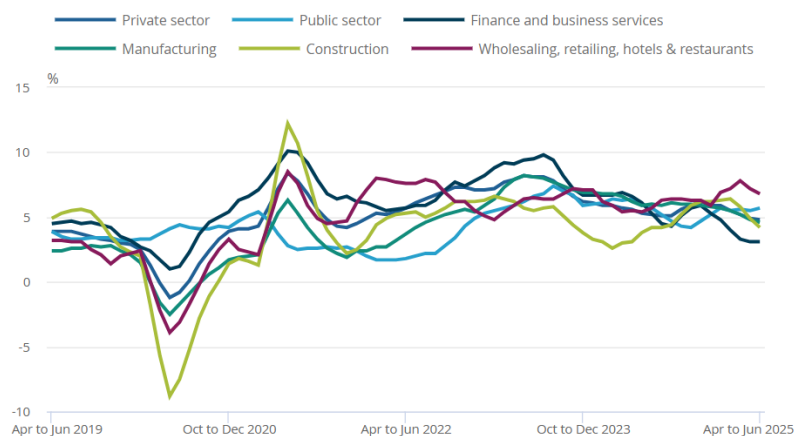
Source: Monthly Wages and Salaries Survey from the Office for National

47. ONS data also shows that the sectors showing strongest growth to June 2025, were wholesaling, retailing, hotels and restaurants at 6.8%. (See figure 4 below).

Figure 4

Figure 4 The wholesaling, retailing, hotels and restaurants sector showed the strongest annual regular growth rate at 6.8% in the latest period

Average weekly earnings annual growth rates for regular pay by sector in Great Britain, seasonally adjusted, April to June 2019 to April to June 2025



Source: Monthly Wages and Salaries Survey from the Office for National Statistics

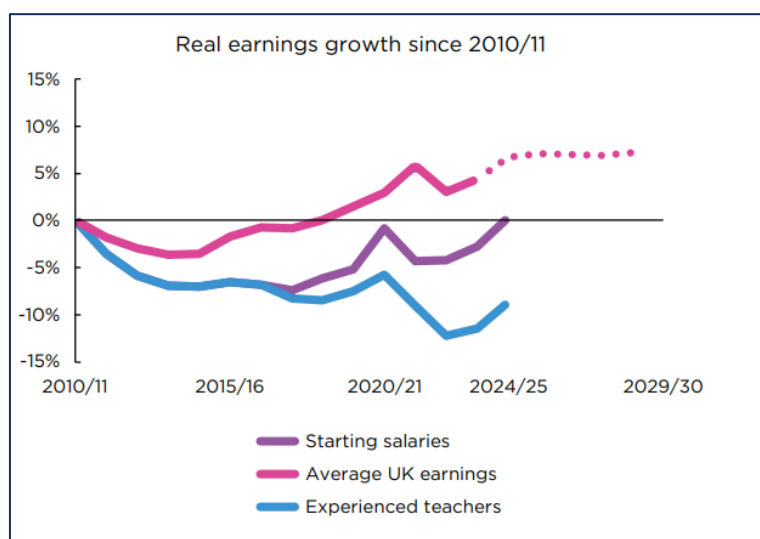
48. Incomes Data Research (IDR) report¹² that pay rises are set to remain steady in 2026, with most employers suggesting that pay will grow at much the same rate next year as it has done

¹² Pay rises set to remain steady in 2026, IDR, September 2026

in 2025. 63% of organisations that took part in the IDR survey said their 2026 pay award is likely to be the same level as this year, and just 30% forecasting a lower increase.

49. Wave three of the Working Lives of Teachers and Leaders survey (WLTl) in England¹³ showed that 58% of respondents were not satisfied with the salary they received for the work they did in 2024.
50. Although this was lower than in 2023 (when the industrial dispute was taking place), it still remains close to the level of 2022 (61%) which was when the 5% represented one of the biggest real terms cuts to teacher pay.
51. We see no evidence to suggest that the situation in Wales is any different and again highlight the lack of data collected on this in Wales.
52. The 2025 Teacher Labour Market in England report¹⁴ from NFER highlights that over the past six years, several notable pay increases have been introduced, with a particular focus on Early Career Teachers (ECTs), who are statistically more likely to leave the profession. The introduction of a £30,000 starting salary in 2023/24, followed by a 5.5% uplift in 2024/25, had restored starting pay to its 2010/11 real-terms value.
53. Although this report references the changes made in England, the IWPRB followed suit with the raising of starting salaries in Wales.
54. The recovery has not extended to experienced teachers, particularly those at the top of the upper pay scale. Despite the 2024 increase, their pay remains 9% below 2010/11 levels in real terms.
55. Moreover, while starting salaries have caught up with inflation, teacher pay across all levels continues to lag behind average earnings growth in the wider economy (see figure 5 below). Between 2010/11 and 2023/24, average UK earnings rose by 4% in real terms, with further growth projected through 2025/26.

Figure 5: Real earnings growth, Teacher Labour Market in England 2025



56. This situation will have now worsened with a below inflation award of 4% for September 2025.

¹³ Working lives of teachers and leaders: wave 3 research report

¹⁴ Teacher Labour Market in England 2025, NFER

57. So, whilst it is clear that 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.

Inflation and UK living standards

58. The impact on living standards has been severe. According to the Resolution Foundation, the UK has experienced a lost-half decade for income growth, with food insecurity in January 2025 twice as high as in 2021.

59. Since our last submission, employee contributions to the Teachers' Pensions Scheme (TPS) increased by 0.3 percentage points from April 2025.

60. This increase means that those working in school leadership roles are paying between 10.5% and 12% of their salaries, reducing the household disposable income for our members.

61. Although inflation rates have declined from the record highs of 2022, we must not overlook the fact that inflationary increases are cumulative - meaning the elevated prices from previous years are now embedded in the cost of living.

62. Lower inflation rates do not mean that prices are falling, simply that they are rising ¹⁵more slowly, but still from a much higher base.

63. The rise in inflation to 3.8% in July 2025¹⁶, the highest in 18 months, (which was maintained in August and September¹⁷) underscores that prices continue to climb.

64. The Retail Prices Index (RPI), which is used to set rail fare increases and other regulated prices, rose to 4.8% in July 2025 and remained there in August and September 2025¹⁸, suggesting continued upward pressure on everyday costs.

65. The OBR suggests that, compared to October, CPI inflation is forecast to be 0.6 percentage points higher in 2025, then marginally lower in 2026 to 2028.

66. We saw interest rates increase fourteen times between December 2021 and March 2024, when they reached 5.25% - a fifteen-year high.

67. Although there have been cuts since then, bringing the rate down to 4% in August 2025, the Bank of England made no further cut in September, and reports suggest that any further cuts are likely to be deferred until 2026. This is in contrast with reports earlier this year which suggested that rates may fall to 3.5% by Christmas.

68. Mortgage rates have started to increase, with the first month on month increase since February, with the average rate for a two year or five year fixed rate standing at around 5%, which, as reported by Moneyfacts, is *'lower than the peak in recent years, but still a stretch for many homeowners'*.

¹⁶ Surprise rise in inflation as summer travel pushes up air fares

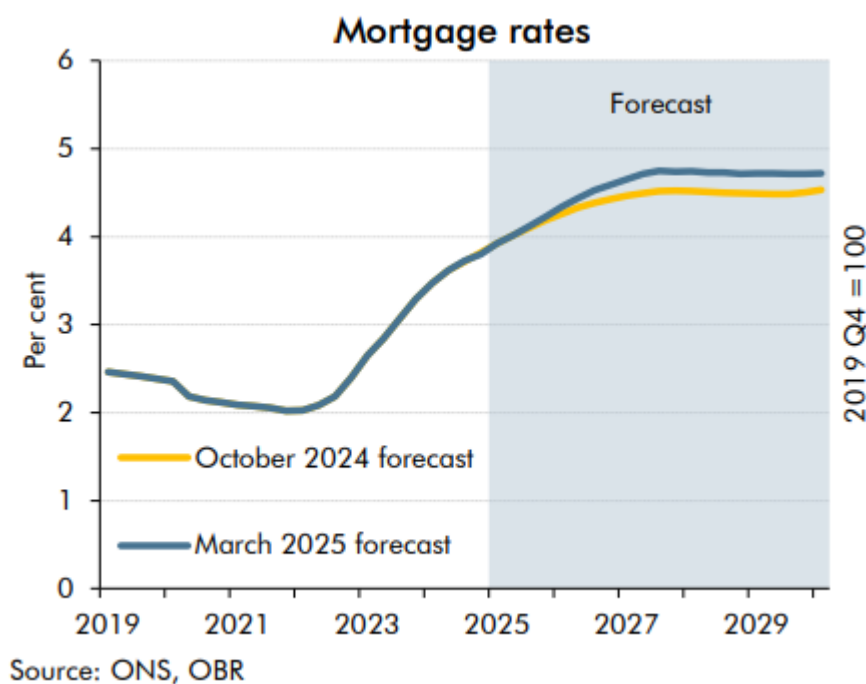
¹⁷ Inflation and price indices, September dataset, ONS

69. We previously highlighted that although some mortgagors were protected with fixed rates, Bank of England analysis suggested that around two thirds of fixed rate mortgages have been repriced since the start of these increases, and it expects the remainder to expire by the end of 2026.¹⁹

70. In its latest Economic and Fiscal Outlook report²⁰, the OBR says it *expects* interest rates on outstanding mortgages *‘to rise from around 3.7% in 2024 to a peak of 4.6% in 2028 and then remain around that level until the end of the forecast’*.

71. It goes on to say that mortgage rates are around 0.2 percentage points higher than its October forecast (Figure 6), driven by the higher interest rate expectations.

Figure 6



72. The stark reality is that, whilst inflation may have fallen prices remain high and interest rates are not set to fall until 2026 at the earliest. Food and housing costs remain high, and pension contributions have increased.

73. All this evidence shows that the cost-of-living crisis is far from over.

Recruitment and retention

Key points:

74. Teacher recruitment and retention remain a dire concern for school leaders in Wales. This affects curriculum delivery and classroom delivery. Schools are having to resort to employing record numbers of unqualified teachers and supply staff to cover gaps²¹.

²⁰ [Economic and fiscal outlook, March 2025, OBR](#)

²¹ [Wales Online, December 2024](#)

75. Erosion of pay over the last 14 years (see figure 1) along with excessive workload and poor working conditions are leading to record numbers of teachers and school leaders leaving the profession alongside an inadequate supply of new teachers and aspiring school leaders.
76. Working conditions for teachers and school leaders are at crisis point. Our recent member ASCL Cymru survey (June 2025)⁵ shows that work/life balance is unacceptable and unsustainable. This is having a detrimental effect on teacher absence and teacher retention rates across the education system.
77. More specifically, the most recent Teacher Labour Market in Wales report²² states: *‘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.’*
78. Moreover, schools in Wales are underfunded largely due to excessive ‘top-slicing’ by local authorities. For example, ASCL Cymru members tell us that Welsh Government funding for the 4% cost-of-living pay award in September along with the additional money to cover ALNCo assimilation costs has not be fully passported into their school accounts, resulting in them having to use their reserves and contingencies with the vast majority of schools in Wales are already in deficit.

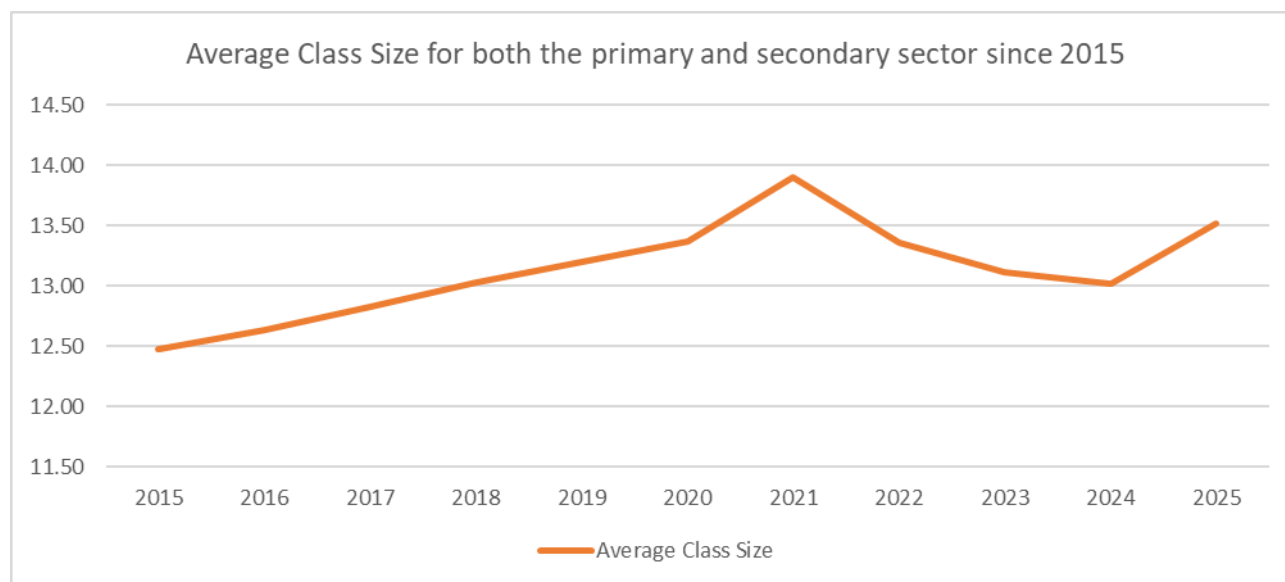
Teacher population

79. 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.
80. In November 2025, there were 35,226 registered teachers, 639 fewer teachers than in 2024.
81. Over the last decade there has been a reduction in the number of registered qualified teachers (over 2100 fewer teachers) – see Figure 7. When compared to the number of all pupils enrolled in Welsh Schools, the average class size has increased from 12.4 in 2015 to 13.50 in 2025. This gradual increase was affected by the pandemic with a spike in 2021 followed by an improvement in 2023 but the current trend analysis shows that we are returning to a level not seen before.

²² Teacher Labour Market in Wales 2022, NFER

Figure 7 - The number of registered schoolteachers in Wales since 2014 (Annual Workforce Survey 2025) compared to the number of pupils in schools.

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
No. Teachers	37,355	36,951	36,426	35,929	35,545	35,171	34,171	35,256	35,837	35,865	35,226
No. Pupils (000's)	466	467	467	468	469	470	475	471	470	467	476



Pupil Population

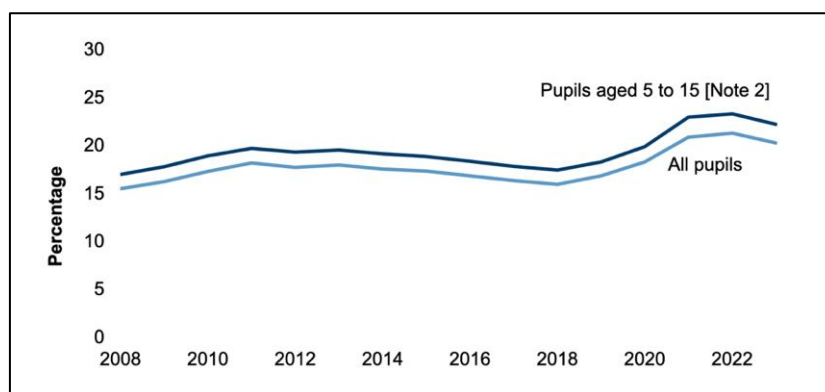
82. The School Census report (January 2025²³) indicates that pressures continue to mount in terms of average class size, levels of deprivation and particularly Additional Learning Needs:

- There were 460,091 pupils in local authority-maintained schools, down 5749 compared with January 2024.
- This is reflected in school closures - there were 1,449 local authority-maintained schools, down 11 compared with January 2024.
- Comparing this to the reduction in the number of full-time equivalent teachers, the average class size rose from 13.02 to 13.51
- Deprivation continues to affect pupil outcomes in Wales. There has been a significant spike in the percentage of FSM pupils during and after the Covid-19 pandemic (see figure 8). The FSM figure for January 2025 (28.3%) is similar to 29.3% for the previous year.
- There were 32,127 pupils with Individual Development Plans (IDP) under the new ALN system in Welsh Maintained schools, which is a significant increase, up from 21,319 in January 2024²⁴.

²³ [School Census Report January 2025](#)

²⁴ The transition to the new ALN Bill makes comparison to previous years challenging

Figure 8: Changes to the % of Free School Meal Pupils in Wales since 2008²⁵



83. In summary, pupils in maintained schools in Wales are taught in larger classes, have more significant learning needs and there is a higher percentage experiencing socio-economic deprivation.
84. Post-Covid catch-up remains a concern for many teachers, particularly with respect to FSM and ALN pupils, who suffered most during the periods of school closure.
85. The Welsh Government state that education is the national mission '*together we will achieve high standards and aspirations for all, tackling the impact of poverty on attainment and ambition. All learners, whatever their background, are supported to be healthy, engaged, enterprising and ethical citizens, ready to play a full part in life and work*'. This aim is being fundamentally undermined by a lack of resources to address the ever more complex and demanding needs of children.

Recruitment

ASCL recommends that:

- ✓ Early career salaries and whole career earning potential must be competitive with comparable graduate salaries to attract the very best graduates into the profession.
- ✓ Workload and wellbeing for all must be addressed.
- ✓ Limited flexible working opportunities in relation to other comparable professions must be compensated for in the rest of the compensation package.
- ✓ Closer alignment is needed between Welsh Government initiatives to improve recruitment to the profession and the work of the IWPRB.
- ✓ 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 all²⁶, and that and that ITE incentive payments do not become financial disincentives once teachers become subject to the STPC(W)D.

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

²⁶Our national mission: high standards and aspirations for all, WG, 2023

- a. Recruitment to ITE
- b. Early career salaries and recruitment incentives
- c. Competitiveness of whole career salaries
- d. Recruitment and vacancies beyond ITE (including Welsh-medium and school leaders)
- e. Flexible working (see flexible working section)

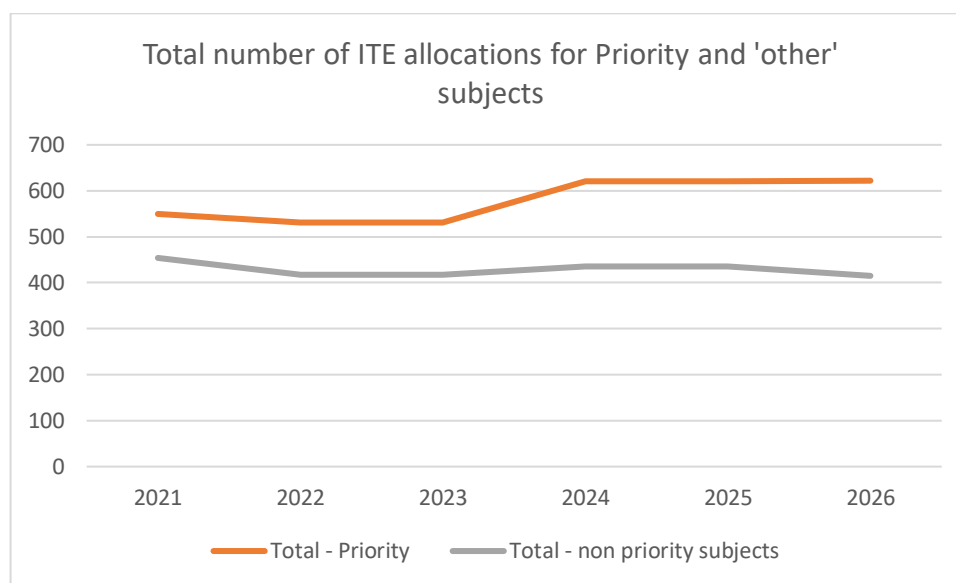
Initial teacher education (ITE)

87. Whilst the total number of ITE allocations has improved and restored to pre-pandemic levels with a particular focus on improving priority subject allocations, it is disappointing to see that allocations for non-priority has fallen (see figure 10)²⁷.

Figure 9

Year	2021	2022	2023	2024	2025	2026
Total ITE allocations	1003	948	948	1056	1056	1037

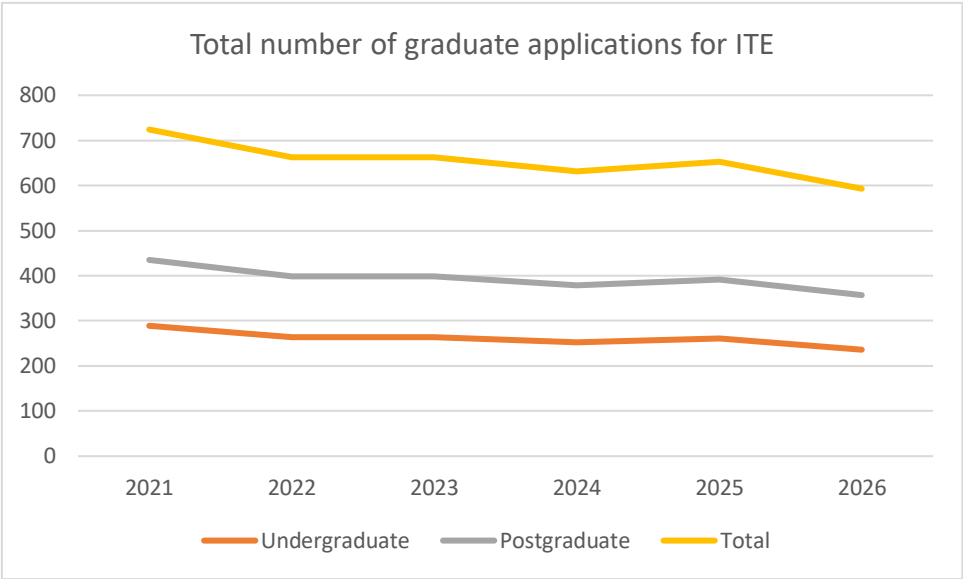
Figure 10



88. Furthermore, the 4 higher education ITE partnerships show a decreasing number of undergraduate and post-graduate applications (see figure 11) meaning that there will be an increasing reliance on older applicants who are choosing teaching as a second career. Typically, the most popular age is still 21-24 (post-graduate intake) but there is an increasing percentage of applicants aged 25-39 (29.3%) and more should be done to market and advertise the professional to all ages. The lack of focus on flexible working in Wales also means that older teachers are not being offered contracts which allow them to reduce their teaching load whilst taking their pension. This creates an unnecessarily high attrition rate with the 55+ age group.

²⁷ EWASCLC Initial Teacher Education Allocations

Figure 11



89. Our members tell us that ITE allocations in secondary education, over the last 5 years, are not responsive enough to market forces. Figure 12, for example, shows that since 2021, only an extra 11 places available for Chemistry ITE yet this remains the most challenging subject for schools to staff, with many secondary schools having to use non-specialists to teach this priority subject.

Figure 12

Priority allocations	2021	2022	2023	2024	2025	2026
Mathematics	116	116	116	136	136	136
Biology	62	62	62	73	73	73
Chemistry	62	62	62	73	73	73
Physics	63	63	63	72	72	72
MFL	59	59	59	69	69	70
Welsh	74	74	74	87	87	87
Information	50	50	50	58	58	58
Design & tech	63	45	45	53	53	53
Total - Priority	549	531	531	621	621	622

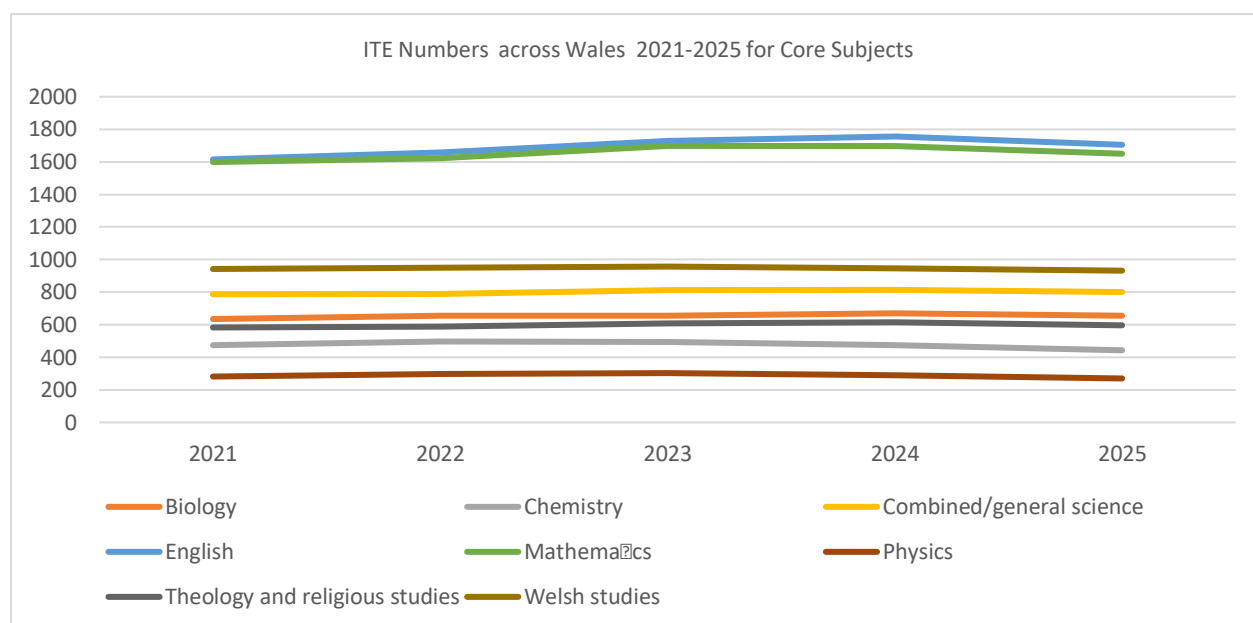
90. EWC Data shows that there is a significant difference between teacher recruitment in Primary and Secondary education. In the 2023/24 academic year, Wales exceeded its primary school Initial Teacher Education (ITE) target by 18% yet it was 56% lower than target for Secondary.

91. This problem is worse in some subjects. There were a number of key subjects which met less than 40% of their target – for example, physics (31%), computing (37%), and design & technology (39%) in 2024/25.

92. ITE recruitment and enrolment lacks responsiveness to demand and market forces. For example, the number of ITE students in core subjects has plateaued since schools returned after the pandemic²⁸, yet schools tell us that the worsening situation with teacher retention is leading to a record number of teacher vacancies.

²⁸ Annual Education Workforce Statistics 2025

Figure 13



93. The situation in Welsh-medium schools is even more chronic. In some subjects (Biology, Chemistry, IT, Business and Music, there was not a single Welsh-speaking ITE student. Welsh-speaking schools represent 22.5% of institutions yet only 16.3% of ITE teachers are Welsh speakers

94. 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)²⁹ showed a number of distinct differences and divergent policies adversely affecting ITE more so in Wales:

- Spend on financial bursaries to attract prospective teachers in Wales has reduced over the last three years.
- Cross-border flows from Wales to England have been increasing over time.
- 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.
- As a result, Welsh schools struggle to recruit teachers in high priority subjects.

95. The most recent government publication on ITE Priority Subjects for 2025-26, however, is allocating £15,000 grant to study certain shortage subjects such as Biology, Chemistry, Design & Technology, Information Technology, Mathematics, MFL, Physics and Welsh. There is a further £5,000 for BAME applicants help diversify the workforce. Whilst we support these incentives, this will need to be tracked in future remits

96. Over 75% of teachers in Wales are female – this pattern is set to repeat with current PGCE ratios in Higher Education (HE) mirroring this duplicating pattern.³⁰ In terms of recruiting potential teachers, therefore, more should be done to support a predominantly female workforce, including a more progressive flexible working policy across Wales (see separate section on flexible working. Research is also needed into how to make the profession more appealing to male undergraduates.

97. In summary, whilst there has been an increase in capacity to deliver ITE in Wales and a recent improvement in applications and enrolments, particularly in the primary sector, there are significant

²⁹ A comparison of teacher training incentives in Wales and England, Bryer and Sibieta, May 2019

³⁰ Higher Education Statistics: Wales

concerns in terms of secondary ITE recruitment, particularly in the priority subject areas and most specifically, Welsh-speaking trainee teachers.

Early career salary concerns

98. Early career salaries are clearly not competitive with comparable graduate professions. There are variety of forecasts around average graduate salaries in the UK, and teachers' starting salaries do not compare favourably with any of them.

99. The Institute of Student Employers (ISE) 2025 Student Recruitment Survey³¹ reports an average starting salary for a graduate of £32,000. It also states that during the first three years after being hired, graduates increase their salaries by 37%.

100. High Fliers³² report that, in addition to year on year increases in median graduate starting salaries over the last three years, (from £32,000 in 2022 to £34,000 in 2024), 2025 sees a further increase to £35,000.

101. The continued poor recruitment to ITE in secondary clearly demonstrates that the £30,000 starting salary has not achieved what the previous Westminster government, or the Welsh Government, intended.

102. Much more needs to be done, and 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 previous Westminster government's insistence on ignoring the importance of pay across the board is one of the reasons why we have not seen the required uptick in recruitment.

103. These issues also exist in Wales due to the pay setting arrangements pre-devolution and some of the changes made since then which have also focussed on early career salaries.

104. Salaries across the board must be comparable and competitive with other graduate professions, so that not only are good quality graduates attracted into the profession, but those already in the system are incentivised to stay. Furthermore, we must create a sustainable pipeline into leadership roles.

Recruitment and vacancies beyond Initial Teacher Education

105. 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 continues to be that, in Wales, there has been a level a lack of strategic 'joined-up' thinking, recruitment targets have been continually missed and this results in an inability for schools to effectively staff their curriculum.

106. Vacancy rates in schools are still high – for example, in 2022 as the effects of the Pandemic ebbed away, some 1503 adverts were placed for teaching positions in Wales. By 2024, this figure had risen to 2448 and although this figure reduced to 2172, it is still 45% higher than in 2022³³.

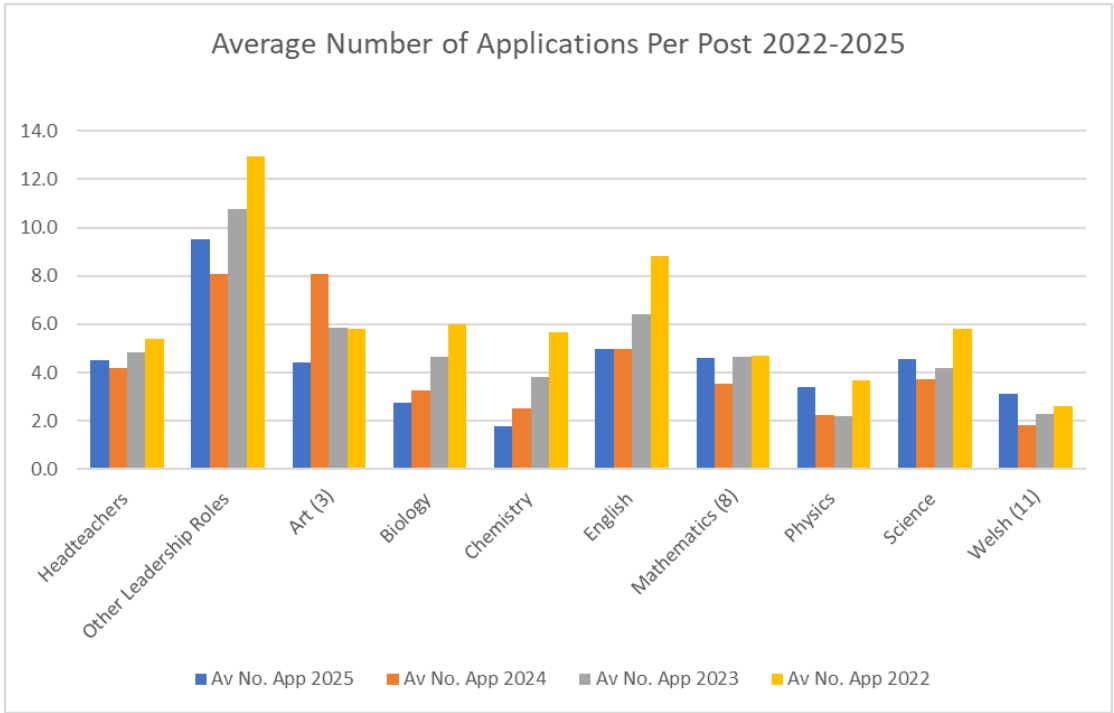
107. The number of applications per post for key positions in secondary schools shows a worrying decline (see figure 14)³³. This results in weaker fields and a higher chance of schools being unable to appoint a suitably qualified applicant.

³¹ [ISE Student Recruitment Survey 2025](#)

³² [The Graduate Market in 2025, High Fliers](#)

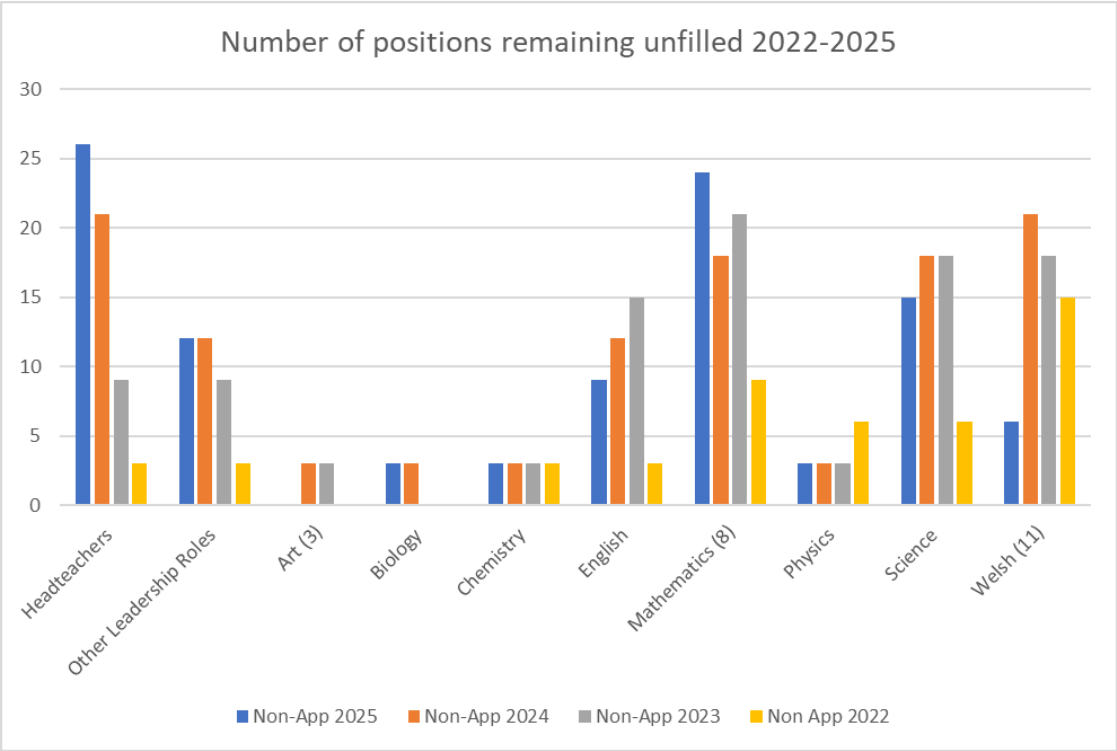
³³ [Stats Wales Data on teacher vacancies](#)

Figure 14



108. As a result, the number of positions unable to be staffed was at a record high in Wales in 2024 with 306 unfilled posts. This reduced in 2025 to 246 but is still over double what it was in 2022 (120). This has unintended consequences for school budgets and the quality of teaching as schools have to pay for expensive short-term supply cover. This issue is particularly concerning with headteacher vacancies (see figure 15) with a record 26 schools unable to appoint last year and having to run with temporary or makeshift leadership structures.

Figure 15



109. There are further leadership complexities as outlined in the article by the Education Policy Institute³⁴ – their research reinforces the issues around decreasing suitability and quality of applications as well as acute problems in more rural and deprived areas in Wales.
110. 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.³⁵ 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 16) – this will be the next cohort of retirees.
111. With 22.5% of schools operating as Welsh-medium secondary schools, the situation here is much worse and continues to deteriorate, with 20% of posts remaining unfilled and just 1.8 applications per post, down from 5.4 per post pre-pandemic in December 2019⁴⁷.
112. At a granular level in Welsh-medium schools, there is particular concern in maths and the sciences. For example, in 2024, there were 15 vacancies advertised for Maths in Welsh-medium Schools, with only 19 applicants and only 10 appointments made.
113. Beyond ITE, there is urgent need for improvements for entrants into the profession in their early years. In particular, the completion of newly qualified teacher (NQT) induction in only one year often leads to new teachers struggling in year two as they lose mentoring support and the additional 10% reduced timetable reduction. Attrition rates across the UK are unacceptable with over 40% leaving the profession within 5 years of qualifying.
114. 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. This is further compounded in Welsh-medium schools which are generally less popular for applicants.

School leader recruitment

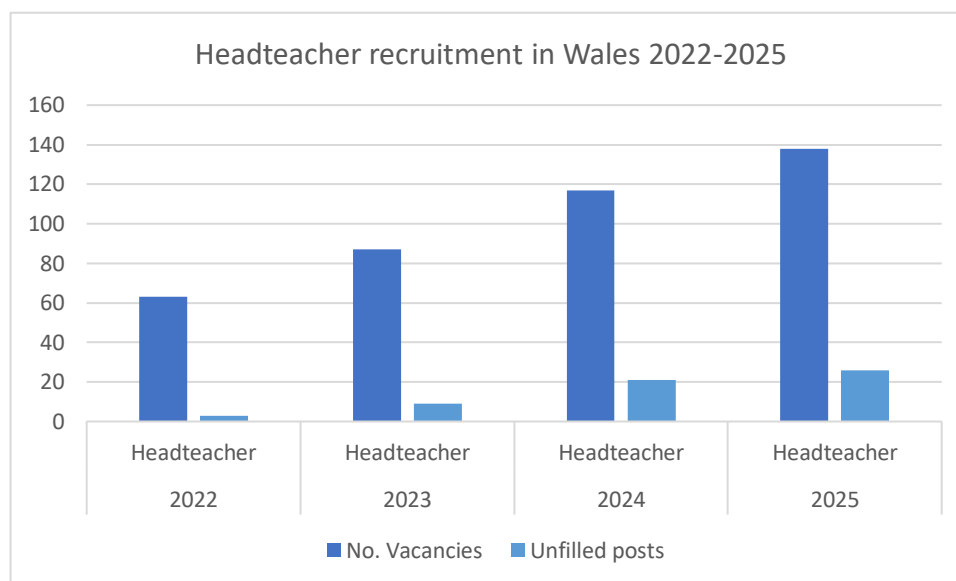
115. There is a wealth of academic and educational research which demonstrates that quality of leadership comes second only to high quality classroom teaching in terms of impact on pupil outcomes³⁶. Wales does not compare well with the other twelve regions of the UK coming below average for both GCSE and Post 16 outcomes, with declining standards particularly for disadvantaged pupils³⁶
116. It has already been demonstrated that the number of applications for the role of secondary headteacher is low and declining averaging only 4 applicants per post in the last two years (see figure 14) –with record numbers of unfilled positions with the quality of fields weakening leading to record numbers of unfilled positions.
117. Figure 16 illustrates the growing concern with headship appointments post-Pandemic. The number of headteacher vacancies has effectively doubled and the number of unfilled positions jumped from 3 in 2022 to 26 in 2025. This demonstrates that the job is now far less sustainable now, with leader wellbeing and workload now at the top of our members’ concerns (see ASCL Survey June 2025 below).

³⁴ [Education Policy Institute – How hard is it to recruit school leaders in Wales](#)

³⁵ [Number of teachers in England and Wales retiring early jumps by 40%, Financial Times](#)

³⁶ [Pupils in Wales perform only as well as disadvantaged children in England – IFS \(2024\)](#)

Figure 16: The number of applications per leadership post since 2022⁵⁰



118. ASCL Cymru members also tell us that 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.
119. Our members also report that there are particular concerns recruiting headteachers 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 media³⁷. These issues are affecting leadership retention rates which are further discussed below.

Teacher and School Leader Retention

ASCL recommends that:

- ✓ Improving retention at all levels should be a key focus for the Welsh Government. This will in turn reduce the pressure on teacher recruitment bringing with it staffing stability in schools along with other savings in recruitment, training, onboarding and mentoring costs. The Welsh Government therefore needs to consider the attractiveness of the teaching profession alongside competition from other sectors beyond education.
- ✓ Excessive workload, long working weeks and low self-esteem are the norm in many Welsh Schools. These issues must be addressed in order to reduce teacher and school leader attrition. The commitment of the Cabinet Secretary in October 2024 to the establishment of the Strategic Workload Coordination Group³⁸ has yet to offer any meaningful discourse and recommendations. We urge that the work from the developing Strategic Education Workforce Plan has a greater focus on outcomes that will have a noticeable impact upon the workload and wellbeing of the profession.
- ✓ A holistic approach to bursaries and other incentive payments made by the government must be taken so that they support the pay framework as set out in the STPC(W)D.

³⁷ ITV Headline – South Wales Headteacher says ‘harrowing pressure of the job forced him off work’.

³⁸ Written Statement: Reducing workload and bureaucracy for education staff

- ✓ Tailored student loan repayment arrangements for all teachers and leaders should be introduced³⁹. This could 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 (see Business Leader section below).
- ✓ The IWPRB's Strategic Review (December 2023) and its 26 recommendations have not been adhered to by the Welsh Government and there is a pervading sense of disjointed incremental initiatives. The Welsh Government must continue to work with trade unions and key stakeholders on the development of a revised strategic education workforce plan⁴⁰ to raise the profile of the workforce, and that this plan indicates clear, manageable and timed tangible outcomes.
- ✓ Schools are provided with the training and resource needed to enable them to fully embrace flexible working.

120. 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. Workload and wellbeing
- d. Flexible working legislation

Classroom teacher retention

121. Teacher and school leader retention⁴¹ 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 17).

Figure 17: The percentage of teachers who leave the profession in their first 5 years

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

122. In the most recent Education Workforce Survey (2025)⁴² the data shows that 42.5% of teachers have left the profession in the last 10 years with 24% having left in the last 5 years. The report also shows that only 76% of teachers registered in 2019 were still working as teachers 5 years later.
123. That is, almost a quarter of the 35,545 teachers in 2019 are no longer teachers today. Whilst some of this 'churn' can be attributed to retirement and ill-health, this only equated to 11% in 2024 and, therefore, a record 14% left for 'other reasons.'
124. High teacher attrition rates completely undermine attempts to recruit new teachers into the profession. Attrition rates are highest amongst young teachers and those in their first five years of teaching with the dropout rate standing at over 40% in the context of the UK.

³⁹ [ASCL Manifesto for the 2024 General Election](#)

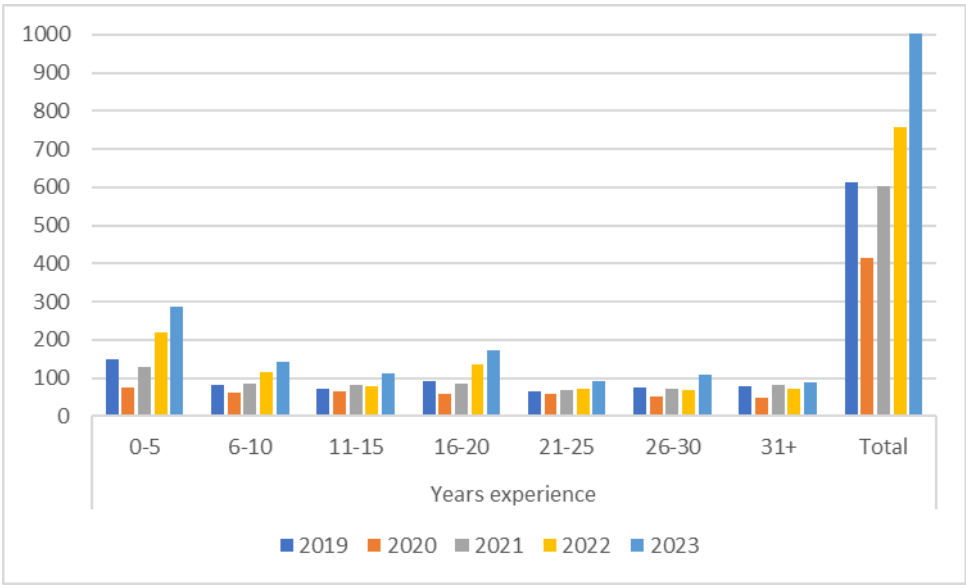
⁴⁰ [Statista Report July 2024](#)

⁴¹ [Stats Wales 2023-2024](#)

⁴² [EWC Annual Workforce Statistics for Wales 2025](#)

125. The StatsWales data on teacher attrition (see figure 18) shows a significant rise (33%) in the total teachers leaving the profession during the year ending December 2023 from the previous year's and demonstrates an upward trend over the five-year period shown. As stated, the rate of attrition for those in their early years (0-5) is most pronounced and has the steepest trajectory and future impact on the profession.

Figure 18: Teacher attrition rates since 2019 showing length of service against cumulative number⁴³



126. Teachers at the beginning of their teaching career, therefore, are more likely to leave teaching (Hutchinson et. al (2024)⁴³ with less experienced teachers having higher leaving rates than their more experienced counterparts. This report also highlights the issue of regional disparity, with rural and more deprived Welsh communities seeing the highest levels of attrition combined with the lowest number of applications per post.

127. Commenting in a recent TES article,⁴⁴ further to this concern, Emma Hollis, chief executive of the National Association of School Based Teacher Trainers said...*‘many early career teachers experience a “dissonance” between what they expect when they apply for initial teacher training and “the reality when they enter the classroom. Primary school teachers often go into teaching with a motivation to develop young people holistically, and secondary school teachers are generally excited by the opportunity to deliver the subject they are passionate about. Yet they end up number crunching and dealing with a host of other issues.’* This conclusion sums up the difficulty of teaching in its early stages – learning the craft of the classroom as well as dealing with unnecessary bureaucracy leads to long working weeks, poor wellbeing and its effects on mental and physical health.

128. The most recent UK-wide Teacher Wellbeing Index report (2025)⁴⁵ records wellbeing at the lowest level since the report was first commissioned in 2019. The headline statistics make grim reading:

- 76% of teachers feel stressed
- 77% experience poor mental health due to work
- 36% are at risk of probable clinical depression.

129. Wales did not compare well in this survey with 75% of respondents feeling stressed (down by 6% on 2024) and 45% feeling that their school and employer (the local authority) made a negative impact on their working lives. By contrast, 57% of teachers and leaders in Wales felt that their place of work supported them in terms of their mental health compared to 53% in England and 38% in Scotland.

⁴³ Hutchinson, J. et al. (2024) Incentives to recruit and retain teachers in Wales

⁴⁴ New data reveals the scale of the teacher retention crisis | Tes

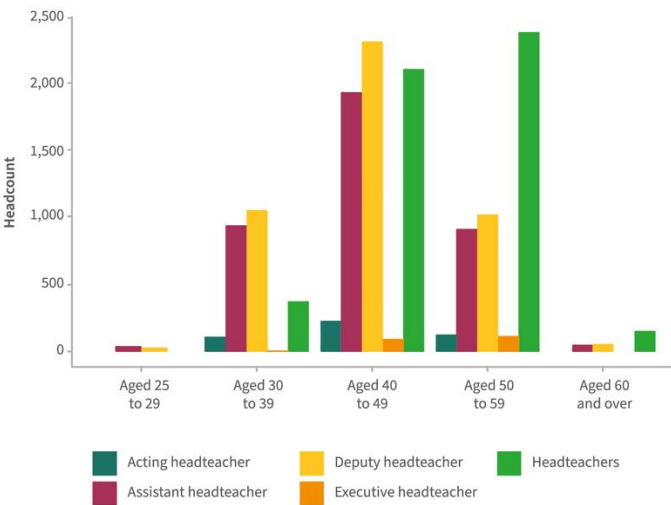
⁴⁵ Teacher Wellbeing Index (2025)

130. In summary, with record attrition rates in Wales alongside poor working conditions and low self-esteem, the teaching profession is haemorrhaging. Attrition rates in rural and 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.
131. Leaders and teachers in Wales do support each other collegially despite the multitudes of problems besetting their schools, demonstrating courage in the face of adversity. It is, however, both worrying and disappointing that they should have to operate like this when they could achieve so much more with the right level of funding and attention to workload.

School leader retention

132. The recruitment and retention of school leaders is at crisis point in Wales. School leaders are at the fulcrum of school improvement and raising standards for pupils in Wales and yet there are record numbers of unfilled positions as well as record numbers of resignations. As Claire Armitstead, Director of ASCL Cymru states *"In Wales our ability to recruit and hold onto school leaders is a real concern of our members, how they can continue to provide the best provision for our children when there simply aren't enough teachers and leaders to deliver it."*
133. This perspective supports the view of Aleynikova et.al⁴⁶ who state that *"The role of a school leader is fundamental to shaping the educational environment and influencing the overall success of a school. Effective school leaders inspire and motivate both teachers and students, creating a vision for the school and fostering a positive and inclusive school culture. However, maintaining the supply of school leaders in Wales and across the UK is challenging, a situation that has been exacerbated by the COVID-19 pandemic."*
134. ASCL Cymru fully supports this position and in previous evidence submissions we have highlighted our concerns over the retention of school leaders in Wales. There have been a number of recent pieces of research which highlight levels of stress and burnout amongst senior leaders in Welsh schools leading to a significant reduction in length of service (Marchant et. al 2024⁴⁸).
135. Aleynikova et al. also highlight the issue of a broken leadership pipeline in Wales. There are now record numbers of senior leaders aged 50-59 which will, in turn, lead to record numbers of retirements over the next 5-10 years. In particular, headteachers are closer to retirement than other school leaders (see figure 19).

Figure 19: Age profile of different categories of school leaders in Wales⁵⁴



⁴⁶ Aleynikova et al. (2024) Recruitment and Retention of School Leaders in Wales

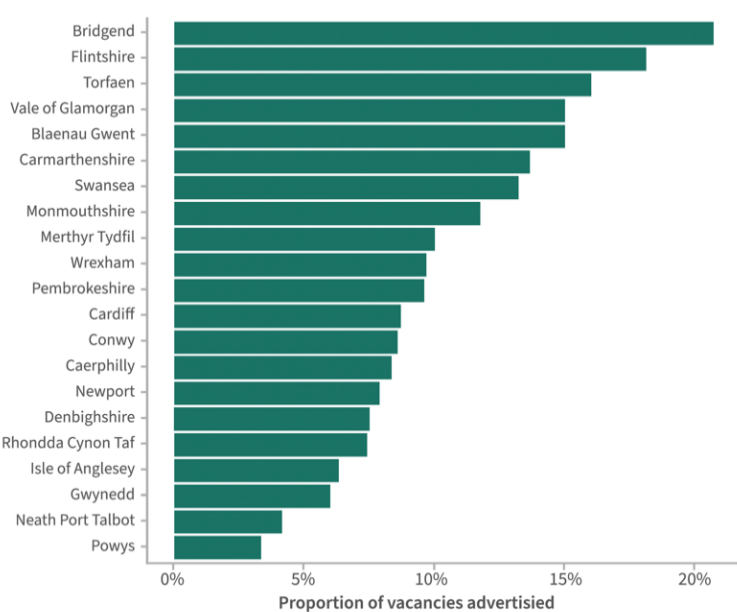
136. A sign of a broken leadership pipeline can be seen in the empirical data from headteacher and other senior leadership vacancies (see figure 20).⁴⁷ The most significant change since schools returned post-Covid has been the increase in the number of headteacher vacancies leading to only 4.5 applications per post and a record 26 non-appointments. That is, 26 schools who are currently operating with temporary or acting headteachers in place.

Figure 20: Headteacher and Senior Leadership Vacancies 2022-2025

2025	Vacancies	Applications	Appointments	Av No. Applications	Non-App 2025
Headteachers	138	624	111	4.5	26
Other Leadership Roles	162	1542	150	9.5	12
2024	Vacancies	Applications	Appointments	Av No. Applications	Non-App 2024
Headteachers	117	492	96	4.2	21
Other Leadership Roles	153	1233	141	8.1	12
2023	Vacancies	Applications	Appointments	Av No. Applications	Non-App 2023
Headteachers	87	420	78	4.8	9
Other Leadership Roles	150	1617	141	10.8	9
2022	Vacancies	Applications	Appointments	Av No. Applications	Non-App 2022
Headteachers	63	339	60	5.4	3
Other Leadership Roles	72	933	69	13.0	3

137. Furthermore, leadership retention rates vary considerably across Wales. There are also fewer applicants for headship and a shorter tenure, particularly in rural and deprived areas. Figure 21 illustrates this point by looking at the variation in the proportion of leadership vacancies advertised with deprived communities such as Bridgend and Flintshire alongside rural areas of Torfaen and the Vale of Glamorgan.

Figure 21: Percentage vacancies for leadership positions advertised per Local Authority⁵⁴



⁴⁷ Stats Wales July 2025

138. Retaining school leaders in Welsh-medium schools is particularly challenging (as it is for recruitment with the noticeably fewer applications per vacancy⁵⁴), contributing significantly to the high percentage of posts remaining unfilled.
139. The inability to recruit and retain school leaders in Wales is placing an unacceptable burden upon those in post. This is being exacerbated by current budget constraints resulting in senior leader redundancies, smaller leadership teams and higher workload for those left in post.
140. Excessive workload and poor wellbeing are major contributory factors behind school leader attrition, limiting a school's capacity to not only operate but also strategically raise outcomes for pupils in Wales – which urgently need to be improved in relation to pupils in other parts of the UK.
141. With regards to school leaders' conditions of service, in our submission to the IWPRB for the 6th Remit Question 2, we highlighted the concerns raised in our ASCL Cymru member survey (June 2025)⁴⁸.
142. Some 61% said that their workload was unmanageable and this particular issue was ranked as the most significant reason for considering leaving the profession. Also, 74% said their work/life balance was unacceptable and 87% felt they had to work beyond acceptable hours. For further details, please refer to our already submitted response.
143. We were grateful to the Cabinet Secretary for writing to employers in July to remind them that Senior Leaders are entitled to periods of uninterrupted weekends and school holidays (this was an action from the IWPRB 5th Remit). This now needs to happen as we are aware from some of our members that this message has not been passed on by their local authority. We would also like to see this measure stated in the STPC(W)D, so it is enshrined in this important legal document for future years.
144. Another lens on school leader workload and wellbeing is an analysis of data from our Member Hotline. This service is provided to all 1000 of our ASCL members if they need 1:1 support. There has been a significant increase in the number of ASCL Hotline cases in Wales (163 cases Sept 24 – June 25 v 114 Sept 23-June 24). When these are categorised, there is a clear pattern with working conditions and associated issues outweighing concerns around pay.
- 20% relating to working conditions
 - 21% grievances against the employer
 - 12% in relation to restructuring and additional workload
 - 10% in relation to ill-health
 - 10% in relation to pensions
 - 7% due to allegations by parents or students
 - 4% in relation to pay
145. These findings are in addition to the very troubling 2025 TWIX survey outlined above where 86% of senior leaders stated that they felt stressed, with many reporting signs of burnout and exhaustion. Also, 81% feel they have too many things to do without enough time to do them in their job
146. In the face of these highly concerning facts and the reality of leaderless and under-resourced schools in Wales, ASCL Cymru calls for the recruitment and retention of school leaders to be prioritised by the Welsh Government with clear action to reduce unnecessary workload and a review of working hours for all teachers and school leaders.

⁴⁸ ASCL Cymru member survey (June 2025)

School Business leaders

147. It remains our view that business leaders are a crucial and integral part of school leadership, with high levels of strategic responsibility and accountability. This is affirmed in our position statement on business leader pay and conditions in Wales⁴⁹, which says:
- Fully funded, highly trained business leaders should be appointed in each cluster of schools across all local authorities.
 - Business leaders should be members of the senior leadership team.
 - ASCL Cymru believes that the status of this should be reflected in their remuneration and be in line with the leadership pay scale.
 - ASCL Cymru believes business leaders must be brought into the scope of the STPCWD alongside their leadership colleagues.
 - Extend the ISBL pilot project to offer a sustained Wales-specific suite of qualifications for school business leaders.
 - A national benchmarking tool, using integrated curriculum and financial planning (ICFP) techniques which will help schools to use resources as effectively and efficiently as possible, should be created.
148. We believe that business leaders, who undertake whole-school responsibilities, should be paid to ensure parity to other leadership colleagues holding the same level of responsibility.
149. Where this isn't the case, we ask employers to review the remuneration of their business leader to ensure that it truly reflects the seniority of their role and that they are paid in parity with, and receive the same recognition as, senior leadership colleagues who hold the same level of responsibility. Where possible, they should be paid on the leadership pay range.
150. As we have previously highlighted, there is no national pay framework that specifically recognises business leadership roles, and as pay for these roles is locally determined, there is a disparity in the level of pay and recognition in these roles.
151. 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.
152. 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.
153. Local authorities each operate their own job evaluation and grading frameworks, typically aligned with the National Joint Council (NJC) pay scales. However, these frameworks vary significantly between authorities, resulting in a fragmented landscape.
154. Consequently, some schools are unable to access higher pay scales that accurately reflect the responsibilities of certain roles, while others are able to do so - creating inconsistency and inequity across the system.
155. The NJC pay awards for three out of the last four years have seen those working in business leadership roles receive the lowest pay award in the sector; lower than support staff colleagues and lower than teachers and leadership colleagues employed under the STPC(W)D. (Figure 23)

⁴⁹ [ASCL Cymru Position Statements](#)

156. The chart below (figure 22) shows the last four year’s annual pay awards for NJC scale points (SCP) 2 (minimum), 22 (mid-point) and 43 (maximum of published points), alongside the annual uplifts in the STPC(W)D (the 2022 STPC(W)D award also included a 1.5% non-consolidated award).
157. Business leaders are likely to paid towards, or above, the top of the NJC pay scale, for those being paid above SCP43, the situation will be even worse due to the 2022 award having no minimum floor. As result, the gap between the pay of business leaders and other senior leadership colleagues has widened even further. This continues to have a significant impact on our business leader members.

Figure 22: Annual pay awards 2022-2025

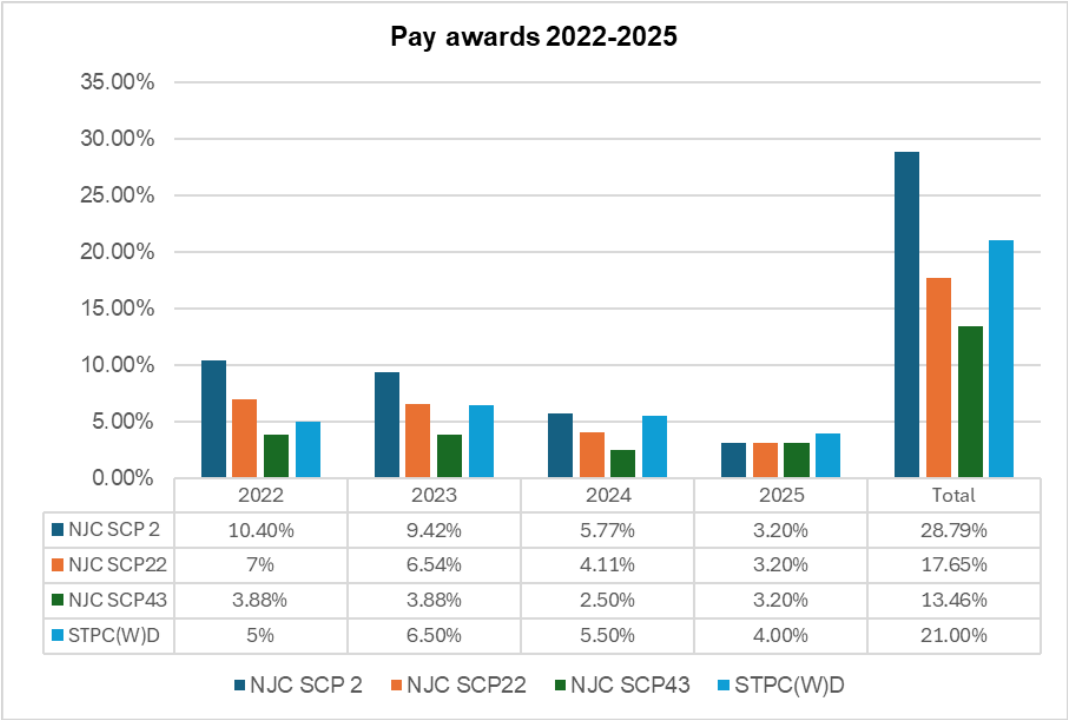
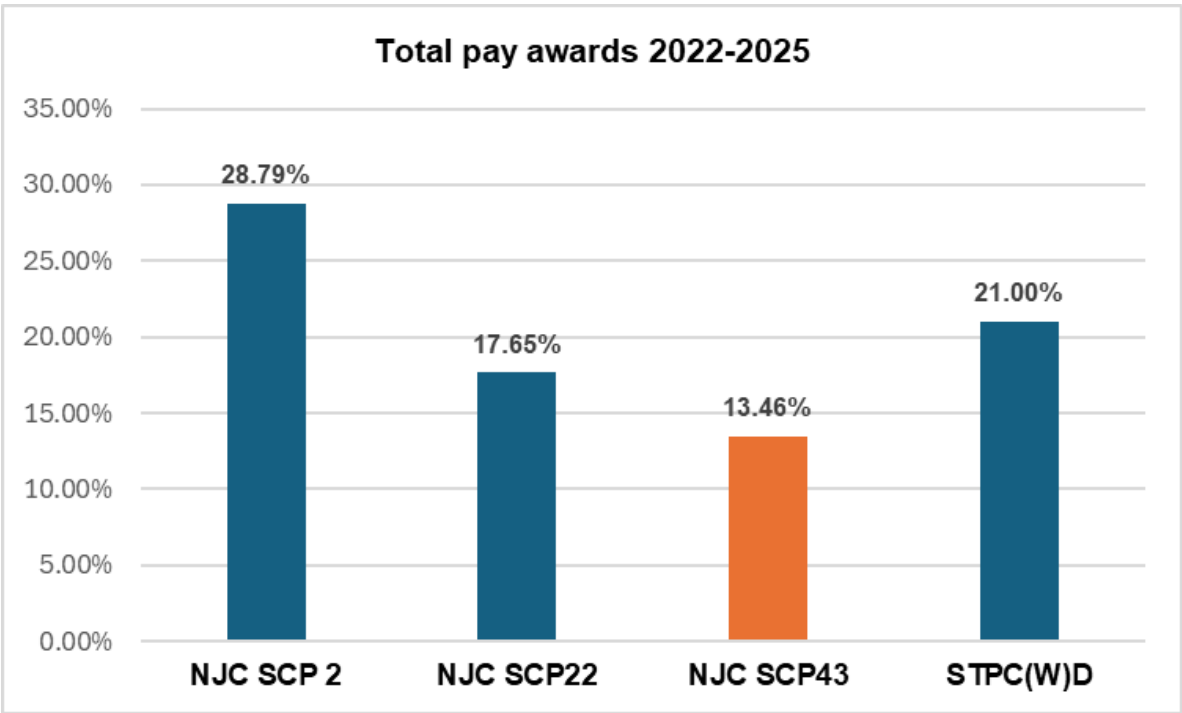


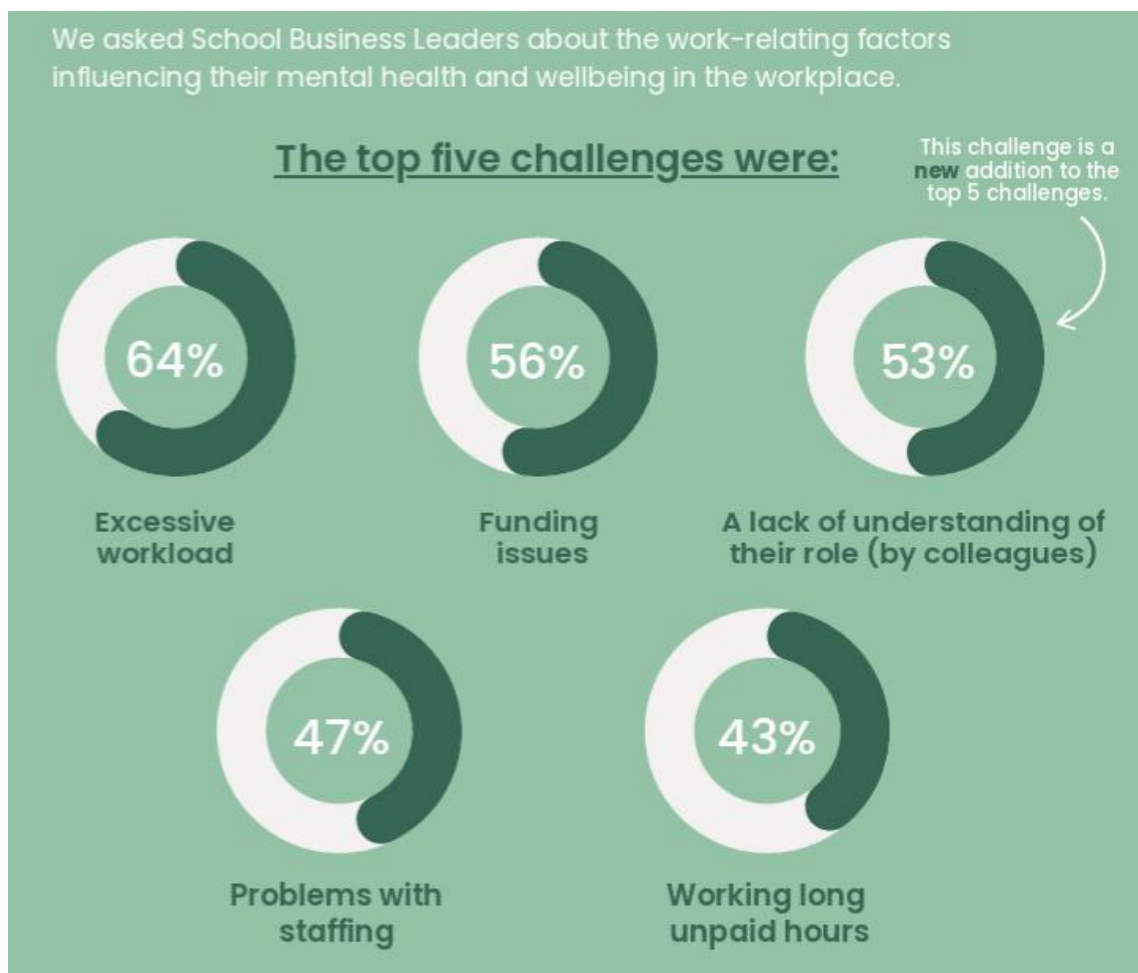
Figure 23: Total pay awards 2022-2025



158. In our business leader pay survey in June 2025, although it was pleasing to see that 88% of respondents were members of the senior leadership team (SLT), 74% of them were paid below their leadership colleagues. This has increased from 70% in our 2023 survey and demonstrates the impact of the pay award inequities detailed above. Furthermore, 48% of respondents reported that they were paid 'well below' their SLT colleagues.
159. Issues for business leaders personally were as follows:
- Pay inequity with SLT colleagues: 75% (38% significantly so)
 - Disparity in annual pay awards: 69% (43% significantly so)
 - Lack of status/recognition: 51% (25% significantly so)
160. The NJC arrangements have not served these roles well, as demonstrated by the severe issues experienced by business leaders, and the flat-rate NJC pay awards in recent years.
161. We believe the solution to this is to broaden the scope of the STPC(W)D and the remit of the IWPRB to include those working in business leadership roles.
162. Bringing the role into the STPC(W)D alongside other senior leadership roles such as assistant headteacher and deputy headteacher, would address the three issues listed above.
163. Business leader pay would be set in the same way as SLT colleagues, this would give full recognition to their whole school responsibilities and increase their perceived status as they would be brought into the leadership section, and it would end the disparity and inequity in annual pay awards.
164. These roles have not been served well by the NJC arrangements, as demonstrated by our survey results and by the flat rate pay awards in recent years.
165. We would rather see one review body for all education staff, and a school workforce pay and conditions document. However, while two systems are in place, it is our firm view that business leaders should be brought into the STPC(W)D alongside their leadership colleagues to receive the remuneration and recognition that these crucial senior strategic roles deserve.
166. If action is not taken soon, we will undoubtedly see an exodus from the profession. This will not only mean that we will lose the extensive knowledge, skills and expertise held by business leaders, but it will also in turn drive up the workload of headteachers and other school leaders trying to fill the gaps, presenting real risks in terms of compliance and financial and operational accountability.
167. Additionally, 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
168. School business leaders are included in the senior leader categories in the TWIX report and also in a separate 'School Business Leader Wellbeing Index'⁵⁰ report by Education Mutual.
169. The chart below (figure 24) taken from the 2025 report for maintained schools in England and Wales, shows the top five challenges affecting mental health and wellbeing at work.

⁵⁰ [School Business Leader Wellbeing Index 2025, Education Mutual](#)

Figure 24 SBL Wellbeing Index 2025



170. The report also listed new challenges which were raised in 2025, these included that 34% of respondents report that their mental health and wellbeing had been impacted by inequitable pay (43% in secondary), 31% by financial reporting/accountability and 27% by government legislation/compliance.
171. These results align with those reported to us by our members and make clear the magnitude of these issues and the need for urgent action.
172. We urge 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.

Flexible working

173. With the increasing challenges posed to the education workforce, flexible working practices can provide a solution to the increasing pressures on teacher retention in addition to promoting teacher and senior leader wellbeing.
174. As we stated in our oral evidence session for the IWPRB 6th Remit Q2, we feel that the STRB and DfE in England have been more proactive, making recommendations for changes to the STPCD and providing a range of resources for schools. By contrast, the Welsh Government have not been proactive and there is little scope within the current STPC(W)D to promote this change in culture.

175. Estyn⁵¹ have observed that some school leaders have offered creative solutions in order to give staff greater flexibility and better work-life balance. This includes allocating PPA so that staff can work off-site but much more could be done.
176. A review carried out by NFER⁵² (2023) into flexible working in schools suggests that flexible working is an important factor in improving teacher recruitment and retention. Successful strategies given are remote working, staggered hours and allocation of a small number of personal days during a term.
177. Staggered hours, in particular offers opportunity for those with childcare commitments to balance their professional duties with family demands that may otherwise be difficult to manage without significant costs. It may, as a result, also help create a more diverse and sustainable source of future school leaders. However, these are only possible where a school has the financial resources to accommodate these practices within their staffing structure.
178. The EPI report on school leaders in Wales⁵³ discusses the challenges that senior leaders face in meeting the demands of their role and maintaining a healthy work-life balance and concludes that this is a source of stress for them. This is also seen as a barrier for potential candidates who saw this as a factor that discouraged them from applying for senior leadership positions.
179. Strategies suggested to introduce more flexibility into leaders working patterns include, assigning more dedicated PPA time and providing TOIL as compensation for long working days or working weekends.
180. The Employment Rights Bill, currently in its final stages of consultation, has flexible working rights as one of its central tenets, and despite the restrictions placed in school settings such as pupil safeguarding, far more could be done to ensure that all members of staff can request flexible working and be objectively considered against an open and transparent policy.
181. In summary, flexible working represents potential to improve the retention of teachers and school leaders in Wales. By promoting wellbeing, encouraging diversity in leadership, and fostering a sustainable career pathway, flexible working can help build a more resilient and motivated education workforce.

⁵¹ [Recruitment and retention – Adroddiad Blynyddol | Annual Report](#)

⁵² [Is it time for more flexible working in teaching? - NFER](#)

⁵³ [Recruitment and Retention of Senior School Leaders in Wales, EPI.](#)

Conclusion

182. In summary, teachers and school leaders deserve to be remunerated appropriately and fairly for the crucial role they fulfil in society and to ensure that the government is able to achieve its National Mission⁵⁴.
183. 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.
184. Welsh Government must ensure that all local authorities pass on sufficient funding to all schools to fully meet the cost of their pay award.
185. 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.
186. Teacher and school leader workload and wellbeing must urgently be addressed. There is a weight of evidence to suggest that the profession is in a state of crisis.
187. The remit item on leaders' conditions of service must be expedited and followed up with clear recommendations for action and improvements. We must see provision within the STPC(W)D to ensure that school leaders receive some protections in relation to working time and guaranteed breaks through school closure periods.
188. 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.

Chris Ingate and Louise Hatswell
Conditions of Employment Specialists: Pay
Association of School and College Leaders
November 2025

⁵⁴ Our national mission: high standards and aspirations for all, WG, 2023