



Independent Welsh Pay Review Body: Remit for the 6th Report

Response of the Association of School and College Leaders

Response to Remit Item 2

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. Our response is based on the views of our members, obtained through discussions at ASCL Council, with relevant advisory groups, recent member survey and prompted and unprompted emails and messages.
3. 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.
4. ASCL Cymru welcomes the opportunity to make a written submission in response to the Independent Welsh Pay Review Body's (IWPRB) 6th remit and this specific question on a very important matter to our members.
5. However, we were extremely disappointed that this was not considered as part of the main 6th Remit consultation process in April as it was an item in the 5th Remit which was not acted upon. It is an issue which is greatly affecting our members workload, wellbeing and is also having a detrimental impact on the recruitment and retention of school leaders in Wales.

Matter for recommendation

What adjustments should be made to Leaders' Conditions of Service and in particular the consideration of whether guaranteed working hours (or limits on) as well as protected holiday entitlement and weekends for leaders be included in the STPC(W)D.

ASCL Recommends that:

6. **The STPC(W)D is amended to include provision for school leaders in relation to working time and removes the current open-ended expectations. Specifically, we would like to see protected leave periods during school holidays as well as agreed limits on working hours (see figure 2 below).**
7. **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 STPC(W)D paragraph 51.1 to explicitly reference leaders.**
8. **There should be provision in the STPC(W)D to allow headteachers to delegate responsibility in terms of managing the school out of normal term time with shared responsibility and in agreement with other senior leaders.**

9. **The STPC(W)D is amended to provide protection for school leaders in relation to working hours. There should be an upper limit to the number of weekly hours that leaders can be required to work, and this cannot simply be a reference to the Working Time Directive.**
10. **Actions are taken to reduce workload for school leaders including business leaders. This includes an independent review of school leader workload to provide an agreed strategy to look after existing school leaders and make the job more achievable and sustainable. There is also a need for the Welsh Government to follow up its Workforce Survey in 2021 to provide complementary data.**
11. **Senior leaders should also be considered for flexible working opportunities, as should every member of staff, in accordance with Flexible Working Legislation. The Welsh Government should champion this in the same way that the DfE does in England¹, with a suite of resources to support schools.**
12. **We urgently request that any agreed changes to leaders' working conditions are implemented with effect from September 2025 as further delays will seriously risk our members wellbeing and could have a catastrophic effect in an already brittle setting.**

Why are we saying this?

There is an emerging crisis in terms of school leadership in Wales. Our members are struggling with excessive workload and poor work-life balance. A headteacher, deputy headteacher, business leader or assistant headteacher feel they have to give everything – working long days, giving up weekends and school holidays without getting anything back. These perceptions will be explored further through our Member Survey results below (June 2025).

'Working conditions for school leaders have become toxic driven by lack of clarity, accountability and their own expectations of what they need to do in a vocation career. School leaders are seen to have no need for 'down time', parents, local authority, multi-agency services and staff see school leaders as always available to them independent of leave, weekends or outside the working day.'

School leaders consistently work over 50-hour weeks, damaging their physical health, mental health and family life. We are in a recruitment and retention crisis in Wales. We are losing school leaders through burnout and creating a system where others don't aspire to be a part of. The workload culture in our schools must change we must create expectations of a work life balance, a system where leaders can recover and recharge and a system with longevity for the children in Wales.' Claire Armitstead, Director of ASCL Cymru.

These bold statements accurately capture the perspective from across our 993 members. Whilst pay remains a key issue and motivator for both recruitment and retention of school leaders in Wales, excessive workload, poor wellbeing and ill-health are prevalent.

With reference to the matter for recommendation:

13. **School leaders in Wales are not protected by guaranteed working hours:** The School Teachers' Pay and Conditions Document STPC(W)D in Wales specifies a maximum of 1265 hours of directed time for teachers (Paragraph 51.5). This limit applies to teachers covered by the STPC(W)D and doesn't apply to school leaders on the leadership pay range. This leaves them exposed and without protection. With many of our members reporting an average 57 hour working week (see survey in Appendix 1). This alone equates to term-time workload exceeding 2000 hours which is unreasonable and unacceptable.

¹ Flexible working in schools, DfE

14. **Work-life balance:** Ironically, the STPC(W)D emphasizes that headteachers should consider the work/life balance of all teachers, including those in leadership roles, and ensure their workload is reasonable. This is challenging and difficult to achieve because there are no set boundaries.
15. **Timeliness of the process:** We have already supplied a wealth of information in March 2024 to the IWPRB as part of our response to the 5th Remit² in response to exactly the same question being posed in this consultation. This is why we are extremely disappointed and frustrated that this was not considered as part of the main 6th Remit consultation process in April, as it is an issue which is greatly affecting our members workload and wellbeing. It is also having a detrimental impact on the recruitment and retention of school leaders in Wales. As a result, the STPC(W)D 2025 draft shared for consultation does not include any directive regarding school leaders' working conditions putting our members at risk for one more year of fatigue, burn-out and low morale. We would urgently request that this matter is included in the September 2025 STPC(W)D when it is published.
16. **Individual School Leader Support:** ASCL have received record number of hotline referrals from school leaders in Wales relating to workload – 162 cases since September 2024 / 25% specifically relating to Working conditions / 10% stress-related health concerns / 18% due to leadership team restructuring and team reduction due to budgetary pressures. This last point is important as, in these cases, the workload is now shared amongst smaller teams increasing workload pressures.
17. **Leader recruitment and retention issues:** As already submitted as part of our response to the 6th remit³, the number of vacancies, applications and appointments for leadership positions on Wales over the last 3 years. It is clear to see how the number of vacancies is spiralling exponentially, and the quality of the field is weakening leading to record numbers of unfilled positions. For example, in 2020/21, there were only 5.4 applications per headteacher vacancy leading to 3 unfilled positions in Wales – a figure that has dropped to 4.2 in 2023 and an alarming 21 unfilled vacancies. Moreover, there is now a record numbers of senior leaders aged 50-59 which will, in turn, lead to record numbers of retirements over the next 5-10 years. The poor application rate for headteacher vacancies is likely to worsen as a result. The job is no longer attractive to many teachers and aspirant school leaders.
18. **Regional disparity:** We have already submitted evidence to show that leadership retention rates vary considerably across Wales and are shorter in challenging socio-economic areas. There are also fewer applicants for headship and a shorter tenure, particularly in rural and deprived areas. Welsh Medium schools, in particular, are struggling to recruit and retain.
19. **Financial pressure:** The current financial situation in Welsh schools means that many are having to downsize and reduce their senior leadership team, placing an unacceptable burden upon those left in post. Indeed, this was a major concern emanating from our member survey (below).
20. **Leader workload and well-being:** As highlighted in our initial evidence⁴ submission for the 6th remit, there have been a number of other 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. We cited Marchant et. al 2024 and the 2024 Teacher Wellbeing Index in our initial submission. This all paints a similar picture across the UK, with almost a third of all school leaders citing mental health concerns.

² ASCL Cymru evidence to IWPRB 5th remit

³ ASCL Cymru evidence to IWPRB's 6th remit

⁴ Ibid

21. **Leadership attrition:** The difficulty retaining school leaders is not exclusively related to pay and pay progression, with working conditions affecting morale. Individual stories of headteachers struggling with stress, burnout and financial pressure have been widely reported in the media. Indeed, a question we posed to our members in our recent wellbeing survey shows that workload and working hours remain uppermost in school leaders' future plans (see figure 1).

Figure 1. Specific question relating to reasons for school leaders to consider changing careers

38. If you are considering changing your career, what are the main reasons? Please put in rank order		
Item	Total Score ¹	Overall Rank
Workload	768	1
Working hours	676	2
Funding constraints	601	3
Personal wellbeing	548	4
Accountability	518	5
Parental behaviours	494	6
Student Behaviour	475	7
Pay	450	8
Malicious or misuse of social media	259	9
Impact of restructuring	161	10

Key Findings from our ASCL Cymru Member Survey – June 2025

22. As stated, we conducted a member survey from 9th – 20th June to establish an accurate picture of how school leaders feel about their current workload, wellbeing and job satisfaction.
23. The survey was strategically timed to link with the IWPRB question on leaders' conditions of service. The main findings are alarming, and we have separated these into four sections: Workload, working hours, wellbeing and future intentions. These can be seen in the Appendix.

Working hours

24. We asked our members to respond to four possible options (see figure 2) – the most popular option was for protected leave periods followed by a maximum number of directed weeks to be specified.

Figure 2. Specific question asked of ASCL Cymru members regarding possible options to improve conditions of service.

31. The IWPRB have been remitted to look at leaders' conditions of service and considering whether protected holiday entitlement for leaders be included in the STPC(W)D. With this in mind, please place the possible approaches below in order of preference		
Item	Total Score ¹	Overall Rank
Protected leave periods as set times of year (e.g. 4 weeks in summer, 2 weeks at Easter, 2 weeks at Christmas).	283	1
Maximum number of directed weeks, with provision to take time back if required to exceed these.	259	2
Maximum number of directed working days, similar to the 195 currently in place for teachers.	199	3
Maximum number of directed working hours, similar to the 1265 currently in place for teachers.	159	4
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	90

25. Figure 2 shows clearly that our members prefer clearly mandated holiday breaks over directed working hours or days. There is an understanding that school leaders do have to work above and beyond classroom teachers but having to give up weekends and school holidays excessively without limits is unacceptable.

Future trends:

26. If school leaders are not given urgent protection from excessive working hours and weeks per year, there will be a mass exodus of current school leaders and an absence of those currently protected by 1265 to take their place.
27. Indeed, comparing statistics with the 2021 EWC survey⁵, the headlines show a deteriorating situation and there is urgent need for the Welsh Government to commission a further survey to provide accurate longitudinal comparisons.

	EWC Survey 2021	ASCL Cymru Member Survey 2025
Average working week	54 hours	57-65 hours
Unacceptable work/life balance	64%	74%
Mental health concerns	61%	84%

⁵ National Workforce Survey 2021, EWC

Conclusion:

28. The workload and working hours for school leaders have been steadily 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.
29. 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.
30. Staff absence and the inability to either procure or afford quality supply cover has meant that leaders end up covering for absent colleagues.
31. Our survey shows that school leadership in Wales is under great stress and that there is a genuine risk of leaderless schools in the near future.
32. We know that many 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.
33. 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.
34. We believe that the IWPRB should consider a variety of factors when considering its recommendations:
 - Excessive workload experienced by school leaders
 - Excessive hours worked by school leaders
 - Impact on wellbeing
 - Impact on work-life balance
 - Impact on professional learning
 - Recruitment and retention of school leaders (see earlier submissions)
35. We have provided information on this in previous 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.
36. The Document currently contains just one paragraph (See below 51.4) in relation to work-life balance: This is clearly not sufficient, or we would not be seeing the high levels of working hours reported for teachers and school leaders.
37. We note that the Welsh Government's Careers Wales 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.'
38. 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. 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 (as shown above in our survey findings).
39. 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.

40. This is already a known issue within Wales, as reported in the EWC Policy Briefing in 2020⁶, 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.'*
41. 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.
42. 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. We would therefore like to see an agreed upper limit on the expected hours per week a school leader has to spend at their place of work.
43. There have been a number of reports into the working hours of school leaders. For example, in the OECD average⁷ for working days for headteachers in 2021 which ranged between 211 and 214 and working weeks per year ranged between 43 and 44.
44. The latest EWC national education workforce survey 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. It is noteworthy that 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.
45. Our members employed on the leadership pay range do not expect to have the same provisions as included for classroom teachers (ie. 1,265 hours) but they also cannot be expected to have limitless expectations on their working hours.
46. 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
1 July 2025

⁶ Policy briefing, teacher recruitment and retention Wals, EWC

⁷ OECD (2022), Education at a Glance 2022: OECD Indicators, OECD Publishing, Paris.

Appendix

ASCL Cymru Member Survey – June 2025

Workload

- 61% said that their workload was unmanageable – it was ranked as the most significant reason for considering leaving the profession
- 74% said their work/life balance was unacceptable – one respondent said *'the volume and complexity of the workload have become unsustainable. What's most draining is not any single task, but the cumulative effect of simultaneous and competing demands, each of which could be a full-time role in itself.'*
- 87% felt they had to work beyond acceptable hours
- 97% said that work intensity was extreme or high
- 74% felt that administration and paperwork was the most significant barrier to them in terms of workload – this detracted from the time they wanted to spend on safeguarding, teaching, quality assurance and strategic planning.
- The qualitative comments from our members frequently refer to current financial pressures – one respondent said *'the bleak financial situation presents a serious threat to the quality of education and support we can offer, negatively affecting both staff and pupils.'*
- 86% felt that external pressures (Estyn inspections / LA interventions) created additional pressure

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- Figure 1 shows clearly that our members prefer clearly mandated holiday breaks over directed working hours or days. There is an understanding that school leaders do have to work above and beyond classroom teachers but having to give up weekends and school holidays excessively without limits is unacceptable.
- Further to this, our members tell us that a school leader in Wales spends on average 10.7 hours at school each day on top of having to do additional work from home.
- The average working week is 57.2 hours which can increase to 65.6 hours in a challenging week, which occurs 42% of the time.
- The number of lunchbreaks per week, where school leaders are not supervising or working averages is half a lunch break per week – this is unacceptable
- 80% of school leaders reported that they often had to work at weekends, with a further 14% sometimes having to work at weekends.
- 83% said they often had to work during the school holidays, with a further 13% saying they sometimes had to (equating to 96% clearly having to work outside normal term time).
- 89% stated that they also had to respond to emails outside their working time
- Whilst there is an appreciation that school leaders have to work above and beyond classroom teachers on a differentiated basis according to seniority (63% in favour), the lack of protection in terms of weeks per year and hours per week are open to abuse. There is no accountability for employers to reduce workload and excessive working hours. Teaching is the only public sector profession where overtime payments are not made. When additional hours have to be accounted for by the employer it incentivises them to ensure they are not excessive.

Wellbeing

- In terms of work/life balance, almost every respondent (97%) felt that their job interfered with their family or personal life, with 85% having to miss family events such as parents' evenings for their own children
- In terms of health, 91% felt the job interfered with their sleep patterns, 84% claiming that their physical and mental wellbeing was affected
- Overall, 40% felt that they enjoyed their job less than the year before, but these issues have not been a year in the making – they are cumulative leading to a loss of job satisfaction and motivation to leave a career that they once held dear.

Support and future intentions

- As a result, the percentage of school leaders considering retiring, leaving the profession, taking on less responsibility is over half (55%) leading to a catastrophic future recruitment crisis.
- In terms of support, there was a relatively positive picture in terms of Governor help (53% feeling well or very well supported) but the support from their LA was negatively skewed (58% feeling rarely or never received support) with the main source of positive support coming from fellow school leaders in their own school or through networks.