

# NASUWT supplementary submission to the Independent Welsh Pay Review Body

**29 March 2024**

If you require further information about this submission, please contact:

**Dr Patrick Roach**

General Secretary

NASUWT

Hillscourt Education Centre

Rose Hill

Rednal

Birmingham

B45 8RS.

0121 453 6150

[www.nasuwt.org.uk](http://www.nasuwt.org.uk)

[nasuwt@mail.nasuwt.org.uk](mailto:nasuwt@mail.nasuwt.org.uk)

## **CONTENTS**

## **Page**

1. Introduction	3
2. The Welsh Government's Evidence	4
3. The Welsh Local Government Association's Evidence	7
4. Additional Learning Needs Provision	8

## 1. Introduction

- 1.1 As has been the case in previous years, NASUWT takes a great deal of pleasure in submitting supplementary evidence to the Independent Welsh Pay Review Body (IWPRB), having taken decisive steps since its establishment to improve the pay and conditions of teachers in Wales.
- 1.2 When responding to evidence from pay review body consultees in our supplementary evidence submissions, we focus on evidence from governments and employer organisations and do not generally comment on evidence submitted by other unions.
- 1.3 In this respect, we will be commenting upon the evidence submitted by the Welsh Government and the Welsh Local Government Association (WLGA). Their submissions will be dealt with separately, with the exception of Additional Learning Needs (ALN) provision which has combined the submissions.
- 1.4 One of the most important tests of the effectiveness of a pay review body is its ability to respond to unexpected and unforeseen events. When the Review Body's 4th remit was issued, the UK economy was recovering strongly from the impact of the coronavirus pandemic, but teachers and other working people were in the grip of a cost-of-living crisis. We believe that this must continue to be taken into account by the Review Body. It should be noted that, since the issuing of the Review Body's 5th remit, wider international events have exacerbated the current cost-of-living crisis and it is vital that the Review Body considers the evidence from consultees in this context.
- 1.5 NASUWT is calling for the IWPRB to demonstrate its independence by making a pay recommendation, in line with our submission in 2024, for a restorative, above-inflation and fully funded pay award.
- 1.6 The Review Body's focus must be on what is needed and what is right for the future supply and retention of teachers. Moreover, those arbitrary affordability constraints put forward by the Welsh Government, which have led to pay deterioration and the current poor state of teacher recruitment and retention, should not be a driver for the Review Body's recommendations.
- 1.7 We remind the Review Body that this is a matter for the Welsh Government and the UK Government via the Barnett formula.
- 1.8 The case for increased pay and sector-wide funding is undeniable from the evidence. The Review Body must focus on its core remit, which is to make recommendations on the pay and conditions of teachers in Wales, which the Welsh Government then accepts or rejects.

## 2. The Welsh Government's Evidence

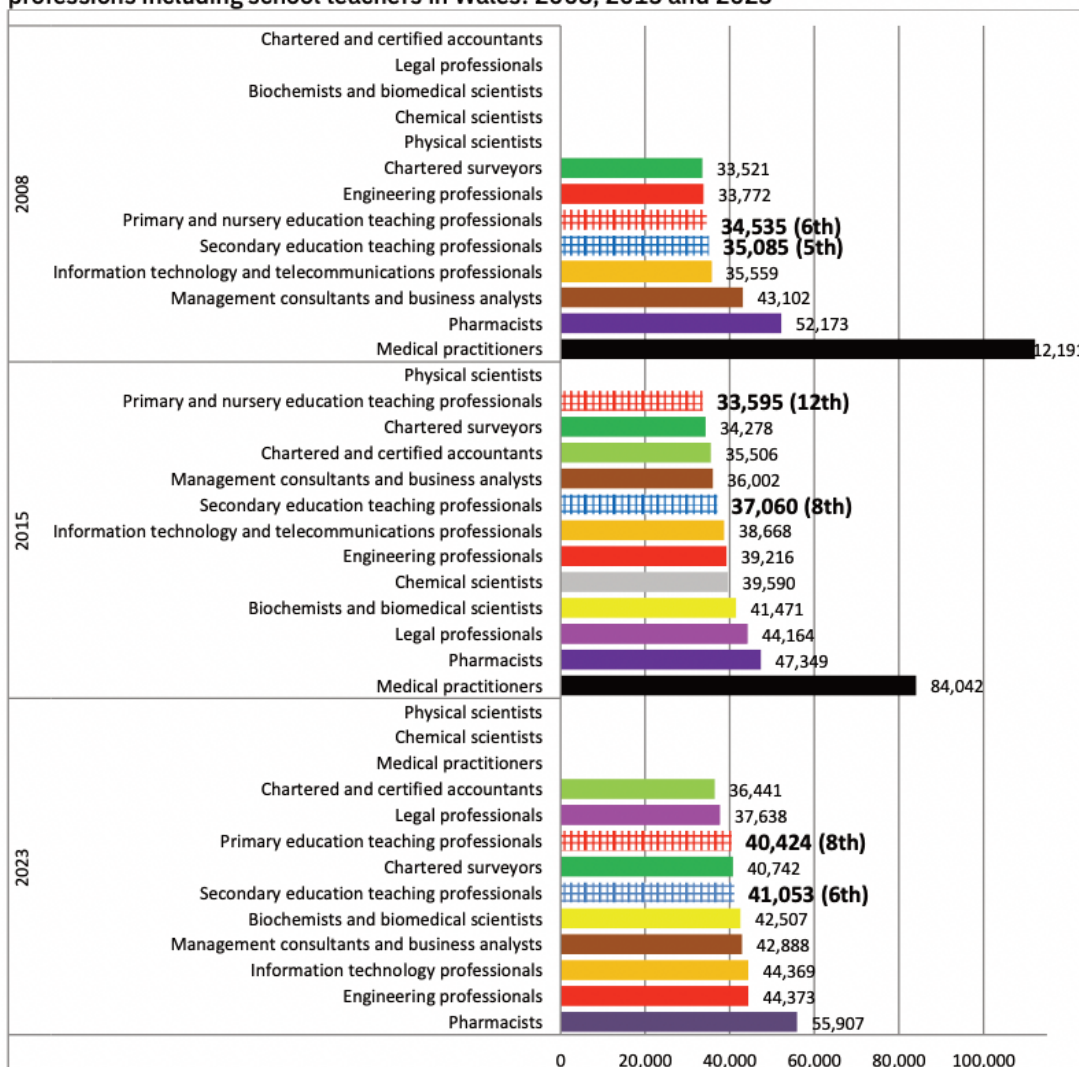
### The cost-of-living crisis and teachers' pay

- 2.1 The Autumn Statement and the 2024 Spring Budget mean higher levels of personal taxation due to the freezing of income tax thresholds.
- 2.2 The requirement that the Review Body should have the '*public sector financial constraints currently in place in Wales*' is flawed, because teachers also have affordability issues.
- 2.3 The NASUWT Big Question Survey of almost 1,000 members in Wales, in late 2023, identified clear evidence of teachers experiencing serious financial difficulties and unable to afford the costs of food (64%), heating (63%) and essential household items (43%).  
<https://www.nasuwt.org.uk/static/847bdd11-256f-4aec-8ee7cc0201f2bf9f/33ff67f1-358b-4ec7-9ec50e1f602dca88/Big-Question-Survey-Report-2023.pdf>
- 2.4 Seventy-seven per cent of respondents said that they think individuals are being put off a career in teaching because of levels of pay. Eighty-two per cent of respondents to the survey said they do not think teaching is competitive with other professions.

### Teaching professionals' pay compared to other professions

- 2.5 The role of the Review Body is to consider what adjustments are needed to teachers' pay to ensure that the profession remains competitive and is able to recruit and retain teachers and headteachers successfully. The Review Body should present its recommendations free from any government straitjacket.

Figure 2: Comparison of average annual gross earnings (£pa) of all comparator graduate professions including school teachers in Wales: 2008, 2015 and 2023\*



Source: ASHE

\*Data available for six non-teaching professions in 2008, ten in 2015 and eight in 2023.

2.6 The Welsh Government evidence uses ASHE data from average weekly salary which puts a much higher ranking on the position of primary (4th position) and secondary teachers' pay (3rd position). The overall rankings in Figure 2 are different, based on average annual salary, because the annual amounts provide a more complete representation of earnings as they are collected later in the year and therefore include bonus payments that are generally not picked up in the weekly figures as they are collected later than when most bonuses are awarded.

<https://www.nasuwt.org.uk/static/5830b48d-b7d2-4dbe-91a2d84ed14cb4a6/NASUWT-Commissioned-IDR-Report-2024-Wales.pdf>

2.7 It is clear that over time, the position of both primary and secondary teachers' pay, compared to other non-teaching professions, improved considerably from 2008 to 2015, but it has worsened in 2023. Both graduates and current teachers therefore have chosen alternative career paths that offer much more attractive salaries.

**Figure 7: Average gross annual earnings of teachers and combined selection of professional groups in the UK 2023\***



Source: ASHE

\*Non-teaching occupational data are based on the same eight jobs in all countries.

\*\*England 2022 figures uplifted by 6.2% to produce the 2023 figures.

2.8 Figure 7 shows clearly that while teachers' pay in Wales may appear relatively competitive versus non-teaching levels in Wales, earnings for non-teaching professions across the border in England or further afield in Scotland are higher, in some cases significantly. Therefore, graduates in Wales have higher earning potential in non-teaching professions outside of Wales.

**Teachers' pay – annual timetable**

2.9 We support the Welsh Government's aim to align the pay review process with the financial year, thereby allowing the implementation of future pay awards at the start of the academic year.

## Initial Teacher Education

- 2.10 NASUWT notes the detailed description of the Initial Teacher Education (ITE) situation in Wales, and recognises the hard work put into this endeavour.
- 2.11 The Welsh Government notes that *'recruitment into secondary remains challenging, with the national level allocations for full-time provision still not met; this is likely to continue when the competitive graduate market, especially for those with STEM specialities and Welsh language ability is considered'* and that *'ITE Partnerships have limited control and responsibility over the pool of suitable candidates they can recruit from'*.
- 2.12 The Welsh Government also *'views teaching as being a highly practical and robustly intellectual endeavour'* and set out the detail of the promotion of the profession as a career in 5.4 of their Review Body Submission.
- 2.13 However, the Welsh Government's analysis must not mean they miss the issues that lie under their noses. The profession and vocation of being a teacher has to be made an attractive option for our future graduates and career-change professionals. The profession resides in a competitive market with other graduate vocations and so the fundamentals of a career in teaching and the underlying infrastructure must be attractive and competitive.
- 2.14 Reforming and refreshing ITE in Wales will not significantly improve upon this supply crisis. NASUWT would remind the Review Body of what the Union put forward in its original submission:

*'The latest official data confirms the continuing and serious decline in participation in ITE over the past decade. Between 2010/11 and 2021/22, the latest date for which data is available, the number of qualifiers from ITE courses in Wales fell from 1,740 to 1,325, a decline of over 23%.*

*'As NASUWT has highlighted previously to the Review Body, this period was characterised by significant periods of pay restraint and declines in the value of teachers' pay in real terms.*

*'Evidence also underlines the degree to which recruitment into ITE programmes is failing to meet Education Workforce Council (EWC)-determined allocations. In 2021/22, only 675 students for secondary programmes were enrolled against an allocation of 1,016, a shortfall of 34% of the numbers required to maintain adequate teacher supply. It should be noted that this figure represents deterioration in the equivalent figure for the previous year and follows on from successive failures to meet national allocations. While the figure for primary allocations exceeded the reduced allocation for 2021/22, it was preceded before the pandemic by serious shortfalls in recruitment, resulting in continuing long-term insecurity in the primary teacher supply position. Overall, recruitment since 2016/17 has failed to meet allocations in each year, including those impacted by the pandemic when the propensity of graduates to apply for ITE courses across the UK increased significantly.*

*'The education system has experienced a significant decline in the average number of applications for vacant posts. Between 2012 and 2022, the total number of applications fell from 29,876 to 20,130, a decline of 32% over the period. While the number of applications increased over 2021 to 2022, it is likely that this is related to the singular circumstances related to pandemic, the longer-term implications of which have been set out in our previous submissions.*

*'The evidence above serves to confirm that recruitment into teaching remains in an entirely unsatisfactory position and that the sustainability of future teacher supply, as a result, remains at significant risk.'*

### 3. The Welsh Local Government Association's Evidence

#### Administrative tasks

- 3.1 The WLGA's evidence rightly notes that teachers are already undertaking significant unpaid overtime hours.
- <https://www.walesonline.co.uk/news/uk-news/teachers-work-54-hours-week-26657627>
- 3.2 The TUC has recently quantified this unpaid work in England, where working hours are comparable to Welsh teachers, as being the equivalent of £15,000 per year.
- <https://www.theguardian.com/education/2024/feb/23/daylight-robbery-two-in-five-uk-teachers-work-26-hours-for-free-each-week>
- 3.3 In response to the request for suggestions to add to the list of administrative tasks in Annex 3 of Section 2, the WLGA makes reference to the requirement to supply annual written notification on pay.
- 3.4 We believe that it is essential to retain the annual pay notification to teachers for the following reasons:
- to confirm whether they have had an incremental uplift on their salary scale;
  - confirmation of the value of their pay value – staff can assure themselves that any cost-of-living pay award has been fully and correctly applied;
  - staff subject to salary safeguarding can see the value of the safeguard sum and the date that it ceases;
  - staff in receipt of any additional payments such as TLRs can see the value of these separately to their teachers pay; and
  - staff who work part time have a record of their pro rata equivalent provided to them – for example, *'detail the FTE salary x by the part-time percentage to calculate their pay'*.
- 3.5 We do not believe that this is an unnecessary bureaucratic burden as the payroll provider needs the information to update the payroll system annually.
- 3.6 The two sentences that the WLGA affords to the 'Matter for Recommendation' regarding teachers' guaranteed working hours shows a startling ignorance of the provisions of the STPC(W)D and suggests that there is no link between working hours required and workload.
- 3.7 What the WLGA fails to take into consideration is the STPC(W)D paragraph 50.7:
- 'In addition to the hours a teacher is required to be available for work, a teacher must work such reasonable additional hours as may be necessary to enable the effective discharge of the teacher's professional duties, including in particular planning and preparing courses and lessons; and assessing, monitoring, recording and reporting on the learning needs, progress and achievements of assigned pupils.'*

It is a matter of serious concern that the WLGA seems not to understand the implications of this paragraph.

#### 4. Additional Learning Needs Provision

- 4.1. NASUWT has considered the response from both the Welsh Government and the WLGA and has further comments to raise, specifically on ALN provision, which are detailed in this separate section.
- 4.2. The Welsh Government stated that: *'In many cases, the new ALNCo role will be a non-classroom based position. There is currently no specific pay scale for ALNcos in Wales. The process for designating a SENCo as an ALNCo was a relatively straightforward one.'*
- 4.3. We would disagree that this process of moving from the special educational needs (SEN) approach to the new ALN system has been straightforward. The difficulties this has placed on teachers and SEN/ALNcos has been immense and has arisen largely from a lack of proper research as to the impact of the implementation of the Additional Learning Needs and Education Tribunal (Wales) Act (ALNET), and a consequent underestimation of the funds needed to implement this new system properly.
- 4.4. Far from ALNcos working to a non-teaching timetable, our research demonstrates that 94% of ALNcos have timetabled teaching commitments. In Wales, 42% of ALNcos have stated that they had more than 21 hours of teaching commitment. The average teaching commitment was 19 hours a week. As teachers must get 10% of teaching time allocated as planning, preparation and assessment (PPA) time, this means that a substantial number of ALNcos are not provided with any additional time for their role. Overall, 97% of respondents said they had insufficient time to carry out their duties. This can only mean that the most vulnerable pupils in Wales are not getting the support they need and deserve.

[Special Additional Educational Learning and Support Needs Survey Report 2018 \(nasuwat.org.uk\)](https://www.nasuwat.org.uk/research/special-additional-educational-learning-and-support-needs-survey-report-2018)

- 4.5. The Welsh Government, in its submission to the IWRPB, acknowledges that the recommendation of the ALN T&F group for ALNcos is that they be remunerated in line with appointments to the Senior Management Team of the setting. The Welsh Government has not clearly committed to making the needed funds available to support schools in providing for remuneration on the Leadership Spine. This will lead to a large increase in the staffing costs across Wales, and this has not been factored into the current funding formula local authorities use to allocate monies to schools for this cost.
- 4.6. Extrapolation of the position taken in an Explanatory Memorandum was added to the draft ALN Code, which states: *'therefore, for the purpose of estimating current costs for the ALNCo in a school, the midpoint for classroom teachers has been used. For 2020 to August 2021, the relevant salary was £33,912 (£44,086 including on-costs).'*

[EM template for sub leg \(gov.wales\)](https://www.gov.wales)

- 4.7. To estimate true costs of implementation of the ALNET, the Welsh Government should calculate costs using the 22/23 leadership midpoint salary of £59,242. NASUWT calls on the Welsh Government to commit to providing sufficient funds to enable the ALNET to be implemented in full.
- 4.8. Furthermore, the need for additional funds is not limited to the provision of appropriate ALNCo remuneration.
- 4.9. A factor affecting all teachers in schools is the move of SEN pupils from the register and in receipt of SEN funds to Universal Provision in schools not in receipt of ALN funds. In theory, this concept of universality is equality-based, but it leads to a classroom-teaching situation which is not supported by learning resources or appropriate teaching assistant input. This results in an increased workload for all teachers as they take on the pressure of ensuring that quality learning is provided for all learners. In response to this workload increase, we called for a reduction in class sizes during evidence given to the CYPE Committee (October 2023).



4.10 In February 2022, there were 74,661 pupils with ALN or SEN in maintained schools; in January 2023, this had reduced to 63,089. This followed an 18,000 reduction in numbers in the previous year.

[Schools' census results: January 2023 | GOV.WALES](#)

This results in a reduction of just under 30,000 pupils over those two years that were not included in funding arrangements to support schools in the provision of learning. It also means that the needs of these learners are not being planned and tracked for comprehensively, as there is no Individual Development Plan (IDP) for these pupils.

4.11 Both the Welsh Government and WLGA have referred to the need for consistency across all schools in Wales. The WLGA notes the extra difficulties for rural schools in finding resources to support an ALNCo post. This is without doubt an issue, and it has previously been addressed through smaller schools sharing a SENCo/ALNCo.

4.12 We note the need for consistency across schools, as well as the need for *'appropriate designation within the leadership pay scales relative to other school leaders'*, but we also assert that this must not be used to award a leadership pay point less than appropriate for the responsibilities to the ALNCo role.

4.13 ALNET was implemented in September 2021. The lack of consultation and research into how it would be implemented effectively has had a detrimental impact on teachers and ALNCoS. The issues of appropriate remuneration and managing workload must be addressed as a matter of urgency. NASUWT calls on the Review Body to make firm recommendations on these issues as part of the pay review for 2024, and not delay further.