

**Labour Market Enforcement Strategy 2025 to 2026:
call for evidence**

GENERAL COMMENTS

1. NASUWT welcomes the opportunity to respond to the call for evidence from the Director of Labour Market Enforcement (DLME), to inform their strategy for 2025/26.
2. NASUWT – The Teachers' Union – represents teachers and headteachers across the United Kingdom.
3. The Union provides extensive casework assistance to members asserting their employment rights. The Union therefore has a detailed understanding of the work of the different enforcement bodies.
4. This submission seeks to address a range of issues associated with the experiences of supply teachers working through supply agencies and umbrella companies.
5. Whilst we recognise the need to resolve disputes at the earliest stage, it cannot go unnoticed that there will always be the need for some disputes to require external intervention and enforcement, such as that provided by the employment tribunal system and other enforcement bodies, including the Employment Agency Standards (EAS) Inspectorate
6. The NASUWT believes that access to justice for employees and workers is a fundamental and guiding principle of a civilised society. State enforcement bodies provide recourse for those who have been wronged by their employer

and permit some form of redress when legal rights and entitlements have been infringed upon.

7. It is right that action is taken by the Government to ensure that all parties engaged in the UK labour market take responsibility for ensuring high standards of employment rights and tax compliance, as well as suitable protection for all workers.
8. Changes in the UK labour market over recent years have had a significant impact upon pay, job security and conditions of employment, resulting in an increased disparity in the balance of power between employers and workers.
9. The well-documented move away from permanent employees to a more complex and flexible labour market has resulted in the increased use of recruitment agencies and umbrella companies, including those wishing to expose the fragile job security and unfair conditions of employment of agency workers, such as supply teachers.
10. Figures published by the Trades Union Congress (TUC) show that 4.1 million people in the UK were currently employed in low-paid and insecure work – including around one million workers on zero-hours contracts,¹ which it is estimated accounts for 3% of all employees.²
11. Analysis suggests there are approximately 900,000 individuals involved in agency work in the UK,³ with roughly 140,000 stating that they were on a zero-hours contract.⁴
12. The *Taylor Review of Modern Working Practices* noted that there was a lack of robust data on the number of agency workers in the UK, with estimates ranging from 800,000 to 1.2 million.⁵ The latter figure was referenced by The Recruitment and Employment Confederation (REC).

¹ <https://www.tuc.org.uk/news/over-8-10-zero-hours-contract-workers-want-regular-hours-tuc-poll-reveals>

² https://assets.publishing.service.gov.uk/media/671787dbd29a0f082ac9c14f/Consultation_application_zero_hours_contracts_measures_agency_workers.pdf

³ Ibid.

⁴ Ibid.

⁵ <https://assets.publishing.service.gov.uk/media/5a82dcdce5274a2e87dc35a4/good-work-taylor-review-modern-working-practices-rg.pdf>

13. However, it cannot go unnoticed that it is not easy to estimate the number of agency workers in the UK labour market, as surveys rely on people knowing and understanding exactly what their employment status is. As such, the level of agency working currently reported could be seen as just the tip of the iceberg.
14. Furthermore, figures suggest that there were approximately 40,000 agencies operating across different sectors of the labour market in the UK in 2018, with a 200% increase reported in 2019.⁶
15. Coupled with this has been the rapid expansion of the umbrella company market. For example, external analysis and HMRC data shows that the umbrella company market has grown substantially since 20 years ago.⁷
16. Many of those working through an umbrella company will have little choice but to work through an umbrella company. Indeed, it has been argued that the proportion of agency workers using umbrella companies is approximately 50%.⁸
17. The precarious nature of zero-hours contracts and agency work means that many workers risk insufficient hours, income insecurity and the inability to assert their rights without the fear of negative impacts in the future (i.e. being denied access to work).
18. Given the growing complexity of taxation and employment and equality law, coupled with the significant changes in the UK labour market over recent years which have impacted upon pay, job security and conditions of employment, it is essential that there is a strong legal and regulatory framework and a strong enforcement system that provides redress and is also fair, open, accessible and impartial.⁹

⁶ <https://www.recruitment-international.co.uk/blog/2018/05/recruitment-industry-edges-closerto-40000-agency-mark>; and <https://www.recruiter.co.uk/news/2020/01/200-increase-new-recruitment-agencies-2019>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1037093/Umbrella_Company_CfE_Final.pdf

⁸ <https://www.recruitment-international.co.uk/blog/2018/05/recruitment-industry-edges-closerto-40000-agency-mark>; and <https://www.recruiter.co.uk/news/2020/01/200-increase-new-recruitment-agencies-2019>

⁹ <http://rtsa.ro/tras/index.php/tras/article/viewFile/27/23>; and https://www.riir.ulaval.ca/sites/riir.ulaval.ca/files/1968_23-4_15.pdf

19. It is right and proper that work should provide a baseline of security and predictability so that workers can plan their lives and their finances accordingly.
20. It is therefore essential that there is a strong employment law framework and a strong enforcement system that provides redress that is fair, open, accessible and impartial.
21. Not acting would enable poor working conditions and insecure, precarious and intermittent employment to continue unfettered, thereby increasing the numbers of those at the mercy of even more unscrupulous employer behaviour.
22. As such, the Make Work Pay Plan¹⁰, including the changes proposed in the Government's flagship Employment Rights Bill,¹¹ represents a once-in-a-generation opportunity to strengthen the working conditions for the lowest paid and most vulnerable in the labour market, including through the establishment of the Fair Work Agency (FWA).¹²
23. The FWA would establish a single enforcement body comprising of His Revenue & Customs National Minimum Wage and National Living Wage team, the Gangmaster and Labour Abuse Authority (GLAA) and the Employment Agency Standards (EAS) Inspectorate.¹³
24. Previous attempts at the creation of a Single Enforcement Body (SEB) has merely tweaked around the fringes without any real desire or intent to make progress on this important matter, including addressing the woefully inadequate funding of levels of funding that means the UK has vastly fewer inspectors than international standards.

¹⁰ <https://www.gov.uk/government/collections/make-work-pay>

¹¹ <https://publications.parliament.uk/pa/bills/cbill/59-01/0011/240011.pdf>

¹² https://assets.publishing.service.gov.uk/media/6707a5eb92bb81fcdbe7b62b/next_steps_to_make_work_pay.pdf

¹³ <https://www.tuc.org.uk/research-analysis/reports/making-employment-rights-work#:~:text=The%20Fair%20Work%20Agency%20should,and%20unpaid%20employment%20tribunal%20awards.>

25. As such, the pledge to create the FWA and ensure that it has strong powers to inspect workplaces and take action against exploitation is to be welcomed.¹⁴

26. If the FWA is implemented well, NASUWT believes this represents an opportunity to seriously address issues of non-compliance and transform the lives of workers.

SPECIFIC COMMENTS

Employment rights enforcement priorities and governance

- **What do you believe should be the priorities for employment rights enforcement as we transition to the FWA?**

27. NASUWT believes that there are currently a number of key areas which need to be addressed as the DLME and its associated enforcement bodies transition to the FWA, including:

- exploitative zero hours contracts, including those used by recruitment agencies;
 - the enforcement of holiday pay;
 - the transparency and clarity of pay slips;
 - regulating and/or licensing of umbrella companies;
 - the enforcement of the Agency Workers Regulations (AWR);
 - the provision and enforcement of the Key Information Document (KID);
 - the enforcement of Statutory Sick Pay (SSP); and
 - pay below the NMW.
- **The FWA will take some time to be set up. What should priorities be for the enforcement bodies before then? What should be FWA medium to longer-term priorities and why?**

¹⁴https://assets.publishing.service.gov.uk/media/67124718386bf0964853d7e2/Impact_assessment_establish_fair_work_agency_bring_state_enforcement_functions.pdf

28. Unfortunately, until the establishment of the FWA, there are a number of areas which the DLME does not currently have oversight of, such as issues of non-compliance in regards to holiday pay and SSP.
29. Given this, NASUWT believes that the DLME and its associated enforcement bodies should focus on ensuring that workers are not losing out on wages and key entitlements.
30. For example, one area of focus should be the compliance with minimum wage rules. It is estimated that one in five workers receiving the National Living Wage/NMW were not provided with the correct pay in 2022.¹⁵
31. Indeed, data from the Office for National Statistics (ONS) suggests that around one fifth of workers were paid at or around the wage floor were underpaid the minimum wage.¹⁶
32. The introduction of a KID from 6 April 2020 sought to address issues of transparency by making it a requirement of agencies to provide agency workers, such as supply teachers, with key information prior to signing up for an assignment, including in relation to how they were paid, and if an intermediary or umbrella company is involved.¹⁷
33. The legislation introduced in respect of the KID is prescriptive, even down to the length of the document, which must be no longer than two A4 pages and easy to understand. Provided that the KID is completed correctly, an agency worker, such as a supply teacher, should be in a position to better understand and track the situation in respect to their pay and the amount paid by the agency to the umbrella company, and the net sum the worker receives.

¹⁵ https://assets.publishing.service.gov.uk/media/65004e0657278000142519c1/NC_report_2023_final.pdf

¹⁶ https://assets.publishing.service.gov.uk/media/65e0b1f93f6945001103601d/E03071356_NMW_LPC_Report_2023_Accessible.pdf

¹⁷ <https://www.gov.uk/government/publications/providing-a-key-information-document-for-agency-workers-guidance-for-employment-businesses>

34. However, as stated in our submission to the DLME 2024-25 enforcement strategy,¹⁸ it remains the case that there is a lack of transparency over the deduction, fees and contractor pay/payments, with some agencies ignoring the legal requirement to provide all workers with a KID.¹⁹ This is a particular problem when the only source of work is via recruitment agencies, which can often be the case for lower paid workers.
35. Despite it being a legal requirement since April 2020, just over a third of supply teachers (35%) who obtained work through a new supply agency reported that they had been provided with a KID, detailing how they would be paid and associated deductions, as well as other key details and well in excess of two-fifths (46%) stated that they did not know whether or not they had been provided with a KID by the agency.²⁰
36. In addition, we are concerned about the extent to which supply teachers, as agency workers, are provided with a KID by their respective agencies at the appropriate time.
37. It is also unclear as to whether a KID is being given out multiple times in the event of multiple potential pay routes, so as to allow workers to compare and contrast accordingly.
38. Accompanying this is the fact that the KID is only a requirement for new agency workers signing up with an agency from April 2020, so existing agency workers, such as supply teachers, may not be provided with one if they were already working through their existing agency prior to this date. As such, the introduction of the KID is not a complete solution.
39. The KID is supposed to be one of the first things that an agency provides to a worker in order for them to make an informed choice. Whilst the Government has not tested with workers whether this has helped them better

¹⁸ <https://www.nasuwat.org.uk/static/63fcd420-1e05-4faf-b159901b167b6d57/Consultation-Response-BEIS-Labour-Market-Enforcement-Strategy-2024-25.pdf>

¹⁹ <http://www.ioanchargeappg.co.uk/wp-content/uploads/2021/04/How-Contracting-Should-Work-Inquiry-Report-April-2021-min.pdf>

²⁰ <https://www.nasuwat.org.uk/advice/supply-teacher/supply-teacher-annual-survey/supply-teacher-annual-survey-england.html>

understand their situation,²¹ the evidence presented above suggests that this is not the case.

40. Many workers are unaware of their employment rights and are unsure how to report unfair practices.

41. Because of this, NASUWT maintains that the KID needs to be looked at in order to better understand why this is not working effectively, including examining how the examples provided by the EAS can be improved so that the provision of the KID is fit-for-purpose.

42. Coupled with this is the provision of a pay slip which accurately details on the associated deductions, including any statutory deductions, such as holiday pay.

43. Research suggests that 1.8 million workers reported that they did not receive a payslip.²² Without a payslip it is hard for a worker to understand if they have been paid correctly, or assess if the correct of deductions have been made, including holiday pay.

44. Furthermore, 60% of those workers who reported receiving a payslip stated that they did not understand their payslip either due to a lack of clarity, not understanding the make-up of their pay, or variances in the pay received week to week.²³

45. The rate advertised by an agency often does not reflect the fact that the worker will be processed through an umbrella company, and, as such, should receive an uplift in their rate of pay to ensure that they are no worse off than if they were paid by the agency directly with a non-uplifted rate of pay.

46. Disappointingly, there is the possibility that some agencies may purposefully deceive workers by advertising at one rate without being clear that the

²¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1037093/Umbrella_Company_CfE_Final.pdf

²² <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

²³ Ibid.

amount received by the worker will be another rate, due to the amount of money which will be taken by the umbrella company.²⁴

47. Indeed, many workers have reported that they have received lower rates that did not match the original salary offer from the employment business/agency or the end client.²⁵

48. NASUWT is concerned that the failure of unscrupulous recruitment agencies and/or umbrella companies to provide a detailed, physical payslip in a timely fashion is leaving some supply teachers vulnerable to exploitation.

49. The lack of transparency means that there is confusion and misinformation around contractual terms and conditions, as well as transparency around rates of pay,²⁶ including the way in which the pay is comprised (e.g. as NMW, discretionary bonuses, or loans).

50. In regards to holiday pay, the evidence suggests that swathes of workers are not getting the holiday pay they are entitled to. For example, analysis by the TUC analysis suggest that 1.1 million employees did not get any of the paid holiday they were entitled to last year, despite this being a day-one entitlement.²⁷

51. In addition, research suggests that this has a disproportionate impact on the lowest-paid workers, with five-times as many lowest-paid workers reporting that they received no holiday pay compared to the highest-paid.²⁸

52. NASUWT believes that agency workers, such as supply teachers, are a category of workers who are particularly at risk from receiving no holiday pay and/or sick pay. They are also a group who face more difficulty in enforcing their rights due to a lack of voice in the workplace, coupled with a lack of job security.

²⁴ <https://www.litrg.org.uk/sites/default/files/files/LITRG-Labour-Market-Intermediaries-Report-2021.pdf>

²⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161119/M4027_Call_for_Evidence_SoR_UCs_0103.pdf

²⁶ Ibid.

²⁷ <https://www.tuc.org.uk/research-analysis/reports/making-employment-rights-work>

²⁸ <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

53. As referenced in previous submissions,²⁹ the Union is concerned about the growth and prevalence of umbrella companies in education. The lack of robust data on the number of umbrella companies means that any estimates are likely to be inaccurate, but reports indicate that one of the three biggest areas for umbrella companies is education.

54. The competitiveness of the market has resulted in a situation where many agencies are looking to reduce their margins and liabilities through the use of umbrella companies.³⁰

55. As the recruitment sector has evolved, umbrella companies have become a legitimate part of the modern labour market; an increasing number of agency workers now find themselves engaged through umbrella companies.

56. As a consequence, umbrella companies now proliferate in all areas of the temporary labour market. HMRC estimates suggest that there has been an increase in the number of individuals working through an umbrella company from 100,000 in the tax year 2007/08 to at least 500,000 in the tax year 2020/21.³¹

57. Further estimates suggest that the number of those working through an umbrella company has increased from between 300,000 to 400,000 in 2015 to over 625,000 in 2021.³²

58. Many of those working through an umbrella company will have little choice but to work through an umbrella company. Indeed, it has been argued that the proportion of agency workers using umbrella companies is approximately 50%,³³ a figure that is likely to increase in the future, given that many agencies increasingly look to dissuade workers from using their own pay-as-

²⁹ <https://www.nasuwt.org.uk/static/63fcd420-1e05-4faf-b159901b167b6d57/Consultation-Response-BEIS-Labour-Market-Enforcement-Strategy-2024-25.pdf>

³⁰ Ibid.

³¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1037093/Umbrella_Company_CfE_Final.pdf

³² <https://www.litrq.org.uk/sites/default/files/files/LITRG-Labour-Market-Intermediaries-Report-2021.pdf>

³³ <https://www.recruitment-international.co.uk/blog/2018/05/recruitment-industry-edges-closer-to-40000-agency-mark>; and <https://www.recruiter.co.uk/news/2020/01/200-increase-new-recruitment-agencies-2019>

you-earn (PAYE) function in favour of umbrella companies which take on the responsibility for such costs and obligations.³⁴

59. Reports suggest that umbrella companies are increasingly involved in the supply chains of lower-paid workers, including those who promote and enable tax avoidance schemes.³⁵

60. As such, the increased use of umbrella companies and the associated increased complexity in the labour market presents a challenge that may be contributing to the widening tax gap between what is expected to be paid and what is paid.³⁶

61. Research conducted by NASUWT found that almost half of supply teachers (49%) reported that they have been asked to sign a contract or agreement with an umbrella/offshore company when working through a supply agency.³⁷

62. The lack of regulation of umbrella companies has long been identified as an issue that needs to be rectified. For example, the 2017 *Taylor Review of Modern Working Practices* recommended that the DLME should consider whether the remit of EAS should be extended to cover policing umbrella companies and other intermediaries in the supply chain.³⁸

63. The failure to act has left a void in which agencies may be putting profits over the welfare of its workers through the use of umbrella companies,³⁹ a situation which the Loan Charge All-Party Parliamentary Group inquiry into how contracting should work describes as: *'out of control, all too often exploiting contractors (even without them realising it).'*⁴⁰

³⁴ <https://www.litr.org.uk/sites/default/files/files/LITRG-Labour-Market-Intermediaries-Report-2021.pdf>

³⁵ Ibid.

³⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1037093/Umbrella_Company_CfE_Final.pdf

³⁷ <https://www.nasuwt.org.uk/uploads/assets/uploaded/cbf2bdf5-8e39-484b-926b1becb8fc586c.pdf>

³⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/627671/good-work-taylor-review-modern-working-practices-rg.pdf

³⁹ <https://www.litr.org.uk/sites/default/files/files/LITRG-Labour-Market-Intermediaries-Report-2021.pdf>

⁴⁰ <http://www.loanchargeappg.co.uk/wp-content/uploads/2021/04/How-Contracting-Should-Work-Inquiry-Report-April-2021-min.pdf>

64. Indeed, whilst acknowledging the concerns over the role played by umbrella companies in the labour market, including in relation to employment rights and issues of tax non-compliance, the previous government failed to address the situation and presided over a state of affairs which has worsened, given the increased complexity of the modern labour market.
65. The Union believes that the EAS is the most appropriate mechanism/body for this, given that the EAS already regulates the recruitment sector where umbrella companies overwhelmingly operate.
66. The EAS would be able to use its existing knowledge and relationships to effective use, which could prove invaluable, particularly when it comes to enforcement.
67. The Union believes that the EAS should use its full suite of enforcement powers to both proactively and reactively tackle non-compliant umbrella companies.
68. However, we are disappointed that the EAS has not used its existing powers already to tackle non-compliant umbrella companies, such as those contained within *Regulation 5* of the Conduct of Employment Businesses Regulations (2003), to the effect that an agency '*may not make your work-finding services conditional upon the work-seeker using other goods or services provided by you or someone else*'.⁴¹ This is when it appears that it is common practice for agency workers to be offered assignments that are conditional upon them signing up with an umbrella company.
69. In addition, NASUWT reiterates previous calls for serious consideration to be given to a licensing scheme which monitors and reviews compliance of employment businesses and umbrella companies operating in education.⁴²
70. Employment businesses/agencies and umbrella companies operating in the state-funded education sector would be an ideal area to extend licensing

⁴¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936515/eas-brief-guide-for-agencies.pdf

⁴² <https://www.nasuwt.org.uk/static/f4b934af-eea4-405b-8ab101fc1a77e994/Consultation-Response-HMRC-Tougher-Consequences-for-Promoters-of-Tax-Avoidance.pdf>

schemes, particularly given the growing concern over the way they operate and the levels of fees they charge, which is, in essence, money being diverted away from the public purse and the education of children and young people.

71. Licensing would be the most effective way to tackle non-compliance in education when there is evidence of repeated breaches of employment rights, as it requires the licence holder to demonstrate compliance before they are legally permitted to operate in the sector. They are also subject to continuing checks.
72. In order to secure public confidence, any licensing scheme should be backed up by an independent regulator that has the ability to hold employers to account and apply appropriate sanctions for those who do not comply with the provisions of any such scheme.
73. NASUWT believes that this should be comprised of relevant stakeholders, including trade unions, in order to ensure that there is a requisite level of veracity about the scheme, as there is currently very little to dissuade an agency if they want to push workers into arrangements with unscrupulous or non-compliant umbrella companies.
74. The Union is clear that any recommendations must ensure that there is a level playing field, and that employers who break the law can expect significant repercussions for their actions, whilst at the same time provide workers with the comfort and knowledge that the system works in a fair and just manner.
75. NASUWT believes that it is odd that the EAS, which regulates the behaviour and compliance of employment agencies does not enforce the Agency Workers Regulations (AWR). Instead, a worker who believes they have been unfairly treated has to seek redress through an employment tribunal. As such, we maintain that this should be remedied as part of the medium to longer-term priorities of the FWA.

76. This would include reviewing the application of Regulation 5 of the AWR so that an agency worker is entitled to the same basic conditions of pay as if directly employed from day one of employment, as opposed to after 12 weeks.
77. Furthermore, the AWR could be amended to include more than just an entitlement to 'basic' conditions for the purposes of pay after day one, including access to occupational pensions, such as the TPS.
78. The arbitrary figure of 12 weeks, agreed at the time by social partners the Confederation of British Industry (CBI) and the TUC to remedy an impasse to introducing the European Union's *Agency Workers Directive*, is now no longer fit for purpose and should be addressed as a matter of priority.
79. Too often, supply teachers inform us that work is cancelled at, or approaching, the 12-week qualifying period for the AWR, meaning that they are losing out on access to wages that better reflect the work undertaking when on an assignment in a school or college.
80. For example, 15% of supply teachers reported that work had been cancelled on specific longer terms assignments at, or approaching, the 12 weeks' qualification period for the AWR.⁴³
81. Such a change would clearly address a key pillar of the Government's agenda to make work pay by ending the 'exploitative' nature of zero-hours contracts, as the payment would reflect the daily rate of a comparable employee.
82. As stated above, broadening the scope of the AWR to include occupational benefits, such as the TPS, would go even further in addressing the commitment to make work pay.
83. NASUWT is concerned about the increased use of non-traditional means of work-seeking and the potential impact this has on workers, such as supply

⁴³ <https://www.nasuwt.org.uk/advice/supply-teacher/supply-teacher-annual-survey/supply-teacher-annual-survey-england.html>

teachers, including in relation to the employment relationship and the assertion of employment rights.

84. For example, some platforms claim that supply teachers will be directly employed by the school that has hired the worker, whereas others expect supply teachers to be classed as self-employed.

85. In addition, we are concerned about potential equalities issues regarding online platforms which may require a photo to be uploaded as part of the profile of the candidate, since this could result in discriminatory decisions by schools when selecting a supply teacher, thereby furthering the detriment suffered by some groups of workers.

86. Furthermore, a number of online platforms that we have been sighted on employ a rating system for the teacher which schools can access and use. The Union is concerned about this, particularly around the criteria that might be used and who has access to it. References to subjective judgements that could negatively impact upon a supply teacher's ability to get work are unacceptable, especially if a supply teacher is unable to challenge these if they do not agree with them.

87. Coupled with this is the rise in the use of artificial intelligence (AI) and whether such technologies are being designed, developed, procured and implemented in ways that secure and protect the lawful rights and interests of teachers, school leaders and learners.

88. This includes their educational and human rights, as well as their rights in relation to privacy and data protection, equality, employment and decent working conditions.

89. The Union is concerned that some digital technologies may be used to monitor and judge the practice of teachers without any recourse. This is even more significant for supply teachers as agency workers who are in intermittent, insecure and precarious employment where high stakes, punitive purposes can have serious impacts on future employment.

90. As such, NASUWT welcomes the acknowledgment in the *DLME Labour Market Enforcement Strategy 2024/45* that due consideration should be given to AI by the three enforcement bodies which will merge to form the FWA.⁴⁴

91. Whilst we recognise that labour market non-compliance may be greater in specific sectors, this does not mean that this should come at the expense of other sectors, such as education.

92. One of the sectors the TUC has identified as having the fastest growth in insecure work is the education sector, which has risen by 42% since 2011.⁴⁵ NASUWT is concerned about the growing trend towards the casualisation of work, precarious employment and the use of zero-hours contracts, and the negative impact of these practices upon teaching standards, teacher morale and the entitlement of children and young people to a high-quality education.

93. Supply teachers are integral to the education system. Around 3% of teachers working in schools at any one time are supply teachers.⁴⁶ Without supply teachers, many pupils would be denied the opportunity to be taught by qualified and dedicated teachers who ensure that schools can continue to provide the education to which children and young people are entitled.

94. As such, supply teachers make a vital contribution to securing high educational standards for all children and young people. However, the experiences of many supply teachers suggest that developments such as deregulation have had a significant detrimental impact upon how supply teachers are deployed, how they are paid, and on their working conditions, in comparison with teachers who have a contract of employment with a school.

95. Whilst the COVID-19 pandemic has highlighted the importance of supply teachers, it has also spotlighted the growing casualisation of work and the

⁴⁴ https://assets.publishing.service.gov.uk/media/673236dc0d90eee304badb89/uk-labour-market-enforcement-strategy_2024-25-accessible.pdf

⁴⁵ <https://www.tuc.org.uk/sites/default/files/the-gig-is-up.pdf>

⁴⁶ Calculated as the total spent by academies on agency supply teachers against the total spent on teachers' salaries as reported for August 2018.

unenviable situation of supply teachers, who often have no choice but to obtain work via different supply agencies and umbrella companies, leaving them vulnerable to the vagaries of precarious, intermittent and insecure employment.

96. As such, NASUWT is pleased to see reference to supply teachers being suggested as an addition to the DLME's list of high-risk sectors,⁴⁷ particularly as this supply teachers were specifically referenced in the *United Kingdom Labour Market Enforcement Strategy 2019/20*, published in July 2019.⁴⁸

'Other sectors I anticipate requiring further enforcement attention in the coming year are care and supply teachers. Both sectors were raised during discussion with stakeholders in my Call for Evidence. The care sector has received a substantial amount of attention since my last Strategy, particularly in relation to pay for sleep-in carers. There has been a significant increase in the volume of intelligence received directly from work-seekers in the supply teaching sector regarding issues ranging from non-payment of wages to serious contractual concerns.'

- **The FWA will have a statutory duty to publish annual reports and a triannual strategy, overseen by a social partnership board with tripartite representation from business representatives, trade unions and independent experts. What data and reporting should the FWA publish to ensure good accountability and transparency, via these publications or otherwise?**

97. NASUWT believes that any data sharing and reporting must be fit-for-purpose and provide a level playing field in which employers and organisations operating transparently and legitimately are not undercut by unscrupulous employers and organisations.

⁴⁷ https://assets.publishing.service.gov.uk/media/673236dc0d90eee304badb89/uk-labour-market-enforcement-strategy_2024-25-accessible.pdf

⁴⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819014/UK_Labour_Market_Enforcement_Strategy_2019_to_2020-full_report.pdf

98. Any such indicators will need to ensure that they are easily accessible and held in a single point of access, in order to provide public confidence that the FWA is operating appropriately and addressing issues of compliance and enforcement.
99. As such, the social partnership board, including trade unions, will need to agree on a standardised set of indicators which would increase the consistency of reporting and facilitate increased scrutiny and engagement, including analysing changes over time.
100. The Union welcomes the recommendation in the DLME's Labour Market Enforcement Strategy 2024/25 regarding the better collection of more and better information on those with protected characteristics and whether those with protected characteristics have increased vulnerability to labour market exploitation.⁴⁹
101. Given that there are significant barriers to teachers wishing to access flexible working, many teachers, particularly women, have little option but to undertake insecure, intermittent and precarious work as supply teachers through an agency. Many report that, despite the pay and career penalty, it is the only way to combine teaching work with a family life.⁵⁰
102. In addition, the evidence presented by NASUWT throughout this submission, specifically on the experiences of supply teachers as agency workers, demonstrates that the rise in insecure work is having a disproportionate impact upon groups who already suffer a labour market disadvantage, such as women and Black and minority ethnic (BME) workers.⁵¹ The TUC estimates that BME workers are over a third more likely than white workers to be in temporary or zero-hours work.⁵²

⁴⁹ https://assets.publishing.service.gov.uk/media/673236dc0d90eee304badb89/uk-labour-market-enforcement-strategy_2024-25-accessible.pdf

⁵⁰ <https://www.nasuwt.org.uk/news/campaigns/being-a-teacher-and-a-parent-survey-2020.html> and <https://www.nasuwt.org.uk/static/uploaded/6fd07ce3-6400-4cb2-a8a87b736dc95b3b.pdf>

⁵¹ <http://www.resolutionfoundation.org/app/uploads/2016/12/Secret-Agents.pdf>

⁵² <https://www.tuc.org.uk/sites/default/files/the-gig-is-up.pdf>

103. This is compounded by the fact that the TUC estimates that agency workers, such as supply teachers, are suffering up to a 20% hourly pay penalty when compared to the pay of an ‘average’ employee.⁵³
104. At the same time, any such reporting must ensure that there is a firewall between the work of the FWA and those involved in the enforcement of immigration, as workers with concerns over their immigration status may refuse to report abuse or exploitation out of a real or perceived fear that reporting could put their jobs at risk.
105. Indeed, the Government’s own review in 2021 acknowledged that data sharing for immigration enforcement can be a contributing factor to victims not reporting crime, and that exploiters and perpetrators ‘*often use the victim’s immigration status to exert fear or control*’.⁵⁴
106. For example, evidence from Freedom of Information (FOI) requests showed that all labour inspectorates in the UK had provided information on migrant workers to immigration authorities for enforcement purposes at least once between 2016 and 2019, and all but one had conducted simultaneous operations with Immigration Enforcement.⁵⁵

Communication and engagement

- **How do you expect stakeholders to be engaged by the FWA and what do you see as the benefits?**
- **By which channels might awareness of the FWA be increased before and once it is established and why do you recommend them?**
- **Where can communications around compliance and enforcement be improved such that workers are aware of their rights and their obligations? What evidence do you have that they work?**

⁵³ Ibid.

⁵⁴ <https://trustforlondon.org.uk/research/preventing-and-addressing-abuse-and-exploitation-a-guide-for-police-and-labour-inspectors-working-with-migrants/>

⁵⁵ https://tfl.ams3.cdn.digitaloceanspaces.com/media/documents/Preventing_and_addressing_abuse_and_exploitation_-_FLEX_and_LAWRS_Feb_2022.pdf

- **Who do you see as the key partners for the FWA thinking both of other agencies or wider stakeholders (for example, by sector) and why?**

107. The evidence suggests that workers, such as supply teachers, are not adequately informed and aware of their employment rights and where to go for help.

108. Indeed, workers' awareness of the various enforcement bodies is extremely low. For example, just 6% of private sector employees said they would approach an enforcement body in the event their rights were violated.⁵⁶

109. As such, it is right that stronger communication is developed including giving due consideration to how a stronger media profile can be developed at both national and local levels to better inform workers of the FWA, including through trade associations, trade unions and other key stakeholders.

110. Whilst organisations such as trade unions are available to assist and offer invaluable advice, guidance and support, NASUWT believes that measures should be introduced to promote and support collective bargaining and the right of trade unions to access workplaces and represent individuals and groups of workers when enforcing their rights, particularly if working through an agency and/or umbrella company.

111. Trade unions have a vital role to play in ensuring that workers are better informed and empowered in respect of their employment rights. The right to representation is a key concern for NASUWT when dealing with supply teachers as agency workers.

112. Evidence suggests that the involvement of trade unions is crucial in negotiating improved terms and conditions and putting in place mechanisms to remedy breaches of these terms and conditions.

113. Trade unions have a significant presence and density in numerous workplaces, particularly in education, where the overwhelming majority of

⁵⁶ <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

teachers are member of a trade union. As such, trade unions are able to spot emerging trends around employment rights issues and are therefore best placed to shape enforcement strategies.

114. However, it should be noted that not everyone is a member of a trade union, and, as such, there is a need for those involved in the establishment of the FWA to give careful consideration to how it can ensure that there is greater public and sectoral awareness of employment status, employment rights and the relevant regulatory bodies involved in the enforcement of these.
115. This includes the use of more traditional forms of communication, as well as social media platforms in order to reach as many groups in society as possible.
116. In regards to different stakeholders operating in different sectors, NASUWT believes there is merit in given consideration to a social partnership model where relevant stakeholders work together to agree and issue joint communications as an effective means to dealing with enforcement and non-compliance.
117. Indeed, the advent of the School Workforce Partnership which was founded on 15 January 2003 secured a programme of profound change in schools that have stood the test of time. This was built on dialogue, consultation, participation and shared solution building between the workforce, trade unions, employers and government.

Resourcing and prioritisation

- **What should the 3 enforcement bodies be doing now to ensure the FWA achieves sustained and lasting improvements in employer compliance?**

118. NASUWT maintains that if the FWA is to be implemented well, the three existing enforcement bodies must ensure that any barriers preventing data sharing between enforcement bodies no longer exists.

119. The three enforcement bodies must work closely together and share intelligence in order to produce a more effective and coherent response on both a national and regional level, as well as by sector, so that the FWA is best placed to achieve its aims.
120. In addition, the three enforcement bodies must put in place effective practices and procedures that utilise and enhance upon best practice from each respective enforcement body, so that any labour market inspector is better placed to be able to deal with multiple breaches of employment rights in the course of one investigation.
- **How should the FWA prioritise its resource between compliance measures (helping employers) and enforcement measures (punishing poor practice, deliberate and serious non-compliance)? How might its success in both areas be assessed?**
121. NASUWT maintains that the chances of being investigated for noncompliant employers is too low.⁵⁷ Coupled with this is the woefully inadequate levels of funding and resources available to regulatory and enforcement bodies which will fall under the remit of the FWA.
122. We believe that it is right and proper that the appropriate distribution of resources is allocated so that effective labour market enforcement can take place, and the creation of the FWA presents the opportunity to address this, especially if the Government is to make work pay.
123. It should be noted that, compared to European countries, UK enforcement agencies are under-resourced and underfunded. For example, in France, there are nearly 19 inspectors for every 100,000 people, whereas in the UK there is just one inspector per 100,000 workers.

⁵⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/705495/labour-market-enforcement-strategy-2018-2019-executive-summary.pdf

124. In addition, the International Labour Organization (ILO), Article 10, Labour Inspection Convention No. 81, recommends adequate resourcing for labour market inspectorates.⁵⁸
125. Furthermore, the ILO references that labour inspection systems should *'be efficient and effective, with workplaces visited as often as possible'*. The ILO also noted that *'comprehensive inspection coverage is required for the control and functioning of the labour market.'*⁵⁹
126. Analysis undertaken by the TUC analysis suggests that the UK would need an additional 1,797 labour market inspectors to meet the ILO benchmark.⁶⁰
127. Despite successive calls for evidence, it cannot go unnoticed that the Government is still failing many workers. For many employers, including agencies and umbrella companies, the threat of detection and having a sanction applied represents a good risk.⁶¹ For example, estimates suggest that an employer could expect a visit every 320 years from a NMW Inspectorate, or every 39 years by the EAS.⁶²
128. In addition, the GLAA was identified as an enforcement body that was impacted by serious budgetary cuts, whilst, at the same time, having an extended remit.⁶³
129. Furthermore, despite recent funding increases in the EAS, up to £1.525 million for the year 2020/21,⁶⁴ this still represents approximately 29 staff covering around 40,000 agencies operating in the UK. As such, the *'lack the resources and the statutory tools to protect workers and ensure a level playing field across the agencies sector.'*⁶⁵

⁵⁸ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C081

⁵⁹ <https://www.tuc.org.uk/research-analysis/reports/making-employment-rights-work>

⁶⁰ Ibid.

⁶¹ https://www.mdx.ac.uk/_data/assets/pdf_file/0017/440531/Final-Unpaid-Britain-report.pdf?bustCache=35242825

⁶² Ibid.

⁶³ <https://assets.publishing.service.gov.uk/media/6733432479e9143625613546/uk-labour-market-enforcement-strategy-2024-25-annex-a-accessible.pdf>

⁶⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040316/E02666987_UK_LMES_2020-21_Bookmarked.pdf

⁶⁵ <https://assets.publishing.service.gov.uk/media/6733432479e9143625613546/uk-labour-market-enforcement-strategy-2024-25-annex-a-accessible.pdf>

130. This is compounded by the lack of due diligence which exists for those seeking to enter the market and establish their own agency.
131. The FWA must therefore be resourced at the level deemed appropriate by the ILO, otherwise there is a real danger that a key metric of its success will not be fit-for-purpose.
132. Given this, NASUWT believes that there is still more that needs to be done to ensure workers have confidence that their cases are being tackled proactively.
133. As previously stated above, we are clear that enforcement penalties must ensure that there is a level playing field, and that employers who break the law can expect significant repercussions for their actions, whilst at the same time providing workers and the wider public with confidence in the system.
134. Unfortunately, the Union believes that the current enforcement penalties are failing to do this, and at times appear as if they are not fit for purpose. For example, as referenced above, it cannot be the case that for many employers, including agencies and umbrella companies, the threat of detection and having a sanction applied represents a good risk.⁶⁶ For example, estimates suggest that an employer could expect a visit every 320 years by a NMW Inspectorate, or every 39 years by the EAS.⁶⁷
135. Furthermore, the previous DLME, Professor Sir David Metcalfe, noted that an employer in the UK was likely to be inspected by one of its three enforcement bodies on average only once every 500 years.⁶⁸
136. Sir David Metcalfe then went on to note that, *'If you . . . have not got the resources . . . then you need heavier penalties.'*⁶⁹

⁶⁶ https://www.mdx.ac.uk/_data/assets/pdf_file/0017/440531/Final-Unpaid-Britain-report.pdf?bustCache=35242825

⁶⁷ Ibid.

⁶⁸ <https://www.thompsons.law/media/3201/enforcement-of-employment-recommendations-thompsons-solicitors-response.pdf>

⁶⁹ <https://www.ft.com/content/50afb91e-ea4a-11e7-bd17-521324c81e23>

137. Given this, NASUWT maintains that the Conduct of Employment Agencies and Businesses Regulations 2003 should be strengthened to ensure that specific provisions relating to umbrella companies are incorporated so that the EAS can enter the premise of umbrella companies, seek labour market enforcement undertakings, and prosecute umbrella companies, in the same way as they apply to employment businesses/agencies.
138. In addition, the Union maintains that this should include the right for an agency worker, such as a supply teacher, to decide whether or not they want to be employed through an umbrella company, and a requirement for mandatory transparency so that all fees and costs are fully disclosed, including any associated deductions.
139. Furthermore, this should include a requirement for agreed rates of pay to include an uplift to cover any fees charged by the umbrella company, including the employer's National Insurance Contributions (NICs) and other related costs.
140. This should be accompanied by a statutory standards framework which strengthens existing regulations, such as those that make it unlawful for an agency to offer a position that is conditional on using a specified umbrella company, and those that stop workers being pushed or encouraged to opt out of the Conduct of Employment Agencies and Employment Businesses Regulations 2003.⁷⁰
141. Furthermore, any such framework should make it unlawful for agencies to receive financial incentives or 'kickbacks' from umbrella companies, such as those received via introductions.
142. The Union also believes in the additional powers that permit the EAS to impose civil sanctions (e.g. fines) on umbrella companies.
143. In addition, we maintain that there should be an avenue which provides for trade unions to bring a complaint on behalf of workers.

⁷⁰ <http://www.ioanchargeappg.co.uk/wp-content/uploads/2021/04/How-Contracting-Should-Work-Inquiry-Report-April-2021-min.pdf>

144. However, as stated before, the extension of the remit of the EAS must be accompanied with improved levels of funding and additional resources to enable the EAS to deliver any extended remit.
145. In addition, NASUWT reiterates previous calls for serious consideration to be given to a licensing scheme which monitors and reviews compliance of employment businesses and umbrella companies operating in education.⁷¹
146. Employment businesses/agencies and umbrella companies operating in the state-funded education sector would be an ideal area to extend licensing schemes, particularly given the growing concern over the way they operate and the levels of fees they charge, which is, in essence, money being diverted away from the public purse and the education of children and young people.
147. Licensing would be the most effective way to tackle non-compliance in education when there is evidence of repeated breaches of employment rights, as it requires the licence holder to demonstrate compliance before they are legally permitted to operate in the sector. They are also subject to continuing checks.
148. In order to secure public confidence, any licensing scheme should be backed up by an independent regulator that has the ability to hold employers to account and apply appropriate sanctions for those who do not comply with the provisions of any such scheme.
149. NASUWT believes that this should be comprised of relevant stakeholders, including trade unions, in order to ensure that there is a requisite level of veracity about the scheme, as there is currently very little to dissuade an agency if they want to push workers into arrangements with unscrupulous or non-compliant umbrella companies.

⁷¹ <https://www.nasuwt.org.uk/static/f4b934af-aaa4-405b-8ab101fc1a77e994/Consultation-Response-HMRC-Tougher-Consequences-for-Promoters-of-Tax-Avoidance.pdf>

150. Furthermore, we believe that the naming and shaming of agencies and umbrella companies could act as an additional lever for compliance. It seems appropriate that employers who commit serious breaches of employment law should be named, as an effective deterrent.
151. Consistent application of naming and shaming must have the desired effect of incentivising non-compliant employers to act promptly or face further escalation through additional sanctions, including greater compensation for workers affected.
152. Furthermore, NASUWT is concerned that many employment businesses/agencies and/or end clients do not undertake due diligence on the entities that make up the labour supply chain, as the lack of visibility and absence of due diligence enables non-compliant umbrella companies to operate.
153. Given this, we welcome moves to consider mandating due diligence, where an employment business/agency and/or end client are required to undertake due diligence, as this could represent a positive step towards removing non-complaint umbrella companies from the labour supply chain.⁷²
154. NASUWT maintains that any such due diligence *must* be operated through a statutory requirement in order to avoid a situation where some employment businesses/agencies or end clients do not undertake due diligence.
155. In addition, any such process must include appropriate financial penalties for both the employment business/agency and the end client (it should not be the case that it is *either/or*).
156. As such, this would reflect existing practice that operates in employment tribunals, where *all* parties involved are held to be responsible (joint and several liability), as this would provide workers with other avenues to pursue when seeking to enforce their rights, whilst ensuring that due diligence is

⁷²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161120/230411_Umbrellas_condoc_HMT_template.pdf

maintained, which in turn could incentivise more permanent and secure employment.⁷³

157. In addition, we consider that any due diligence process should extend to detailing the obligations on employment rights in the labour supply chain.
158. As referenced above, the credibility of any due diligence process would be enhanced by the naming and shaming of agencies and umbrella companies, as employers who do not comply with any such statutory process should be named in order to serve as an effective deterrent.
159. In addition, public procurement rules should be strengthened to ensure that public sector bodies are prohibited from using those employment agencies and umbrella companies which fail to adhere to minimum standards.
160. The House of Lords Economic Affairs Finance Bill Sub-Committee reinforced this notion by recommending that the Government: *'ensure that no government or public sector body contracts with an intermediary operating a disguised remuneration scheme, and to publicise this requirement along with the protocols that public bodies are expected to follow.'*⁷⁴
161. In the case of schools and colleges, as public bodies, they have a great deal of purchasing power and, as a consequence, leverage over their suppliers. This provides them with the opportunity to bring about change in the behaviour of those employed in the supply chain. Suppliers wishing to enter a contract with such public bodies should be expected to evidence a robust approach to both employment and tax law obligations.
162. For example, in Norway, public authorities are obliged to advance contract clauses on wages and decent working conditions in relation to the procurement of construction, facility management and cleaning services.⁷⁵

⁷³ <https://www.tuc.org.uk/sites/default/files/2021-07/Umbrella.pdf>

⁷⁴ <https://committees.parliament.uk/publications/4097/documents/40546/default/>

⁷⁵ <https://www.hrprocurementlab.org/wp-content/uploads/2016/06/Public-Procurement-and-Human-Rights-A-Survey-of-Twenty-Jurisdictions-Final.pdf>

163. Public authorities in Norway are also required to follow up with suppliers on the performance of such clauses, such as requiring the supplier to make a self-declaration.
164. The United Nations (UN) sustainable development goals (SDGs), which all UN member states, including the UK, have adopted, includes the goal to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (SDG8).⁷⁶ This includes the target to protect labour rights and promote safe and secure working environments for all workers, including migrant workers and particularly women migrants, and those in precarious employment (Target 8.8). Therefore, it is vital that reforms to the enforcement of employment address this goal and Target 8.8 in particular.
165. Furthermore, the Government accepted in *Good Work – A response to the Taylor Review of Modern Working Practices* that all work should be fair, decent and underpinned by five principles: overall worker satisfaction; good pay; participation and progression; wellbeing, safety and security; and voice and autonomy.⁷⁷
166. NASUWT believes that changes to the labour market must work for everyone, while ensuring that the interests of everyone in the labour market are properly protected and workers are able to access their rights effectively.⁷⁸
167. The introduction of more effective and robust penalties and new powers for enforcement bodies to recoup fees and fines from employers could contribute to proper resourcing of the FWA.
168. Where enforcement agencies find that employers have breached employment law and impose fines to sanction this non-compliance, these fines should be recycled back into the system. This way, the money would

⁷⁶ <https://sustainabledevelopment.un.org/sdg8>

⁷⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/679767/180206_BEIS_Good_Work_Report_Accessible_A4_.pdf

⁷⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/817359/single-enforcement-body-employment-rights-call_for_evidence.pdf

bolster the resources of enforcement agencies and fund further enforcement work.

- **What are the key labour market non-compliance risks for which the FWA needs to be ready? What is the evidence for this?**

169. We refer to the arguments and evidence set out above regarding the key areas of labour non-compliance risks for which the FWA needs to be ready.

- **Holiday pay will be a new area of enforcement for the FWA. Where are the key priority areas as regards holiday pay non-compliance (for example, by employment model or by sector) and how might these risks be tackled?**

170. We refer to the arguments and evidence set out above regarding the concerns the Union has over holiday pay non-compliance for supply teachers as agency workers.

Moving towards a FWA

- **What do you value about the present practices of the 3 employment bodies that you want to see continued by the FWA and why?**

171. Over a number of years, NASUWT has developed a good working relationship with colleagues at the EAS. This has included attendance and presentation at a number of NASUWT events in order to educate supply teachers about a number of issues relating to working through a recruitment agency, including the importance of the Conduct of Employment Businesses Regulations (2003), the Key Information Document (KID) and the role of umbrella companies.

172. This has proved beneficial and alerted a number of supply teachers to the role of the EAS and how to pursue a case.

173. We believe that the experience and expertise of the EAS should not be lost by the creation of the FWA. Instead, the knowledge and skillset of those working in the EAS should be replicated in the FWA.

- **What would you like to see done differently?**

174. We refer to the arguments set out above regarding the way in which the FWA should operate in regards to compliance and enforcement.

175. In addition, we note that the creation of a social partnership board with representation from trade unions indicates a different way of addressing and dealing with labour market enforcement that should make work pay for workers.

- **The enforcement bodies currently use different approaches for compliance and enforcement – which of these do you think are most effective and should therefore be preferred for the FWA and why?**

176. We refer to the arguments set out above regarding the way in which the FWA should operate in regards to compliance and enforcement.

- **In establishing the FWA is there any good practice you would like to highlight from other UK and/or international regulators/enforcement bodies, either in the labour market enforcement space or beyond?**

177. We refer to the arguments set out above regarding the way in which the FWA should operate in regards to compliance and enforcement.

ADDITIONAL COMMENTS

178. If the intent of the Government is to make work pay, then NASUWT believes that the aim of the FWA is to ensure that there is strong enforcement of employment regulations and that workers feel that their rights and protections are adhered to.

NASUWT - The Teachers' Union

179. It is evident cannot go unnoticed that the creation of the FWA as proposed in the flagship Employment Rights Bill⁷⁹ represents a once-in-a-generation opportunity to strengthen the working conditions for the lowest paid and most vulnerable in the labour market. The Government should not, therefore, shy away from its vision to make work pay for *all* those in the UK.

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⁷⁹ <https://publications.parliament.uk/pa/bills/cbill/59-01/0011/240011.pdf>