

**NASUWT SUBMISSION**

**TO THE INDEPENDENT WELSH PAY REVIEW BODY**

**15 MARCH 2024**

NASUWT – The Teachers' Union

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## **1. INTRODUCTION**

1.1 NASUWT welcomes the opportunity to submit evidence to the Independent Welsh Pay Review Body (IWPRB) in connection with its 5th remit. In this submission, the IWPRB will be referred to as the Review Body.

1.2 NASUWT believes that the independent nature of the Review Body, carefully considering evidence submitted to it by consultees, makes a crucial contribution to the development of teachers' pay and conditions of service in Wales.

1.3 Teachers in Wales today face enormous challenges that the Welsh Government recognises but, to date, has done very little about – even though the Education Minister is on record as having expressed concern about the workload and wellbeing of education workers.

1.4 A significant reason for the failure to challenge these issues is that the commitments given by the Education Minister in his letter to education unions and employers on 24 February 2023 were extremely limited in their scope and ambition. Not one of the work streams that it announced had the potential to impact on classroom teacher workload in the immediate or even medium-term future.

1.5 NASUWT meetings with the Education Minister offered low cost and straightforward solutions to this omission, but these have not been picked up by the Welsh Government. Part of the reason for this seems to be the faith that the Welsh Government has placed in the outcomes of the Review Body's Strategic Review. However, NASUWT cannot comment upon the impact of this as, at the time of writing, this paper has not been released. That is regrettable, as the Strategic Review may have ameliorated the present view of NASUWT that the Welsh Government is paying 'lip service' to the growing problems in education without having a positive strategy to improve teachers' and education workers' working conditions to stem the teacher crisis in recruitment and retention.

1.6 The NASUWT submission to the Review Body supporting the 5th remit shows that, post-Covid, the experience of teachers in Wales is not improving. Teachers in Wales look forward to the Strategic Review, but if that Review does not cover the concerns raised in this submission, we would respectfully suggest that the Review Body compensate for this with their Recommendations to the Minister this year.

## **2. THE POSITION ON TEACHERS' PAY**

### **The impact of inflation**

2.1 It is imperative that the Review Body considers teachers' pay in the context of the significant real terms reduction in pay that teachers have suffered since 2010.

2.2 The Office for National Statistics (ONS) publishes inflation statistics using a variety of inflation indices. Considering the range of inflation indices available, Review Bodies are obliged to select the one which is most appropriate to their workforce. NASUWT recommends that the Review Body should prioritise the use of the Retail Prices Index (RPI) when considering the impact of inflation on teachers' pay.

2.3 Incomes Data Research (IDR) indicates that almost two-thirds (62%) of UK employers use the RPI inflation index when calculating pay awards for their workforces.<sup>1</sup> The range of prices, which are included in the index, makes RPI a much more reliable indicator of the increases in prices which impact workers. This also makes the RPI index the inflation measure which is most directly relevant to teachers in a wage-setting context.

RPI is a true cost-of-living index, since it measures the change in minimum household expenditure needed to maintain a given standard of living.

The Harmonised Index of Consumer Prices (HICP) measure, renamed CPI in the UK since 2010, was designed as a macroeconomic tool to assist European Union (EU) countries to set interest rates. Eurostat, the creators of the HICP, state

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<sup>1</sup> Incomes Data Research (IDR), *Pay Climate*, Issue 34, September 2023.  
[www.incomesdataresearch.co.uk](http://www.incomesdataresearch.co.uk)

specifically that it is '*not suitable for wage bargaining purposes*' since it includes no estimation of owner/occupier housing costs.<sup>2</sup>

The Consumer Prices Index with Housing costs (CPIH) has significant deficiencies in estimating owner/occupier housing costs and is based upon the HICP/CPI to ensure that the same statistical principles and methods were used in each country to set interest rates. It is not designed to ensure the maintenance of a given standard of living. CPIH will be significantly amended by the ONS from March 2024, to address known deficiencies in underestimating owner/occupier housing and rental equivalence costs. It is anticipated by ONS that, on average, UK annual percentage change reported by the Price Index of Private Rents (PIPR) is 0.7 percentage points higher than the Index of Private Housing Rental Prices (IPHRP), which PIPR will replace in March 2024.<sup>3</sup>

2.4 As stated by Dr Mark Courtney, the former Cabinet Office Head of Economics in the Regulatory Impact Unit, in his seminal paper *Consumer Price Indices in the UK*:

*'Overall, taking account of both coverage and formula effect differences, the conclusion is that, within the limitations of how price data is collected within the UK, the RPI is as good a consumer price index as one can get for uprating purposes. The systemic differences between the RPI and the CPI are the result entirely of under-estimation by the CPI.'*<sup>4</sup>

2.5 The failure of CPI to include any estimation of housing costs makes it unsuitable in the context of determining pay awards. The experimental estimation of rental equivalence currently utilised within the Household Costs Indices (HCI), which inform the housing costs element of CPIH, make it an unreliable inflation

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<sup>2</sup> Eurostat news release, 'Interim step towards harmonised measurement of consumer prices NEW WAY OF COMPARING EU INFLATION Required for the assessment of convergence for Economic and Monetary Union', 29 February 1996.  
<https://ec.europa.eu/eurostat/documents/2995521/5253882/2-29021996-AP-EN.PDF.pdf/2228be52-e560-48bd-9393-f16e39132b08>

<sup>3</sup> ONS, *Redevelopment of private rental prices statistics, impact analysis, UK*: December 2023.  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/redevelopmentofprivaterentapricesstatisticsimpactanalysisuk/december2023>

<sup>4</sup> Dr. Mark Courtney, *Consumer Price Indices in the UK*, 2016.  
<https://uksa.statisticsauthority.gov.uk/wp-content/uploads/2016/11/Consumer-Price-indices-in-the-UK.pdf>

measure that currently underestimates housing costs,<sup>5</sup> at least until planned improvements are implemented by ONS from March 2024.

2.6 NASUWT therefore strongly recommends that the Review Body utilise RPI as the most appropriate and accurate inflation measure suitable for determining teachers' pay increases.

### **The real terms cut in teachers' pay since 2010**

2.7 In Wales in 2023, the pay of classroom teachers' starting salaries was almost one-fifth (18%) less in real terms than if it had increased to match RPI inflation in each year since 2010. Removing M1 and making M2 the starting salary for classroom teachers has had a significant impact on reducing the real terms cut to starting salaries, but significant improvements need to be made to restore teachers' starting salaries in real terms to 2010 levels. By the same measure, the pay of classroom teachers on M6 was one-quarter (24.9%) less in real terms, and the pay of teachers on the Upper, Lead Practitioner and Leadership Pay Ranges was almost one-third (30.5%) less in real terms than in 2010.

2.8 It is essential for the future of the teaching profession that the Review Body seeks to restore teachers' pay to 2010 levels in real terms, to address the acute and worsening teacher recruitment and retention crisis in Wales.

2.9 In the IWPRB's 4th Report, the Review Body recommended for September 2022 that: *'all statutory scale points on all pay scales, and all allowances, are increased by 5% for 2022-2023'*. In September 2022, annual inflation increases, as measured by RPI, stood at 12.6% and at 10.1%, as measured by the CPI. Following extensive negotiations with NASUWT and other education stakeholders, the Welsh Government presented a new and enhanced pay offer for teachers and headteachers comprising of an additional 3%, of which 1.5% is consolidated and 1.5% is non-consolidated.

2.10 In the IWPRB's 4th Report, the Review Body also recommended for September 2023 that: *'that all statutory scale points on all pay scales, and all allowances, are increased by 3.5% for 2023-2024. This figure should be kept*

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<sup>5</sup> Office for Statistics Regulation (OSR), 'National Statistics status of Consumer Prices Index including Owner Occupiers' Housing Costs (CPIH), 31 July 2017. <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2017/07/CPIH-letter-from-Ed-Humpherson-to-John-Pullinger-final.pdf>

*under review and revisited if there is a significant change in economic conditions compared with the current forecasts'. In September 2023, annual inflation, as measured by RPI, stood at 8.9% and at 6.7%, as measured by CPI.*

Consequently, NASUWT engaged in negotiations with the Welsh Government and the original proposed pay uplift of 3.5% was increased to 5%.

2.11 It is imperative that the IWPRB recommend an appropriate pay award for teachers in Wales for 2024-25 if the Review Body is to retain any semblance of credibility.

2.12 The cost-of-living crisis, soaring inflation and rising interest rates are creating misery for teachers. An analysis of responses from teachers in Wales to NASUWT's Big Question Survey 2023 revealed that nine in ten teachers (89%) are worried about their financial situation. The vast majority of teachers in Wales (82%) state that they do not think that teachers' pay is competitive with other professions, and 77% believe that people are put off a career in teaching because of pay. Significantly, 79% of teachers in Wales do not think they are paid at a level appropriate for their skills and level of experience.

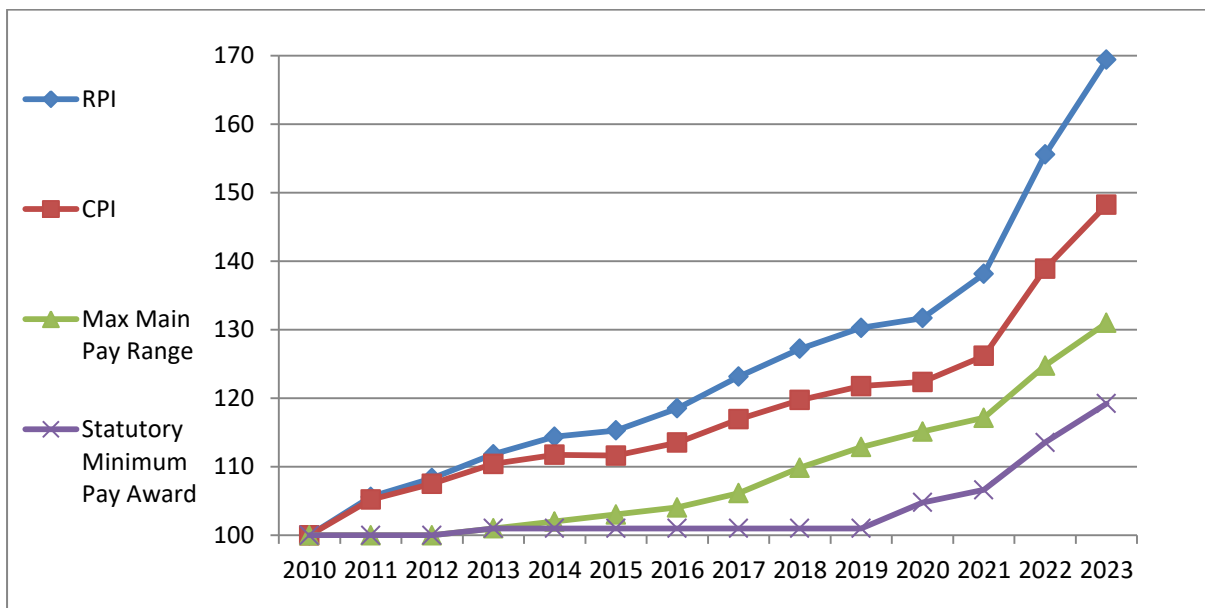
2.13 Teachers in Wales have endured more than a decade of pay freezes and below-inflation pay awards. The Review Body must act now to restore teachers' pay to 2010 levels in real terms.

### **Teacher salary increases compared to inflation increases 2010 to 2023**

2.14 The following chart shows the extent to which the pay of classroom teachers on the Main Pay Range (MPR) has fallen behind price increases, measured by both the RPI and CPI, since 2010. The chart illustrates pay increases in the best-case scenario where a teacher at the top of the MPR has received the maximum pay award each year since 2010 (Max MPR) and the worst-case scenario, where a teacher on the MPR received no cost-of-living award from 2014, until the statutory minimum pay award was applied by the Welsh Government from 2020.

2.15 The indexed price increases, as measured by both RPI and CPI, are measured against the indexed increases to teachers' pay on the MPR in each year between 2010 and 2023, to illustrate the cumulative effect of successive below-inflation pay awards since 2010.

## Indexed price increases compared to teachers' MPR increases 2010 to 2023



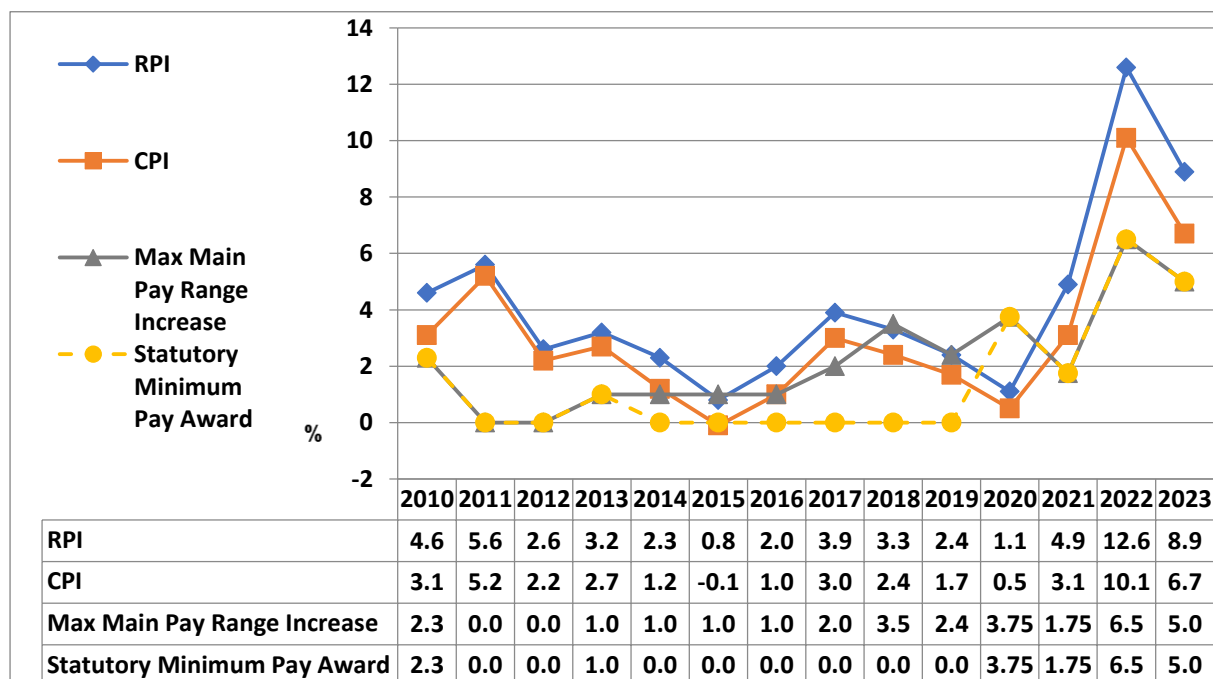
2.16 In both the best- and worst-case scenarios, teachers' pay has failed to keep pace with price increases as measured by both the RPI and CPI inflation measures. Teachers in 2023 are significantly poorer in real terms than they were in 2010.

2.17. The paltry 1.75% pay increase implemented in 2021 couldn't have come at a worse time for hard-working teachers. RPI inflation rocketed to a high of 14.2% in November 2022, its highest rate in over 40 years (since December 1980). The IWPRB's recommended pay increase for September 2022 of 5%, in the context of 12.6% RPI inflation, represented the biggest proposed real terms pay cut suffered by teachers in 45 years. The 6.5% increase in teachers' pay, which was eventually implemented in September 2022, still failed to protect teachers' pay in the context of soaring inflation. The 5% pay award in September 2023 represented another significant real terms pay cut in the context of 8.9% RPI inflation.

2.18 The following chart illustrates the annual percentage increase in teachers' pay in both the best- and worst-case pay scenarios in each year since 2010, as set out above, together with the 12-month percentage change in inflation for both RPI and CPI in September of each year.



## Teacher salary increases compared to inflation increases 2010 to 2023



2.19 Any marginal real terms gains made in 2015, 2018, 2019 and 2020 have had little positive impact on teachers' real terms earnings, which have plummeted since 2010. The 1.75% pay award in 2021, followed in 2022 by the largest real terms pay cut suffered by teachers since 1977,<sup>6</sup> when taken in the context of crippling cost-of-living increases, has plunged many teachers into serious financial hardship.

2.20 The real terms pay cut recommended by the Review Body in 2023 has further exacerbated the appalling financial situation many teachers are faced with, as mortgage rates, energy bills and food costs continue to increase at a faster rate than their pay.

### Cumulative shortfall in teachers' salaries since 2010

2.21 The following table shows the extent to which teachers' salaries have eroded in real terms, as measured by RPI, since 2010. The values of teachers'

<sup>6</sup> In April 1977, teachers received a 5% pay award when RPI inflation was at 17.5%, resulting in a 12.5% real terms pay cut. In September 2022, teachers received a 5% pay award when RPI inflation was 12.6%, resulting in a 7.6% real terms pay cut.

pay on the MPR are between £5,545 (18%) and £10,569 (24.9%) lower in 2023/24 than if teachers' salaries had increased in each year since 2010 to keep pace with RPI inflation.

2.22 Similarly, the salaries of teachers paid on the Upper Pay Range (UPR) are between £13,430 (30.5%) and £14,442 (30.5%) lower in 2023/24 than if teachers' salaries had increased to keep pace with RPI inflation since 2010. Leadership Pay Range (LPR) headteachers' salaries are between £16,918 (31.1%) and £43,305 (32.5%) lower by the same measure.

2.23 The following table shows the cumulative impact on teachers' pay range values since 2010, as a result of successive and prolonged below-RPI inflation pay awards. Teachers and school leaders who have remained in the profession since 2010 are in effect between £36,041 and £252,486 worse off in real terms since 2010, due to the cumulative shortfall in pay.

#### Teachers' Salary Shortfall in 2023-2024

| Wales                       | Salary 2023/24 | Shortfall in 2023/24 (£) | Shortfall in 2023/24 (%) | 2010/11-2023/24 Cumulative shortfall (£) |
|-----------------------------|----------------|--------------------------|--------------------------|--|
| <b>Main Pay Range</b>       |                |                          |                          |  |
| M2 (Minimum)                | £30,742        | -£5,545                  | 18.0                     | -£36,041                                 |
| M3                          | £33,212        | -£9,092                  | 27.4                     | -£52,754                                 |
| M4                          | £35,771        | -£9,788                  | 27.4                     | -£56,792                                 |
| M5                          | £38,587        | -£10,562                 | 27.4                     | -£61,280                                 |
| M6 (Maximum)                | £42,466        | -£10,569                 | 24.9                     | -£61,014                                 |
| <b>Upper Pay Range</b>      |                |                          |                          |  |
| UPS1                        | £44,024        | -£13,430                 | 30.5                     | -£77,510                                 |
| UPS2                        | £45,656        | -£13,926                 | 30.5                     | -£80,372                                 |
| UPS3                        | £47,340        | -£14,442                 | 30.5                     | -£83,354                                 |
| <b>Leadership Pay Range</b> |                |                          |                          |  |
| L6                          | £54,316        | -£16,918                 | 31.1                     | -£97,548                                 |
| L8                          | £57,064        | -£17,777                 | 31.2                     | -£102,499                                |
| L11                         | £61,547        | -£19,175                 | 31.2                     | -£110,559                                |
| L28                         | £93,236        | -£29,051                 | 31.2                     | -£167,502                                |
| L43                         | £133,350       | -£43,305                 | 32.5                     | -£252,486                                |

2.24 A significant above-RPI inflation increase in salary values over a sustained period is necessary to restore teachers' salaries to a level commensurate to their skills and experience. If the Welsh Government is serious about supporting the teaching profession to deliver a world-leading education system, then rebuilding and investing in the teaching profession must be prioritised to ensure there are enough qualified teachers to teach in schools. This is a basic requirement of government.

### **A restorative pay award**

2.25 NASUWT continues to call for significant above-RPI inflation increases to all salary points and allowances to address the cumulative shortfall in teachers' salaries since 2010, as detailed earlier in this evidence. In 2022, the Union recommended that the following increases to teachers' salaries and allowances were necessary to reverse the real terms reduction in pay suffered by teachers in Wales since 2010:

2022 – 12%

2023 – 10%

2024 – 8%

2.26 NASUWT is calling upon the Review Body to increase all teachers' salaries and allowances by 8% in September 2024.

### **The disparity between public and private sector earnings growth since 2010**

2.27 The latest data on growth in earnings for employees, published by the ONS on 16 January 2024, shows that: '*Average regular earnings growth was 6.5% for the private sector in September to November 2023, and 6.6% for the public sector.*'<sup>7</sup>

2.28 When we consider annual growth in employees' average total earnings (including bonuses) since 2010, it is clear from the ONS data that public sector workers earnings, including that of teachers, has failed to increase in line with private sector workers generally. In September 2010, private sector employees'

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<sup>7</sup> ONS, Average weekly earnings in Great Britain: January 2024.  
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsingreatbritain/january2024>

average total earnings (including bonuses) were £440 per week (£22,879 annually). This had increased to £674 per week (£35,048 annually) by September 2023, which represents a 35% increase since September 2010.

2.29 By contrast, in September 2010, public sector employees' average total earnings (including bonuses) were £468 per week (£24,318 annually). This had increased to just £645 per week (£33,526 annually) by September 2023, which represents a 27% increase since September 2010. Public sector workers, including teachers, cannot afford another year of damaging pay austerity.

2.30 The chart below shows the extent to which the pay of classroom teachers earning the maximum amount on the MPR (Max MPR) has fallen behind price increases, measured by both the RPI and CPI, since 2010. It also incorporates the ONS data to measure annual total pay growth in September each year since 2010 for both private sector and public sector employees.

2.31 The chart illustrates that since 2010:

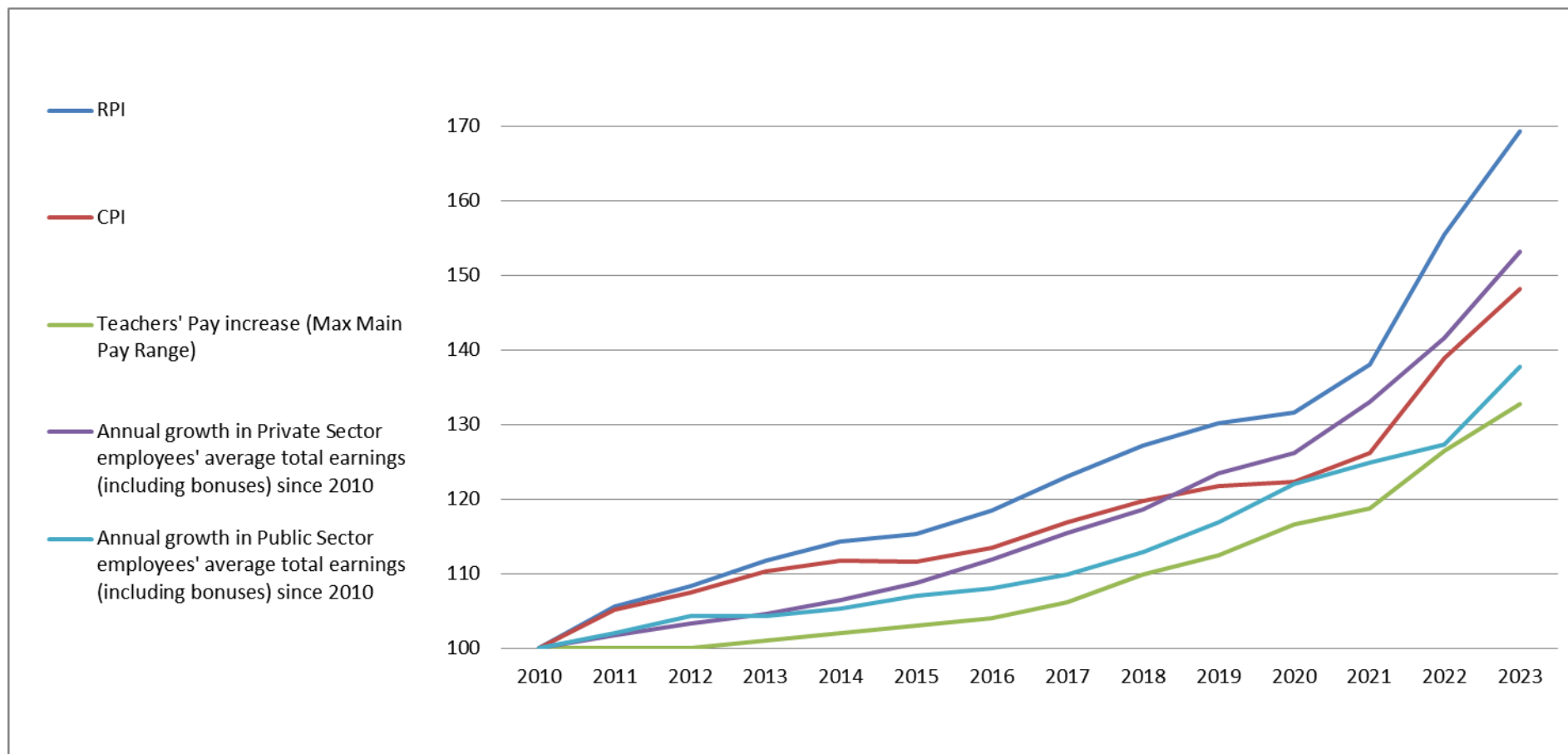
- the cost of living has increased by 69.4%, as measured by RPI, and 48.2%, as measured by CPI;
- average total earnings in the private sector has risen by 53.2%;
- average total earnings in the public sector has risen by 37.9%; and
- pay for teachers in Wales at the top of the MPR has risen by just 32.8%.

2.32 Classroom teachers in Wales are significantly poorer in real terms than they were in 2010, due to the cumulative impact of pay awards failing to match cost-of-living increases as measured by both the RPI and CPI inflation measures. Pay increases for classroom teachers in Wales has also failed to keep pace with pay increases more generally in both the public and private sectors since 2010. Although private sector earnings have risen faster than price increases, as measured by CPI since 2010, the earnings of public sector workers more generally have failed to do so.

2.33 The extent to which the growth in teachers' earnings in Wales has fallen behind their counterparts in both the public and private sectors is truly shocking. The ONS data demonstrates the urgent need for a significant above-RPI inflation pay award for the teaching profession, to put an end to the cycle of ever-

deteriorating real terms pay for teachers when compared to the pay of other workers in an increasingly competitive graduate market.

**Indexed price increases compared to teachers' MPR increases, private sector and public sector average total pay increases 2010 to 2023**



## **The gender and ethnicity pay gaps for teachers**

2.34 An analysis of the School Workforce Annual Census (SWAC) for Wales 2022<sup>8</sup> reveals that average salaries are higher for male teachers than for female teachers both overall and at headteacher and 'other leadership' grades.

2.35 The average salary for all teachers, including those in leadership roles in 2022/23, was £43,740. For male teachers, the average salary was £45,421, whereas the average salary for female teachers was £43,162. The pay premium for male teachers in 2022/23 was £2,259, which represents a gender pay gap of 5% in the teaching profession in Wales across all grades of teacher in 2022/23.

2.36 For male classroom teachers, the average salary in 2022/23 was £40,309, compared to £40,620 for female classroom teachers. The relative parity between average (mean) full-time equivalent (FTE) salaries for male and female classroom teachers in Wales 2022/23 is to be welcomed.

2.37 In 2022/23, the average salary for men in school leadership roles, excluding headteachers (Other Leadership), was £61,472, compared to £58,227 for women in similar leadership positions. The pay premium for men in this category in 2022/23 was £3,245, which represents a gender pay gap of 5.3% in 2022/23.

2.38 For headteachers, the gender pay gap is at its most extreme. In 2022/23, the average salary for men was £76,795, compared to £70,234 for women. The pay premium for male headteachers is £6,561, which represents a gender pay gap of 8.5% in 2022/23.

2.39 The extent of gender- and ethnicity-based pay inequality within the teaching profession remains a significant concern for NASUWT. The Welsh Government's own SWAC data clearly demonstrates a significant gender pay gap in schools in Wales in 2022/23, which becomes more pronounced in leadership and headteacher positions.

2.40 Systemic discrimination is denying progress towards a more diverse teaching profession. Research by NASUWT has also found that Black teachers are paid less than their white colleagues, are more likely to be employed in

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<sup>8</sup> Welsh Government, School Workforce Annual Census (SWAC) for Wales 2022, 18 July 2023. <https://www.gov.wales/school-workforce-census-results-november-2022>

temporary posts, are less likely to be promoted, and are more likely to be disciplined or dismissed from their jobs.<sup>9</sup>

2.41 The findings of research undertaken recently by the National Foundation for Educational Research (NFER) should be a reminder to both the Review Body and the Government that greater action is needed to tackle the causes and effects of racial discrimination in the teaching profession. Black teachers still face barriers to pay and career progression, as well as covert and overt racial discrimination throughout their careers.

2.42 The Welsh Government's *Initial teacher education Black, Asian and Minority Ethnic recruitment plan*<sup>10</sup> looks at what can be done to increase recruitment onto initial teacher education (ITE) programmes, and the *Ethnic Minority Initial Teacher Education Incentive Scheme* provides a £5,000 grant to students on an accredited postgraduate ITE programme that leads to Qualified Teacher Status (QTS) where they meet the eligibility criteria, including ethnicity criteria. Progress is being made, but more needs to be done to remove the barriers to pay and career progression that Black teachers still face.

2.43 NASUWT continues to call on the Review Body and the Welsh Government to undertake a thorough review of both gender and ethnicity pay gaps within the teaching profession and to consult with NASUWT and the teaching profession on the formulation of an action plan to explain what actions will be taken to address any gender and ethnicity pay gaps. As a first step, the Review Body should strongly recommend that school and college employers should publish ethnicity and disability pay gap data together with gender pay gap data on an annual basis.

### **3. TRENDS IN TEACHER SUPPLY**

3.1 We welcome the continued emphasis of the IWPRB, reflected in its 5th year remit, on the recruitment and retention of teachers, thereby ensuring that children

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<sup>9</sup> Institute for Employment Research (IER) at the University of Warwick, *Teachers' Pay and Equality*, 2016. <https://www.nasuwat.org.uk/advice/pay-pensions/teachers-pay-research.html>

<sup>10</sup> Welsh Government, *Initial teacher education Black, Asian and Minority Ethnic recruitment plan*, 2023. <https://www.gov.wales/initial-teacher-education-black-asian-and-minority-ethnic-recruitment-plan.html>



in Wales can continue to receive their entitlement to high-quality, universal and educational provision.

3.2 The evidence below sets out our continued concerns about the recruitment and retention position in Wales.

3.3 As the IWPRB will be aware, our previous submissions have highlighted profound problems in relation to teacher recruitment and retention, as well as the factors that underpin these problems. In our evidence, we have emphasised the high numbers of teachers seeking to leave teaching altogether, the inadequate number of graduates seeking to train to become teachers, and the substantial numbers of ITE places remaining unfilled.

3.4 We remain clear that the available evidence continues to confirm that the teacher supply situation remains troubling and that meaningful steps need to be taken to improve the teacher recruitment and retention position in Wales.

## **Recruitment**

3.5 The latest official data confirm 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 are available, the number of qualifiers from ITE courses in Wales fell from 1,740 to 1,325, a decline of over 23%.<sup>11</sup>

3.6 As we have highlighted previously to the IWPRB, this period was characterised by significant periods of pay restraint and declines in the value of teachers' pay in real terms.

3.7 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

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<sup>11</sup> Statistics for Wales (2023a). *Qualifiers on ITE courses in Wales by class of degree and year*. Available at: (<https://statswales.gov.wales/Catalogue/Education-and-Skills/Post-16-Education-and-Training/Higher-Education/Initial-Teacher-Training-ITT/students-in-Wales/qualifiersonitecoursesinwales-by-classofdegree-year>), accessed on 15.02.24.

on from successive failures to meet national allocations.<sup>12</sup> 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.<sup>13</sup>

3.8 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.<sup>14</sup>

3.9 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.

### **Pupil and teacher numbers**

3.10 Pupil numbers have been relatively stable over the past decade, although they are projected to decline after 2023.<sup>15</sup> However, it should be noted in this context that the projected decline to 2031 would only reduce overall pupil numbers to levels generally comparable with those recorded in 2012/13.<sup>16</sup>

3.11 Teacher numbers have declined significantly during a period when pupil numbers have remained high by historical standards. Between 2011 and 2023,

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<sup>12</sup> Statistics for Wales (2023b). *Statistical Bulletin: Initial Teacher Education Wales, 2020/21 (SB 19/2023)*. Available at: (<https://www.gov.wales/sites/default/files/statistics-and-research/2023-05/initial-teacher-education-september-2021-august-2022-080.pdf>), accessed on 15.02.24.

<sup>13</sup> Ibid.

<sup>14</sup> Statistics for Wales. (2023c). *Teacher recruitment: number of applications received by subject and year*. Available at: ([https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Teachers/teachers-and-support-staff/pupil-level-annual-school-census/Teacher-Recruitment-and-Retention/teacherrecruitmentapplications-by-subject-year](https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/pupil-level-annual-school-census/Teacher-Recruitment-and-Retention/teacherrecruitmentapplications-by-subject-year)), accessed on 15.02.24.

<sup>15</sup> Statistics for Wales (2023d). *Pupil projections*. Available at: (<https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Projections>), accessed on 15.02.24.

<sup>16</sup> Statistics for Wales (2023e). *Pupils present on census day by local authority and sector*. Available at: (<https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census/Pupils/pupilspresentcensuseday-by-localauthorityregion-sector>), accessed on 15.02.24.

the total number of EWC-registered teachers fell by 7.5% from 38,770 in 2011 to 35,837 in 2023.<sup>17</sup>

3.12 This trend has had an adverse impact on pupil/teacher ratios, particularly in primary schools, in which between 2010 and 2023, the pupil/teacher ratio increased from 20.1 to 20.9. Over the same period, the average junior class size increased from 24.7 to 25.7 pupils.<sup>18</sup>

### **Teacher wastage and retirements**

3.13 Teachers continue to leave teaching in significant numbers. In respect of later-stage career teachers, data published by the EWC in 2019 confirms that of the 1,863 teachers who gained QTS in 2009, only 889 were still teaching ten years later.<sup>19</sup> While this data has not been updated, other evidence suggests that rates of exit from the profession for reasons other than retirement or death-in-service remain significant among this group.<sup>20</sup> This emphasises the critical importance of ensuring that pay-related teacher supply policy is focused on the retention of serving teachers across the whole of the experience range, as well as recruitment into the profession. However, it remains the case that exit from the profession among relatively recent entrants is a continuing cause for concern.<sup>21</sup>

3.14 Overall, in 2021/22, only 125 of the 1,175 teachers who left teaching in Wales did so because they had reached pension age.<sup>22</sup> This high proportion of those leaving for other reasons is unsurprising, given that our Big Question

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<sup>17</sup> EWC (2021). *EWC Annual Education Workforce Statistics for Wales 2021*. Available at: (<https://www.ewc.wales/site/index.php/en/research-and-statistics/workforce-statistics.html#school-teacher>); EWC (2023). *EWC Annual Education Workforce Statistics for Wales 2023*. Available at: (<https://www.ewc.wales/site/index.php/en/documents-eng/about/workforce-statistics/annual-statistics-digest/current/931-2023-education-workforce-statistics-english/file>), accessed on 15.02.24.

<sup>18</sup> Welsh Government (2023). *School census results: January 2023*. Available at: (<https://www.gov.wales/sites/default/files/pdf-versions/2023/9/1/1695645738/schools-census-results-january-2023.pdf>); Welsh Government (2014). *School census results: January 2014*. Available at: (<https://www.gov.wales/sites/default/files/statistics-and-research/2019-05/school-census-results-2014.pdf>), accessed on 15.02.24.

<sup>19</sup> EWC (2019). *Registered School Teachers and retention in Wales – tracking analysis*. Available at: (<https://www.ewc.wales/site/index.php/en/documents-eng/about/workforce-statistics/leadership-npgh/527-retention-tracking-analysis-2019/file>), accessed on 15.02.24.

<sup>20</sup> See, for example: Ghosh, A. and Worth, J. (2023). *NFER Teacher Labour Market in Wales Annual Report 2022*. Available at: ([https://nfer.ac.uk/media/4zznpygz/teacher\\_labour\\_market\\_in\\_wales\\_annual\\_report\\_2022.pdf](https://nfer.ac.uk/media/4zznpygz/teacher_labour_market_in_wales_annual_report_2022.pdf)), accessed on 15.02.24.

<sup>21</sup> Ibid.

<sup>22</sup> Statistics for Wales (2023f). *Teacher leavers by destination and local authority*. Available at: (<https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/school-workforce-annual-census/teachers/teachersleavers-by-destination-localauthority>), accessed on 15.02.24

Survey 2023 confirmed that nearly three-quarters of teachers in Wales had seriously considered leaving the teaching profession in the last 12 months.<sup>23</sup>

3.15 Official data indicates that, where permitted, a substantial proportion of the teaching workforce is continuing to secure their exit from the profession through use of actuarially-reduced pensions. Welsh Government evidence confirms that 20.5% of those leaving teaching in 2022 did so by accessing early retirement.<sup>24</sup>

3.16 It is important to recognise that teachers electing to leave the profession by these means face considerable financial costs, given the actuarial reductions that early retirement entails. This cost highlights the extent of the propensity of many teachers to leave teaching in light that incurring these costs were seen as preferable to remaining employed as teachers.

3.17 The current demographic composition of the teacher and school leader workforce highlights the implications of retirements and exit from the profession for teacher supply. EWC data confirms that 21.6% of the total teacher population is aged 50 or over and that, as a result, age retirements are likely to continue to put pressure on the sufficiency of the pool of active teachers.<sup>25</sup>

### **Impact on specialist teaching**

3.18 The nature of the current teacher supply situation is that schools are deploying teachers to teach in areas that are not their first subject specialism or for which they do not possess appropriate academic qualifications. The most recent official data shows that, in 2023, only 50.2% of secondary school chemistry lessons were taught by teachers who were qualified in the subject, while the figures for Welsh and physics were 71.2% and 43.9% respectively. Similar concerns can be identified in respect of biology (57.4% of lessons were taught by teachers trained in the subject in 2023), information technology (43.7%) and religious education (62.3%).<sup>26</sup>

### **The teacher supply crisis: implications and other policy influences**

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<sup>23</sup> NASUWT (2023). *Big Question Survey 2023*. Available at:

(<https://www.nasuwat.org.uk/news/campaigns/big-question-survey.html>), accessed on 15.02.24.

<sup>24</sup> Statistics for Wales (2023f). *op.cit.*

<sup>25</sup> Statistics for Wales (2023g). *Teachers (headcount) by sex and age range*. Available at:

(<https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/school-workforce-annual-census/teachers/teachers-by-sex-agerange>), accessed on 15.02.24.

<sup>26</sup> EWC (2023). *op.cit.*

3.19 As we have continued to highlight in our previous submissions to the IWPRB, the declines in the real value of teachers' pay have had a considerable adverse impact on teacher supply and is continuing to contribute to the recruitment and retention issues described above. It is likely that unless meaningful remedial action is taken, including in respect of teachers' pay, these problems will continue to pose a significant risk to the effective operation of the education system.

3.20 We remain concerned about the implications of the teacher supply crisis on the future recruitment of teachers into leadership roles. School leaders are drawn from the wider teacher workforce, and teacher supply issues will inevitably impact on leadership recruitment in time.

3.21 It is likely that the impact of the current teacher supply situation, if it remains unaddressed, will impact negatively on the supply of suitably qualified and experienced teachers to fill middle and senior leadership roles. We believe it is clear that security of leadership workforce supply will be placed at risk if steps are not taken to tackle the corresponding recruitment and retention issues related to the generality of the teaching workforce.

### **Policy influences on teacher supply and further action**

3.22 In respect of other barriers to maintaining sufficient teacher supply, we continue to identify those issues addressed at length in previous submissions to the IWPRB. These matters include excessive and unnecessary teacher and leader workload, poor teacher and school leader wellbeing and mental health, low job satisfaction, barriers to accessing professional training and development opportunities, and unsupportive working environments and cultures.

3.23 The Education Minister recognised workload as a barrier to teacher retention and, in February 2023, initiated talks with education stakeholders to tackle workload. Unfortunately, the outcome of these talks was aimed largely at dealing with education leadership workload and, to date, not one reform has been progressed that has had any impact on classroom teacher workload.

3.24 NASUWT has also pursued with the Welsh Government the failure of the Social Partnership and Public Procurement Act to get to grips with workload-intensive initiatives at school level which are not subject to Social Partnership provisions.

#### **4. THE PUBLIC SECTOR FINANCIAL CONTEXT**

##### **High Fliers Research**

4.1 In January 2023, High Fliers Research carried out a study of the latest graduate vacancies and starting salaries at the UK's 100 best-known and most successful employers and found that graduate recruitment at employers featured in *The Times Top 100 Graduate Employers* recovered well in 2022, following a substantial increase in graduate vacancies in 2021, the biggest ever annual increase in graduate vacancies.<sup>27</sup> The research also found that:

On average, employers received 39 applications per graduate vacancy in 2022.

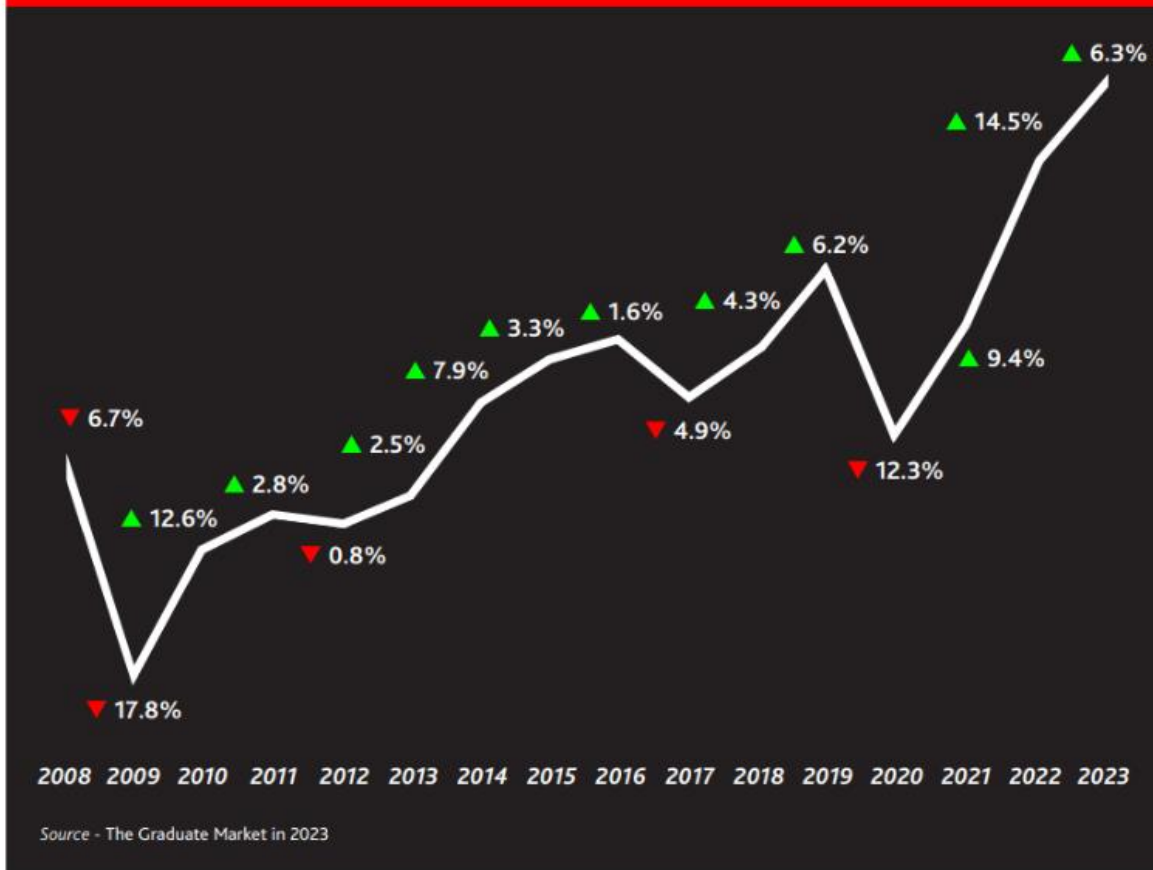
4.2 The UK's top employers had recruited 3,500 more graduates than had been expected at the start of the 2021-2022 academic year.

4.3 For the second year running, graduate starting salaries at the UK's leading graduate employers are set to increase to a new median starting salary of £33,500 in 2023.

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<sup>27</sup> [https://www.highfliers.co.uk/download/2023/graduate\\_market/GMReport23.pdf](https://www.highfliers.co.uk/download/2023/graduate_market/GMReport23.pdf)

Chart 2.1 Changes to Graduate Vacancies at the UK's Top Employers 2008 to 2023



4.4 Graduate recruitment was higher in 11 out of 15 industries and business sectors featured in the research in 2022 (see Table 2.3).<sup>28</sup> The largest rises were at accounting & professional services firms, technology companies, and engineering & industrial companies, which together recruited over 3,000 more graduates than in 2021.

<sup>28</sup> Ibid.

**Table 2.3 Analysis of Graduates Recruited in 2022, by Industry or Business Sector**

| Industry or Business Sector        | Recruitment target for 2022, as published in Sept 2021 | Recruitment target for 2022, as revised in Jan 2022 | Actual graduates recruited by Dec 2022 | % change from recruitment in 2021 | Vacancies added (cut), compared with 2021 |
|------------------------------------|--|---|--|-----------------------------------|---|
| Accounting & professional services | 5,800  | 7,424   | 7,752                                  | ▲ 31.5%                           | 1,856                                     |
| Armed Forces                       | 1,100  | 1,100   | 1,100                                  | ▲ 1.9%                            | 20  |
| Banking & finance                  | 1,525  | 1,654   | 1,693                                  | ▲ 21.7%                           | 302                                       |
| Charity & voluntary sector         | 112  | 95  | 102                                    | ▲ 3.0%                            | 3   |
| Chemicals & pharmaceuticals        | 190  | 144   | 96                                     | ▼ 23.8%                           | (30)                                      |
| Consulting                         | 380  | 310   | 332                                    | ▲ 36.1%                           | 88  |
| Consumer goods                     | 270  | 273   | 269                                    | ▲ 9.8%                            | 24  |
| Engineering & industrial           | 1,925  | 2,410   | 2,642                                  | ▲ 30.5%                           | 617                                       |
| Investment banking                 | 1,980  | 2,005   | 2,102                                  | ▲ 7.9%                            | 154                                       |
| Law                                | 866  | 892   | 1,010                                  | ▲ 14.8%                           | 130                                       |
| Media                              | 855  | 920   | 751                                    | ▼ 5.9%                            | (47)                                      |
| Oil & energy                       | 140  | 138   | 154                                    | ▲ 54.0%                           | 54  |
| Public sector                      | 4,690  | 4,748   | 4,331                                  | ▼ 6.5%                            | (299)                                     |
| Retailing                          | 1,310  | 1,617   | 1,368                                  | ▼ 5.0%                            | (72)                                      |
| Technology                         | 2,355  | 2,944   | 2,975                                  | ▲ 40.4%                           | 856                                       |
| <b>ALL SECTORS</b>                 | <b>24,378</b>  | <b>28,411</b>                                       | <b>28,107</b>                          | <b>▲ 14.5%</b>                    | <b>3,865</b>                              |

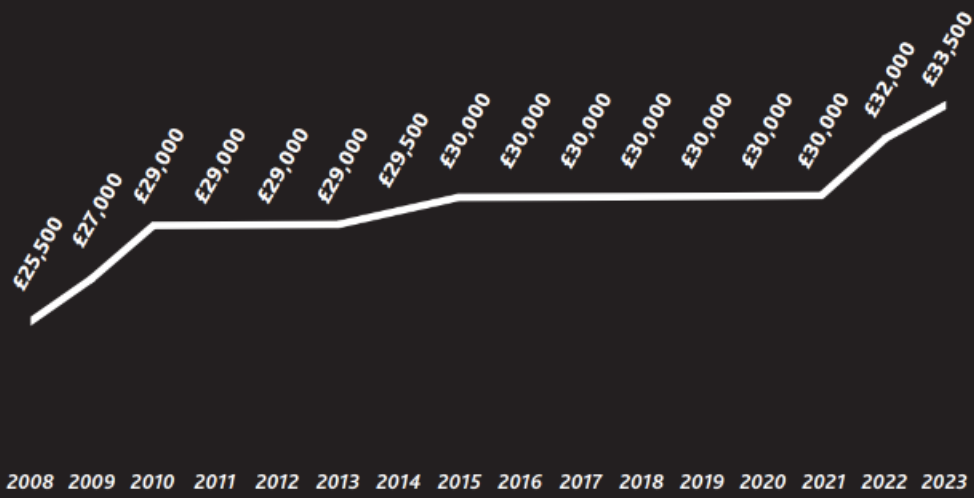
Source - The Graduate Market in 2023

4.5 It will not be lost on the Review Body that a teacher’s starting salary of £30k is already uncompetitive (see Chart 3.1),<sup>29</sup> with almost 10% of graduates starting on more than £50,000.

<sup>29</sup> Ibid.

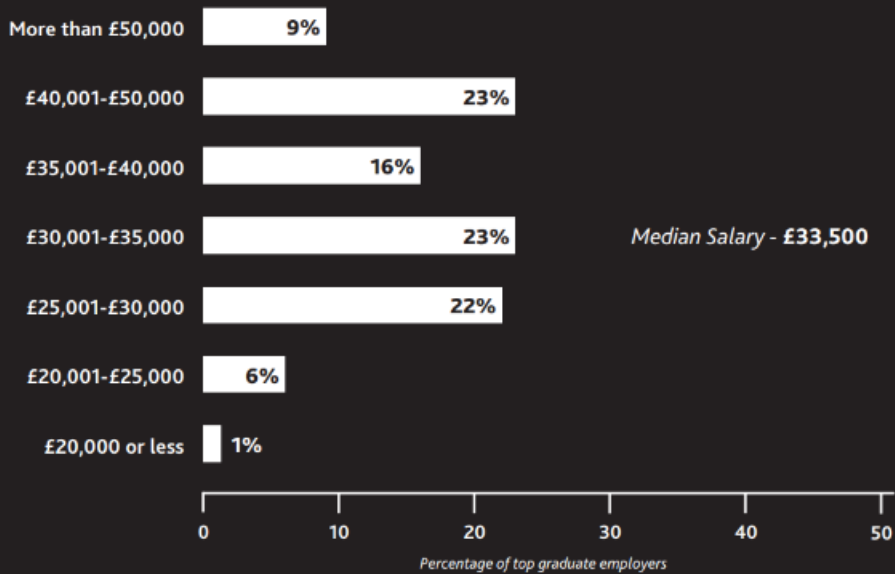


**Chart 3.1 Graduate Starting Salaries at the UK's Top Employers 2008 to 2023**



Source - The Graduate Market in 2023

**Chart 3.2 Graduate Starting Salaries at leading UK Employers in 2023**



Source - The Graduate Market in 2023

## **5. MATTERS FOR RECOMMENDATION**

- a) What adjustments should be made to the salary and allowance ranges for classroom teachers, unqualified teachers and school leaders, to ensure the teaching profession in Wales is promoted and rewarded to encourage recruitment and retention of high-quality practitioners?**

### **Flexible working**

5.1 The Covid-19 pandemic transformed the world of work, with remote and home working being imposed on many workers, including teachers during the two periods of school closures to most pupils. Importantly, many of the flexibility changes have become permanent features in many jobs in the wider workforce, while teachers returned to their classrooms and relatively inflexible work environments.

5.2 Data from the Timewise Flexible Jobs Index demonstrates these trends in the wider workforce (Timewise, 2023).<sup>30</sup> The proportion of jobs advertised with flexible working rose from 10% in 2015 to 17% on the eve of the pandemic, highlighting the growing focus on offering flexible working in the wider labour market. The proportion of jobs advertised with flexible working rose further throughout the pandemic, reaching 31% in 2023. The report shows that 60% of workers work flexibly. For teaching to compete, it would need to become more attractive in other ways, including higher pay to compensate for a lack of work flexibility compared to opportunities in the wider labour market.

### **Workload & Wellbeing**

5.3 There remains further work to do in reducing the amount of time teachers spend working in general, and on non-teaching activities such as planning, marking and administration.

5.4 Unmanageable workload is the most cited reason ex-teachers give for why they left in NASUWT surveys. NASUWT has proposed to the Minister three changes that could be made which would have a swift impact on classroom teacher workload:

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<sup>30</sup> <https://timewise.co.uk/article/flexible-jobs-index/>

1. The Restoration of the Section 4 Guidance of the STPCD to the STPC(W)D – appropriately updated.
2. The deletion of STPC(W)D paragraphs 50.7 and 50.8 and renumbering as appropriate.
3. A stakeholder task and finish group to be set up, to produce recommendations for the incorporation of the provisions of the appropriate requirements of the Social Partnership and Public Procurement Act into schools.

5.5 The removal of the open-ended clause in the teachers' contract (paragraph 50.7 and 50.8) must be urgently addressed. No other profession carries an unlimited working time expectation of workers. It is clear that without sufficient safeguards in the teachers' contract, teachers' working time will remain excessive and open to abuse.

#### **Pay progression post-threshold teachers**

5.6 The current provisions state that: '***The relevant body must also award a teacher on scale points M2 to M5 of the Main Pay Scale progression of one point following completion of a year of employment completed as a qualified teacher during the previous school year, unless the teacher has been notified that capability procedures are underway in respect of that year.***' (Paragraph 19.2.c).<sup>31</sup> This annual pay progression is also for those on the LPR, as set out in paragraph 11.2.b.

5.7 Post-threshold teachers are treated differently. As set out in paragraph 19, '***Pay progression on the upper scale should be in most cases on a two-yearly basis in line with requirements of paragraph 14 unless capability procedures are underway in respect of that period.***'

5.8 NASUWT asserts that all teachers and leaders should be eligible for annual pay progression; a failure to do so is to discriminate against post-threshold teachers.

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<sup>31</sup> [https://www.gov.wales/sites/default/files/publications/2023-10/school\\_teachers\\_pay\\_conditions\\_wales\\_document\\_2023\\_2.pdf](https://www.gov.wales/sites/default/files/publications/2023-10/school_teachers_pay_conditions_wales_document_2023_2.pdf)

## **Removal of post-threshold standards**

5.9 NASUWT is calling for the removal of post-threshold standards and the application of the Teachers' Standards for all teaching roles.

## **A six-point teacher pay scale**

5.10 NASUWT is also calling for the introduction of a six-point pay scale – starting at the current M4.

5.11 In the Isle of Man, there has been a step change in relation to teachers' pay and conditions of service as a consequence of years of recruitment and retention issues that resulted from significant pay erosion, increased workload and low morale. Recruitment and retention have been substantially improved, in large part due to:

Reducing the teachers' nine-point pay scale to a six-point scale commencing at M4.

Removing the Upper Pay Spine standards so that equitable standards apply to all teachers.

5.12 This has resulted in:

An increase in the number of vacancies receiving ten or more applications; and a reduction in the number of teachers leaving in the last 12 months, with leaver numbers down 16% in 2022/23 in comparison with 2021/22.

## **Pay Portability**

Paragraph 12.2 Currently states: '**Any pay increase or safeguarded sum (for the safeguarded period) awarded to a teacher on the main pay scale, the upper pay scale or the unqualified teacher pay scale in accordance with Parts 3, 4 and 5 or any movement between those pay scales must be permanent for as long as the teacher remains within the same school.**'  
(NASUWT emphasis)

This appears to contradict the principle of pay portability set down in paragraph 12.3 which states: **‘The relevant body must apply the principle of pay portability in arrangements to cover all movements of teachers between teaching posts within Wales (applicable to posts on the Main Scale or Upper Pay Scale).’**

NASUWT recommends that for clarity the text emboldened in paragraph 12.2 above is removed.

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

5.13 Section 3 of the current STPC(W)D gives invaluable statutory guidance for schools and centres to follow, to ensure that the provisions in Section 2 are applied fairly, equitably and consistently across the country.

5.14 Until its removal in 2013, Section 4 of the then-STPCD gave further detailed narratives regarding key workload issues and other contractual principles, arising from the National Agreement on Raising Standards and Tackling Workload in 2003.<sup>32</sup>

5.15 This Section 4 gave extended advice and instruction on items such as exam invigilation, administrative and clerical tasks, planning, preparation and assessment (PPA) time and the school calendar and timetable. The effect of having this clarity and detail was that schools avoided any misinterpretation of the then-STPCD (intentional or otherwise), which led to more harmonious industrial relations. Importantly, it ensured consistency in applying these principles across schools and sectors, whereas in the past there was a growing difference in how the primary and secondary sectors applied the STPCD in respect of non-pay conditions.

5.16 Since its removal from print, the Section 4 information has slipped from the collective memory and the Union has seen a return of variances across schools and sectors – especially with school calendars and timetables in respect of the fair application of directed time and resulting work-life balance. Worryingly, in the

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<sup>32</sup> <https://dera.ioe.ac.uk/540/1/081210thenationalagreementen.pdf>

annual NASUWT Big Question Survey 2023,<sup>33</sup> teachers reported working 52 hours in a typical work week, six hours more than they reported on average in 2022.

5.17 In the current STPC(W)D, there is no reference to the school calendar and timetable and how its introduction and planning can have positive effects on accurate directed time calculations (when calculating directed time budgets) and work-life balance of staff – in particular, part-time teachers. In the 2012 STPCD Section 4,<sup>34</sup> points 67-72 described how schools can consult upon the forthcoming calendar and timetable so as to ensure the above issues were properly addressed. Our members inform us that all too often, schools impose calendars and timetables that can be detrimental to part-time teachers, to workload wellbeing, and may even give rise to equalities issues.

5.18 In the current STPC(W)D, there is no description regarding the effective use of supply teachers. In the 2012 STPCD Section 4, paragraphs 82-84 described effective use of supply teachers and their right to access CPD, to receive site induction, to receive relevant information about pupils and classes etc. This reflects a resolution of the NASUWT Cymru Conference 2022,<sup>35</sup> where delegates called for minimum provisions and information that schools must provide for supply teachers upon employment. Reintroduction of this section would support schools and ensure consistency and quality of provision for supply teachers.

5.19 In the current STPC(W)D, there is one paragraph, 51.8 of Section 2, regarding exam invigilation. In the 2012 STPCD Section 4, paragraphs 91-95 described the rationale for its removal and how any variation (for example, internal examinations or oral examinations) can be addressed.

5.20 In the current STPC(W)D, there is one paragraph, 51.5 of Section 2, regarding PPA. In the 2012 STPCD Section 4, paragraphs 96-100 clarified the purpose and principles behind it as well.

5.21 The reintroduction of Annex 3 with the administrative and clerical tasks in the 2023 STPC(W)D is addressed elsewhere in this consultation response, and is

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<sup>33</sup> <https://www.nasuwt.org.uk/news/campaigns/big-question-survey.html>

<sup>34</sup> <https://www.local.gov.uk/sites/default/files/documents/School%20Teachers%E2%80%99%20Pay%20and%20Conditions%20Document%202012.pdf>

<sup>35</sup> <https://www.nasuwt.org.uk/asset/A30168D5%2D917B%2D4B3C%2DADAB2C0F5C9738FF/>

also referred to in paragraph 51.8 of Section 2. NASUWT notes that the list of 21 is not exhaustive, yet there is no guidance on how schools can objectively assess similar tasks. In the 2012 STPCD Section 4, paragraphs 3-13 and 17-22 gave detailed guidance on how administrative and clerical tasks could be defined and quantified. This allowed schools to apply the principle of non-undertaking of such tasks to a wider range of activities unique to the school than just those 21 set in the 2023 STPC(W)D.

5.22 Whilst the current Section 3 is a valuable guide for schools and centres, NASUWT remains certain that, for the reasons outlined above, the extra guidance in the 2012 STPCD Section 4 should be incorporated into the current Section 3 guidance, which can then be addressed and potentially expanded on.

5.23 All this being the case, NASUWT would refer the Welsh Government and the IWPRB to our 2022 submission where a new draft Section 3 was included that was revised using amendments:

- suggested by NASUWT;
- that should have been amended following the 3rd and 4th report of the IWPRB;
- restored from the Section 3 Guidance in the 2012 Document, suitably amended; and
- restored from the Section 4 Guidance in the 2012 Document, suitably amended.

This submission document is Appendix 1 and is arguably ready for adoption.

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

5.24 NASUWT has significant concerns about the Additional Learning Needs and Education Tribunal (Wales) Act. The Union believes that the Act is creating massive workload burdens for ALNCOs and teachers. The ALN Code was published in April 2021, and NASUWT has raised concerns regarding the lack of

consultation with education stakeholders that has caused significant workload issues in the system.

5.25 Evidence from an NASUWT survey of teachers' experiences of ALN highlights the difficulties that teachers already face in supporting learners with ALN (NASUWT (April 2018) *Special Educational Needs (SEN), Additional Learning Needs (ALN) and Additional Support Needs (ASN): Survey report - <https://www.nasuwt.org.uk/static/uploaded/525e2166-6bf1-4b7c-be067062f8ead91c.pdf>* ). Almost two-thirds of respondents reported that support for learners with ALN had decreased in the previous five years. Eighty-four per cent reported that workload has increased because of ALN reforms.

5.26 Teachers reported that local authority central services are automatically rejecting initial applications for assessment or support and are then requiring the school to provide additional and overly-detailed information in order to secure an assessment or support for the learner:

*“As we are having increasing numbers of pupils with ALN in mainstream, most of which have NO support whatsoever, up-to-date training for staff is crucial as we are trying to juggle so much.”* – Teacher NASUWT ALN/SEN survey.

5.27 The 2023 NASUWT ALN Wales 2023 survey revealed that 86.3% of respondents felt, in their professional teacher opinion, that '*rates of adverse emotional personal or social issues among pupils you teach*'. had increased. This is placing added pressure on teachers in provision of support to ALN students with very low support.

5.28 Worryingly, more than two-thirds of respondents to NASUWT's ALN/SEN survey reported that they never or rarely receive the support they need to enable them to teach learners with ALN effectively.

5.29 NASUWT is aware that only 10% of classroom teachers have an SEN allowance (School Workforce Annual Census, ad hoc request). This is difficult to understand, given the criteria for the award of this allowance, when the number of pupils within mainstream settings have increased significantly.



ALN teachers in Wales that responded in the NASUWT Big Question Survey that 84.62% felt they were not paid at an appropriate level for their skills and level of experience as a teacher.

5.30 It is clear from the ALN Code that the role of the ALNCo is perceived to be a strategic one (The ALN Code, Welsh Government, March 2021, <https://gov.wales/additional-learning-needs-code>). The Code does include a point that ALNCoS should be in a senior leadership position, or at least have a line of influence through a senior leader.

5.31 NASUWT maintains that the expectations set out in the ALN Code should result in the role of ALNCoS being recognised by a position remunerated on the leadership pay spine, which recognises and reflects their strategic responsibilities. The IWRPB instructed an ALN Task and Finish Group to examine the roles, responsibilities and workload of this position and to make a recommendation as to appropriate remuneration. This was a wide stakeholder group of which NASUWT was a member. NASUWT proposed in this Task and Finish Group that the ALNCo role was placed on the leadership spine to reflect managerial, strategic and statutory responsibilities. This report reflects the NASUWT proposal (<https://www.gov.wales/pay-and-non-contact-time-additional-learning-needs-coordinators-alncos-report>).

5.32 NASUWT believes that adequate time must be provided to ALNCoS in order for them to properly carry out their duties, particularly given the widely reported lack of support and training opportunities provided by many local authorities. This accords with comments from Estyn in their report recommending that schools must ensure that ALNCoS have sufficient time and resource to carry out their duties ([https://www.estyn.gov.wales/system/files/2023-09/The%20new%20additional%20learning%20needs%20system\\_0.pdf](https://www.estyn.gov.wales/system/files/2023-09/The%20new%20additional%20learning%20needs%20system_0.pdf)).

5.33 The Welsh Government Additional Learning Needs Implementation Report 2023 states:

*'we are alert to concerns about the increased workload placed upon ALNCoS and the need for schools to ensure there is sufficient support around the*

*ALNCo to prevent them becoming isolated and overwhelmed with caseloads.'*  
(Paragraph 3.21)

<https://business.senedd.wales/documents/s137055/IER%2034%20Welsh%20Government%20-%20Additional%20Learning%20Needs%20-%20May%202023.pdf>

5.34 NASUWT, as a member of the ALN Task and Finish Group, raised these concerns and proposed that reasonable and protected non-contact time was guaranteed for the ALNCo to manage their increased workloads both in caseload and managerial, strategic and statutory responsibilities. We are confident that the ALN Task and Finish Report will support this proposal when released.

5.35 NASUWT survey findings reveal that workload is a very significant issue for teachers with ALN and SEN responsibilities, and that it is particularly acute for ALNCos in Wales.

5.36 Teachers report that 94% of ALNCos have timetabled teaching commitments, which compares to 81% of respondents across the UK. In Wales, 42% of ALNCos stated 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 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. (NASUWT (April 2018) *Special Educational Needs (SEN), Additional Learning Needs (ALN) and Additional Support Needs (ASN): Survey report*).

<https://www.nasuwt.org.uk/static/uploaded/525e2166-6bf1-4b7c-be067062f8ead91c.pdf>

5.37 NASUWT survey findings point to the need for substantial additional investment in ALN so that ALNCos have the time to undertake their

responsibilities for ALN. The Union has repeatedly warned that the implementation of the ALNET Act must be accompanied with sufficient funding to properly support ALN pupils throughout Wales:

*“It is very hard to get external ALN-related support – services have been cut. There is little or no support with respect to behavioural difficulties.”* – Teacher NASUWT ALN/SEN survey.

5.38 This is particularly pertinent, considering the comment in the NAEL report that a potential 37% of ALNCoS are unlikely to remain in their post in view of the challenges they now face (<https://nael.cymru/wp-content/uploads/2023/09/Commission-Report-ALN-Cohort-3-FINAL.pdf>). The NASUWT Big Question Survey 2023 (Wales) reveals that 70.77% of respondents had seriously consider leaving their current jobs (<https://www.nasuwt.org.uk/news/campaigns/big-question-survey>).

5.39 The Union proposes that the Review Body recommend that additions are made to the STPC(W)D to ensure that ALNCoS are properly rewarded, by appointment, on an appropriate point on the leadership spine.

5.40 NASUWT also proposes that the Review Body recommend that the following amendment is made to Paragraph 51.6, to ensure that ALNCoS have adequate and appropriate time to support their role:

*A teacher with leadership or management responsibilities **or undertaking the role of ALNCo** is entitled, so far as is reasonably practicable, to a reasonable amount of time during school sessions for the purpose of discharging those responsibilities.*

<https://business.senedd.wales/documents/s137055/IER%2034%20Welsh%20Government%20-%20Additional%20Learning%20Needs%20-%20May%202023.pdf>

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

5.41 Whilst formal recommendations have been commented upon in the preceding paragraphs, it is important to take note of the issues the T&F group raised issues for further consideration (P14). These issues were outside the remit given to the ALNCo T&F group, but they were felt to have a significant yet unmeasured impact on the performance of their role.

- Inconsistencies across local authorities.
- The issues raised by existing budgetary constraints, especially in relation to availability of teaching assistants.
- Understanding of ALN is not comprehensive across the system.
- The issue of the stress that ALNCoS were experiencing was emphasised by the members of the T&F group.

No recommendations were made in relation to these challenges. NASUWT would emphasise that provision of appropriate funding to support the deployment of sufficient trained and experienced staff is crucial to the achievement of the aspirations of this role. It is also crucial in protecting teachers, and supporting a healthy work-life balance. Members have been telling NASUWT that the contents of Annex 3 of the STPC(W)D had crept back into the daily work streams of teachers since its removal from print in 2013. The Union welcomes its return and is confident that, in time, it will contribute to the removal of any ambiguity relating to the professional duties of the teacher. In the NASUWT Big Question Survey 2023,<sup>36</sup> over 70% of respondents said they had spent more time on administrative and clerical tasks that past year than before. Fifty-five per cent of respondents noted that they had spent more time on data and assessment requirements that past year than before.

5.42 The return of the list of administrative and clerical tasks is still new, and NASUWT would suggest that it is too early to spot any issues or blind spots that can be addressed by new items. Item 13 rightly describes the administration of

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<sup>36</sup> <https://www.nasuwt.org.uk/news/campaigns/big-question-survey.html>

public and internal examinations as administrative/clerical that does not call for the exercise of a teacher's professional skills and judgment. However, paragraph 51.8 of the STPC(W)D only refers to external examinations. The STPC(W)D needs to be amended to include internal examinations within 51.8, so as to marry up with item 13 in Annex 3.

5.43 Further, in paragraph 64 of Section 3 of the STPC(W)D, it is expected that no teacher should routinely carry out administrative and clerical ITT-related activities. This is not reinforced in Annex 3, so NASUWT would seek it to be added to the list.

5.44 Administrative and clerical tasks should also be removed from the workload of leadership staff as well. The list is applicable to leadership staff, aside from points 2, 9 and 10 – since they relate to responsibilities that lie with the leadership team. The Union would expect the contents of Annex 3 to be relevant to leadership staff, aside from the contents of points 2, 9 and 10.

**e) Leaders' Conditions of Service and, in particular, the consideration of if introducing guaranteed working hours (or limits on) as well as protected holiday entitlement and weekends for leaders is to be included in the STPC(W)D**

5.45 School leaders in Wales are not subject to the limit on working days (195) and directed time (1,265) to which teachers are. As a result, there is no limit to their working time. This has a detrimental effect on school leaders' work-life balance, including affecting their mental health. *In the NASUWT Big Question Survey, the average working hours of leaders in Wales was over 45 hours per week and leaders reported working an average of 14 hours outside of the school day.* Over 83% of those leaders believed their job had adversely affected their mental health in the last 12 months, and 70% had considered leaving the profession, showing the impact of workload on the retention of school leaders.

5.46 NASUWT calls for school leaders to be entitled to a limit to their working days and hours, including a 35-hour working week. A limit to working hours could encourage more leaders to consider flexible working, as currently those leaders

who chose to work part time do not have a limit on their working hours as a proportion of directed time, as do teachers (paragraph 50.6). This may, in turn, have a positive influence on the diversity of leadership candidates in Wales.

5.47 A limit on working time would be a strong start to limiting the detrimental effects on school leaders; however, this alone would be of limited benefit if national policy and regulation require leaders to undertake duties which would necessitate them continuing to work unsustainable hours or simply delegating unsustainable duties to colleagues who are themselves working beyond capacity. NASUWT therefore calls on the IWPRB to recommend that a limit on working hours is accompanied by a contractual requirement for employers and the Welsh Government to publish workload impact assessments for the implementation of policies affecting the work of schools in Wales. Furthermore, there must be a commitment that any resource implications arising from those impact assessments would be fully funded in advance of implementation.

**f) Teachers' Conditions of Service and, in particular, reviewing guaranteed working hours (or limits on) as well as protected holiday entitlement and weekends be revised in the STPC(W)D**

5.48 NASUWT hopes that the IWPRB has the courage and conviction to rid the STPC(W)D from all vestigial exploitative practices.

5.49 It can be asserted that the modern teacher has two jobs: The five hours or so of continuous teaching and then the hours of PPA and other administrative tasks that the first job generates. These workload issues have been evident for years and remain a major hurdle to teacher wellbeing, morale, recruitment and retention. Whilst workload is currently being scrutinised and addressed by the Reducing Workload Stakeholder Group, there is no doubt that the workforce is being adversely affected by the open-ended nature of the Contract. As mentioned in previous responses, the Union believes that the current paragraph in the STPC(WD):

*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.*

– is such fertile ground for limitless excessive workload and exploitation that the Union seeks that this paragraph be expunged from the Document.

5.50 The Welsh Government need not be cautious about such a step. The removal of 50.7 will not adversely affect the effective discharge of a teacher's professional duties. This is because teachers, as with all professionals, will discharge their duties to the best of their abilities and to the benefit of their learners regardless of when, where and how they have to achieve this. It is, in effect, an implied part of every professional's contract.

5.51 The removal of 50.7 will instead rid the profession of any exploitation of teachers by errant employers who quote the paragraph to press their staff into unsustainable working practices. Its removal can force employers to rationalise workload and address its problems, knowing that the teacher is not any more contracted to work for unfair, unnatural and unhealthy periods and times.

5.52 In the annual NASUWT Big Question Survey 2023,<sup>37</sup> 52% of the teachers surveyed said that their workload had increased significantly over the last year. Worryingly, teachers also reported working 52 hours in a typical work week, six hours more than they reported on average in 2022.

5.53 The STPC(W)D continues to set a limit of 1,265 hours directed time for full-time teachers annually. The scarcity of casework related to directed time limits tells NASUWT that this limit is reasonable. There have been no calls to increase this limit in recent memory from any stakeholder. It is therefore reasonable to adopt 1,265 hours as a contractual limit on annual working hours.

5.54 All this will go a long way to ensure a vibrant workforce of high morale and professional satisfaction, who are able to professionally manage their work and workload to their and their learners' benefit whilst enjoying a work-life balance at the same time.

5.55 NASUWT would note that paragraph 51.1 in the STPC(W)D is suffice in its stated protection of weekends and bank holidays.

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<sup>37</sup> Ibid.

5.56 A healthy and meaningful work-life balance is essential so that staff can be the best they can be for the benefit of the learners. In the annual NASUWT Big Question survey 2023,<sup>38</sup> the effect of the extra strain and workload is having an effect on teachers' daily morale. Seventy-one per cent of respondents claimed to be too worn down to give their best efforts in the job. More than three-quarters of teachers surveyed say they have been unable to separate their work and home life since the start of the pandemic. Most teachers are not satisfied with their job, and 69% of teachers are considering leaving the profession entirely.

5.57 A minimum holiday entitlement is inferred from the contents of paragraph 50.2, where it is established that a teacher employed full time must be available for work for 195 days in an academic year. The Union would suggest that the Welsh Government insert a sub-paragraph of paragraph 51 that explicitly protects a minimum holiday entitlement in the summer to no less than six weeks. This would end the current futile and baseless obsession with restructuring the school year.

## **6. CONCLUSION**

6.1 NASUWT makes no apologies for asking the Review Body to implement further significant structural reform of the teachers' pay framework to build on its successes in its last four reports. The Union believes that the nature of this remit from the Minister of Education, and the nature of the crisis in the teaching profession, necessitates radical reform.

6.2 A substantial multi-year pay award for all teachers and school leaders is the key to radical reform. NASUWT stresses again to the Review Body that it should recommend a pay award and a teachers' pay framework which the teaching profession and the education system deserve, and which educational and social recovery in Wales both warrant and need.

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<sup>38</sup> Ibid.