



**WRITTEN SUPPLEMENTARY EVIDENCE SUBMISSION TO**

**THE INDEPENDENT WELSH PAY REVIEW BODY**

**MAY 2020**

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1. We are grateful to have the chance to submit supplementary evidence to the IWPRB in this second year of the devolved pay and conditions process, the tight timescale notwithstanding. Within this supplementary evidence, we refer back to paragraphs of our main written submission, and also use the same abbreviations as in our submission.

### **Teachers' Pay and Conditions Process: Year Two**

2. We start our supplementary evidence by making clear how unacceptable the actions of the Welsh Government have been throughout this process.
3. Following its devolution to Wales, the pay and conditions review process was agreed after consultation with the employers and the unions. The process was riven with delay in the first year but, in the main, we took a pragmatic stance, given that it was the first year that it had taken place. There is no place for such pragmatism in the second year when first year teething problems should have been rectified, the covid-19 pandemic notwithstanding.
4. In particular, we would like to draw the IWPRB's attention to the following:
  - Partnership Forum meetings in 2019 cancelled by the Welsh Government, leading to delays;
  - Consistent intransigence over the inclusion of a cost consideration in opposition to both the employer and union sides, leading to delays;
  - Inexplicable delays to the issuing of the Remit by the Cabinet Minister for Education, which was not sent to the Chair of the IWPRB until 26 February 2020;
  - Notification by e-mail by the Secretariat at 12.09pm on Friday 1 May, the deadline date for the submission of written evidence, that the Welsh Government evidence would be delayed despite the fact that paragraph 14 of the IWPRB's guidance states that, '*Due to the tight timescales for consideration of this evidence, we are unable to grant extensions....*' and that all other submissions were submitted by the deadline dates;
  - Notification by the Secretariat on 6 May that the Welsh Government would not be submitting its evidence until 14 May (and not receiving it from the Welsh Government until 18 May);
  - A total of 8 working days to prepare our supplementary evidence from the date of receiving the Welsh Government evidence.
5. We ask the IWPRB to put on record that the Welsh Government's actions, as detailed in the paragraph above, have gravely risked stakeholders' and teachers' confidence in the entire process, and have led to unacceptable delays and an opaque application of the rules by both the Secretariat and the Welsh Government.

6. We also register our incomprehension that the Welsh Local Government Association has not submitted evidence. As the representative of the employer side and a participant in the Partnership Forum, we consider that the WLGA has not taken the process seriously with regard to the thousands of teachers that the 22 local authorities in Wales employ, and we therefore have significant concerns about the operation of the process in future years.

### **Union Agreement**

7. We have considered all of the written evidence submitted to the IWPRB but, due to the fact that many of our arguments align with those of other union submissions, and the tight timescales involved, we choose to respond directly only to the Welsh Government submission.
8. However, we wish to emphasise that the joint statement submitted by ASCL, HAHT, NEU, UCAC and Voice, and all six of the individual union submissions are in broad agreement with the following changes that we wish to see implemented in the STRB(W) in 2020/21:
  - Above-inflation across the board pay increase;
  - Re-introduction of pay scales;
  - Differentiation between pay points and equivalent uplifts to all pay points;
  - Pay portability;
  - Removal of any form of performance related pay.

The unions are also in agreement that there is a very real recruitment and retention crisis that needs to be urgently addressed.

### **Response to Welsh Government Submission**

9. Voice considers that the Welsh Government submission rehearses much data with little real analysis and without responding in depth to the matters for recommendation. The mere fact that the matters for recommendation for implementation from September 2020 have not been directly cited as headings, unlike in other submissions, means that the structure of the submission is unclear and confused, appears to make broader political points, and is not always directed to the considerations and matters for recommendation within the remit.

## Chapter 1: Wider current economic outlook/labour market conditions

10. We have little comment to make on the data presented by the Welsh Government regarding the wider economic outlook and labour market conditions in the context of the covid-19 pandemic, other than reiterating that, firstly, salary increases made since the lifting of the 1% cap have remained insufficient to address the real term losses sustained by teachers over the last 10 years of austerity; secondly, it is even more vital at this time that teachers in Wales are valued in both pay and conditions, when the profession has gone above and beyond what could reasonably be expected of it, and demonstrated dedication and utmost professionalism to children and their parents, employers, the Welsh Government and the wider public.

## Chapter 2: Public sector financial context/affordability

11. We object strongly to evidence relating to *affordability* being part of the considerations to which the IWPRB is to have particular regard, and we urge the IWPRB not to make its recommendations on the basis of affordability, a factor that remains solely within the capacity of the Welsh Government. We further wish to remind the IWPRB that affordability is *not* included within the considerations in the Remit, and that the inclusion of the identification of cost of any proposed changes to pay and conditions was strenuously objected to by both the employer and union sides during Partnership Forum meetings.

12. We consider that the Welsh Government's inclusion of the IFS opinion that the gap in school spending per pupil between England and Wales has been '*virtually eliminated*' is a wholly specious argument given that the crux of the matter, as voiced by the Children, Young People and Education Committee in its School Funding in Wales report published in July 2019, is that there is, '*...a very bleak picture in terms of the overall quantum of funding available for education. It is absolutely clear that schools across the country are facing a period of unprecedented funding concerns, and budget difficulties. In simple terms, we agree....that the overall quantum of funding is insufficient. There is not enough money currently available to ensure schools meet everything required of them, and provide an education for our pupils at the level they deserve.*'<sup>1</sup>

13. Much of this chapter relates to the funding of local authorities but we again comment that, without evidence from the WLGA there is a lack of local authority perspective to the data presented by the Welsh Government, such as at section 2.6 with regard to the '*...range of future scenarios taking account of [local authorities'] own income and resources as well as the uncertainty surrounding future public funding*'.

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<sup>1</sup> <https://senedd.wales/laid%20documents/cr-ld12643/cr-ld12643-e.pdf>; para 55

### **Chapter 3: Schools' financial positions and the impact of annual teachers' pay awards on school budgets**

14. We note that, at section 3, the Welsh Government has provided data regarding school deficits and reserves, but with no analysis of that data. We would refer the IWPRB back to the CYPE report at paragraph 12 above and we add the analysis lacking in the Welsh Government submission, which is that the data shows that many schools are in a parlous financial position with an unacceptable number in deficit, leading to wholesale redundancies of both teachers and support staff, and very difficult financial decisions in terms of how to ensure that all children and young people in Wales receive the best possible education.

### **Chapter 4: Data in relation to the school workforce, including recruitment and retention**

15. We note that, at section 4.1, the Welsh Government acknowledges that there has been a reduction in the number of teachers and an increase in the number of pupils and that, as a consequence, the pupil teacher ratio for all maintained schools has risen. This is also referred to at section 4.7, where there is recognition that, '*there may be an increased demand for secondary school teachers in the next few years in some parts of Wales*'. This represents an unfortunate juxtaposition of the recruitment and retention crisis with the rise in projected pupil numbers, and is a real cause for concern, as we outlined in our submission at paragraphs 44 - 46.

16. We further note that inclusion of data relating to registered teachers by age, and chart 10 at section 4.3 providing the age of headteachers, chimes with the concerns expressed by us at paragraph 33 of our submission.

17. We are staggered by the fact that, at section 4.4, the Welsh Government maintains that, '*...overall recruitment and retention rates throughout Wales show little evidence of concern...*'. To counter this assertion, we would ask the IWRPB to consider our evidence on recruitment and retention at paragraphs 30 to 41, along with the evidence presented on this matter by the other unions. In particular, the fact that the largest group of teachers leaving the profession in 2018 were those with 0 – 5 years' experience, and that this is still the largest proportion of leavers next to those with 31+ years' experience, indicates significant concerns with the retention of NQTs (charts 11 & 12).

18. Further, the substantial proportion of teachers who leave the profession either to be 'employed outside education' or in the 'other' category (chart 13), shows a disillusionment with the profession that must be rectified if this crisis is to be averted. With regard to the current time and foreseeable future, when teachers will be required to adopt innovatory pedagogy and blended learning techniques in order to address the social distancing and other measures

needed for children to return to school, we are concerned that we may see an even higher proportion of teachers leaving the profession because the stress of working in this environment has become too great.

19. Section 4.5 relates to vacancies, and the important sentence to note is that, *'All phrases and mediums show decreasing trends in average numbers of application per post'*. We argue at paragraph 44 of our submission that this trend is a further indication of the shortage of teachers.
20. With regard to recruitment to ITE courses at 4.11, we note the data provided by the Welsh Government but would submit that the most relevant figures are those showing that the targets for recruitment to courses are being missed in significant numbers (table 13 and chart 18), and that this, coupled with a proportion of students failing to complete the course or choosing not to enter the profession (paragraph 29 of our submission), conclusively demonstrates a shortage of entrants to the profession.
21. Further, in our opinion, the Welsh Government's view that falling numbers in secondary school courses in Wales do not cause concern because a significant proportion of Welsh students training in England will return to Wales to work is complacent to say the least. Firstly, it is clear that targets to ITE courses are not being met; secondly, as we stated at paragraph 54 of our submission, 85% of those completing ITE courses in Wales remain in Wales, so if falling numbers are completing ITE courses in Wales, there will still be a shortage notwithstanding Welsh graduates coming back to Wales to work; thirdly, the education system in Wales is becoming increasingly distinctive to England, and it is highly likely that this will have an effect on the numbers of Welsh graduates studying in England who then wish to return to Wales to work. It is possible that a higher proportion of Welsh students will choose to study in Wales for this reason but there is no guarantee, particularly if pay, terms and conditions are seen as more favourable in England.
22. The telling quote in section 4.8 with regard to entrants to the profession is that, *'In the secondary sector, trends over the last 5 years have led to an increased reliance on re-entrants. **This is partly the result of a particularly low intake of trainees combined with low undergraduate survival rates**'* [our emphasis]. This sums up the current situation concisely and is the real picture despite the fact that the Welsh Government has *little concern* regarding the overall recruitment and retention rates in Wales.

## Chapter 5: Teachers' pay – comparative levels and the implementation of recent reforms

23. We consider Chart 22 to be highly misleading: Firstly, senior professionals of educational establishments are being compared with all medical practitioners rather than senior medical practitioners. If this comparison took place, we have no doubt that senior medical practitioners would rank highest. Secondly, there is no comparison with private sector professions, such as law, accountancy, surveying, engineering, finance and marketing, that tend to have higher pay, (see our paragraph 24 for the comparison of starting salaries in the public and private sectors), and it must be remembered that graduates have a choice to enter both private and public sector professions. It is possible that the recession following the pandemic may change the available job opportunities, but the future is uncertain, and it cannot necessarily be relied on that sufficient numbers of graduates will gravitate towards teaching because of changes in the economy.
24. At section 5.5, the Welsh Government suggests that, '*pay is not a key driver for teachers*'. We say that pay is an important factor in recruitment and retention but that there are other contributory factors, the most important being workload, and we are very surprised that workload has not been alluded to, even in passing, in the Welsh Government's submission. We would refer you to paragraphs 35 to 41 of our submission.
25. We support the Welsh Government's position at section 5.5 for national standardised pay scales and do not consider that the legislative changes and associated issues that will need to be considered should stand as impediments to ensuring that this change to the pay structure is implemented.
26. We note that there is no mention of performance related pay in the Welsh Government's submission but the letter from the Cabinet Minister to the Chair of the IWPRB dated May 2020, does explicitly support the assertion that, '*...there does not appear to be any conclusive evidence of [PRP's] positive impact on the profession since its introduction*', and, '*...a return to an assumption in favour of progression unless an individual recorded unsatisfactory performance would also seem fair*'. As paragraphs 57 to 63 of our submission states, we do not consider that PRP is a beneficial feature of teachers' pay and, along with other education unions, we want this feature of the pay structure to be removed. Therefore, we support of the Welsh Government's stance, although we would need much more detailed consultation on what would be seen as an *unsatisfactory* performance, because the use of a negative assessment of performance could quite easily turn into an even more inconsistent application of PRP, unless it is explicitly linked to formal capability processes.
27. With regard to the pay options put forward by the Welsh Government at section 5.6, we disagree that 3% is a reasonable pay award and we strongly

object to further differentiation within the pay structure. We believe that continuing to increase the lower levels of the Main Pay Range (or lower pay points if and when pay scales are implemented), can only ever be a short-term incentive, and that lower pay increases for more senior teachers will lead to an exacerbated retention crisis and divisions within the profession. We also argue that pay does act as a driver for more senior teachers and leaders, and that its importance in retention must not be underestimated. Further, the proposed differentiated pay structures do not account for an even more distorted position if the starting salary for teachers increases to £30,000 by September 2022, and does not indicate the value, nor support the retention, of more experienced teachers.