



## **Cabinet Secretary's Response to the Independent Welsh Pay Review Body (IWPRB) 5<sup>th</sup> Report**

### **Response of the Association of School and College Leaders**

#### **Introduction**

1. The Association of School and College Leaders (ASCL) represents over 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. ASCL Cymru represents school leaders in more than 90 per cent of the secondary schools in Wales. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to make a written response to the government's proposals following the Independent Welsh Pay Review Body's (IWPRB) recommendations to the 5<sup>th</sup> Remit. Our response is based on the views of our members, obtained through discussions at ASCL Council, with relevant advisory groups, and prompted and unprompted emails and messages.
3. When considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the nine protected characteristics included in the Equality Act 2010, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged. We have answered any equality impact questions on this basis.

#### **Executive Summary**

4. ASCL is pleased to see that the Cabinet Secretary has increased the pay award for teachers and leaders from the 4.3% recommended by the IWPRB to match the 5.5% pay award in England, thus ensuring that the 'no detriment' principle is adhered to.
5. This award must be part of a multi-year above inflation pay award to restore teacher and school leader pay, after 14 years of salary erosion.
6. Whilst ASCL acknowledges that the delay in the minister's response to the IWPRB recommendation was caused by the need for the Cabinet Secretary to consider the implications of a new UK Labour Government, ASCL is disappointed with the extreme lateness of this response. The timing has had significant impact on school leaders who we represent.

7. We have repeatedly voiced concerns over the report being published late year-on-year, and the impact that this has on our members when trying to balance their budgets. This creates unnecessary and unacceptable workload and stress for school leaders and is totally out of time with the requirements they face with regards to budget setting and approval.
8. The timescales and delays this year meant that the report and response were not published until the second week of the new academic year. Notwithstanding comments made above, this simply cannot be allowed to happen again.
9. However, we do commend the Cabinet Secretary for allocating additional funding intended to fully fund the 5.5% teacher pay award at school level.
10. Our members are concerned, unfortunately, that this additional money will not be fully passported by Local Authorities and there is already growing evidence that this will be the case. Many school budgets are already in deficit, and we need assurance from the Welsh Government that there will be no obfuscation of funds and that schools will receive funding that cover the actual costs of the pay award.

### **Timeliness of the process**

11. Since teachers' pay and conditions were devolved to the Welsh Government, ASCL has made the case for the process to be carried out in a timely manner.
12. As we have stated previously, the time frame for the publication of the IWPRB's report and the subsequent consultation with stakeholders is problematic. In 2022, the 4<sup>th</sup> report and the Minister for Education and Welsh Language's response were published after most schools had closed after the summer term meaning that consultation with ASCL members was impossible before the summer break.
13. The lateness of the report inevitably meant that the pay award for September 2022 was not laid before the Senedd and on the statute book before the intended implementation date of 1 September 2022.
14. As we highlighted in our response in 2022, the proposal for multi-year awards for 2022 and 2023 provided some breathing space to allow for a timelier process in the future.
15. ASCL suggested that the Teachers' Pay and Conditions Partnership Forum (PPF) should agree a timetable that ensured the delivery of the IWPRB's report and the Minister's statement on it by no later than the end of May 2024.
16. It is therefore staggering that for the 5<sup>th</sup> remit, we saw the tightest timescales for evidence submissions, with deadlines in school holidays and on bank holidays, and the latest publication of the report and Cabinet Secretary's response, on 10 September.
17. This made a profound impact on teachers and leaders as they returned to school in September with no idea what their pay increase would be.

18. For school leaders the implications from this are manifold. In addition to the uncertainty over their own pay award, they also had no idea what the implications would be for their school budgets, creating stress and worry through the summer break and into the start of the new academic year.
19. Furthermore, they then find out that due to time constraints and lack of secretariat support, that despite there being a remit item relating to their conditions of service, there are no recommendations to address their excessive working hours or to provide them with guaranteed breaks throughout the year.
20. The message that this sends to leaders is not a positive one. This sentiment was reflected in a meeting with ASCL Cymru Executive on 25<sup>th</sup> September.
21. This cannot be allowed to happen again, and we must see urgent action to improve leaders' conditions of service as this is having a significant effect on the recruitment and retention of school leaders in Wales.

### **Matter for recommendation**

***What adjustments should be made to the salary and allowance scales 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.***

### **IWPRB Recommendations**

**Recommendation 1** - *The IWPRB recommends to the Welsh Government that all salaries and allowances be increased by 4.3% from September 2024.*

**Cabinet Secretary's response** – *Do not accept - Consult on increasing all salaries and allowances by 5.5% in line with commitment to no detriment to teachers in Wales.*

### **ASCL's Response:**

22. ASCL was pleased to see the recommendation for a 5.5% increase to all pay ranges and allowances.
23. It was reassuring to see that the Cabinet Secretary increased the pay award for teachers and leaders from the 4.3% recommended by the IWPRB to match the undifferentiated 5.5% pay award in England, thus ensuring that the 'no detriment' principle is adhered to.
24. Whilst this increase in and of itself does not restore the real terms cuts to teacher and school leader pay, it is an above inflation increase and a welcome step towards this.
25. We must continue to see increases of this nature in forthcoming years until the real terms value of teacher and leader pay has been restored and salaries become competitive with comparable graduate professions.

26. The IWPRB 5<sup>th</sup> Remit report<sup>1</sup> presents an economic evaluation of teachers' pay, considering *'inflation as well as considerations regarding recruitment and real terms decline in pay'* arriving at a recommended a 4.3% increase for all salaries and allowances. This was rejected by the Cabinet Secretary in order to match the pay award in England and to adhere to the 'no detriment' principle in Wales.
27. Despite the comments made in the report that teachers' salaries are in the top quartile for professions in Wales, and the OECD high headteacher salaries claim which only relates to large secondary schools, what our members report is that teacher and school leader recruitment has reached crisis point with high levels of attrition and low morale.
28. We also know that teacher and leader pay is not competitive, due to the erosion of pay since 2010. This was confirmed in the STRB's 34<sup>th</sup> report<sup>2</sup> which stated:
  - *The relative value of teachers' earnings has fallen behind the wider labour market (by 14 percentage points since 2010).*
  - *Teacher and leadership pay is at the low end of the competitive range for jobs of comparable size and scope.*
29. Whilst acknowledging that this report relates to teacher and leader pay in England, due to many of the real terms pay cuts taking place during the time period prior to pay being devolved in Wales, there is very little difference between the value of teacher and leader pay in England and Wales.
30. Teaching must be seen as a desirable career once again and this will require salaries to be competitive at all levels. Alongside this, working conditions must improve to ensure that work-life balance and teacher wellbeing are improved. We have already submitted evidence as part of the IWPRB 5<sup>th</sup> remit consultation process highlighting the teacher shortage issue across Wales, with a broken leadership pipeline resulting in some schools having to operate without a headteacher.
31. This has to include restoration of the differentials between pay ranges which have been eroded over time as a result of pay awards which targeted the main pay range over the upper pay range and leadership pay range.

## **Funding**

32. The Welsh Government's commitment to provide additional funding intending to fully fund the 5.5% increase to teacher and school leader's pay needs to be part of a multi-year above inflation pay settlement to help restore the value of their salaries after 14 years of below inflation pay awards.
33. ASCL has grave concerns over the ability of the additional funding for the teachers' 5.5% pay award for 2024/25 to reach school budgets. The Welsh Government's director of education confirmed that funding had been made available to Local

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<sup>1</sup> IWPRB 5<sup>th</sup> Report

<sup>2</sup> STRB 34<sup>th</sup> Report

Authorities to meet the costs of the teacher pay award and this funding would be specifically for teachers pay. As stated, there is a lack of trust in the way Local Authorities passport directed funds to schools, with far too much held back, obfuscated by complex and confusing funding formulae.

34. This point is further exemplified with the additional £5m promised by the Cabinet Secretary money for ALNCo assimilation costs. This needs to continue year-on-year as any pay uplifts will be permanent, with fears that this is not enough even on an annual basis (see paragraph 43 below). When only 80.6% of the school's delegated budget expenditure is delegated directly to schools<sup>3</sup>, it is no surprise that there is anxiety amongst your school leaders.
35. We need confirmation that this funding will be provided directly to schools to meet the actual costs of the pay award as they pertain to each individual school, rather than funding being awarded based on a calculation of average costs, as such an approach would disadvantage many schools and the children they serve. We need urgent reassurance to your school leaders on this matter as soon as possible, as this will address the stress and concern that many will be feeling over budgets which are already under enormous pressure.
36. What we know, from feedback from our members is that there are real funding concerns in Welsh schools despite the commitment to provide additional funding intended to cover the pay award. These are exacerbated by the fact that many school's budgets are already in deficit. In order to ensure that teachers received their correct salaries for 2024-25, headteachers could have to further cut back impacting on average class size and resourcing if they do not receive the 5.5% uplift in full.
37. School leaders are also having to do more with less including the increased post-Covid pressures around safeguarding, behaviour and SEND.
38. With reference to inflationary figures now reducing to below 4% (Chart 1), it is important to stress that inflation is cumulative and costs for schools are now at a record high, placing extreme pressure on school leaders to set a balanced budget.

**Consideration of the case for further statutory guidance within the School Teachers' Pay and Conditions (Wales) Document in addition to that currently provided in Section 3 of the Document, with specific reference to statutory guidance previously provided in the STPCD for England & Wales prior to 2012.**

**Recommendation 2** - *The IWPRB recommends that during 2024-2025 the Welsh Government remits an existing tripartite working group to begin to amend the additional guidance required in section 3 of the STPC(W)D in accordance with the timeline in the strategic review-*

**Cabinet Secretary's response** – *Accept in principle subject to consultation Do not accept Welsh Government to take the recommendation to the Teacher's Pay and Conditions Partnership Forum (PPF) to agree a way forward.*

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<sup>3</sup> Local Authority Budgeted Expenditure 2024-25

## **ASCL's response:**

39. ASCL agrees with this in principle but Section 3 of the STPC(W)D provides important information for headteachers, governors and local authorities in relation to the pay and conditions of teachers in Wales and this needs to be actioned immediately, as we are already in the academic year 2024-2025.
40. Unfortunately, we have experienced, to date, an *ad hoc* short-notice approach to the establishment of PPF meetings and we are still awaiting a timetable of scheduled meetings and agenda items from the Welsh Government. This point was raised at the meeting on 19 September and the point was acknowledged – yet we are still unclear about scheduling and prioritization moving forwards.
41. This is an example of the wider concern across ASCL Cymru about the lack of strategic planning by the Welsh Government. This was aptly demonstrated by the unnecessary delay in the publication of the Strategic Review which then overlapped with the consultation process of the 5<sup>th</sup> Remit. The IWPRB have similarly expressed concerns with the delays and lack of administrative support.

### **Recommendations 3-7. Appropriate remuneration and terms and conditions for the newly defined statutory role of Additional Learning Needs Coordinator (ALNCo) to fairly reflect role, responsibilities, working time and workload, with particular regard to the consistency and appropriateness of awards.”**

These were set out as 5 distinct recommendations:

**Recommendation 3** - *The IWPRB recommends to the Welsh Government that ALNCoS be appointed as members of the senior management team/senior leadership team in all education settings and that the ALN Code be amended to reflect this by September 2024.*

**Recommendation 4** - *The IWPRB recommends to the Welsh Government that ALNCoS currently paid on the MPR and UPR be paid on the LGPR from September 2024. We further recommend that ALNCoS be included in the ‘leadership pay’ sections of the STPC(W)D and that they are subject to the same terms and conditions as leaders.*

**Recommendation 5** - *The IWPRB recommends to the Welsh Government that ALNCoS currently paid on the MPR and UPR should be paid a salary on the LGPR on a scale point which is either equivalent to, or the nearest point above, their consolidated existing salary and allowance*

**Recommendation 6** - *The IWPRB recommends to the Welsh Government that ALNCoS should be offered a professional learning package appropriate to their role, experience and needs, and that employers allocate sufficient non-contact time to undertake this professional learning.*

**Recommendation 7** - *The IWPRB recommends to the Welsh Government that it commissions further research in 2024-2025 to determine appropriate non-contact time for ALNCoS to support leaders in the allocation of non- contact time for ALNCoS’ duties.*

**Cabinet Secretary’s Response** - *Accept in principle subject to consultation. Consideration will be given to providing further clarification that the role must form part of the senior leadership team within the ALN Code when this is next reviewed.*

*Timescales cannot be determined at this current time. Part of the consideration will be the need to maintain flexibility for schools to make their own decisions based on their size and structure.*

**ASCL's response:**

42. ASCL agrees with raising the status, pay and working conditions of the ALNCo, as recommended in the ALNCo Report<sup>4</sup>. This key role has been ambiguous and undervalued in the past. Ensuring that ALNCOs are part of the senior leadership team ensures that there is statutory compliancy with the ALN Code of Practice (2021) and raises the importance of education provision for students with additional learning needs.
43. Our members tell us that there is a significant increase in pressure for schools as a result of enrolling more pupils with complex learning needs. However, the additional £5m promised by the Cabinet Secretary money for ALNCo assimilation costs needs to continue year-on-year as any pay uplifts will be permanent. In addition, members tell us that the ALNET Act is also proving to be far more costly to implement on a school-by-school basis.
44. We have been given assurances by the Welsh Government that funding will not be lost. This is important as various examples were cited at a recent ASCL Cymru meeting where members stated that their Local Authorities often used a complex funding system which leads to underfunding or obfuscation of directed funds. Whilst we are aware that the Welsh Government have launched an independent enquiry into Local Authority funding, this will be time-consuming and will not result in urgent action, which is what is required.
45. We are also concerned about timing and the vagueness of implementing such a pressing number of key recommendations. These recommendations are for action by September 2024, but the Welsh Government response is that this should happen when the ALN Code (2021) is next reviewed. Timescales for this have not yet been determined. We need far greater clarity on timescales and what should happen in the interim.
46. With regards to Recommendation 6, it is important to provide ALNCOs with appropriate CPD to ensure that they are equipped with the knowledge and skills to undertake this complex role successfully. We have concerns about how fit-for-purpose the current training for ALNCOs is and how will this be funded. Furthermore, with built-in time for study periods, there are unforeseen consequences which are likely to be senior colleagues having to cover necessary workload.
47. With reference to Recommendation 7, whilst a reduction in teaching for ALNCOs will help with work/life balance, their classes would have to be taught by other teachers or school leaders and this has not been resourced, costed or funded.

**Recommendation 8** - *The IWPRB recommends to the Welsh Government that, subject to agreement by an existing appropriate group, the wording of the list of*

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<sup>4</sup> ALNCo task and finish group: report to the Minister for Education and Welsh Language

*administrative and clerical tasks in Annex 3 of Section 2 of the STPC(W)D be updated as set out in Appendix D by September 2024.*

**Cabinet Secretary's Response** - *Accept in principle subject to consultation. Welsh Government will update Annex 3 with revised text as recommended by IWPRB and consult on changes with stakeholders through the consultation process.*

**ASCL's response:**

48. ASCL, like many trade unions, welcomes a review of administrative and clerical tasks as these have a detrimental on workload and wellbeing of teachers and school leaders.
49. However, we do not believe an additional, separate illustrative list is useful for school leaders. This is because the nature of the role varies considerably between phase, context level of seniority and the make-up of the senior leadership team. We are of the view that the existing list plus the narrative in full is sufficient to give appropriate clarity and protection for school leaders.

**Recommendation 9** - *The IWPRB recommends to the Welsh Government that the list in Appendix D should be extended to include reference to headteachers and leaders through the updating of 46.1 of the STPC(W)D by September 2024 to include reference to all teachers' overarching rights of paragraph 51, as follows:*

*Unless expressly provided for in their contract of employment or elsewhere in the STPC(W)D, assistant headteachers, deputy headteachers, headteachers and other leaders will be entitled to the rights conferred in paragraphs 51.8 and 51.9*

**Cabinet Secretary's Response** - *The rights conferred by Paragraph 51 are conferred to all teachers which includes headteachers, and other leaders who are employed as teachers in a school therefore, unless anyone is excluded from paragraph 51 they should benefit from the rights conferred by that paragraph. Welsh Government will confirm this as part of the consultation.*

**ASCL's response:**

50. Although leaders are covered by the overarching rights of paragraph 51, there is clearly an issue as raised by consultees. This has also been recognised by the IWPRB, which clearly feels it necessary for this to be clarified/strengthened.
51. No change has been proposed in the draft STPC(W)D, so this needs to be amended as per the IWPRB recommendation.

**Recommendation 10** - *The IWPRB recommends to the Welsh Government that conditions of service for leaders should be further explored as part of our 2025-2026 remit.*

*In the interim period, the IWPRB recommends to the Welsh Government that it reminds local authorities and relevant bodies of their responsibilities as employers, and in particular the need the need for leaders to have periods of uninterrupted rest.*

**Cabinet Secretary's Response** - *Accept in principle subject to consultation. Welsh Government will write to employers to remind them of the obligation under paragraph 51.4 of the STPC(W)D and of the working limits set out in the Working Time Regulations 1998.*

**ASCL's response:**

52. There is strong consensus amongst consultees on the need for additional protections for school leaders, and recognition of the excessive workload and working hours that leaders carry out. This consensus also includes the need to provide guaranteed/protected leave for leaders.
53. The Report stated that consultees reported a widespread sense of a system at or nearing 'breaking point'. This is a significant ongoing issue which must be addressed and, indeed, the Review Body itself said: 'We believe that this requires urgent attention'<sup>5</sup>.
54. We have learnt from our members that burn-out and exhaustion are pronounced in many Welsh Schools with teachers and support staff are struggling with resilience and resourcefulness at an all-time low.
55. The implications from this must not be underestimated. If urgent action is not taken, this will lead to significant impact of the retention of school leaders in Wales. This will do nothing to encourage teachers and middle leaders to aspire to senior leadership roles, particularly headship.
56. School leaders' conditions of service was originally to be included as part of Managing Workload and Reducing Bureaucracy Group. It was then pushed into the 5<sup>th</sup> remit<sup>6</sup>. Now it is proposed to be pushed further back. We must see this in the 6<sup>th</sup> remit and not pushed back beyond 2025.
57. Our members have been significantly disadvantaged by the lack of time and independent secretariat support afforded to the IWPRB for the 5<sup>th</sup> remit<sup>7</sup>. This is totally unacceptable.
58. We expect this to be a priority for the Welsh Government and the IWPRB, and the outcome must be some clear recommendations to improve leaders' conditions of service. We will not accept this being further delayed.
59. Teacher recruitment and retention continues to be a significant issue demonstrating that workload and wellbeing remain major concerns.
60. The Welsh Government's response to the IWPRB's suggestion for the interim period is insufficient. As the IWPRB recommendation states, when reminding employers of their obligations on this, it needs to explicitly reference the need for leaders to have

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<sup>5</sup> IWPRB 5<sup>th</sup> Report

<sup>6</sup> Written Statement: Reducing workload and bureaucracy for school staff

<sup>7</sup> Executive Summary, IWPRB 5<sup>th</sup> Report

periods of uninterrupted rest, which is the whole point of this part of the recommendation.

**Recommendation 11** - *The IWPRB recommends to the Welsh Government that a briefing paper be prepared that schedules the annual pay review process. The briefing paper and associated impact assessment should be discussed with all relevant parties during 2025-2026 to agree the way forward.*

**Cabinet Secretary's Response** - *Accept in principle subject to consultation. Welsh Government to draft a paper setting out options for changing the timing of the pay review for discussion with relevant parties during 2025 - 2026.*

**ASCL's response:**

61. With this recommendation, there is no mention of impact assessment. This must be included.
62. ASCLs response to this remains as our initial evidence: we strongly oppose any change in the pay award implementation date from 1 September.
63. Support staff pay awards are implemented on 1 April because they are applicable to staff across multiple sectors and not just education. As we have stated in our evidence submission, the majority of teacher and leader contracts will start on 1 September, which is also when there will be the biggest turnover of staff for the start of a new academic year. It is non-sensical to consider moving away from the September pay award implementation date for teachers and leaders, particularly when they are the only group of staff that this pay award applies to.
64. This would also mean that there would be two points in the academic year when teacher and leader pay would increase – in September from pay progression and again in April from annual uplifts, resulting in an increase in bureaucracy and workload.

**Recommendation 12** - *The IWPRB refers the Welsh Government to its previous recommendations that were endorsed by the Minister for Education and Welsh Language, and recommends that the Welsh Government urgently reviews the monitoring and reporting of equality legislation at school and local authority level, and considers whether changes are required to the STPC(W)D and school pay policies, to ensure that schools and local authorities carry out their statutory duties regarding equality.*

**Cabinet Secretary's Response** - *Accept in principle subject to consultation. Welsh Government officials are currently working with Local Authorities and Welsh Government equality teams to review what information is currently/or could be available at school or local authority level and how we could strengthen the reporting process. Stakeholders will be kept up to date with developments.*

**ASCL's response:**

65. This recommendation was made in May 2022 as part of the 4<sup>th</sup> report. It is puzzling as to why this has not been actioned in over two years. This must be expedited, and this recommendation must be carried out without further delay.

**Strategic Review:**

In her letter on 10 September, the Cabinet Secretary also announced consultation on the implementation of 7 of the 26 recommendations made in the **IWPRB Strategic Review of the Structure of Teachers' and Leaders' Pay and Conditions in Wales** which she accepted in principle in April this year.

66. Whilst we have responded to each of these seven recommendations, there is a lack of explanation regarding why these items are being put forward to immediate consultation and others, some of which are more pressing, have been put back and are being recommended for future remits.

**Recommendation 12** - *The IWPRB recommends to the Welsh Government that the requirement for line management responsibility for a significant number of people (paragraph 20.5 of the 2024-2025 STPC(W)D) is broadened by adding: or equivalent significant additional levels of responsibility and accountability in key areas of the school.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders.*

**ASCL's response:**

67. Consulting with our members, we would agree with this broader definition, giving schools the flexibility to appoint teachers with TLR1 payment either due to significant numbers of people or levels of responsibility in line with the schools published model pay structure.

**Recommendation 13** - *The IWPRB recommends to the Welsh Government that paragraph 20.3 and Section 3, paragraph 54 of the 2024-2025 STPC(W)D should be amended to stipulate that TLR3 allowances should not be awarded for longer than two years.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders.*

**ASCL's response:**

68. We are unclear as to the rationale behind this 2-year restriction and we would recommend keeping to 2023 STPC(W)D wording paragraph 20.3. That is, the relevant body may award a fixed-term third TLR (TLR3) to a classroom teacher for clearly time-limited school improvement projects, or one-off externally driven responsibilities.

**Recommendation 14** - *The IWPRB recommends to the Welsh Government that Section 3, paragraph 51 of the 2024-2025 STPC(W)D is replaced by: TLR1s and TLR2s should only be awarded to teachers placed in the specified posts in the staffing structure and to the cash value set out in the pay policy. Where such TLRs are awarded to part-time teachers they will be paid pro rata at the same proportion as the teacher's part-time contract or, with agreement of the part-time teacher and the employer, will be paid in full if the teacher undertakes the full duties associated with the allowance.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders*

**ASCL's response:**

69. This is already in place in STPC(W)D Paragraph 40.2. That is, *the allowances (except for TLR3) of a part-time teacher may be determined in accordance with the pro-rata principle and no less than contracted working hours or may be determined to be paid in full, if the teacher undertakes the full duties associated with the allowance.* We do agree, however, that if a part-time teacher is to be paid a full TLR it has to be with the agreement of the teacher concerned and the employer regarding the full duties associated with the allowance.

**Recommendation 15** - *The IWPRB recommends to the Welsh Government that paragraph 20.4 of the 2024-2025 STPC(W)D should be extended to cover pastoral or well-being responsibilities and the safeguarding of children.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders.*

**ASCL's response:**

70. We agree with this proposal. Whilst TLR1 and TLR2 payments have traditionally been awarded in relation to curriculum development and to support teaching & learning, it is important that schools have the flexibility to also allocate these allowances in terms of pupil safeguarding and pastoral management.

**Recommendation 21** - *The IWPRB recommends to the Welsh Government that the STPC(W)D (paragraph 51.10) is revised to link the CPD needs of teachers and leaders to the Professional Standards for Teaching and Leadership and the National Professional Learning Entitlement.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders.*

**ASCL's response:**

71. ASCL supports any measure to improve the quality and fitness-for-purpose of teacher CPD. We would also urge a review of teacher standards which date back to

2012 and were then adopted by Wales in 2017. We are also support of a review of the National Professional Learning Entitlement, established in 2015. This has not had positive reviews – [see link](#)

**Recommendation 24** - *The IWPRB recommends to the Welsh Government that the STPC(W)D be redrafted, to include hyperlinks to key guidance to the information contained within the statutory section of the document.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. The Welsh Government will draft changes to the STPC(W)D and consult on the changes with key stakeholders.*

**ASCL's response:**

72. This is a technical recommendation and not a strategic one.

**Recommendation 26** - *We recommend that the Welsh Government urgently reviews the monitoring and reporting of equalities legislation at school and local authority level, and considers whether changes are required to the STPC(W)D and school pay policies, to ensure that schools and local authorities carry out their statutory duties regarding equalities.*

**Cabinet Secretary's response** - *Accepted in principle on 9 April 2024. Welsh Government officials are currently working with Local Authorities and Welsh Government equality teams to review what information is currently/or could be available at school or Local Authority level and how we could strengthen the reporting process. Stakeholders are kept up to date with developments.*

**ASCL's response:**

73. We welcome improvements to monitoring and reporting equality legislation in schools and we have assumed that this recommendation is the same as the 5<sup>th</sup> Remit Recommendation 12. As we have already stated, when considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the nine protected characteristics included in the Equality Act 2010, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged. We have answered any equality impact questions on this basis.

74. We note, however, that this is listed in the draft STPC(W)D as one of the changes made since 2023, yet there do not appear to be any proposed changes in the draft Document which relate to this.

75. Finally, we hope that this is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

Louise Hatswell & Chris Ingate

Conditions of Employment Specialists: Pay  
Association of School and College Leaders  
2 October 2024