



Supplementary Submission to the School Teachers' Review Body

National Education Union
March 2022

Introduction

- 1 This supplementary submission from the National Education Union (NEU) responds to evidence submitted by other consultees, with a particular focus on the issues raised by the Government's evidence to the STRB.

Developments in the wider economy

- 2 There have been significant economic developments since we and other consultees drafted initial submissions to the STRB. These developments have serious implications for teacher living standards and we wish to highlight those issues at the outset.
- 3 The crisis in Ukraine has significantly worsened the already worrying outlook for inflation. The latest figures available at the time of writing¹ showed RPI at 8.2% in February 2022, with RPI expected to climb even higher in the coming months.
- 4 This higher level of RPI inflation is likely to be sustained. According to the Treasury average of economic forecasts published on 23 March, RPI inflation is expected to be at 8% in the fourth quarter of 2022.² The Treasury has been consistently increasing its inflation forecast, so even 8% may turn out to be an underestimate.
- 5 The Resolution Foundation has underlined the significant impact of recent developments on inflation and living standards.³ The latest ONS data⁴ shows negative growth in real pay compared to inflation, adding to the impact of the already serious cost of living crisis. The impact on public sector workers is particularly severe, with the latest ONS data available at the time of writing showing average total pay over three months growing more than twice as fast in the private sector as in the public sector.⁵
- 6 The key focus of policy across the public sector, including in education, should be on addressing the sharp decline in real wages, the impact of this on the already serious cost of living crisis, and the consequences for recruitment, retention, and wellbeing. This reinforces the need for the STRB to make recommendations based on objective assessment of the action needed on teacher pay.

¹ <https://www.ons.gov.uk/economy/inflationandpriceindices#timeseries>

² <https://www.gov.uk/government/collections/data-forecasts#2022>

³ [The Living Standards Outlook 2022 • Resolution Foundation](#)

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/march2022>

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsingreatbritain/latest>

- 7 Within this overall picture, it is clear that the competitive position of teacher pay continues to be damaged as pay grows in the wider economy but teachers and school leaders continue to see their pay frozen each month. The latest ONS data at the time of writing shows regular pay (excluding bonuses) growing by 3.8% over the latest three-month period.⁶
- 8 These wider economic developments mean that we are now calling for increases for all teachers and school leaders of at least 9% in September 2022 and at least 8% in September 2023. We are clear that these increases are needed to protect teacher and school leader living standards against rising inflation. Pay increases must at least match cost of living increases – and should also start to recover the real terms pay losses since 2010.

Evidence from consultees other than the Government

- 9 The joint statement to the STRB from the NEU, NASUWT, ASCL, NAHT and Voice set out the united view of the profession. This included the need for undifferentiated pay increases for all teachers and school leaders significantly higher than RPI inflation, so that the pay lost in real terms since 2010 is restored urgently. This view is shared by other consultees. The National Employers' Organisation for School Teachers (NEOST) states in its evidence that the proposed increases to starting pay "should be seen in a wider context, to support the sufficient future supply and retention of all teachers and school leaders by ensuring an equal 'cost of living' increase for all teachers and school leaders."⁷
- 10 The joint union statement to the STRB argued that the Government must increase funding to ensure the pay increases needed, and for the STRB to refuse to be constrained by the Government's political choices including the inadequate funding levels. NEOST notes the unprecedented cuts to school funding⁸ and argues for the STRB to be allowed to fully exercise its role.⁹
- 11 Consultees express continuing serious concerns about recruitment and retention. These concerns are reflected in the NEOST survey of local authorities, which reports serious issues on retention and morale. The National Governance Association (NGA) notes the potential impact on teacher supply of the recovery in the wider employment market, the importance of pay competitiveness to teacher supply and the teacher supply issues across the board.¹⁰

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsingreatbritain/latest>

⁷ NEOST evidence to STRB March 2022, paragraph 3.

⁸ NEOST evidence to STRB March 2022, paragraph 23.

⁹ NEOST evidence to STRB March 2022, paragraph 39.

¹⁰ NGA evidence to STRB March 2022, paragraphs 4.4-4.7 and 5.1.

- 12 The NEU is strongly opposed to the call from NEOST for discussions with the DfE on enabling “voluntary” moves by teachers from the Upper Pay Range (UPR) down to the Main Pay Range (MPR) within schools. Such a change would lead to inappropriate pressure on teachers to take demotion. This would take us in entirely the wrong direction. We need to support teacher pay and career development, so instead of enabling demotion from the UPR we need to ensure that inappropriate additional expectations are not imposed on UPR teachers.
- 13 We do not believe that enabling demotion would have the positive retention benefits referred to in the NEOST evidence – rather, seeing teachers demoted from the UPR would send out a hugely negative signal to potential and serving teachers.
- 14 The NEU is also strongly opposed to the reduction of the period of salary safeguarding raised as a possibility in the NEOST evidence. Salary safeguarding protects teachers against pay losses experienced through no fault of their own and helps the management of restructuring exercises.
- 15 Enabling demotion and reducing salary safeguarding rights would further attack teacher pay, when we need instead to secure urgent and significant pay improvements that will value teachers properly.

Government evidence to the STRB

Funding issues

- 16 The Government’s evidence repeatedly seeks to justify its proposals on pay with reference to current funding levels. As we noted in our initial submission, we do not accept this approach. The focus of the STRB must be on what is needed to repair the damage to teacher pay, to value teachers properly and in doing so to support recruitment and retention.
- 17 Simply stating that the funding envelope is “finite” (paragraph 41 of the Government’s evidence) should not allow the Government to close off analysis of the impact of its political choices. The key question is whether the funding envelope is sufficient to support the objective of protecting teacher pay and supporting teacher supply. The STRB should express a view on that issue, as part of the holistic and objective evidence-based analysis required.
- 18 The STRB must not accept that discussion of the policy options on teacher pay should be limited to those that are possible within the current inadequate funding envelope. The Government’s proposals on pay are not the only ones available – and they are at odds with the proposals from other consultees.

- 19 The Government evidence argues that implementing higher increases at starting pay and lower increases for other teachers ensures “good value for money for taxpayers” (Government evidence, paragraph 12). This conclusion is based on the Government’s shallow and dogmatic take on fiscal policy. It must be critically assessed.
- 20 As noted in our initial submission, the value generated by investing in education is immense. The opportunity cost of underpaying and undervaluing teachers and other educators is equally significant, so failing to invest properly in teachers is not “good value for money.” The Government evidence itself notes the significant direct costs to schools of recruitment and retention problems.
- 21 The Government evidence states at paragraph 63 that “teacher pay is one of several spending priorities” and that the STRB should consider these other priorities when considering the pay increase. Again, this is an inappropriate attempt to constrain the STRB. Of course, schools have a number of spending priorities – but inadequate pay for educators has an adverse impact on all of those other priorities.
- 22 In our earlier submission we highlighted research from the Institute for Fiscal Studies (IFS) on what it called the “the long, long squeeze on teacher pay.” New IFS research¹¹ underlines our concerns on pay and funding.
- 23 IFS notes that the Government’s proposals on teacher pay in 2022 and 2023 would result in further significant real terms cuts to add to those already experienced. IFS describes the prospect of further cuts to the value of teacher pay against inflation as a “genuine risk” to recruitment and retention, and to the Government’s “levelling up” agenda.

More pay cuts

- 24 We agree with the statement in the Government evidence that a high-quality teaching workforce makes the biggest difference to pupil outcomes. That is why it is so important for the Government to properly value all teachers and school leaders, instead of proposing yet more significant cuts to the real value of their pay.
- 25 The Government evidence states that “it is right” that experienced teachers should get just 3% in 2022 and 2% in 2023. This assertion is backed up only with an argument that this is “deemed appropriate” to avoid a “wage-price spiral.” As was shown in the independent research we commissioned from IDR and sent to the STRB alongside our initial submission, the Government’s attempt to focus on the impact of pay increases on inflation is misleading. IDR found that Government policy on pay is a relatively minor influence on the pay decisions taken by private sector employers.

¹¹ [The even longer squeeze on teacher pay - Institute For Fiscal Studies - IFS](#)

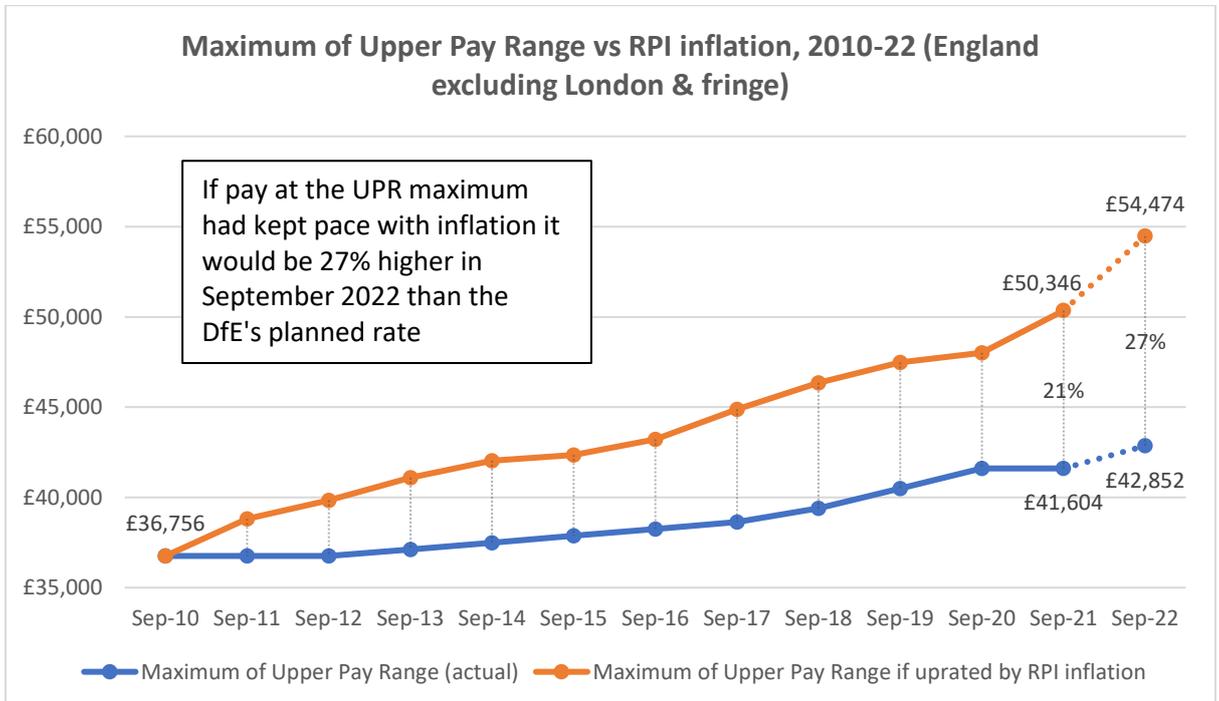
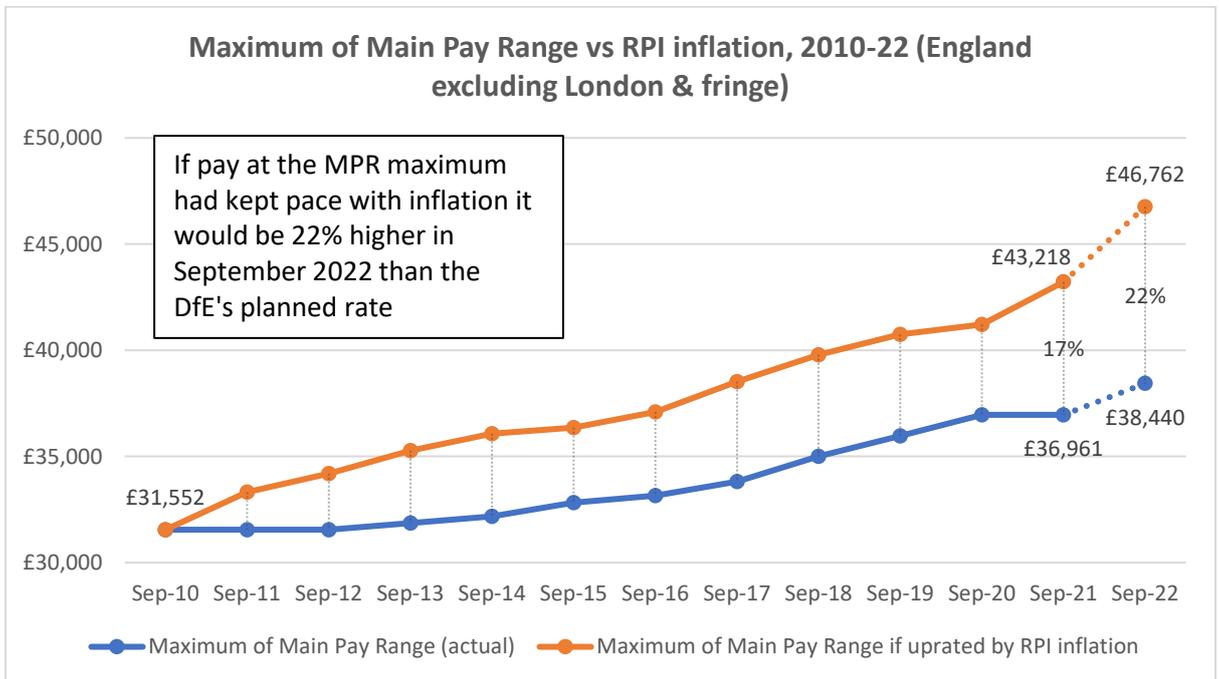
- 26 Teachers and other educators already face a major cost-of-living crisis because of the long history of Government attacks on their pay. They cannot be expected to accept more huge cuts to their living standards. Such cuts would do immense damage to teacher pay, recruitment, retention, and wellbeing.
- 27 The Government evidence states that a 3% pay increase in 2022 would be the highest increase for teachers since 2006, without providing the inflation context either for the 2006 increase or for the proposed 2022 increase. Such partial and misleading presentation of information is a recurring theme in the Government's evidence.
- 28 In fact, a 3% increase in 2022 may well represent an even bigger pay cut in real terms than the one inflicted by the 2021 pay freeze.
- 29 In September 2006, the year-on-year increase in RPI was just 3.6% compared to the current level of 8.2% and expected levels later this year of 8%.
- 30 The real value of a 3% increase this year for those on the upper pay range, leadership range and all other pay and allowance ranges, is very likely to be negative, with a significant real terms cut based on current expectations for RPI. This would be a much worse outcome than in 2006, or indeed than in most years.
- 31 The same may well be true of a 2% increase in September 2023, proposed by the Government for all teachers on the maximum of the MPR as well as for those on the other pay and allowance ranges. The outlook for inflation is uncertain, but the latest Treasury forecast for RPI in the fourth quarter of 2023¹² is 3.7% - almost double the 2% increase the Government proposes for the overwhelming majority of teachers in September 2023.

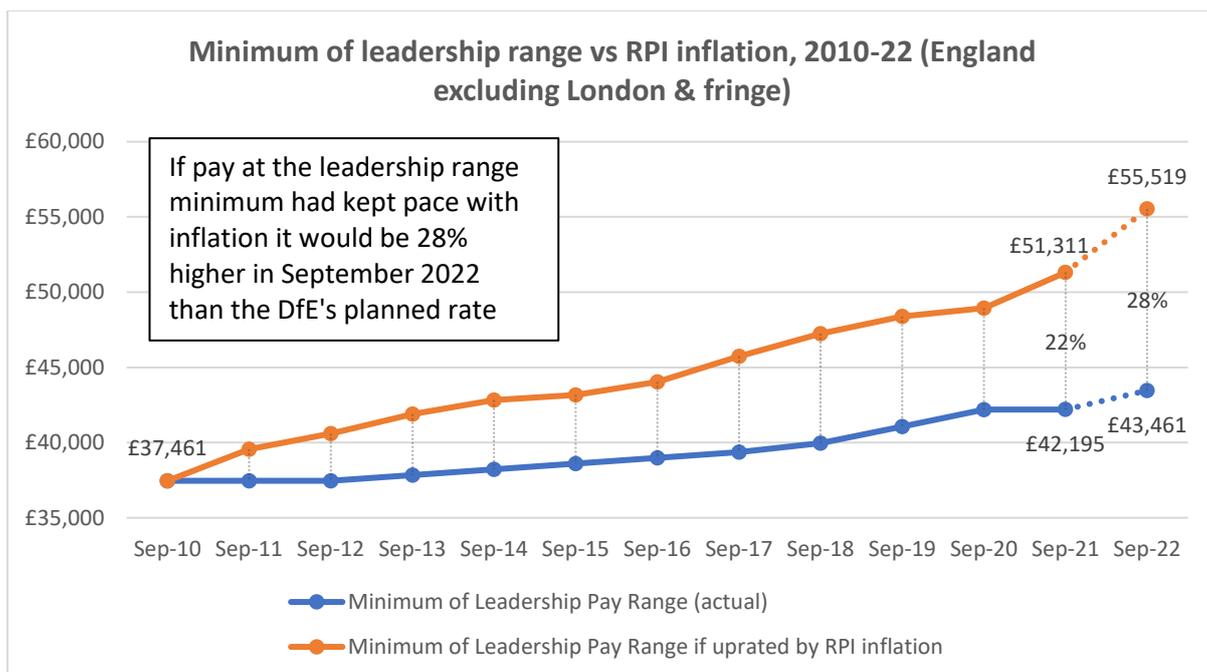
The widening pay gap

- 32 Instead of the urgent action needed to close the gap between teacher pay and inflation, enabling recovery of the already significant pay losses since 2010, the Government's proposals will widen the gap between pay and inflation still further.
- 33 The charts below set out the likely impact of the Government's proposals on teachers in September 2022. We use the latest figure for RPI inflation available at the time of writing, which was 8.2%. The current uncertainty over the inflation outlook means that inflation in September 2022 could be even higher.
- 34 On the basis of the latest 8.2% increase in RPI, there would be only a small improvement in real terms to starting pay – but significant real terms cuts at other key points in the teacher career journey.

¹² <https://www.gov.uk/government/statistics/forecasts-for-the-uk-economy-march-2022>

35 At the maximum of the MPR, the maximum of the UPR and the minimum of the leadership pay range, the gap between pay and inflation would grow significantly when we urgently need it to be removed.





- 36 The Government evidence includes no justifiable reason for these further real terms pay cuts. Nor does it explore their impact on teacher recruitment, retention, and morale. The Government evidence argues that differential increases to starting pay “remains the best opportunity for supporting recruitment and retention overall” (Government evidence, paragraph 10). This assertion takes no account of the impact on recruitment and retention of continuing to cut the value of pay across the teacher career structure.
- 37 The Government evidence argues that targeting higher pay increases at starting pay and early career helps to tackle recruitment and retention challenges where they are “most acute.” This misses the fundamental point that the teacher recruitment and retention challenge is a systemic problem with causes which can only be effectively addressed by system-wide change. Uncompetitive starting and early career pay, and the particular supply issues they cause, are by no means the only examples of the problems caused by the wider attack on teacher pay.
- 38 Potential recruits do not just look for professions offering competitive starting pay – they also need to know that they will be able to access competitive pay levels as they develop experience as a professional. They are interested not just in pay levels in their first year of teaching, but in how much they will be paid as an experienced teacher. Cutting real pay levels for experienced teachers therefore sends a hugely negative signal which affects both recruitment and retention.
- 39 The Government’s own evidence states at paragraph 74 that the targeted approach to pay will only retain around a thousand additional teachers per year from 2023-24, a reduction of only a quarter of a percentage point in the number of teachers leaving.

40 In the context of the loss of around a quarter of teachers over the first three years in the profession, and around a third in the first five years, this is a wholly inadequate response to the serious teacher supply problems.

Pay structure issues

41 The Government evidence states at paragraph 38 that “we continue to propose that proportionate increases are also made to the rest of early career pay.” It is important to remember that the dismantling of the national pay structure means that, other than the increase to starting pay, the increases suggested by the Government are to advisory points only.

42 The advisory nature of the pay points limits their use in encouraging teachers to join and stay in the profession. Potential and serving teachers know there is no guarantee that they will be able to access advisory pay points and levels. Mandatory pay points with appropriate pay levels are required to support recruitment and retention. This underlines our call for a fair and mandatory national pay structure.

43 The Government evidence focuses on standardising the differential between pay points in the existing pay structure. The focus instead needs to be on implementing the improved pay levels needed for all teachers and school leaders within a fair national pay structure, as set out in our initial submission.

44 For classroom teachers, that means a six-point single classroom teacher pay scale to replace the current separate MPR and UPR, with no threshold and automatic progression to recognise and value the acquisition of experience and expertise. Simply implementing uniform differentials within the current unfair pay structure and on the basis of inadequate pay levels will not provide the holistic and effective solution we need if we are to support recruitment and retention.

London and the Fringe Area

45 The NEU’s initial submission called for pay increases across the board and this principle applies equally to London and the Fringe Area. We noted the importance of taking account of particular cost-of-living issues in London and the Fringe Area, so there is no justification for the lower pay increases proposed by the Government for London and the Fringe Area. The Government’s evidence provides no support for the significant changes to the differential between pay in London, the Fringe Area, and the rest of England that would result from its proposals.

46 Implementation of lower increases will compound the already serious recruitment and retention problems in London and the Fringe Area. In this context, NFER reports that the Government’s proposals to reduce the London pay differential risk exacerbating teacher shortages in London.¹³

¹³ NFER Teacher Labour Market in England Annual Report 2022.

Recruitment and retention

- 47 The Government evidence states that “there has been some improvement to recruitment and retention, but challenges remain.” This assessment of the recruitment and retention picture severely understates the problem. The NEU and other consultees set out details in initial evidence of the continuing impact of the long-term failure to recruit to target and the impact of increasing wastage rates across the teacher career journey. The NEU and other consultees also noted the short-lived nature of the temporary improvement to some recruitment and retention indicators due to the pandemic.
- 48 New research published by the National Foundation for Educational Research (NFER) on 23 March underlines the concerns on teacher supply.¹⁴ NFER notes that “the pressure on teacher supply witnessed before the pandemic has resumed.” In response, NFER states that improving teacher pay and working conditions, to make teaching an attractive and rewarding graduate career choice, should be a “policy priority.” NFER also states that the Governments proposals on teacher pay seem “insufficient to address the emerging recruitment and retention challenges.”
- 49 As NFER confirms, teacher training targets are at risk across the curriculum and including subjects that typically recruit well. NFER also reports that senior leaders are more likely to report higher teacher turnover than they were last year.
- 50 The Government evidence refers to the Schools White Paper, which had not been published at the time of writing. The high-quality teaching rightly identified by the Government as the “most powerful in-school lever to improve pupil outcomes” must be supported by improvements to pay and conditions including workload.
- 51 The discussion of teacher supply in the Government evidence avoids the central role played by pay levels and pay structure. The Government evidence fails to tackle the key point that more real terms pay cuts for the overwhelming majority of teachers are bound to cause further recruitment and retention problems.
- 52 The list of recruitment and retention initiatives set out in the Government evidence cannot disguise its failure to tackle the strategic issue, which is the impact on teacher supply of inadequate pay levels and an unfair pay structure.
- 53 Support for teacher training and development is identified in the Government’s evidence as a top priority for the DfE. Our initial submission identified performance-related pay (PRP) as a barrier to supportive and positive appraisal – removing PRP would be hugely beneficial in supporting teachers and school leaders to identify development needs and appropriate training.

¹⁴ NFER Teacher Labour Market in England Annual Report 2022.

- 54 Urgent action to reduce workload is also essential to support the “world-class training and development” the Government evidence states that it wants teachers to receive.
- 55 The Government evidence states that there are more full-time equivalent (FTE) teachers than in 2010 but does not contextualise this statement by recognising that there are significantly more pupils than in 2010. As we noted in our initial submission, there has been a steady increase in class sizes since 2010. With class sizes at their highest in decades, the aim must be to urgently reduce class sizes – reinforcing the need to recruit and retain many more teachers.

Workload

- 56 The steps that the DfE is taking to reduce teacher workload are welcomed and the NEU supports these efforts in many different ways. For example, the NEU promotes the DfE Workload Reduction Toolkit in our materials and on our website. However, these initiatives on their own are clearly not having the desired effect. The DfE Workload Reduction Toolkit was introduced in 2018 and the recommendations of the DfE Workload Monitoring Group were published in the same year, yet workload, by all accounts, still remains high and along with pay, it is one of the main reasons teachers leave the profession. The Government evidence acknowledges this fact.
- 57 The NFER research noted above, in addition to highlighting the recruitment and retention challenges, concludes that more needs to be done to reduce workload if retention levels are to improve in the context of a resurgent labour market. This supports the NEU position. That is why the NEU has identified and highlighted practical steps that our members have told us will help reduce workload. If the Government is serious about teacher workload and wellbeing, it should listen to our members and implement the steps proposed in our submission. We believe that a review of teachers’ working time and reinstating guidance that limits time spent on cover and administrative tasks will radically help to reduce teacher workload to more manageable levels.
- 58 Our initial submission noted the unfairness of PRP and the significant additional workload and stress it causes. The obvious detrimental impact PRP is having on teacher and leadership workload is another reason for removing PRP. If the Government is serious about reducing workload in schools, it should remove PRP.
- 59 The DfE acknowledges that staff workload is a serious issue that needs to be resolved but refuses to take the required and practical steps that will help, which is why the NEU is calling on the STRB to seek a remit on workload immediately.

SEND issues

60 School workload reduction and staff wellbeing is important to enable staff to deliver quality first teaching (QFT) to all students. In the NEU's January 2022 survey of SENCOs, 84% said that teachers were finding it increasingly difficult to provide QFT in an inclusive classroom without SEND/ALN support staff as part of the professional class team due to the loss of support staff in mainstream classes due to redundancies. We therefore need to see any funding offers including provision for an increase in support staff in mainstream classes if the aims of the SEND Green Paper are to be achieved.

Equality in pay and progression

61 The description in the Government's evidence of the "context" for this issue (paragraphs 139-148) is not accurate. It is not true to say that the 2013 reforms "ended the practice of automatic annual pay progression for teachers." Pay progression under the pre-2013 pay system was not "automatic," but could be withheld due to capability concerns.

62 The analysis included in the Government's evidence that follows is not the full equality impact assessment for which we and other consultees have called. The Government evidence itself states that its analysis of the data "is not a comprehensive assessment of the 2013 reforms." But such a comprehensive assessment is what is needed, as noted by the NEU and other consultees.

63 The Government argues that: "There is no evidence of gender differences in base pay of classroom teachers and how it changes over a career (years of experience), once accounting for working patterns." This is to downplay the impact of the detrimental pay outcomes for part-time teachers, the majority of whom are women. The net result is, as the Government evidence itself later notes, to "disproportionately disadvantage female teachers."

64 The Government evidence notes the gender gaps in progression onto and on the Upper Pay Range. This underlines the urgent need for the comprehensive equality impact assessment, annual equality audits, and equality data by establishment, for which we have called.

65 The NEU is extremely disappointed by the Government's response to the allegations of racial discrimination by NAHT, NASUWT and the NEU at paragraphs 163 to 167. Of late the Government's approach to racial discrimination is to deny its existence or, where that is not possible, to minimise its impact. The Government's response to the racial inequality identified by the unions follows a similar pattern of denial. We hope the Government's proposed analysis of WLT data will be sufficiently robust to yield solutions to a clearly documented problem, although we remain sceptical given the conclusions reached in the Sewell report.