

## Consultation on the new model to determine teachers' pay and conditions of service in Wales

### Consultation

#### response form

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Responses should be returned by **4 May 2018** to

Teachers' Pay and Conditions Branch  
School Effectiveness Division  
The Education Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [SchoolsandYoungPeopleWorkforceUnit@gov.wales](mailto:SchoolsandYoungPeopleWorkforceUnit@gov.wales)

The document sets out a potential 'teacher engagement model' as a future mechanism for determining teachers' pay and conditions of service in Wales, when the powers are transferred to the Welsh Government.

This response form is set out into three main sections.

Section A – The overall proposed process.

Section B – Individual stages within the proposed process.

Section C – Alternative proposals and additional comments.

**About the National Education Union Cymru:**

- The National Education Union Cymru stands up for the future of education. It brings together the voices of teachers, lecturers, support staff and leaders working in maintained and independent schools and colleges to form the largest education union in Wales.
- The National Education Union is affiliated to the Trades Union Congress (TUC), European Trade Union Committee for Education (ETUCE) and Education International (EI). It is not affiliated to any political party and seeks to work constructively with all the main political parties.
- Together, we'll shape the future of education.

## Section A – The overall proposed process

### Preliminary Statement

National Education Union Cymru welcomes the opportunity to respond to this consultation.

Last year, when the Welsh Government put forward its Trade Union (Wales) Act, the Cabinet Secretary for Finance said during the passage of the legislation: “*Our Bill seeks simply to reinforce and protect our social partnership arrangements by maintaining the existing settled arrangements within the Welsh public sector, which have supported positive employer-employee relationships, including the right of trade unions to organise and, when other avenues have been exhausted, to take industrial action. It requires a culture of integrity, openness and trust, in which the shared aim is of early resolution of disagreement and the pursuit of consensus, even when there are difficult decisions to be made.*” In making proposals for a new mechanism for determining teachers’ pay and conditions, the NEU would have expected more to have been made of social partnership.

National Education Union Cymru believes that it is both possible and appropriate to establish a collective bargaining model for determination of teachers’ pay and conditions. We set out in this response our position on such a model as an alternative to that proposed in the consultation.

We believe that the social partnership model of working with the trade unions in Wales has largely worked well, and that this is an opportunity to put into practice the assertions which the Welsh Government made last year in relation to the Trade Union (Wales) Act. In the same way that the WG sought to disapply aspects of the UK Government’s Trade Union Act (2016), the model for deciding teachers’ pay in Wales could take a more equitable approach.

We believe that this equitable approach goes to the heart of social partnership, but also supports the aims of *Education in Wales: Our national mission* in achieving an effective education service which enables the children and young people of Wales to learn and achieve their full potential. A well-motivated and sufficiently supported workforce will support this. Without a well-supported workforce, with decent pay and conditions, the learning environment for children and young people could suffer.

*Education in Wales: our national mission* is also signed up to the following wellbeing aims, which we believe can only be achieved if teachers and the wider workforce are able to access pay and conditions which are at least as rewarding as those given to professionals in England. The wellbeing aims are as follows:

- Support people and businesses to drive prosperity
- Tackle regional inequality and promote fair work
- Drive sustainable growth and combat climate change
- Deliver quality health and care services fit for the future
- Promote good health and well-being for everyone
- Build healthier communities and better environments
- Support young people to make the most of their potential
- Build ambition and encourage learning for life.

Whatever arrangements are eventually established, we intend to seek to ensure that the model will work as well as possible for our members, in order to ensure that they have access to the best possible pay and conditions. We therefore also set out in this response the amendments to the proposed model that we believe are necessary, should the proposed model be implemented, to ensure that it achieves those aspirations as well as it can.

We believe that this consultation should have been undertaken with the recognised trade unions and employer bodies, rather than the public at large. It is vital for the future of the education service that teachers participate in, and are served well by the outcomes of, the process for determining their pay and conditions. The mechanism by which teachers will engage in this process will be via their recognised trade unions.

We are extremely concerned that the Welsh Government’s decision to engage in public consultation on this matter and on future proposed changes to pay and conditions opens this discussion too widely and will allow other interest groups to confuse the process for those charged with making decisions on education matters in Wales.

We would also highlight that this consultation lacks critical information including the proposed cost. We believe that in order for this to be a meaningful consultation costings and other options should have been addressed.

**Question 1** – Do you agree that teachers’ pay and conditions should continue to be statutory and annual in nature?

<b>Agree</b>	✓	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Supporting comments**

We set out below in our answer to Q2 our preference for a collective bargaining arrangement in place of the proposed model. The pay and conditions arrangements for other public sector workers covered by collective bargaining arrangements, such as local government and health sector workers, do not generally have a statutory basis.

However, whether the mechanism established is a collective bargaining model or a model based on the proposals for consultation, we agree that school teachers' pay and conditions in Wales should remain on a statutory basis for a number of reasons.

By making such arrangements statutory and therefore binding on all maintained schools in Wales, we can ensure that all teachers employed in public service are paid on the same pay structure and at the appropriate rate, are subject to the same provisions in respect of pay progression, receive intended pay increases and are employed on the same working conditions. This, in itself, will promote certainty, remove disparities and ensure equality of treatment. Changing the statutory basis of pay and conditions arrangements might send the wrong message to the workforce, in terms of maintaining the declared intention to maintain fair pay and conditions which are at least comparable to those for teachers in England.

We would be open to considering pay settlements operating on a two or three year basis if such arrangements were beneficial to our members. In line with our views on the need for agreed arrangements, we believe that such settlements should only ever be implemented following discussion and agreement with teacher unions and employers.

Any such settlements would still need to include provision for annual pay progression and cost of living increases and a reopener or trigger clause in the event of, for example, greater than predicted inflation increases.

We believe, however, that in the first few years of a new pay model for Wales, when we are effectively trialling the new mechanism, seeking to achieve and implement any multi-year settlements would be unwise.

**Question 2** – Is the proposed model appropriate for determining pay and conditions of service for teachers in Wales?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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## Supporting comments

National Education Union Cymru does not accept that the proposed model is the most appropriate mechanism for determining pay and conditions of service for teachers in Wales.

The formal position of the NEU Cymru is that we would prefer to see a collective bargaining model. In responding to this question, we will set out briefly the form of the model which we wish to see implemented. We will also set out our comments on the proposed model and on matters which we believe should be amended, should the Wales Government decide nevertheless to proceed with a model based on these proposals.

### **Preferred model – a collective bargaining model**

We note in particular the Welsh Government's pledge in a letter to the Wales TUC dated 21 December 2017 to "*the extension of collective bargaining and widening access to trade unions as an important tool in realising our ambition of making Wales a Fair Work nation.*" The proposals as set out in this consultation do not implement that pledge.

The proposals are also unnecessarily complex. Wales, as a country, should suit the more streamlined approach to pay determination provided by a collective bargaining mechanism, which should be capable of being more flexible and responsive to changing circumstances than the proposed model.

We propose that the Welsh Government should establish a system based on the system which currently operates in Scotland but modified for the needs and circumstances of Wales. Essentially this would be a tripartite mechanism involving representatives from the Welsh Government, the employers and the trade unions.

The new body should, like the Scottish body, have a standing remit to consider the pay and conditions of service for teachers and, potentially, other teaching-related professionals such as music instructors, educational psychologists and education advisers employed by Local Authorities in Wales.

The objectives of the negotiating body in Scotland are:

- to create a salaries and conditions of service structure that contributes to a highly motivated teaching profession and underpins the delivery of a quality education service;

- to ensure that the outcome of negotiations secures, and maintains, appropriate levels of remuneration for the profession to enhance professional status;
- to ensure that salaries and conditions of service reflect professional status, including the commissioning from time to time of research on the comparative external position in order to inform its deliberations

The Welsh Local Government Association should organise representation on behalf of the 22 local authorities.

Pay claims would be submitted by a specified date each year, following which negotiations would take place between the representatives of each of the groups, with more detailed discussions taking place between the joint secretaries of the new body.

The process would not be as formal as that which would apply under a review body system. There would be no single stage requirement for submission of evidence and there would be considerable flexibility for the parties to agree to undertake additional research and evidence as necessary. There would be greater freedom to meet as required in order to pursue agreement. Decisions on pay would be taken within the meetings and, while potentially requiring a statutory order to give them statutory effect, would be the property of the parties involved.

With regard to representation, an appropriate structure might be a joint body comprising 22 members, drawn from and appointed as follows:-

- 8 representatives of Local Authorities
- 4 representatives of the Welsh Government
- 12 representatives of the teacher trade unions/professional associations.

With regard to the latter, it would be appropriate for each trade union representing teachers in Wales to have one representative by right, with the remaining 6 places allocated by formula in order to reflect membership size.

### **Comments on the proposed model**

Each of the following points is explored more fully in our answers to the further questions in this consultation.

The model set out in the Annex has seven distinct stages that will, in reality, prove to be too cumbersome for the needs of the education system. A slow, cumbersome approach to pay determination adds an

unnecessary risk to managing teacher supply, and in turn risking pupils' education. It appears to us that following initial discussions with teaching unions there has been a haphazard attempt to appease differing views and opinions which has resulted in a muddled approach.

Should the proposed model be implemented, we believe firstly that the proposed role for the partnership forum must be extended. The forum should participate in drawing up the remit for the review body, which should where possible be an agreed remit, and it should participate in reviewing the recommendations of the review body with a view to reaching where possible an agreement on any changes to be made to pay and conditions.

The proposed form of the partnership forum must be properly representative of the teaching workforce, by ensuring that teacher unions' representation reflects the relative membership of the various unions.

The membership of any review body must be clearly independent, appointed on a fair and open basis and include members who are appointed on the basis of recent experience of teaching. The secretariat for the review body must be independent of all Welsh Government departments with an interest in the outcome of its deliberations. The cost of a review body must be quantified and subject to consultation before a decision is taken to proceed with its establishment, particularly if (as we believe is likely) these prove to be proportionately greater than the cost of the current STRB system and would take up a significant sum of money which could otherwise be used for education.

The suggestion that proposals on teachers' pay should be put every year to public consultation is fundamentally flawed and must be rescinded immediately. This idea is unwise and unnecessary and has unhelpful implications for the public services more widely, not just for teaching.

**Question 3** – Do you agree that the proposed teacher engagement model could support and complement the development of the education system in Wales?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input checked="" type="checkbox"/>
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**Supporting comments**

While this may be the ultimate aim of the Welsh Government, it is difficult to see how the proposed mechanism will deliver this more effectively than any other model.

If Wales is truly committed to a social partnership model and wishes to fulfil its promise of real social partnership, it must allow the teaching profession a real opportunity to make a significant contribution to the development of and decisions on pay and conditions arrangements. That would be best achieved via a collective bargaining model with the full involvement of teachers' representatives – a model to which the Welsh Government has said it is committed but which is absent from the proposals.

Wales should aspire to a system that supports career development and permits teachers to identify how their careers may develop through an easy to understand structure, rather than the present structure which presents hurdles at every stage.

A range of changes could be made to teachers' pay and conditions which would improve the education system for learners in Wales, as set out in the NEU Cymru response to the previous consultation on the current pay and conditions arrangements:

[https://neu.org.uk/sites/neu.org.uk/files/NEU\\_Cymru\\_WG\\_STPC\\_Task\\_Force\\_consultation.pdf](https://neu.org.uk/sites/neu.org.uk/files/NEU_Cymru_WG_STPC_Task_Force_consultation.pdf)

Whatever the model, it is critical that the Welsh Government ensures that teachers, through their trade unions, are central to discussions and decision-making on their future pay and conditions.

**Question 4 – Is the overall timetable proposed achievable?**

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input checked="" type="checkbox"/>
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**Supporting comments**

Under a collective bargaining process, there might be a prescribed date for the commencement of the process and a “settlement date” by which date it is envisaged that the process would ordinarily be concluded, but the date on which the process was concluded would be determined by the progress of negotiations and the time needed to reach agreement. The parties should always seek to reach agreement by the due date.

Should the proposed model be implemented, we believe that the overall timetable extending from early September to the end of May should be sufficient to allow time for matters to be fully considered, including with the amendments to the process proposed below, and decisions taken in time for preparations to be made for implementation on 1 September annually. However, this would be complicated if the model included the proposal for public consultation and this provides one more reason for removing that proposal (see Q14 below).

However, the proposal does not set out any timeframes for initial discussions with trade unions, the decision making process on the remit, the timescale for the call for evidence from the review body and any oral evidence sessions, the timeframe for the receipt of recommendations, further consultation with the profession (and with the partnership forum which we propose under Q7&8 below) and the intended public consultation.

In addition, we must consider the Welsh Government’s commitment that school teachers’ pay and conditions are to keep pace with England. This requires due consideration to be taken of proposed changes to pay and conditions for England which will cause significant problems with the timetables in the proposals. Teachers in Wales will of course take an extremely dim view of any erosion to the pay parity which has been promised.

## **Section B – Individual stages within the proposed process**

The proposed model has elements of both a social partnership forum (the partnership forum) and an independent Welsh review body which will both feed into the determination process for teachers’ pay and conditions at different stages.

### **Stage 1**

**Question 5** – Do you agree that it should be for the Cabinet Secretary for Education to decide the initial draft remit outlining the terms and matters for consideration?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Supporting comments**

As we have already said, we believe that the process should be a collective bargaining process. The involvement of all stakeholders would be most effectively achieved via such a process and the scope of negotiations would be determined by discussion and agreement of all the parties.

Should the proposed model be implemented, we believe that giving the Cabinet Secretary sole responsibility for the setting of the remit would not sit easily within the scope of true social partnership as envisaged for Wales. The remit should therefore be discussed and wherever possible agreed by the proposed partnership forum, with the Cabinet Secretary setting the remit only in the event of a failure to agree.

The remit will fall into two parts – the subjects to be considered by the review body, and any directions on matters to be taken into account by the review body. The former should be described neutrally and a “standing remit” could be drawn up for those subjects which would ordinarily be considered.

**Stage 2**

Considering the partnership forum in the first instance, it is proposed that in this model the partnership forum is comprised of representatives of Welsh Government (four), employers (six from local authorities, one from diocesan authorities, one from governing bodies) and all relevant recognised trade unions representing employees (two from each of the six teacher/headteacher unions);

**Question 6** – Is the proposed membership, size and distribution of the partnership forum as highlighted above appropriate?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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### Supporting comments

We could not agree to the proposal that each of the unions representing teachers would have equal representation on the proposed partnership forum. This is wholly inappropriate and will make the forum wholly unrepresentative and unbalanced. The representation of trade unions must reflect their size of membership; otherwise the deliberations of the forum will be inappropriately influenced by the views of representatives with little or no backing among the relevant workforce. NEU Cymru believes that representation on the partnership forum from trade unions representing teachers should be in direct proportion to the percentage of teachers in membership of each union.

We would be concerned by any attempt to designate unions separately as “teacher” and “head teacher” unions. NEU Cymru has members who are head teachers and the NAHT and ASCL have members in more junior roles. It would be inappropriate to treat them in the above way as appears to be suggested.

We believe that the particular representation from each perspective should be decided by the unions themselves, with each union entitled to determine which of their own representatives to send to each meeting, depending on who are the relevant specialists are for the topics under discussion.

Finally, we draw attention to fact that, until January 2019, the NEU Cymru is constituted on the basis of two separate sovereign sections and that, if the new process commences before that date, it should recognise and provide for the representation of the two sections separately until that date, in accordance with the TUC agreement which the Welsh Government has previously agreed to observe.

**Question 7** – Do you agree that such a social partnership forum should have a role within the determination process for teachers’ pay and conditions of service?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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## Supporting comments

Should the proposed model be implemented, we agree that such a forum should exist within the process in order that the principles of social partnership are maintained to some extent.

We believe, however, that the role proposed for the social partnership forum is wholly inadequate and must be extended in order to provide for its involvement in discussing any recommendations made by the review body and seeking to reach agreement on pay and conditions arrangement before their implementation. We have already addressed this in our response to Q4 and will address it further in our response to Q8.

**Question 8** – Do you agree with the scope of the role of the partnership forum as highlighted in the consultation document, within the determination process?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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## Supporting comments

The partnership forum as proposed does not reflect a true social partnership model and lacks true opportunity to influence the decision making process. The failure of the proposed model to provide for any role for the partnership forum following the publication of the review body's recommendations removes any possibility of pay and conditions arrangements being formally agreed by representatives of teachers and their employers.

Should the proposed model be implemented, we believe that the partnership forum should reconvene following the publication of the review body recommendations in order to discuss those recommendations with the Welsh Government. This stage of the process should operate under a formal remit to the partnership forum to seek to reach agreement on the pay and conditions arrangements to be implemented at the conclusion of the process, with the Cabinet Secretary only permitted to take and implement their own decision in the absence

of such an agreement. We believe that the partnership forum should be entitled to question, agree, approve, or dismiss the findings.

**Question 9** – Is the timetable proposed for this stage in the process achievable?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Supporting comments**

Under a collective bargaining process, there might be a prescribed date for the commencement of the process and a “settlement date” by which date it is envisaged that the process would ordinarily be concluded, but the date on which the process was concluded would be determined by the progress of negotiations and the time needed to reach agreement. The parties should always seek to reach agreement by the due date.

Discussions about how this process will work should be started as soon as this consultation closes in May. It is vitally important that this stage is properly considered and thought through in order to ensure teachers are, through their union representatives, able to participate effectively in the process.

**Stage 3**

The teacher engagement model proposes the establishment of a new independent national pay review body for Wales – the Welsh review body – as part of the consideration process. It is envisaged that the independent review body could provide an independent and expert view of all the issues, reaching considered conclusions and recommendations based on evidence from the full range of parties.

**Question 10** – Do you agree that the establishment of an independent Welsh review body is required to provide sufficiently independent and expert advice, rather than the direct commissioning of such expertise?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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### Supporting comments

We do not accept that a review body is a necessary part of any process of determining pay and conditions arrangements. The expertise required to establish appropriate agreed arrangements will exist among the representatives of the teaching workforce and their employers participating in a process of collective negotiation, and the fact that those representatives are not “independent” does not alter the fact of their expert knowledge.

Should the proposed model be implemented, we remind the Welsh Government that all parties in preliminary discussions on this point agreed that, if a review body model was to be adopted, there should be an independent Welsh review body.

However, the NEU Cymru position has always been that this should be subject to full and accurate costing of establishing the same, an exercise that does not appear to have taken place. We are concerned at the likely cost of, for example, the process of appointing members, expenses for attending meetings and visiting schools, servicing meetings and undertaking research.

The costs of the existing STRB process for England & Wales are considerable – their expenses and fees are published<sup>1</sup> - and we understand that the secretariat function provided by the Office for Manpower Economics is not charged on a full cost basis, so the costs of a similar body in Wales are likely to be higher, not lower, than the cost of the current STRB process. All of these matters should have been fully

<sup>1</sup> <https://www.gov.uk/government/publications/pay-review-body-members-fees-and-expenses-2016-to-2017>

researched and published as part of the current consultation exercise.

We would oppose any 'commissioned' model, which would seriously undermine the existing social partnership arrangements which the Welsh Government are seeking to enhance and promote. Nevertheless, the review body and/or the social partnership forum if established should be able to commission independent pieces of research to assist the process.

**Question 11** – How should the body/panel be selected and appointed? For example, it is proposed that the members of the Welsh review body be selected and appointed through an open public appointments exercise, based on key areas of expertise.

### **Supporting comments**

All appointees to any review body should be fully independent of the Welsh Government and the employers and should be appointed in accordance with the usual requirements and open procedures for public appointments of this kind.

Whilst we would agree that appointments should be based upon areas of expertise, the membership of the Review Body must include members who are appointed on the basis that they have recent experience of the

teaching profession itself.

**Question 12** – It is proposed that the Welsh review body would be supported in their work by a clerical secretariat. Do you agree that this support should be provided by the Civil Service (Welsh Government)?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input checked="" type="checkbox"/>
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### Supporting comments

Under a collective bargaining process, the secretariat arrangements could be shared between the parties as is usual in other such cases.

Should a review body be established, we would wish to be assured about the independence of its secretariat from those parts of the Welsh Government which might influence the remit or make submissions to the review body.

In the case of the current STRB, its secretariat is provided by the Office of Manpower Economics which is located within a different department to the Department for Education and HM Treasury. Since all Civil Servants are servants of the Crown, however, ideally another body outside the Civil Service should undertake this role. However, the funding arrangements for such a model would need to be examined in detail and there is not enough detail in this consultation to allow that to be done here.

**Question 13** – Is the timetable proposed for this stage in the process achievable?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input checked="" type="checkbox"/>
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## Supporting comments

With regard to the timetable for establishing a review body, to the best of our knowledge the availability of sufficient independent expertise in Wales has yet to be scoped and we have serious reservations about the ability to establish this body and its secretariat within what will be a very short period of time.

With regard to the timetable for the review body's consideration of the issues referred to it each year, the timetable is as challenging as it has often been with the STRB. Delays due to purported "election purdah" have often intervened in the STRB process when the NEU has felt those delays were unjustified by the purdah rules – this should be avoided wherever possible in future. There will be little time available for independent research to be commissioned and considered in addition to submissions from stakeholders where the review body or the partnership forum wish this to happen.

## Stages 4–7

It is proposed that following the Welsh review body report and consideration of the recommendations by Welsh Ministers, given their statutory nature, Welsh Ministers will undertake a public consultation on any proposed changes to teachers' pay, terms and conditions.

**Question 14** – Should there be a public consultation on the Cabinet Secretary for Education's decision, before the revisions to the Pay Order and implementation of the Order?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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## Supporting comments

We completely oppose this proposed stage in the process and cannot emphasise enough how strongly we are concerned by it.

Public consultations on public sector workers' pay do not exist in any other branch of the public services in any part of the UK. There is no public consultation stage in the existing process for determining teachers' pay for England and Wales. There is no policy justification that we can see for introducing it here. We have also argued consistently that there is no legal requirement either - we have repeatedly asked Welsh Government officials to provide evidence of any such requirement for a public consultation and they have failed to do so. The proposal to include a public consultation in this process will set a precedent which raises concerns for public service employment as a whole.

Under a collective bargaining model, the only necessary consultation would be the process of negotiation with the teaching profession and education employers. In order to put the agreed arrangements on a statutory basis, however, we would accept the need for a Parliamentary process in the usual manner necessary in order to implement the required orders.

A full Welsh Government public consultation would undermine the overall process, whatever its form; it would undermine the principle of social partnership; and it would leave the proposals and the Welsh Government open to challenge from wider interest groups which do not have the interests of the education service as their priority.

**Question 15** – Is the timetable proposed for this stage in the process achievable?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Supporting comments**

As stated above, we completely oppose this proposed stage in the process and, in addition to our position of principle outlined above, we also believe that it will add an unnecessary and wholly avoidable delay in reaching a conclusion which would make the timetable for the process overall potentially inadequate.

## Section C – Alternative proposals and additional comments

**Question 16** – Please include any suggestions for alternative models or amendments to the proposed teacher engagement model set out in the annex.

### Supporting comments

As we have already said, we believe that the process should be a collective bargaining process but, should the proposed model be implemented, some substantive amendments to the proposals will be necessary. We have set out our position on those matters in our answers to the foregoing questions.

**Question 17** – We would like to know your views on the effects that the proposed model to determine teachers' pay and conditions would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

### Supporting comments

Opportunities for education practitioners in their current roles and for those entering the profession to learn Welsh must be seen as important by the WG if they are to reach the 1 million Welsh speakers by 2050. Experienced practitioners must be given more opportunities to learn Welsh, as they have a great knowledge of their specialisms and pedagogy which must not be lost. These opportunities should be considered well in advance. Please see our response to the Welsh Language Strategy:  
[www.atl.org.uk/sites/www.atl.org.uk/files/ATL%20Cymru%20summary%20of%20response%20to%20Welsh%20Language%20Strategy.pdf](http://www.atl.org.uk/sites/www.atl.org.uk/files/ATL%20Cymru%20summary%20of%20response%20to%20Welsh%20Language%20Strategy.pdf)

**Question 18** – Please also explain how you believe the proposed model for the determination of teachers’ pay and conditions of service could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Supporting comments**

**Question 19** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: