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**Janet Finch-Saunders AM**  
**Chair, Petitions Committee**  
**National Assembly for Wales**  
**Pierhead Street**  
**Cardiff**  
**CF99 1NA**

20 May 2019

Dear Janet

### **Petition P-05-805 Fair Deal for Supply Teachers**

Thank you for your letter dated 29<sup>th</sup> April 2019. I provide a response on behalf of the Education Workforce Council (EWC) below.

#### About the EWC

Due to the EWC's statutory requirement to maintain a Register of education practitioners in Wales and the legal duty upon employers and agencies to employ registered practitioners and make misconduct / incompetence referrals to the EWC, the Council:

- holds extensive information about those undertaking supply work, including age, gender, qualifications, employment, subjects taught, ethnicity and Welsh language ability;
- works closely with:
  - private supply agencies, local authorities that maintain supply pools and schools;
  - registered teachers and learning support staff who work on a supply basis;
  - trade unions that represent registered teachers and learning support staff who work on a supply basis.

This intelligence places us in a strong position to comment about issues and systems for supply teaching.

#### What EWC data shows

The Council would invite the Committee to note the following points:

- When the Council was formed in the year 2000 (under our previous name of the GTCW), there were 12 supply agencies operating in Wales. This number has expanded significantly such that we now deal with 65 agencies in Wales. Over this period, we have also seen a reduction in the number of local authorities running their own "supply pools".
- Data from the EWC Register of education practitioners as at 31<sup>st</sup> March 2019 shows that some 4,800 registered school teachers and some 6,000 registered learning support staff recorded their employment as "supply". The Council has followed the debate regarding supply teachers' pay and conditions for some time and yet throughout this debate, we are

concerned that little reference has been made to learning support staff who undertake supply, despite their number now exceeding those of supply teachers.

- EWC data shows that supply teachers are predominantly either (a) in the early part of their career and undertake supply work largely due to a lack of permanent or temporary long term contracts. Almost all of these registrants are seeking permanent employment; or (b) towards the end of their teaching career or retired from a substantive teaching post. Our data also shows that supply staff are used more heavily in the primary phase. It is important that this profile is taken into account when making decisions on matters such as professional development for supply teachers to ensure access to professional development aligned to the relevant career stage is planned.
- A survey undertaken by the GTCW in 2014 confirmed that the most common reasons for schools to require supply teachers were to cover sickness absence (41%) or for permanent teachers to undertake professional learning (32.9%). There is clearly an opportunity to reduce the amount of supply teaching required by developing solutions to reduce sickness absence and managing “planned absence” (professional learning and long term sickness) in a more strategic way.

Further information may be found on the EWC website as follows:

- EWC survey of supply teachers 2014
- EWC national workforce survey 2017, sections 6 and 8 cover supply teachers and supply learning support workers
- A data analysis from the EWC Register 2016 of supply teachers
- A data analysis from the EWC Register 2016 of supply learning support workers

<https://www.ewc.wales/site/index.php/en/policy-hub/statistics-archive.html>

<https://www.ewc.wales/site/index.php/en/policy-hub/national-education-workforce-survey.html>

### Possible models for supply teaching

We consider that any supply model in Wales must ensure the **correct deployment** of appropriately qualified registered practitioners and results in **high standards of teaching and support**. Any model must operate efficiently, offer value for money, fair pay and conditions for those undertaking supply work and be future proof (given the significant level of change in Welsh education, in particular the introduction of a new Curriculum).

It is important that Wales does not invest in and introduce models that are not fit for purpose and which try to “treat the symptoms rather than the underlying causes and issues”. As such, the points raised in the section above in respect of “who undertakes supply work and why this cover is needed” are particularly relevant.

You have asked the Council to comment on the viability of a public sector solution for supply teachers in Wales, in a similar vein to the system which operates in Northern Ireland or the recent

pilot project based on cluster arrangements. There are a number of options for models, some of which are established while others would be new. We provide some examples below:

- **A central model coordinated by government or an organisation acting on its behalf.** This model currently operates in Northern Ireland. Given the relatively manageable size of the supply workforce in Wales, a more centralised model would seem to be an option. However, it would be necessary to determine “who the employer is”. In Northern Ireland, it is the government that takes this role, therefore to mirror this position in Wales would be a major departure from current arrangements.

The Welsh Government has utilised the EWC to undertake work on its behalf in areas such as Induction, the Masters in Educational Practice and the Professional Learning Passport using the power of the Register of educational practitioners as a focal point. This has included developing an online facility for supply teachers to record their Induction sessions. We are also beginning work on a national portal, where all teaching jobs will be advertised in the future, resulting in significant savings to the public purse.

The EWC undertakes such work under Welsh Government terms and conditions of grant and makes no profit. It is not seeking or advocating a role for itself in relation to supply but pointing out that the Welsh Government should consider how new systems might be integrated into existing arrangements, thus reducing cost and effort.

- **A model organised by regional consortia and / or local authorities.** While a return to local authority supply pools may not be practical or cost effective, a model at a regional level is an option, as it may be possible to address current concerns raised about pay, terms, conditions, continuing professional development and performance management without creating 22 administrative systems. However, as with a single central model clarification on “who the employer would be” would be needed.
- **A market driven model involving supply agencies.** The increased prevalence of supply agencies in Wales (and other countries) has caused discontent, with concerns raised regarding rates of pay, terms and conditions, a lack of continuing professional development, inadequate performance management arrangements and the cost to schools. It is also contrary to the aims set out in the “Alternate Delivery Model” approach set out by the Welsh Government, which advocated:
  - accountability to local government;
  - protection of employee terms and conditions;
  - confirmation of trade union recognition.

The Welsh Government has introduced “national framework / preferred supplier” arrangements in Wales, however this has not stopped a host of other agencies operating in Wales without adherence to the national framework. Agencies also continue to be largely unregulated, with no quality assurance system in place in Wales (note a system operates in England).

The Council is aware that a number of respondents to the Inquiry into Supply Teaching by the National Assembly for Wales Children, Young People and Education Committee advocated a return to local authority supply pools in place of agencies. The EWC is more open minded in this regard as the administration of supply staff is intensive, requires sound structures and could result in duplication if undertaken locally rather than more centrally. As such, contracting such work out to the private sector should not be automatically discounted, however the Council believes that the current model is flawed and any new model would need to offer value for money and meet the needs of the Welsh Government. We make further reference to this below in relation the “national framework”.

- **A model involving clusters of schools working together to employ a small number of supply staff.** Prior to the introduction of the Welsh Government pilot for newly qualified teachers in 2018, this is a model that was rarely found in Wales on a formal basis though sometimes operated more informally. However (especially with Heads increasingly having responsibility for more than one school), this could be a practical and cost effective model for some schools. There would be benefits in respect of “continuity” for learners, schools and the supply staff concerned. The existing pilot has focused on newly qualified teachers, meaning that some of these persons have left the scheme having secured a permanent position. The Council considers that if this scheme was to be adopted more widely, it could be available for all supply teachers (and not just NQTs) and supply learning support staff.
- **More innovative and potentially more cost effective approaches.** These might include:
  - Creating a guarantee that any trainee teacher in Wales would have a teaching post, with some such posts involving covering a group of schools on a supply basis. The Council believes that this is not unrealistic given the significant reduction in training numbers in Wales since 2006 and the number of NQTs that undertake supply work. It would also assist such teachers in meeting the Induction Standards and ensure continuity for pupils where staff are absent.
  - Encouraging more part time working for teachers towards the end of their career who retire but subsequently undertake supply work.
- **Contractors.** In registering learning support staff in Wales, the Council has identified that schools are increasingly using companies or organisations to provide specific services such as sports or music provision, particularly to cover a school’s PPA requirements. While this is “not supply”, the recent development is worthy of reference as it involves the use of private sector organisations and involves a financial cost to schools;
- **Mixed models.** These could involve combination of the above.

#### Improvements that could arise from a national framework

The EWC considers that each of the models above has its pros and cons and we emphasise that as an independent body, we have no vested interest in advocating any model over and above another.

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However, the EWC firmly believes that any model or models for supply staff in Wales must be underpinned by certain requirements by government, for example:

- access to continuing professional development for supply staff;
- access to performance management arrangements for supply staff. Note, agencies are required to refer certain cases of misconduct and incompetence to the EWC and therefore the Council is aware that many of those undertaking supply work do not have access to performance management processes;
- appropriate rates of pay, terms and conditions for supply staff;
- appropriate quality assurance of providers / employers, whether these be private supply agencies, local authorities and their consortia or schools. The Council is aware of the REC arrangements for agencies operating in England.
- be administratively efficient for all involved (including practitioners and schools) and offer value for money.

We are encouraged that the national framework seeks to address a number of these areas, however it has a fundamental flaw in that it does not prevent any school from using a supply outside of the framework that offers cheaper rates and a “lesser deal” to the supply teacher. We understand that the Welsh Government is seeking to improve matters by extending the framework to more agencies, however the flaw will still prevail.

The EWC has long advocated the introduction of a Quality Mark for supply agencies, underpinned by a set of standards / requirements. The Minister for Education stated in the Assembly in 2018 that she was minded to ask the EWC to administer such a scheme, however as yet we have not been formally asked to commence this by the Welsh Government.

We are also not clear whether the framework will cover both teachers and learning support staff.

#### Opportunities or risks from devolved pay and conditions for teachers

The Independent Welsh Pay Review Body (IWPRB) is due to submit its report in mid-June to the Minister for Education with recommendations for teachers’ pay for September 2019. Given the number of supply teachers in Wales (around 14% of the teaching workforce), the IWPRB ought to consider supply teachers in its recommendations to the Minister.

Please note, the body’s considerations only cover teachers, yet as stated above there are now more active supply learning support staff than teachers.

#### Arrangements for professional learning

The Council is aware that many teachers and learning support staff do not benefit from professional development in the same way as substantive staff do. We also know that some agencies are more active than others in providing professional development. All supply teachers are able to count their

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sessions towards the completion of Induction (these sessions are logged with the EWC) and receive the support of an external verifier from their regional consortia.

The EWC makes available a range of services and training to its registrants and these are available to supply staff.

The Council thinks that all supply staff (teachers and learning support staff) should have an entitlement to professional development, particularly with the introduction of significant reforms in the Curriculum and ALN. We believe that this should be incorporated into any supply model in existence, including local authority pools and supply agencies. However, we re-emphasise two points made earlier in this response:

- While a requirement to provide professional learning can be incorporated into a national framework for agencies, this is not fool proof as the framework does not cover all active agencies. A more effective or complementary solution would be a Quality Mark, where all active agencies would need to meet the necessary standards, one of which could relate to professional learning.
- It is important to recognise “who undertakes supply”. Professional learning opportunities should be appropriately tailored to the particular career stage of the individual, in order to maximise value for money and long term impact of this on the learning of pupils in schools.

#### Other points

We note that the petition states “teachers are leaving the profession as they cannot afford to be supply teachers”. EWC data does not indicate that that supply teachers are leaving the profession in significant numbers.

Please do not hesitate to contact at [hayden.llewellyn@ewc.wales](mailto:hayden.llewellyn@ewc.wales) or **(029) 2046 0099** if I can be of further assistance.

Yours sincerely



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Education Workforce Council