Gillian Barton STRB Secretariat Office of Manpower Economics Victoria House Southampton Row London, WC1B 4AD

DATE:

Dear Gillian (?)

1. Introduction

- 1.1. The British Association of Teachers of the Deaf (BATOD) welcomes this opportunity to submit representations and evidence to the School Teachers' Review Body (STRB).
- .1.2 BATOD has the unique position as the only professional body which represents the interests of Teachers of the Deaf (ToDs) in the United Kingdom. BATOD members work in a range of situations and locations, not only in LA schools. Furthermore, the ToDs' specialist role operates in a very wide age range context: from the point of very early diagnosis (via the New-born Hearing Screening Programme) to Further and Higher Education settings. Also, many ToDs operate under the classification of "unattached teachers": a classification which BATOD still feels is inappropriate and unhelpful. We would propose that ToDs are considered under the same classification as other centrally employed specialist teachers.
- 1.3 ToDs are essential in providing and promoting curriculum access for learners who are deaf (we use this term to include all degrees of hearing loss). In mainstream school settings, the intervention of a ToD is essential in promoting high achievement towards social and educational outcomes. This is in line with the Coalition's recommendations in the DfE Business Plan 2011 2015 (ref: Impact Indicators 'narrowing the gap' [p22]). Additionally, ToDs have a crucial role in supporting the Coalition's Early Intervention initiatives as outlined in the DfE Business Plan 2011-2015. ToDs are represented in every Local Authority in England and carry out essential intervention to deaf learners across the entire educational age range. ToDs work within both the maintained and non-maintained sectors. Early Intervention is a key function of ToDs and they work in partnership with NHS and social care services. ToD involvement in early diagnosis and intervention is assessed through a Quality Assurance programme carried out by National NHS consultants.
- 1.4 We would also draw attention to the fact that the context of the work of many ToDs is very similar to that of teachers of learners with other low incidence special educational needs, for example; teachers of children with visual impairment, multisensory impairment, and profound and multiple learning difficulties.



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- 2. Questions cover in this submission, as outlined in Gillian Barton's email 22 February 2012
 - a. how the pay framework for teachers should best be made more market facing in local areas
 - 2.1 What evidence is there of teacher recruitment or retention difficulties in particular locations? Such evidence might include, for example, persistent **local** shortages of teachers of particular subjects, or of staff with particular experience.
 - BATOD: There continues to be a national recruitment problem with respect to Teachers of the Deaf. This is supported by evidence which has been gathered by BATOD over a number of years. Recent TDA funding (2009/10) to provide training to mainstream teachers to qualify as Teachers of the Deaf was a success. This is warmly welcomed by BATOD and recognised as energising the profession. However, the ageing profile of the profession will mean an acute shortage in Teachers of the Deaf over the coming five years. Future recruitment remains a serious concern given the current financial climate and the termination of TDA dedicated funding.
 - 2.2 What evidence is there of over-supply of teachers in particular locations? Such evidence might include for example consistently higher than average levels of applications for vacancies, or very low turnover rates?
 - BATOD: There is no evidence of an oversupply of Teachers of the Deaf.
 - 2.3 What evidence is there that the flexibilities already available in the STPCD¹ are not adequate to manage recruitment and retention difficulties? In what way might the relevant provisions be clarified or simplified to encourage their use and/or make them more effective?
 - BATOD: There is a disparity in the way ToDs are paid with reference to the SEN scale and the use of TLR points. Pay at the top of SEN scale has been used in the past and yet there continued to be a recruitment problem. Currently, some Local Authorities are paying at a point less than this and this is likely to compound the recruitment problem. We feel that payment of SEN at the top of the scale should be used for qualified Teachers of the Deaf. BATOD has also noted that some LAs are placing Teachers of the Deaf on Soulbury pay scales. This, BATOD believes, will further compound the difficulties in recruitment and retention. The profession has benefitted greatly from the TDA initiative to fund training of Teachers of the Deaf (in addition to teachers for the visually impaired and teachers for multi-sensory impairment) for two years. It would be extremely helpful if this funding were to be reinstated in the future. Currently, Teachers of the Deaf are in extremely short supply and as such can be regarded as a shortage subject discipline.

Such as recruitment and retention payments, or discretionary points on the pay scale

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- 2.4 What evidence is there that:
 - the geographic boundaries for existing pay bands are not correctly defined;
 BATOD: None.
 - existing pay bands are not set at an appropriate pay level (relative to other pay bands);

BATOD: None

 The number of pay bands is inadequate to reflect the range of labour market conditions.

BATOD: Apart from the London inner and outer weighting there are no provisions made to attract Teachers of the Deaf to enter the profession in other areas of the UK. However, the London weightings are a true reflection of the high cost of housing which would *prevent* ToDs living there if this were *not* to exist. BATOD maintains that the provision of Teachers of the Deaf should be considered a shortage area and that schools and services should have the flexibility to award Recruitment and Retention points.

there are particular boundary or 'cliff edge' problems?
 BATOD: None.

2.5 What are the appropriate comparator graduate-level occupations when assessing pay levels for school teachers against other occupations in specific localities?

BATOD: ToDs are a special case when compared to mainstream teachers. Teachers of the Deaf hold an additional post graduate qualification (often at Masters level) and would have been assessed as being competent in their role as a teacher prior to being accepted on a Mandatory Qualification course.

2.6 Where there is evidence that pay is not set at levels appropriate to local labour markets, what changes might be needed to the STPCD to give head teachers / governing bodies greater autonomy to set pay?

BATOD: Teacher's pay is set at national levels and BATOD maintains this is appropriate.

2.7 What evidence is there on the scale and extent of teacher mobility?
BATOD: No evidence to offer.

2.8 What **evidence** is there that the current pay and progression arrangements need reforming in order to more effectively link pay and performance?

BATOD: We would like to suggest that some form of quality assurance for Teachers of the Deaf be put in place to ensure the continuation of high quality teaching. Periodic peer reviews have been successful in other areas and could be considered for Teachers of the Deaf and sensory services.



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2.9 What **changes** to current pay and progression arrangements for (a) the main scale and (b) the upper pay scale would enable schools to more effectively link pay and performance?

BATOD: Retain current system of UPS progression.

- 2.10 What **other factors** need addressing to:
 - enable schools effectively to manage arrangements to link pay to performance; and UPS does a good job.

BATOD: Covered above

 help teachers to develop their professional skills, and so improve their performance and ability to progress? Additional qualifications (like ToDs). We appreciate MQ exists in 3 areas and would recommend this being extended to other SEN areas.

BATOD: Additional qualifications (like ToDs). We appreciate MQ exists in 3 areas and would recommend this being extended to other SEN areas.

- c. what other reforms should be made to teachers' pay and conditions in order to raise the status of the profession and best support the recruitment and retention of high quality teachers in all schools
- 2.11 What are the barriers in the existing pay and conditions framework (STPCD) to recruiting and retaining high quality teachers?

BATOD: Low pay. Recent pay increases have improved R&R and BATOD supports this. Greater flexibility in time management (non-contact time). Current uncertainty surrounding pensions.

2.12 What existing provisions of the framework might be clarified or simplified to encourage their use or to make them more effective?

BATOD: Greater flexibility to use TLRs and R&R payments.

2.13 What other changes to the framework might be made to provide greater flexibility for head teachers (and others) to recruit and retain high quality teachers?

BATOD: Greater flexibility to use TLRs R&R payments.

2.14 What other changes to the pay and conditions framework would help to raise the status of the teaching profession?



BATOD: More allocated planning time and flexibility

Summary

BATOD looks forward to receiving details of the outcome of this consultation process in due course and reiterates its willingness to participate further if required.

With best wishes

Paul Simpson, National Executive Officer, BATOD

