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School Teachers' Review Body
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Dear Craig and Anthony,

School Teachers' Review Body (STRB)

Executive Summary

The British Association of Teachers of Deaf Children and Young People (BATOD) recommends a 10% pay award following advice from National Foundation for Education (NFER) for all teacher groups to support recruitment and retention. We urge the Government to fully fund pay uplifts and ensure that pay uplifts also apply to centrally employed specialist teachers.

Teacher workload significantly exceeds international norms and includes extensive time spent on planning, marking, administration, and other non-teaching duties. The impact on teacher wellbeing, retention, and job satisfaction is well-documented. These demands reflect a broader trend of increasing expectations without proportional support, highlighting the urgent need for policy review and workforce investment.

To enhance financial protection and support workforce stability, BATOD opposes any reduction in the current safeguarding period for teachers whose salaries are adversely affected by changes in role, responsibilities, or school structure.

BATOD supports the proposal to allow maintained schools to make non-consolidated payments as long as the process is fair and transparent. This process should also be available to teachers employed directly by Local Authorities (LAs).

BATOD strongly supports the retention of directed time as a protective measure against excessive workloads. Directed time provides a framework for managing expectations and safeguarding teacher wellbeing. BATOD acknowledges ongoing confusion and inconsistency in the application of directed time, particularly for specialist teachers employed by LAs and within schools. These misunderstandings risk undermining protections and could lead to exploitation, especially in underfunded settings.

Introduction

BATOD welcomes this opportunity to submit representations and evidence to the School Teachers' Review Body (STRB).

We would like to reaffirm BATOD's unique and vital role as the only professional body representing the interests of Qualified Teachers of Deaf Children and Young People (QToDs) across the United Kingdom.

We respectfully remind the STRB that BATOD members work in a wide variety of contexts and locations, not limited to school environments. Their specialist expertise spans an extensive age range—from the earliest stages of identification through the Newborn Hearing Screening Programme to support within Further Education (FE) and Higher Education (HE) settings.

We trust that this breadth of professional responsibility and the distinctive nature of the QToD role will be duly considered in your deliberations.

We would also like to highlight the essential role of QToDs in ensuring and promoting curriculum access for deaf children and young people (CYP)—a term we use to encompass all levels and types of deafness.

In mainstream educational settings, special schools and specialist settings the involvement of a QToD is critical in supporting high achievement and fostering positive social and educational outcomes. QToDs also play a pivotal role in advancing the Government's early intervention strategies and in contributing to sustained improvements in outcomes for all children.

QToDs are represented in every LA in England and provide vital support across the full educational age range. Their work spans both the maintained and non-maintained sectors, and early intervention remains a core function of their practice. This includes close collaboration with National Health Service (NHS) and Social Care services to ensure holistic and timely support for deaf CYP.

We would also like to draw the STRB's attention to the fact that the professional context in which many QToDs operate closely parallels that of teachers supporting CYP with other low-incidence special educational needs—for example, those working with CYP who have vision impairments, multi-sensory impairments, or profound and multiple learning difficulties.

BATOD would advise, when addressing acute teacher shortages, careful consideration is given to barriers faced by deaf individuals on the routes in teaching (and specialist QToDs). BATOD membership indicates ~12% of the BATOD QToD members identify as deaf. However, diversity in the profession across the UK is poor.

In response to the matters raised by the STRB, please find below BATOD's considered position, informed by consultation with its membership.

Pay awards

There will obviously be concern for schools and LAs if the Department for Education (DfE) maintains that there no additional funding will be provided for pay awards during the current spending review period and that schools will be expected to cover pay increases from existing budgets. This stance has raised concerns among professionals about sustainability and fairness.

BATOD would like to acknowledge the previous pay award to teachers and especially the support schools and LAs received with additional funding. It is encouraging to see the value placed on the role of teachers, especially in specialist areas. However, teachers have lost up to a third of their salary value in real terms between 2010 and 2023–24 (NASUWT). This means that, adjusted for inflation, their pay is worth 28.3% to 32.8% less than it would be if it had kept pace with the Retail Prices Index (RPI). In addition to the erosion of salary, nearly a third of teachers leave within five years of qualifying, 89% of teachers report financial stress and 87% feel their pay is not competitive with other graduate professions (NASUWT). Due to these factors, BATOD is in agreement with the NFER which suggests that to meet the government's target of recruiting 6,500 new teachers, pay would need to rise by around 9.55% annually for two years (2025/26 and 2026/27). [nfer.ac.uk]

Without significant increases, the Government's teacher supply pledge is unlikely to be met.

Teachers' and leaders' working conditions:

BATOD welcomes the recommendations of the 35th School Teachers' Review Body (STRB) report, which calls for mandatory flexible working policies in schools across the UK. These measures are vital

for improving teacher retention and attracting a more diverse and inclusive workforce, including QToDs and those with additional accessibility needs.

The report outlines practical approaches such as structured job shares, staggered start and finish times, compressed working weeks, and remote working for planning and assessment. BATOD believes these changes will help make teaching more sustainable and accessible, particularly for professionals balancing work with caring responsibilities or managing health conditions. Directed time for teachers is 32.5hrs per week plus reasonable additional non directed hours. In the UK the standard working week is approximately 40hrs with the law limiting most workers to a maximum of 48hrs however, in 2024, teachers worked an average of 48.1 hours per week with anecdotal evidence suggesting that many teachers are far exceeding these hours with long hours of travel for peripatetic QToDs. Some surveys report even higher figures, with full-time teachers averaging 52.4 hours per week (Schools Week).

Research highlights the demanding nature of teaching in England, particularly in relation to working hours. Teachers in England consistently report longer working weeks compared to their international peers, with many spending significant time outside of classroom teaching on planning, marking, and administrative tasks. This workload not only affects teacher wellbeing but also has implications for retention and job satisfaction (Jerrim, Sims and Allen, 2019).

Recent data reveals a critical issue in the workload of special educational needs coordinators (SENDCOs), with only 6 per cent reporting that they are able to complete their tasks within contracted working hours. This alarming statistic underscores the unsustainable nature of the role, which is increasingly dominated by administrative responsibilities such as managing education, health and care plans (EHCPs). Experts argue that without significant reform and better support structures, the pressure on SENDCOs will continue to rise, particularly as mainstream schools are expected to accommodate more pupils with additional needs (Roberts, 2025).

Anecdotal evidence from BATOD professional group discussions shows that peripatetic staff are under pressure to complete more than 20 hours of contact time as well as the associated travel time to different settings, paperwork, assessments, dealing with increasing amounts of emails. Staff running Provisions/Enhanced Resource Provisions/Bases have seen a growth in the number of deaf CYP they are expected to support (BATOD recommends a ratio of 1:6) with additional pressures on the lengthy amount of time people are expected to sign, pressure to attend school trips if deaf CYP are present as well as maintaining EHCPs, supporting parents/carers, coaching, supporting engagement, training school mainstream staff and ensuring that teaching assistants are upskilled.

In addition to the above, the BATOD membership survey 2025 (publication pending) highlights challenges for Resource Provision based QToD where there is a continuing increase in the ratio of deaf CYP and deaf with additional needs CYP to QToDs. These challenges are magnified by the recruitment of unqualified QToDs to train on the job due to the challenges of recruiting, school/local area reputation. Trainee ToDs report insufficient study release time for ToD to undertake level 7 Mandatory Qualification (MQ). QToDs also report time pressures to meet EHCP needs and effectively supervise the unqualified ToD who can be in role but "they can start under supervision but the MQ must be achieved within three years of starting to work with deaf children. The three-year period does not start again if they change jobs. (2003 regulations)".

Salary safeguarding

To strengthen financial protection for teachers whose salaries are adversely affected by changes in role, responsibilities, or school structure, ensuring retention, fairness, and workforce stability BATOD suggests does not agree with reducing the safeguarding period, on contrary BATOD suggests the following proposals:

1. Extension of Safeguarding Period

Proposal: Increase the standard safeguarding period from 3 years to 5 years for teachers impacted by involuntary changes (e.g. restructuring, curriculum shifts). This should also apply to teachers employed centrally by LA rather than directly by schools.

Rationale: A longer period provides greater financial security and supports retention during periods of educational reform.

2. Tiered Safeguarding Based on Length of Service

Proposal: Implement a tiered safeguarding system based on years of continuous service:

Rationale: Recognises experience and loyalty while balancing cost implications for schools.

3. Partial Safeguarding Option

Proposal: Introduce a partial safeguarding mechanism (e.g. 50% of salary loss) beyond the standard period, especially for voluntary role changes or budget-constrained settings.

Rationale: Offers flexibility and cost-efficiency while maintaining a degree of financial support.

4. Local Authority Support Fund

Proposal: Establish a central safeguarding support fund managed by LAs to assist schools facing exceptional financial pressure.

Rationale: Ensures equity across schools, particularly in rural or high-SEND areas.

5. Transparent Review and Oversight

Proposal: Require schools and LAs to conduct a formal safeguarding review before terminating safeguarded pay, with union representation, documented rationale, and an appeal mechanism.

Rationale: Promotes transparency, accountability, and staff confidence.

6. Link to Professional Development

Proposal: Pair safeguarding arrangements with career development plans, offering pathways into leadership, specialist roles, or retraining. This is particularly important for teachers with specialism as their career path is often stunted and management roles are not available.

Rationale: Encourages progression and helps teachers transition into sustainable roles.

Changes to allow maintained schools to make non-consolidated payments

BATOD supports the proposal to allow maintained schools to make non-consolidated payments as long as the process is fair and transparent. This process should also be available to teachers employed directly by LAs. This will support the retainment of specialist teachers with mandatory qualifications as well as supporting:

- Retainment of experienced staff at the top of their pay range
- Flexibility as is seen in academies, which already have more freedom in pay arrangements

However, BATOD would like assurances that safeguarding guidelines are in place to ensure that the following are taken into consideration:

- Transparency in how such payments would be awarded
- To avoid the potential for favouritism or inconsistency

- Impact on collegiality and morale
- Clear criteria and oversight mechanisms are in place
- Payments are linked to objective performance measures not linked to exam results
- Budgetary safeguards
- Equity across schools, especially in areas with limited funding

BATOD would like further consideration given to the administrative burden on schools/LAs, the risk of undermining the statutory pay structure and would again like to emphasise the need for clear guidance from the DfE.

Teachers directed and non directed time

Despite various government initiatives aimed at reducing teacher workload, recent research shows little meaningful progress. Secondary teachers in England continue to spend nearly as much time on non-teaching tasks—such as marking, planning, and administration—as they do on actual teaching, averaging around 20.1 hours per week on each (Jerrim, Sims and Allen, 2019). The Government Report Working lives of teachers and leaders: Wave 3 shows that teachers and leaders continue to face demanding schedules, with leaders working an average of 56.6 hours per week and teachers 48.1 hours. Teaching commitments account for 23.3 hours weekly for teachers and 12.4 hours for leaders with teaching duties. Workload perceptions remain concerning: only 22% consider their workload acceptable, 34% feel they have sufficient control, while nearly half (49%) describe their workload as both unacceptable and uncontrollable 90 (Department for Education (DfE), IFF Research and IOE, UCL's Faculty of Education and Society (2024)).

Moreover, evening and weekend work remains common, with approximately 40% of teachers working evenings and 10% working weekends. School leaders face even greater demands, averaging 56.6 hours per week. These figures highlight the persistent intensity of the profession and suggest that current policy efforts have not significantly alleviated the burden (Jerrim, Sims and Allen, 2019). To add to the challenges teachers face, the pupil-to-teacher ratio increased from 17.1 (2010) to 18.0 (2022), indicating teacher numbers have not kept pace with rising pupil numbers.

Vacancy rates rose from 0.1% (2010) to 0.5% (2022), with shortages most acute in secondary subjects like modern foreign languages, design & technology, computing, and science (Maisuria, A., Roberts, N., Long, R. and Danechi, S. (2023).

BATOD strongly supports maintaining directed time to protect teachers from the ever-increasing excessive workloads. BATOD recognises that in schools and for specialist teachers directly employed by LA misunderstandings and a lack of clarity continues to persist about what counts as directed time leading to inconsistent application. Although far from perfect concerns exist that removing directed time could lead to exploitation, especially in underfunded schools and LAs.

BATOD recommendations take in to account the below cost pressures but would also like to highlight specific examples of how the support deaf CYP is specifically affected:

- a. The cost pressures that schools are already facing and may face over the coming years (and how they affect individual schools).**

BATOD acknowledges the financial pressures currently facing schools and stresses the importance of fully funded pay awards. Without adequate government funding, schools may struggle to implement the STRB's recommendations effectively, risking further strain on budgets and staff wellbeing. Ensuring pay awards are fully funded is essential to maintaining educational standards and supporting the recruitment and retention of specialist teachers, including QToDs. Rising staffing costs in schools and LAs means

that they are reluctant to employ special teachers and/or delay supporting staff to complete mandatory qualifications. There is also disparity around pay scales for specialists in terms of SEN points, pay ranges and access to Teaching and Learning Responsibilities. This means that deaf CYP may be supported by teachers who do not hold mandatory qualifications (NDCS Report 2024).

Specialist QToDs play a vital role in ensuring equitable access to education for deaf CYP. However, there is growing concern that their deployment is increasingly focused on supporting CYP in mainstream settings, often at the expense of their involvement in Resource Provisions/Bases (RP/B). This shift risks undermining the quality and consistency of specialist provision for those with more complex needs.

BATOD believe that QToDs should be afforded the time, resources, and professional autonomy to contribute meaningfully to both mainstream inclusion and specialist settings such as RPs. These resource provisions are essential for delivering intensive, tailored support that cannot be replicated in mainstream environments alone. QToDs are not only educators—they are advocates, communicators, and specialists. Their role must be safeguarded and strategically deployed to ensure that all deaf CYP, regardless of setting, receive the support they need to thrive.

Inflation and Operational Costs: Schools are facing cost increases of 3.4–3.6%, driven by inflation in energy, food, and materials, while funding is only rising by 2.2–2.8%, creating a real-terms funding gap (Norden, 2025). This has very obvious impacts on deaf CYP in terms of access to technology to enable them to access the curriculum. Although currently an EHCP provides some security, the majority for deaf CYP do not have EHCPs but still require specialist and non specialist equipment.

Special Educational Needs and Disabilities (SEND): SEND provision costs are rising sharply. Over 60% of schools report serious challenges in meeting SEND needs, with many SENDCOs unable to complete their tasks within contracted hours due to unsustainable workloads (Roberts, 2025).

The number of CYP with EHCPs has increased by 80% since 2018, straining budgets and staffing (Tormey, 2025). Anecdotal evidence suggests that to decrease costs, deaf CYP are being forced in to inaccessible mainstream lessons as schools try to reduce costs by decreasing interventions and small group work. Deaf CYP are having to fight for access rights with regards to exam arrangements and reasonable adjustments.

Capital Funding Shortfalls: Many schools face crumbling infrastructure, with only 656 schools receiving capital funding in 2025–26. The National Audit Office estimates that £13.8 billion is needed to restore buildings to a safe condition (Norden & Hodgson, 2025). This means that schools have no funding to make reasonable adjustments to school environments to improve acoustics. This increases the concentration needed to access language and being included in school life having an additional negative impact on social inclusion and wellbeing.

Anecdotal evidence also suggests that many LAs have a recruitment freeze and are not replacing established roles. This means that caseloads have to be absorbed by existing staff causing additional stress and increased sickness and absences and/or support for CYP with SEN being decreased.

Budget restrictions are also affecting pay scales with job roles being manipulated on paper so that they do not accurately reflect the scope of the work covered.

b. Potential equalities impacts associated with any changes proposed to the STPCD.

Proposed changes to the STPCD may have significant equalities implications for specialist teachers unless there is guidance for schools and LAs, particularly in relation to workload, flexible working, and pay progression. The reintroduction of a list of administrative tasks that teachers should not be expected to perform aims to reduce workload, which disproportionately affects women and disabled staff who are more likely to seek part-time or flexible arrangements (Martin, 2024). The recommended that all schools

implement flexible working policies, which could improve retention and career progression for underrepresented groups, including those with caring responsibilities (Whittaker, 2025). BATOD has not supported performance related pay in the past but has accepted that some employers use this. The removal of performance-related pay progression may limit schools' ability to reward staff equitably, unless alternative mechanisms are introduced to ensure transparency and fairness. Additionally, extending STPCD compliance to academies and LAs could standardise protections such as salary safeguarding and directed time, potentially benefiting staff in settings where such rights were previously less secure (Mitchell, 2025).

The Government should monitor and evaluate the effectiveness of Performance-Related Pay Progression (PRPP) in schools, with a view to discontinuing the policy if evidence shows it is ineffective or inequitable. A robust and transparent review process is essential to ensure that pay progression supports fairness, teacher morale, and retention, rather than undermining them.

c. The need to ensure that any proposals are not too difficult or onerous for schools to implement and minimise the impact on staff.

It is essential that any changes to the STPCD are designed to be practical and manageable for schools to implement, while minimising disruption to staff. For example, the DfE's proposal to reintroduce a list of administrative tasks that teachers should not be expected to perform aims to reduce workload, but concerns have been raised about the feasibility of this in under-resourced schools and especially in terms of staff employed centrally by LAs. Typically peripatetic staff also have a lot of administrative tasks, booking appointments, emailing, writing reports, how will these tasks be taken into account with any new recommendations

d. Evidence of the national state of school teacher and leader supply, including rates of recruitment and retention, vacancy rates, and the quality of candidates entering the profession.

There continues to be a decrease in numbers of QToDs. In 2012, there were over 1,200 QToDs in employment. By 2022, this number had dropped to just over 860 (Consortium for research in deaf education CRIDE 2023). The average annual decline is approximately 2.8%. Projections suggest only 727 QToDs will remain by 2030. In 2012, each peripatetic QToD supported an average of 46 deaf children. By 2022, this increased to 63 children per teacher, indicating rising demand and shrinking capacity. Over half of the current QToD workforce is expected to retire within 10–15 years. More than a quarter of services report difficulty recruiting due to a lack of qualified applicants. BATOD would advise a specialist SEND workforce strategy to support restoring staffing levels.

e. Evidence of the wider state of the labour market, including the impact of recommendations on the further education teaching workforce in England.

As mentioned before, fewer QToDs means deaf CYP have limited access to tailored educational support, affecting their ability to engage with course content, participate in discussions, and complete assessments. With fewer QToDs involved in transition planning, many deaf students enter FE without adequate preparation or support strategies, resulting in lower retention and achievement rates. Colleges without QToDs often lack deaf awareness training for staff, leading to communication barriers and exclusion. Deaf students may feel isolated or misunderstood, impacting their wellbeing and academic confidence.

Without QToD input, some FE institutions may discourage deaf YP from enrolling in certain courses due to perceived support limitations. The BATOD and NDCS Joint response- Curriculum and Assessment

Review (2024) showed that deaf YP are frequently placed in repeated Level 2 vocational courses. Progression is often blocked until they achieve a pass in English and/or Maths, resulting in delays and limited educational advancement.

It also reported that there was a barrier to apprenticeships and that employers may be reluctant to accept deaf YP into apprenticeships if they have not secured English and Maths qualifications, regardless of their practical skills or potential. This creates a significant barrier to employment and independence and can be counteracted if there is a better understanding which should be provided by QToDs employed in establishments.

The lack of access to appropriated QToDs, has an impact on the confidence and wellbeing of deaf CYP. The repeated failure to meet English and Maths thresholds can negatively affect deaf YP's confidence, motivation, and self-esteem, further reducing their likelihood of pursuing vocational pathways. This restricts career pathways and contributes to long-term inequality.

The absence of QToDs can result in misallocation of SEND funding, with colleges unaware of the specific needs of deaf YP. This undermines the effectiveness of EHCPs.

f. Forecast changes in the size and shape of the pupil population and consequent changes in the level of demand for teachers.

At least 46,933 deaf children are currently identified in England. This represents a 3% increase from the previous year (45,671). (CRIDE 2024). Includes CYP under 20 with sensorineural or permanent conductive deafness. Gradual increase in numbers due to improved early identification, better reporting, and increased survival rates of medically complex infants. Rising use of cochlear implants: 4,201 children (9%) had at least one implant in 2024, up from 3,907 in 2021. BATOD anticipate growing demand for specialist support services and has concerns over insufficient workforce capacity, especially among QToDs.

BATOD emphasises the need for strategic planning to meet the needs of an expanding and increasingly diverse deaf population.

g. The flexibilities that exist in the current framework, which allow school leaders and governors to develop pay arrangements suited to the individual circumstances and to determine teachers' pay within the statutory minima and maxima.

BATOD's calls for guidance around pay flexibility and equity. We emphasise the need for parity in access to resources for deaf teachers and encourage flexible pay arrangements for QToDs in multi-agency and outreach roles.

BATOD will also ask that consideration be given to part-time and specialist teachers to be paid based on actual duties and enhances guidance on flexible working arrangements. Consideration should also be given to guidance around SEN points and teaching and learning responsibility (TLR) allowances.

As usual BATOD are happy to discuss any of these points with you in more detail.

Yours sincerely

Teresa Quail, National Executive Officer, Sibel Djemal BATOD Consultant Coordinator.

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