

# **Sixth Report part 2, 2025: Leaders' Conditions of Service**

**Independent Welsh Pay Review Body**

**Report for the Cabinet Secretary for Education, Welsh Government  
December 2025**

This report has been produced by the Independent Welsh Pay Review Body (IWPRB), with secretariat support provided by the Education Workforce Council (EWC) and Alma Economics.

WG: WG 53728

ISBN: 978-1-80633-807-8

# Contents

Terms and Abbreviations .....	1
The Independent Welsh Pay Review Body .....	2
Our role .....	2
Executive Summary .....	3
Introduction .....	3
Our remit for December 2025.....	3
Our conclusions and recommendations.....	3
Adjustments to leaders’ conditions of service .....	4
1.Introduction.....	7
Opening remarks .....	7
2.Research on Leaders’ Conditions of Service .....	9
Introduction .....	9
Comparison of contracted working hours and annual leave entitlement .....	9
Comparison of responsibilities for headteachers, other leaders, and teachers in Wales ...	14
School leaders’ working hours in Wales and other nations .....	17
The Working Time Regulations (1998) .....	19
School leaders’ conditions of service across the UK and Ireland.....	20
3.Consultation Responses .....	22
Guaranteed working hours (or limits on).....	22
Protected holiday entitlement and weekends .....	26
4.Conclusions and Recommendations .....	31
Definition of a school leader in the context of the sixth remit .....	31
Recommendations.....	32
Appendix A – Cabinet Secretary’s Remit Letter 2025.....	40

# Terms and Abbreviations

## Organisations that made representations and provided evidence to the IWPRB

The ASCL Cymru Community	The Association of School and College Leaders in Wales
The NAHT Cymru	The National Association of Headteachers in Wales
The NASUWT Cymru	The National Association of Schoolmasters Union of Women Teachers in Wales
The NEU Cymru	The National Education Union in Wales
UCAC	Undeb Cenedlaethol Athrawon Cymru
The WLGA	The Welsh Local Government Association
Welsh Government Church in Wales	

## Terms and abbreviations used in this report

AFPRB	Armed Forces Pay Review Body
ALN	Additional Learning Needs
ALNCo	Additional Learning Needs Co-ordinator
ALN Code	Additional Learning Needs Code for Wales (2021)
ALNET (Wales) Act	Additional Learning Needs and Education Tribunal (Wales) Act (2018)
DDRB	Review Body on Doctors' and Dentists' Remuneration
DfE	Department for Education
DE	Department of Education
EWC	Education Workforce Council
HR	Human Resources
IWPRB	Independent Welsh Pay Review Body
NCARRB	National Crime Agency Remuneration Review Body
NHSPRB	National Health Service Pay Review Body
OECD	Organisation for Economic Co-operation and Development
PRB	Pay Review Body
PRRB	Police Remuneration Review Body
SNCT	Scottish Negotiating Committee for Teachers
SSRB	Senior Salaries Review Body
STPC(W)D	School Teachers' Pay and Conditions (Wales) Document
STRB	School Teachers' Review Body
TLR	Teaching and Learning Responsibility
TNC	Teachers' Negotiating Committee Northern Ireland (TNC)
VCSE	Vocational Certificate of Education
WTR	Working Time Regulations

# The Independent Welsh Pay Review Body

## Our role

The Independent Welsh Pay Review Body (IWPRB) was established in March 2019 to make recommendations to the Welsh Government on the pay and conditions of school teachers and leaders in Wales.

The IWPRB reports to the Cabinet Secretary for Education. The responsibility for setting teachers' and leaders' pay and conditions in Wales transferred to the Welsh Ministers from 30th September 2018 under the Welsh Ministers (Transfer of Functions) Order 2018.

The independent secretariat for the IWPRB is jointly provided by the Education Workforce Council (EWC) and Alma Economics.

The members of the IWPRB are:

- Sharron Lusher MBE DL – Chair
- Simon Brown – Member
- Dr Caroline Burt – Member (resigned October 2025)
- Aled Evans – Member
- Gareth Morgans – Member
- Annmarie Thomas – Member
- Saleha Wadee – Member
- Professor Stephen Wilks – Member (resigned September 2025)

# Executive Summary

## Introduction

The Independent Welsh Pay Review Body (IWPRB) is pleased to present the second part of its sixth report on teachers' and leaders' pay and conditions in Wales.

## Our remit for December 2025

In May 2025, the IWPRB published the first part of its sixth report, which focused on the salaries and allowances for teachers and leaders in Wales.

The second part of its sixth report considered:

- What adjustments should be made to Leaders' Conditions of Service, and in particular, the consideration of whether guaranteed working hours (or limits on), as well as protected holiday entitlement and weekends for leaders, should be included in the School Teachers Pay and Conditions (Wales) Document (STPC(W)D)?

## Our conclusions and recommendations

In reaching our conclusions and subsequently arriving at recommendations, the IWPRB has considered research provided in Chapter 2 (Research on Leaders' Conditions of Service) and responses from the Welsh Government and other consultees in Chapter 3 (Consultation Responses). Chapter 4 (Conclusions and Recommendations) presents our conclusions and recommendations.

The IWPRB notes that while implementation of these recommendations would result in considerable improvements to the working conditions of school leaders in Wales, these conditions are influenced by many complex factors. Chief amongst these is workload, which many consultees reported to be both excessive and ever-increasing due to a combination of pressures, unclear delegation protocols and cultural expectations that school leaders will always be available.

The recommendations presented in this report are interconnected and are all aimed at enhancing the work-life balance of school leaders. They should not be viewed as discrete or optional measures; their impact depends on them being implemented as a coherent package. In particular, reductions in workload and changes in working culture are reliant on a system-wide effort, addressed with urgency and sustained commitment over the coming years. Implementing these recommendations collectively is therefore essential to securing meaningful and sustainable improvements in conditions for school leaders.

Our definition of a school leader in these recommendations includes headteachers, deputy headteacher and assistant headteachers.

## Adjustments to leaders' conditions of service

**RECOMMENDATION 1:** The IWPRB recommends that school leaders should be entitled to 33 days plus eight public holidays of uninterrupted annual leave per annum and that the Welsh Government amends the STPC(W)D to include this provision from September 2026.

This recommendation has been developed based on evidence from our research, including our understanding of the Working Time Regulations (1998) (WTR); a benchmarking exercise of annual leave entitlements (across professions where recommendations are made by pay review bodies in England and Wales and benchmarked education professions), indicating that school leaders in Wales are unusual in not having a contractually expressed annual leave allowance; and Organisation for Economic Co-operation and Development (OECD) evidence.

It has also been based on evidence from consultees that the lack of clear reference to designated annual leave time within the STPC(W)D is leading to school leaders being unable to take uninterrupted time off.

The IWPRB therefore believes an annual leave entitlement of 33 days plus eight public holidays should be implemented, during which time school leaders cannot be contacted other than in exceptional circumstances, in line with the 'force majeure' derogation under the WTR (1998).

Teachers work 195 directed days annually. There is an assumption that school leaders will be available on those days. School leaders will then have 33 days annual leave plus eight public holidays, which leaves them with a remainder of 25 days of additional paid leave per annum. There should be no expectation that leaders will be available during these days; however, it is recognised that they may sometimes choose to carry out their professional responsibilities during these days. Local cover and delegation arrangements should be agreed in each school context.

**RECOMMENDATION 2a:** The IWPRB recommends that the Welsh Government leads on the development of a strategy aimed at securing a reduction in leaders' current working hours to 1,650 annually, with its implementation to be completed by September 2029.

**RECOMMENDATION 2b:** The IWPRB recommends that the Welsh Government clarifies the STPC(W)D with reference to leaders having the same overarching rights conferred on teachers, under paragraphs 51.1 and 51.2, by September 2026.

These connected recommendations have been developed in response to evidence from consultees that an absence of clearly defined working hours is contributing to a culture of long working hours amongst school leaders. The IWPRB recognises the complexity of reducing leaders' workload in the current challenging context for schools, and notes that a reduction in working hours cannot be achieved simply by amending the STPC(W)D.

Nonetheless, we support the view of many consultees that placing a defined limit on working hours will highlight the need for cultural change to support recruitment and retention of school leaders and improve work-life balance.

Our evidence shows, as is the case with annual leave, having no limit on working hours in the STPC(W)D makes school leaders in Wales an outlier across benchmarked professions and international school leaders. Work is already underway in England (which, like Wales, does not stipulate a limit on leaders' working hours) to reduce working hours by five hours weekly within three years, with work starting in 2023.

The recommended 1,650 hours per annum is aligned with the OECD average for school leaders' working hours and other benchmarked professions. This is higher than the directed 1,265 hours already in place for teachers, which we believe is appropriate given the additional responsibilities of a leader. We believe that setting this limit annually will address concerns regarding any risks to autonomy and flexibility that could arise if limits were to be placed on weekly working hours for leaders.

Recommendation 2b further aims to protect the rest time of school leaders by clarifying the terminology in the STPC(W)D surrounding paragraph 51 relating to working on Saturdays, Sundays and public holidays.

These recommendations must be supported by action from the Welsh Government to progress its Strategic Education Workforce Plan. Without a practical reduction in the volume of work expected of school leaders, it will not be possible for them to reduce their working hours without compromising the effective and efficient operations of their schools. Additionally, we support the Welsh Government's previous commitment to implementing workload impact assessments for any new policy or initiative involving schools.

**RECOMMENDATION 3:** The IWPRB recommends to the Welsh Government that a future remit includes a review of paragraph 46.2 of the STPC(W)D to define a minimum protected amount of time to which all headteachers are entitled for the purpose of discharging their leadership and management responsibilities.

Several consultees highlighted particular challenges for headteachers in smaller schools, which invariably have smaller leadership teams and flatter staffing structures that limit the potential for delegation. Evidence from consultees notes that in these settings, headteachers can find it difficult to carry out their whole school responsibilities and teaching duties and maintain a good work/life balance. Managing these day-to-day pressures may lead to workloads becoming unsustainable within working hours, and headteachers being required to work during weekends and school closure periods to fully discharge their leadership and management responsibilities.

The IWPRB believes that it is necessary to remove the current ambiguity in paragraph 46.2 of the STPC(W)D, which refers only to a "reasonable" amount of headship time. However, additional research and consultation are required to quantify the minimum proportion of protected headship time that is sufficient for headteachers in Wales. Therefore, we recommend that the Welsh Government include a review of paragraph 46.2 in a future IWPRB remit, to enable a specific recommendation to be made to address the issues outlined.

**RECOMMENDATION 4:** The IWPRB recommends that the Welsh Government undertake and publish a longitudinal study to gather data on the working hours and conditions of leaders (and teachers) in Wales, starting from September 2026.

Given the recommendation to limit working hours to 1,650 annually, there is a need to monitor progress toward achieving this. Whilst consultees have produced valuable survey evidence, there is a lack of nationally coordinated and regularly collected data on school leaders' working hours and conditions in Wales to inform discussions and policy decisions. The IWPRB also recommends the introduction of a longitudinal study on the working hours and conditions of leaders (and teachers) in Wales.

# 1. Introduction

## Opening remarks

- 1.1. The Independent Welsh Pay Review Body (IWPRB) is pleased to present the second part of its sixth report on leaders' conditions of service in Wales, following the submission of the first part in May 2025.
- 1.2. The IWPRB is committed to recommending reforms that should be made to teachers' and leaders' pay and conditions of service in Wales, to help raise the status of the profession and best support the recruitment and retention of high-quality teachers and leaders in all its schools.

## Sixth remit (2025)

- 1.3. The Cabinet Secretary for Education issued the sixth remit letter to the IWPRB on 27th January 2025, included at Appendix A.
- 1.4. The sixth remit letter was divided into two parts. The first part required the IWPRB to consider:
  - What adjustments should be made to the salary and allowance ranges for classroom teachers, unqualified teachers, and school leaders, to ensure the teaching profession in Wales is promoted and rewarded to encourage the recruitment and retention of high-quality practitioners.
- 1.5. The IWPRB submitted its report ("the May 2025 report") to the Cabinet Secretary for Education recommending that all salaries and allowances for teachers and leaders should be increased by 4.8% from September 2025. Following consultation on the recommendation, the Cabinet Secretary agreed a 4% pay rise for teachers and leaders in Wales from September 2025.
- 1.6. The second part of the sixth remit required the IWPRB to consider:
  - What adjustments should be made to Leaders' Conditions of Service, and in particular, the consideration of whether guaranteed working hours (or limits on), as well as protected holiday entitlement and weekends for leaders, should be included in the STPC(W)D?

## The IWPRB's approach to conducting the consultation to address the second matter for recommendation

- 1.7. Following the submission of the May 2025 report, the IWPRB issued timelines and guidance for consultees to present written evidence, supplementary evidence, and oral evidence for the second part of the sixth remit.
- 1.8. The IWPRB invited written submissions from the following:
  - The Association of School and College Leaders in Wales (The ASCL Cymru)
  - The Diocesan Authorities
  - Community
  - The National Association of Headteachers in Wales (The NAHT Cymru)

- The National Association of Schoolmasters/Union of Women Teachers in Wales (The NASUWT Cymru)
  - The National Education Union in Wales (The NEU Cymru)
  - Undeb Cenedlaethol Athrawon Cymru (UCAC)
  - The Welsh Government
  - The Welsh Local Government Association (The WLGA)
- 1.9. The IWPRB received written evidence from:
- The ASCL Cymru
  - The NAHT Cymru
  - The NASUWT Cymru
  - The NEU Cymru
  - UCAC
  - The WLGA
- 1.10. The ASCL Cymru, UCAC, and Welsh Government submitted supplementary evidence to the IWPRB. The Welsh Government's evidence was submitted following the deadline for written evidence, but in time for the receipt of supplementary evidence. In the period between submitting written and supplementary evidence, the Welsh Government circulated its evidence to all consultees.
- 1.11. All consultees participated in oral representation sessions.
- 1.12. The IWPRB wishes to extend its gratitude to consultees for their time and cooperation during this year's process.
- 1.13. The IWPRB conducted site visits at a small number of schools in Wales. These site visits have supported the IWPRB's understanding of how issues relating to working hours and protected holiday entitlement are experienced by school leaders. The IWPRB wishes to extend its gratitude to school staff for participating in the site visits.
- 1.14. The IWPRB wishes to draw attention to the support of the independent secretariat, provided jointly by the EWC and Alma Economics. We thank them both for their work. We also extend our thanks to Geldards LLP for their legal advice, and Nerys Hurford of Nerys Hurford Ltd, and Trosol for providing Welsh language translation services.

## **The structure of this report**

- 1.15. This report provides the IWPRB's recommendations in respect of the second part of the sixth remit issued by the Cabinet Secretary for Education, and the evidence base and rationale for recommendations. Its structure is as follows:
- Chapter 2 presents research that supports conclusions and recommendations on leaders' conditions of service.
  - Chapter 3 presents evidence provided by consultees.
  - Chapter 4 sets out the IWPRB's conclusions and recommendations.

## 2. Research on Leaders' Conditions of Service

### Introduction

2.1. This chapter sets out findings from research conducted to inform the development of conclusions on leaders' conditions of service, set out in Chapter 4. The IWPRB has taken this research into consideration alongside evidence provided by consultees during the consultation process. The topics that were researched include:

- A comparison of contracted working hours and annual leave entitlement across professions where pay and conditions are reviewed by independent pay review bodies in England and Wales, as well as benchmarked educational professions.
- A comparison of responsibilities for headteachers, other leaders, and teachers in Wales, outlined in the School Teachers' Pay and Conditions (Wales) Document (STPC(W)D) 2025.
- An analysis of school leaders' working hours in Wales and other nations.
- A narrative based upon a legal briefing on the Working Time Regulations (1998) (WTR).
- School leaders' conditions of service across the UK and the Republic of Ireland.

### Comparison of contracted working hours and annual leave entitlement

#### Overview of school leaders' conditions of service

2.2. Part 7 of the STPC(W)D sets out the contractual framework for teachers. Specific provisions are included at paragraphs 43-46 of the STPC(W)D for headteachers, and paragraph 47 for deputy and assistant headteachers. Paragraphs 50 and 51 refer to working time and rights conferred on all teachers.

#### Working hours for school leaders

2.3. Paragraph 50.2 of the STPC(W)D states that a teacher employed full-time must be available to teach 190 days during the year, and available to work 195 days during the year. These days must be specified by the employer. Paragraph 50.5 states that a teacher employed full-time must be available to work for 1,265 hours, with those hours to be allocated reasonably throughout those days in the school year on which the teacher is required to be available for work. Paragraph 50.7 states that in addition to this, a teacher must work such reasonable additional hours as may be necessary to enable the effective discharge of the teacher's professional duties.

2.4. Paragraph 50.4 excludes headteachers, deputy and assistant headteachers, and teachers paid on the scale for leading practitioners from these provisions. This means the STPC(W)D does not set a statutory specified number of working days or hours for school leaders or leading practitioners.

- 2.5. Paragraph 50.1 states that “nothing in [the STPC(W)D] is to be taken to conflict with [Council Directive 93/104/EC](#) of 23 November 1993 concerning certain aspects of the organisation of working time.” The [Working Time Regulations \(1998\)](#) (WTR) is the UK’s domestic legislation that implements the requirements of the European Union’s Council Directive 2003/88/EC (which replaced the original 1993 Directive).
- 2.6. The two tables presented below show the working hours and annual leave entitlements across professions where pay and conditions are reviewed by independent pay review bodies in England and Wales, as well benchmarked education professions (“benchmark professions”).
- 2.7. The tables do not seek to compare individual roles across benchmarked professions, but instead to show the different conditions of service for working hours and annual leave entitlements.
- 2.8. Table 1 shows the number of hours specific roles within the benchmarked professions are contracted to work. School leaders in Scotland are contracted to work the fewest at 35 hours per week. Civil servants, further education college principals/chief executives, healthcare professionals, doctors and dentists are contracted between 37 and 40 hours per week. National Crime Agency employees and prison officers are contracted for approximately 40 hours per week.

**Table 1. Comparison of contracted working hours**

<b>Professions/Pay Review Bodies</b>	<b>Example Role</b>	<b>Pay Range<sup>1</sup></b>	<b>Weekly hours of work<sup>2</sup></b>
SNCT (Scottish Negotiating Committee for Teachers)	Headteachers	£67,332 - £124,365	<b>35</b>
Estyn	Delegated Grade Civil Servant/HMI/Director	£58,918 - £86,546 (Grade 6-7) £98,000 - £162,500 (SCS Pay Band 2)	<b>37</b>
SSRB (Senior Salaries Review Body)	Senior Civil Servant	£73,000 - £200,000 (Deputy director – Permanent secretary)	<b>37</b>
Further Education Common Contract (Colleges in Wales)	College Principal/Chief Executive	Not publicly available	<b>37</b>
NHSPRB (NHS Pay Review Body)	Healthcare professionals, excluding doctors and dentists	£55,690 - £125,637 (Band 8a-9)	<b>37.5</b>

<sup>1</sup> Figures are based on most recent data publicly available. Some refer to current salaries, while others may refer to figures announced for implementation in 2026.

<sup>2</sup> Where professions do not have contracted weekly hours of work, these are noted as ‘not specified’.

Professions/Pay Review Bodies	Example Role	Pay Range <sup>1</sup>	Weekly hours of work <sup>2</sup>
DDRB (Review Body on Doctors' and Dentists' Remuneration)	Primary Care Dentist	£52,821 - £112,974 (Band A1 – Band C18)	<b>37.5</b>
DDRB (Review Body on Doctors' and Dentists' Remuneration)	General Medical Practitioner (Salaried GP)	£79,123 - £119,394	<b>40</b>
NCARRB (National Crime Agency Remuneration Review Body)	NCA Employee	£52,594 - £96,384 (Grade 4 CS HEO - Grade 1 CS G6)	<b>40</b>
Prison Service Pay Review Body	Governor	£75,185 - £112,255 (Band 10 min – Band 11 max)	<b>41</b>
IWPRB (Independent Welsh Pay Review Body)	Headteachers	£59,597 - £146,313 (Group 1 L6 - Group 8 L43)	<b>Not specified</b>
Teachers' Negotiating Committee Northern Ireland (TNC)	Headteachers (Principals)	£56,241 - £137,905 (Band 1 - 8)	<b>Not specified</b>
School Teachers' Pay Review Body (England)	Headteachers	£58,569 - £143,795 (Band 1 - 8 excluding London)	<b>Not specified</b>
PRRB (Police Remuneration Review Body)	Superintendent	£84,177 - £99,015 (Pay point 1-4)	<b>Not specified</b>
AFPRB (Armed Forces Pay Review Body)	Royal Navy Commander	£92,520 - £106,955 (OF-4-1 - OF-4-8)	<b>Not specified</b>

## Annual leave entitlement for school leaders

- 2.9. The STPC(W)D does not explicitly cover holiday or annual leave entitlement for school leaders (or leading practitioners).
- 2.10. The WTR (1998) state that workers are entitled to 5.6 weeks' annual leave each year, inclusive of public holidays. Annual leave is meant to provide a period of rest and relaxation. During that time, workers should be fully relieved of work duties. Should an employer contact a worker and require involvement in work-related matters, the purpose of the leave may be compromised, especially where such contact is substantial or occurs regularly.

- 2.11. Table 2 shows annual leave and public holiday entitlement in professions across the UK. Public holiday entitlement varies for example:
- England and Wales: eight days
  - Scotland: nine days
- 2.12. In addition to this, Estyn employees receive two additional privilege days, Senior Civil Servants receive an extra day for the King's Birthday, and the Prison Service grants one additional privilege day.
- 2.13. Total time off entitlement varies across the range of professions outlined in Table 2.
- 2.14. For those professions in education where recommendations are made by pay review bodies, the position is more nuanced. One interpretation for school leaders in Wales is that as the STPC(W)D is silent on annual leave, then school leaders could be entitled to the statutory minimum as specified by the WTR (1998). However, the position is unclear regarding requirements on days when schools are closed to pupils (school closure days). In respect of public holidays, part 7, paragraph 42 of the STPC(W)D relates to "all teachers", and paragraph 51.1 specifies that all teachers are entitled to public holidays unless the contract of employment expressly provides for this. The table below reflects the distinctions made.

**Table 2. Comparison of time off entitlement**

<b>Professions/ Pay Review Bodies<sup>3</sup></b>	<b>Example Role</b>	<b>Pay Range<sup>4</sup></b>	<b>Annual leave entitlement (not including public holidays)</b>	<b>Public holiday entitlement</b>	<b>Total time off entitlement</b>
SNCT (Scottish Negotiating Committee for Teachers)	Headteachers	£67,332 - £124,365	40	9	<b>49</b>
Further Education Common Contract (Colleges in Wales)	Chief Executive or Principal (of a college)	Not publicly available	37	8	<b>45</b>
Estyn	Delegated Grade Civil Servant/HMI/ Director	£58,918 - £86,546 (Grade 6-7) £98,000 - £162,500 (SCS Pay Band 2)	31	10	<b>41</b>

<sup>3</sup> Annual leave entitlement is not specified in contractual frameworks for the TNCI, IWPRB and STRB.

<sup>4</sup> Figures are based on most recent data publicly available. Some refer to current salaries, while others may refer to figures announced for implementation in 2026.

Professions/ Pay Review Bodies <sup>3</sup>	Example Role	Pay Range <sup>4</sup>	Annual leave entitlement (not including public holidays)	Public holiday entitlement	Total time off entitlement
NHSPRB (NHS Pay Review Body)	Healthcare professionals	£55,690 - £125,637 (Band 8a-9)	33	8	<b>41</b>
DDRB (Review Body on Doctors' and Dentists' Remuneration)	Primary Care Dentists	£52,821 - £112,974 (Band A1 – Band C18)	32	8	<b>40</b>
NCARRB - National Crime Agency Remuneration Review Body	NCA Employee	£52,594 - £96,384 (Grade 4 CS HEO - Grade 1 CS G6)	31	8	<b>39</b>
PRRB (Police Remuneration Review Body)	Superintendent	£84,177 - £99,015 (Pay point 1-4)	31	8	<b>39</b>
SSRB (Senior Salaries Review Body)	Senior Civil Servant	£73,000 - £200,000 (Deputy director – Permanent secretary)	30	9	<b>39</b>
Prison Service Pay Review Body	Governor	£75,185 - £112,255 (Band 10 min – Band 11 max)	30	9	<b>39</b>
DDRB (Review Body on Doctors' and Dentists' Remuneration)	General Medical Practitioner	£79,123 - £119,394	30	8	<b>38</b>
AFPRB (Armed Forces Pay Review Body)	Royal Navy Commander	£92,520 - £106,955 (OF-4-1 - OF-4-8)	30	8	<b>38</b>
Teachers' Negotiating Committee Northern Ireland (TNC)	Headteachers (Principals)	£56,241 - £137,905 (Band 1 - 8).	Not identified	8	<b>Not identified</b>
IWPRB (Independent Welsh Pay Review Body)	Headteachers	£59,597 - £146,313 (Group 1 L6 - Group 8 L43)	Not identified	8	<b>Not identified</b>

<b>Professions/ Pay Review Bodies<sup>3</sup></b>	<b>Example Role</b>	<b>Pay Range<sup>4</sup></b>	<b>Annual leave entitlement (not including public holidays)</b>	<b>Public holiday entitlement</b>	<b>Total time off entitlement</b>
School Teachers' Review Body (England)	Headteachers	£58,569 - £143,795 (Band 1 - 8 excluding London)	Not identified	8	<b>Not identified</b>

## Comparison of responsibilities for headteachers, other leaders, and teachers in Wales

2.15. Paragraph 45 of the STPC(W)D sets out the professional responsibilities of headteachers, whilst paragraph 49 sets out the professional responsibilities for teachers other than a headteacher. The narrative below discusses key differences in professional responsibilities, and paragraph numbers refer to the STPC(W)D.

### Whole-school organisation, strategy, and development

- 2.16. Headteachers have explicit responsibility for “overall strategic leadership” and, with others, for leading, developing, and supporting “the strategic direction, vision, values, and priorities of the school” (paragraph 45.2). They must also “develop, implement, and evaluate the school’s policies, practices, and procedures” (paragraph 45.3). These duties establish the headteacher as the person responsible for the school’s long-term direction, strategic decision-making, and operational effectiveness.
- 2.17. Deputy and assistant headteachers are responsible for carrying out the professional duties of a teacher, alongside any duties specifically assigned by the headteacher. Under the overall direction of the headteacher, they play a major role in formulating the school’s aims and objectives, establishing policies to achieve them, managing staff and resources, and monitoring progress towards these aims and objectives (paragraph 47.1). They also undertake any professional duties reasonably delegated by the headteacher and, in the headteacher’s absence, deputise “to the extent required by the headteacher or relevant body” (paragraph 47.2). These responsibilities position deputy and assistant headteachers as key operational and strategic leaders.
- 2.18. Teachers are responsible for contributing “to the development, implementation, and evaluation of the school’s policies, practices, and procedures” (paragraph 49.5), supporting the school’s vision and values. Teachers work with others on curriculum or pupil development (paragraph 49.6), but do not have responsibility for establishing strategic priorities or evaluating the performance of the school as a whole.
- 2.19. Paragraph 43 of the STPC(W)D outlines the overriding requirements in which headteachers must carry out their professional duties, covering legislation and regulation, as well as policies and procedures set by the governing body or local authority. These overriding requirements are unique to headteachers and underline their role as the accountable individual for the entire school’s statutory compliance and accountability to the local authority and governing body.

## Teaching

- 2.20. Headteachers must “lead and manage teaching and learning throughout the school” (paragraph 45.4), including ensuring that a qualified teacher is assigned on the timetable to every class or group of pupils. This is a whole-school leadership duty, requiring oversight of curriculum delivery, teaching quality, and timetabling. Headteachers may also have teaching responsibilities (paragraph 45.5), and if so, are also entitled to take reasonable time to focus on leadership and management responsibilities (paragraph 46.2).
- 2.21. Teachers’ teaching duties are centred on their assigned classes. They must “plan and teach lessons” in line with curriculum expectations (paragraph 49.2), assess and report on pupil progress (paragraph 49.3), and participate in preparing pupils for examinations (paragraph 49.4).

## Health, safety, and discipline

- 2.22. Headteachers must “promote the safety and wellbeing of pupils and staff” (paragraph 45.6) and “ensure good order and discipline amongst pupils and staff” (paragraph 45.7). These duties reflect responsibility for safeguarding and organisational leadership that extends across the entire school.
- 2.23. Teachers are required to “promote the safety and wellbeing of pupils” (paragraph 49.8) and to maintain discipline among the pupils they teach (paragraph 49.9). Teachers do not have responsibility for staff wellbeing or for school-wide behaviour systems.

## Management of staff and resources

- 2.24. Headteachers have whole-school managerial responsibility. They must “lead, manage, and develop the staff” (paragraph 45.8), appraise and manage performance, advise on pay recommendations (paragraph 45.9), “organise and deploy resources within the school” (paragraph 45.10), and maintain relationships with trade unions and staff associations (paragraph 45.12). They are also responsible for leading and managing their staff with a proper regard for their “wellbeing and legitimate expectations, including the expectation of a healthy balance between work and other commitments” (paragraph 45.13).
- 2.25. Teachers’ management duties relate to the supervision of staff assigned to them (paragraph 49.10) and contributing to recruitment and professional development activities (paragraph 49.11). They may “deploy resources delegated to them” (paragraph 49.12), but do not manage the school budget or allocate staffing.

## Professional development

- 2.26. Headteachers are required to “promote the participation of staff in relevant continuing professional development” (paragraph 45.14) and participate in arrangements for the appraisal and professional development of other staff (paragraphs 45.15–45.16). These responsibilities constitute an overarching responsibility for workforce development within their schools.

- 2.27. Teachers' roles are primarily focused on their own practice, rather than leading school-wide continuous professional development. They must participate in appraisal and their own professional development (paragraphs 49.13–49.14) and may contribute to the development of other staff.

## **Communication**

- 2.28. Headteachers are responsible for consulting and communicating with the governing body, staff, pupils, parents, and carers (paragraph 45.17). This reflects their role in governance, leadership, and accountability to multiple stakeholders.
- 2.29. Teachers are required to communicate with pupils, parents, and carers (paragraph 49.15), but do not have a formal role in reporting to governing bodies or representing the school to wider stakeholders.

## **Work with colleagues and other relevant professionals**

- 2.30. Headteachers must “collaborate and work with colleagues and other relevant professionals within and beyond the school, including relevant external agencies and bodies” (paragraph 45.18), illustrating the strategic focus of their role.
- 2.31. Teachers also work with colleagues and relevant professionals (paragraph 49.16). Their collaboration is typically related to pupil learning and classroom practice, rather than strategic partnership working.

## **Teaching and Learning Responsibility Allowances**

- 2.32. Teachers may be awarded Teaching and Learning Responsibility (TLR) payments, which recognise the undertaking of sustained additional responsibilities beyond those expected of a classroom teacher. Paragraph 20 of the STPC(W)D notes that TLRs may be awarded for ensuring the continued delivery of high-quality teaching and learning. TLR roles may include leading, managing, and developing a subject or curriculum area or exercising delegated management or leadership functions. These responsibilities involve leadership and strategic contribution, but are delegated responsibilities within a specified area of the school's structure. Whilst carrying responsibility and accountability for the specified area, they do not carry the school-wide accountability or overall strategic responsibility placed on headteachers.

## **Delegation**

- 2.33. The professional responsibilities of a headteacher may be delegated to a deputy headteacher, assistant headteacher, or other members of the staff in a manner consistent with their conditions of employment. Such delegation must have regard to the nature and extent of their management responsibilities and must maintain a reasonable balance between work and other commitments for each teacher in accordance with paragraph 50.4, which relates to specified working hours.
- 2.34. There is one exception to the general delegation of duties. Paragraph 45.9 states that there should be “clear arrangements to advise the relevant body on pay recommendations for teachers, including on whether a teacher at the school who applied to be paid on the upper pay scale should be paid on that scale.” This may only be delegated if the headteacher is absent from school in accordance with paragraph

47.2 which states that “if a headteacher is absent from school, a deputy headteacher must undertake their professional duties to the extent required by the headteacher or the relevant body or, in the case of a foundation, voluntary aided, or foundation special school, the governing body.”

## Breaks and work-life balance

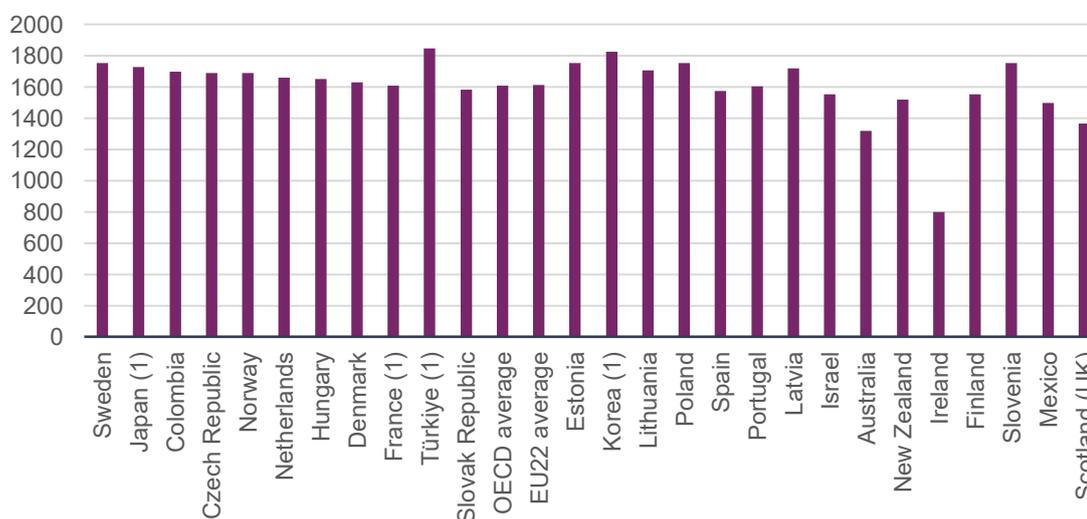
- 2.35. A headteacher is entitled to a break of reasonable length in the course of each school day and must arrange for a suitable person to assume responsibility for the discharge of their functions as headteacher during that break (paragraph 46.3).
- 2.36. Paragraph 51.4 of the STPC(W)D states that governing bodies and headteachers must have regard to the need for headteachers and teachers to achieve a satisfactory balance between their professional duties and their personal lives. In doing so, they should take particular account of the duties placed on teachers covered by paragraphs 50.2–50.12, including their wider professional responsibilities under paragraph 50.7. The STPC(W)D further advises that governing bodies and headteachers should ensure compliance with the working limits set out in the WTR (1998).
- 2.37. Deputy headteachers, assistant headteachers, and teachers on the pay range for leading practitioners are entitled to a break of reasonable length as near to the middle of each school day as is reasonably practicable.

## School leaders’ working hours in Wales and other nations

- 2.38. The [National Education Workforce Survey 2021](#) (Education Workforce Council Survey, Wales) found that permanent school leaders in Wales reported working an average of 54 hours per week. Over 64% of school leaders indicated that they were unable to manage their workload within their “agreed hours”. This survey was carried out during the COVID-19 pandemic, and included a period when schools were in “lockdown”. The previous 2016 survey did not include a disaggregated analysis specifically for school leaders, so direct comparisons with that year are not possible.
- 2.39. A study of school leaders’ wellbeing and stress during the COVID-19 pandemic found that leaders in Wales worked an average of 55 hours per week during this period, with 79% working more than 50 hours ([Marchant et al., 2024](#)). Just over half (55%) reported this to be an increase on their pre-pandemic workload, indicating high working hours prior to the study period as well.
- 2.40. In England, the Department for Education’s [Working Lives of Teachers and Leaders](#) study is a longitudinal study running for at least five years, up to 2026. It is intended to provide a representative picture of the experiences of teachers and leaders in state schools in England. The aim of the study is to examine issues around teacher supply, recruitment and retention in the school teaching and leadership workforce in England. The study is intended to improve the evidence base around teachers and leaders experience of working in state schools in England and to help the Department for Education (DfE) to design policies that better support teachers and leaders. Its wave 3 study, carried out in 2024, reports that school leaders worked an average of 56.6 hours per week in 2024. This is slightly lower than 2023 (57.4 weekly hours), and in line with 2022 (56.8 weekly hours).

- 2.41. Most information in the remainder of this section is drawn from the Organisation for Economic Co-operation and Development (OECD)'s Education at a Glance 2022, which contains data on leaders' working hours in OECD and partner countries (OECD, 2022). While this data provides useful insights into the expected demands on headteachers, and the extent to which working hours are prescribed in statutory documentation, some caution is needed when interpreting the data. The definition of 'working time' varies by jurisdiction, and may refer to minimum, maximum, or typical hours. This makes direct comparison difficult. Actual working hours are not generally captured by official data. Finally, the most recent OECD data on leaders' working hours was published in Education at a Glance 2022 (with data from 2021), as the 2023 and 2024 reports did not include this data. As in other OECD reports, data from Wales is not disaggregated from England.
- 2.42. Many OECD countries and partner countries define headteachers' statutory working time under relevant regulations or collective or individual contracts. Headteachers work an average of 43-44 weeks per year. Average hours per year vary little across primary and secondary levels, with the highest hours (1,613) at the primary level and the lowest (1,608) at the upper-secondary level. Average hours are slightly higher at the pre-primary level, at 1,648. Working hours are highest in Türkiye, at 1,844 hours, and lowest in Mexico (at the pre-primary level) and Ireland (at the primary and lower and upper-secondary levels). However, OECD statistics indicate the official figure for Ireland may be much lower than actual hours worked.

**Figure 1. Working time of upper-secondary school headteachers in hours per year, 2021, for applicable countries with available data (Source: OECD Education at a Glance, 2022)**



(1) Teachers' working time requirements refer to those of civil servants.

- 2.43. In several jurisdictions, including Korea, Japan, Portugal, and Türkiye, headteachers' hours are governed by regulations that apply to other civil servants, either at a national or local authority level.
- 2.44. Wales (along with England) is one of a small number of jurisdictions (also comprising the Flemish community of Belgium, most Länder (federal states) in Germany, Greece, Italy, and Luxembourg) in which working hours for headteachers are not defined.

## Requirements to work during school closure days

- 2.45. Across OECD jurisdictions, statutory working time for headteachers includes a requirement to work during students' (pupils') seasonal holidays in about two-thirds of jurisdictions with available data. The time required ranges from one week in Scotland, Austria, and the Netherlands (where this is restricted to special circumstances upon request by the employer), to ten weeks in Türkiye.
- 2.46. While working during school closure days may not be explicitly stated in regulations for the other one-third of countries, headteachers may still work during this time outside of their statutory hours.

## Headteachers' teaching time

- 2.47. The extent to which headteachers are expected to perform teaching responsibilities varies. Where teaching is part of headteachers' roles, it can be on a voluntary basis or as a minimum requirement. This is usually determined based on factors including the school level and size, and socio-economic considerations.
- 2.48. Among the 29 countries/participants with available information at pre-primary level, all headteachers are required to teach in seven countries, and some headteachers are required to do so under specific circumstances in a further eight countries. Some primary headteachers are required to teach in more than half of the countries with available data (19 out of 34 countries). Teaching responsibilities become less common for headteachers at the secondary level (general programmes). At this level, all headteachers are required to teach in only six countries; and some headteachers in a further 10 countries with available data. Headteachers are free to teach at their own discretion in six countries, and are not required to teach in 12 countries.
- 2.49. Typically, countries do not set specific teaching hours for headteachers; instead, they define minimum and maximum teaching times. Maximum teaching hours are usually about one-fifth of total working hours.
- 2.50. In Wales (as in England), the STPC(W)D specifies teaching as one of a range of professional duties a headteacher may have to undertake, but no specific limits or hours are allocated.

## The Working Time Regulations (1998)

- 2.51. The IWPRB has been supported by a legal briefing to gain a greater understanding of the WTR (1998), and to appreciate how they may apply to school leaders in Wales.
- 2.52. There is an average maximum weekly working hours limit of 48 hours under section 4(1) WTR (1998). Workers can still work more than 48 hours in any one week, provided the overall weekly average measured over the appropriate reference period of 17 weeks is not more than 48 hours. Certain categories of workers are exempted, including those who have opted out under regulation 5 WTR (1998) and those with unmeasured time, such as autonomous decision-makers, outlined under regulation 20 WTR (1998).

- 2.53. Workers who have autonomous decision-making powers, i.e., who have control over the hours they work and whose time is not monitored or determined by their employer, are exempt from limits on average weekly working time. This exemption does not apply to workers who are required under their contract to work certain “core hours” or to be at work for a specified length of time.
- 2.54. Paragraphs 50.2 and 50.5 of the STPC(W)D state that teachers employed full-time must be available to work 195 days per annum and at times and places specified by the headteacher/employer for 1,265 hours throughout the school year. These provisions do not apply to headteachers, deputy headteachers, assistant headteachers, and leading practitioners (paragraph 50.4). As the roles outlined in paragraph 50.4. do not have core hours nor are required to be at work for a specified length of time, this would support a conclusion that “the duration of his working time is not measured or predetermined” (regulation 20 WTR (1998)), and that these categories are exempted from the regulation.
- 2.55. However, deputy and assistant headteachers and leading practitioners may have less autonomy over their schedules. Their working times and presence in school may be prescribed by the headteacher. Where this is the case, it is possible they would have some working time that is measured and some that is not. This may take deputy and assistant headteachers, and leading practitioners outside of the scope of the exemption for the provision of the maximum average weekly working hours limit set out in the WTR (1998).

## **School leaders’ conditions of service across the UK and Ireland**

### **Scotland**

- 2.56. Full-time teachers, including leaders, in Scotland are contracted to a 35-hour working week, which equates to 1,365 hours per annum. In Wales, teachers employed full-time are required to be available to work 1,265 hours per annum (paragraph 50.5 of the STPC(W)D).
- 2.57. A 2025 [AHDS study](#) of 1,252 school leaders in Scotland found headteachers reported 53.8 weekly working hours on average, indicating there are barriers to headteachers in Scotland completing their work within the 35-hour week.
- 2.58. For leaders in Scotland, salaries start higher than in Wales, with [the deputy headteachers’ and headteachers’ scales](#) starting at £62,556 in 2024. There are only 19 points on the Depute Headteachers and Headteachers scale, rising to a maximum of £115,539. In Wales, headteachers at the highest point on the 43-point scale could earn £140,685 in 2024.

### **England**

- 2.59. Teachers’ and leaders’ pay and conditions in England are similar to those in Wales, given that the STPCD is closely linked to the STPC(W)D. Annual leave arrangements are also the same as in Wales, i.e., annual leave is not specified.

- 2.60. Paragraph 2.37 noted that school leaders worked an average of 56.6 hours per week in 2024. In England the Department for Education's [workload reduction task force](#) has been established to support the government's ambition to reduce the working hours of teachers and leaders by five hours weekly within three years (beginning 2023).

## Northern Ireland

- 2.61. Teachers' and leaders' pay and conditions in Northern Ireland are governed by a negotiated framework under the Teachers' Negotiating Committee (Schools) (TNC) and the Department of Education (Northern Ireland) (DE).
- 2.62. Classroom teachers have [directed working-time provision of 1,265 hours per year](#). This includes Planning, Preparation and Assessment time, but is exclusive of time spent off school premises in preparing and marking lessons. The workload agreement of April 2024 states that "*A Teacher cannot be directed to undertake duties beyond 1,265 hours on 195 days. However, schools have always been dependent on a commitment from Teachers beyond the legal minimum requirement and this guidance does not change this. Schools would, for example, find it impossible to include within a Teacher's 1,265 hours all of the time currently given by Teachers to such activities as games, drama, music and school trips. Nevertheless, the extent of this commitment is for each Teacher to determine for himself or herself.*" School leaders (Principals and Vice Principals) are not subject to specified working time, similar to the arrangements in England and Wales. Annual leave is also not defined.
- 2.63. There is a lack of evidence as to the actual worked hours of school leaders in Northern Ireland.
- 2.64. In 2025, pay for leaders in Northern Ireland ranged from £49,840 (or £56,241 for Principals) to £137,905.

## Republic of Ireland

- 2.65. While outside the UK, the Republic of Ireland is considered a relevant comparator with Wales, particularly given the similarities in terms of linguistic requirements.
- 2.66. Similar to Northern Ireland, Wales, and England, there is no specification of school Principals' working hours.
- 2.67. Each [school with a teaching principal](#) will have 37 release days in the 2025/26 school year, and those with one special class will have 4 additional release days in the 2025/26 school year. This means that teaching time is defined for teaching principals.
- 2.68. Annual leave is also not specified. It is worth noting that the school year is shorter in the Republic of Ireland, with secondary schools open 166 days per year and primary schools open 182 days.
- 2.69. Principals are [paid an additional allowance](#) on top of a standard pay scale, which ranges up to €84,565 (£74,584 approx.). The maximum Principal Teacher Allowance at the post-primary level is €52,434 (£46,245 approx.). A range of additional allowances is also allocated based on factors including the number of pupils, geography (location on an island or in a Gaeltacht [Irish speaking] area), teaching through Irish, and length of service.

### 3. Consultation Responses

- 3.1. Chapter 3 summarises written submissions and oral evidence provided to the IWPRB from consultees.

#### Guaranteed working hours (or limits on)

##### The Welsh Government's views

- 3.2. The Welsh Government noted that the current provisions within the [School Teachers' Pay and Conditions \(Wales\) Document \(STPC\(W\)D\) 2025](#) allow appropriate bodies discretion in determining how working time limits should be implemented.
- 3.3. The Welsh Government highlighted that provisions of the WTR (1998) apply to all staff, including leaders. It believed that additional clarity around these entitlements for leaders specifically could be achieved by amending paragraph 46.1 (around the rights conferred to headteachers) to include reference to provisions of paragraph 51, inserting "unless expressly provided for in their contract of employment or elsewhere in the STPC(W)D, assistant, deputy and head teachers will be entitled to the rights conferred in paragraph 51."
- 3.4. In its evidence, the Welsh Government highlighted the importance of school leaders having clarity regarding periods of uninterrupted rest. While recognising that some weekend and holiday working may be required to support the effective operation of schools, the Welsh Government emphasised the need for clearer boundaries around protected time off.
- 3.5. In relation to guaranteed working hours, the Welsh Government considered that introducing prescriptive limits could impact significantly on workload and staffing issues: *"I think what we're trying to avoid is a situation where there is a very rigid prescription of working hours... which don't give leaders or indeed local authorities the means to actually ensure that their schools are run properly and effectively and that there is the right cover in place."* It recognised that some level of prescription might be appropriate, and expressed a preference for supporting local authorities and schools to establish local arrangements within a national framework that provides structure while retaining flexibility for different school contexts.
- 3.6. The Welsh Government indicated it was looking to the IWPRB for potential solutions in this area. It emphasised that any recommendations would need to be considered in the context of the decisions the Welsh Government and local authorities must make when prioritising funding for education alongside other public services.

##### Overall position of consultees

- 3.7. There was widespread support amongst union consultees for limits on guaranteed working hours for school leaders to ensure working hours are conducive to leaders' wellbeing. Several noted that school leaders in England are estimated to work around 57 hours per week. NAHT noted that unreasonable working hours are currently an accepted expectation of leadership roles that need to be addressed. NAHT and ASCL Cymru noted that school leaders have been increasingly taking on responsibilities that

were previously covered by local authorities. They attributed this to financial pressures within local authorities and an expectation that school leaders will take them on. However, consultees differed in their views on the most appropriate model for limiting hours and highlighted significant practical, structural, and cultural considerations that would affect implementation.

- 3.8. WLGA supported the principle of guaranteed working hours but raised a number of concerns. It highlighted potential unintended consequences for recruitment and retention, particularly in contexts where senior roles elsewhere in a local authority do not benefit from such protections, which could make certain posts less attractive and difficult to fill. It also noted practical challenges for smaller schools in responding to urgent or unforeseen matters. In addition, concerns were raised about the potential impact on workload, salary, and the support required for leaders to meet professional standards, as well as the risk that workload demands could remain high despite limits on hours, potentially affecting school leaders' wellbeing. Overall, the WGLA recommended that guaranteed working hours be considered as part of a broader strategy addressing recruitment, retention, workload, and wellbeing.

### Clarity and precision of statutory wording

- 3.9. Several consultees highlighted that existing wording within the STPC(W)D is too vague and open to interpretation. UCAC noted that guidance must be clear and unambiguous to avoid differing interpretations of terms such as 'reasonably.' In oral evidence, Community Wales, NEU, NASUWT, NAHT, and ASCL Cymru similarly noted that the current wording in the STPC(W)D was too vague. Across these consultees, this related to issues such as explicit working hours, leaders' responsibilities, and expectations around delegation.

### Preferred models for limiting working hours

- 3.10. Consultees proposed a range of approaches to implementing guaranteed working hours. UCAC, NAHT, ASCL Cymru, NASUWT, and NEU wanted the STPC(W)D to be amended to remove open-ended expectations and include defined upper limits on leaders' working hours. UCAC proposed specifying days per annum so that leaders' working time aligned more closely with that of teachers, suggesting a maximum of 200 days annually. ASCL Cymru suggested a tiered model in which different levels of leadership would have different limits, with headteachers at the highest level and 'working back' to 1,265 hours over 195 days for other roles. It proposed using OECD data to identify an appropriate benchmark. NAHT and NEU did not specify a model but supported the principle of introducing limits. Community Wales supported the inclusion of protections against "extreme" working hours but preferred locally determined arrangements over a statutory limit.
- 3.11. The Church in Wales favoured a model specifying annual days rather than hours per day or week. NASUWT was the only consultee to call explicitly for a 35-hour working week for school leaders, drawing on evidence from Scotland of lower working hours and reduced intentions to leave the profession. In oral evidence, NASUWT stated: *"it's actually empowered [leaders in Scotland], and created the necessary framework for them to have detailed organisation and operational discussions in their schools about*

*what actually are the core jobs that need to be done, because if there's a maximum working week of 35 hours then it's not an ever-ending list of hours or hours of availability that you have, so let's get focused on those."*

## **Practical and operational implementation challenges**

- 3.12. Consultees raised several practical issues that could affect how limits on working hours operate in practice. UCAC emphasised that any model must not create ambiguity between the respective roles of teachers and leaders. NAHT argued that guaranteed working hours should apply only during term time and should not result in any requirement to work outside those hours during school holidays. In oral evidence, Community Wales noted that fixed weekly guaranteed hours could be problematic due to the ebb and flow of workload across the school year, with periods such as the start of the academic year being consistently more demanding. They stated, *"the issue for us within the list of duties, is it's never explicitly made clear that the headteacher must do all of these things, but by exclusion, it's also never made explicitly clear that the headteacher can delegate these duties. And so therefore some headteachers, particularly in larger secondary schools, will be delegating many of these duties to people who are closer to that work. And yet in some of the smaller schools, perhaps where there is a lack of the ability to delegate, the headteacher feels that they have to take on board every single duty personally."*
- 3.13. ASCL Cymru noted that up-to-date data on school leaders' working hours was not publicly available. It suggested that benchmarking data should be gathered annually or every two years to monitor school leaders' working hours. However, the Welsh Government and NASUWT felt any additional monitoring requirements would put pressure on schools and leaders.
- 3.14. The Church in Wales highlighted that the broad scope of school leaders' responsibilities can make comprehensive delegation difficult and raised concerns about maintaining standards expected by governing bodies and local authorities when duties are delegated.

## **Workload pressures and the feasibility of compliance**

- 3.15. Many consultees argued that excessive working hours reflect wider systemic workload pressures and that limits alone would not resolve the issue. NAHT, UCAC, ASCL Cymru, and NEU noted that leaders frequently reported being unable to complete their duties within normal working hours. In oral evidence, NEU explained that core school hours were often dominated by tasks such as parental engagement and facilities management, leaving evenings, weekends, and holidays for strategic leadership work. NEU stated: *"Increasingly that role has just got bigger and bigger for many different reasons, sometimes it can be down to budgets, but increasingly what our leaders were telling us is that they spend so much time on other areas. It might be student-parent interaction, it might be facilities management, whatever that is, it's cutting down on their ability to look at managing from that more strategic level."*

- 3.16. The Church in Wales emphasised that while the balance of national duties and local discretion is important, this flexibility often results in inconsistency and excessive workloads, particularly affecting small schools where senior leaders may also be teachers. They noted that such workloads are misaligned with resources and that limited staffing means delegation is often impossible. These consultees cautioned that without tackling the underlying workload and role expansion, guaranteed limits risk being ineffective in practice.
- 3.17. UCAC similarly reported that leaders in very small schools frequently operate without deputies or assistant headteachers, leaving all responsibilities to fall to an individual headteacher, including responsibilities relating to additional learning needs. Community also suggested that while leaders in larger schools can delegate across a wide staff and leadership team, those in smaller schools may feel obliged to take on all duties personally.

### **Role definition and structural changes to support reduced hours**

- 3.18. To enable compliance with any limits on working hours, some consultees proposed a clearer role definition and structural changes. UCAC suggested mandating responsibilities that leaders should *not* be expected to fulfil. NEU referred to its recent research in which many of the leaders were strong advocates of coaching for headteachers, believing that it should be an entitlement for all. The research explored establishing a coaching culture in all schools, ideally with all teachers having a maximum of 80 per cent contact hours to enable meaningful professional development to take place. NASUWT called for working hour limits to be accompanied by contractual agreements and mandatory workload impact assessments.
- 3.19. In oral evidence, WLGA, NAHT, and Community Wales suggested revisiting the STPC(W)D to clarify which tasks genuinely require the skill and experience of a headteacher, with a view to removing responsibilities over areas such as facilities and HR management where these could reasonably be carried out by other appropriately trained staff. NEU and the Church in Wales similarly highlighted the burden of administrative tasks, particularly for schools under Estyn inspection or in special measures. WLGA stated: *“In order to address the workload issues, I think we need to really kind of comprehensively think about all of the tasks that are asked of school leaders in a really structured and systemic way. And anything which is unnecessary, doesn’t add value to the processes and the education of our children and the support of our children should be removed.”*

### **Flexible working**

- 3.20. NASUWT noted that flexible working arrangements among school leaders could be facilitated if school leaders had explicit working hours. They drew on job-sharing as an example, stating it would not be possible for school leaders to assess how to divide a role if the number of hours was not fixed. ASCL Cymru also felt that school leaders should be considered for flexible working opportunities in accordance with Flexible Working Legislation, with the Welsh Government supporting schools to implement it.

## Cultural change

- 3.21. In oral evidence sessions, Church in Wales, Community Wales, NEU, NAHT, and ASCL Cymru all felt that while guaranteed working hours (or limits on) would not immediately solve wider issues around workload, this move would contribute to a cultural change by signalling a change in expectations. Church in Wales stated, *“I think changing the conditions of service signals a real commitment to supporting cultural change. I think it's a really strong message that wellbeing and sustainability for leaders are a system priority, and I think that's very important [...] I think putting that in legislation and supporting it then with resource to be able to enable headteachers to make it happen is really vital. But I think the strong signal that it sends is that there's a need for a cultural change and that the system supports it and is doing its best to facilitate it [...] cultures in every school are different as well, but culture has to come from the top.”*
- 3.22. NASUWT indicated that the extent of cultural influence would depend on the nature and strength of the changes introduced. These consultees also supported formalising the right to disconnect within the STPC(W)D, on the basis that this would send a clear signal to the profession, local authorities, and governing bodies about acceptable working practices and boundaries.

## Protected holiday entitlement and weekends

### The Welsh Government's views

- 3.23. The Welsh Government stated that it is vital for everyone to have periods of uninterrupted rest, and that it was keen for leaders to have clarity on when they can have periods of uninterrupted leave from their work. While acknowledging that certain tasks may need to take place during weekends or holiday periods, it stated that there was no expectation that leaders should work routinely at weekends and during holiday periods.
- 3.24. As with guaranteed working hours, the Welsh Government expressed caution about introducing a national entitlement with rigid prescription of holiday periods. It emphasised the value of enabling local authorities and schools to develop local arrangements within a broader national framework, citing the need to balance structure with flexibility across diverse school contexts.
- 3.25. The Welsh Government stated that the STPC(W)D provides sufficient scope for appropriate bodies to determine how protected holiday entitlements are to be made available, but noted that there may be inconsistencies in application. It highlighted the role of governing bodies and local authorities in monitoring periods of rest and indicated that it was seeking recommendations from the IWPRB on how protections might be strengthened.
- 3.26. The Welsh Government further noted ongoing workload pressures on leaders and referenced wider work underway, including the Strategic Education Workforce Plan and developments relating to professional standards. It noted that any recommendations concerning protected holiday entitlement would need to be considered in light of broader decisions about funding priorities across public services.

## Overall position of consultees

- 3.27. Most union consultees supported stronger, clearly defined protections for school leaders' holiday entitlement and rest time, arguing that the current lack of explicit protection contributes to burnout, poor wellbeing, and retention challenges. They called for guaranteed minimum breaks during school closure periods, clearer boundaries around weekend and holiday working, and safeguards to prevent non-urgent contact. Consultees also emphasised that any changes would need to be accompanied by a clearer division of responsibilities between school leaders and local authorities, alongside cultural change in expectations and communication practices
- 3.28. In contrast, WLGA considered current arrangements broadly sufficient and cautioned against unintended operational and equity impacts. Whilst it noted that there is the potential for protected holiday entitlement and guaranteed weekends to positively impact the wellbeing of leaders, it drew attention to practical and operational implications, especially during critical periods.

## Desire for guaranteed protected breaks during school closures

- 3.29. Several consultees expressed a clear preference for formally protected holiday periods for school leaders. ASCL Cymru reported that its members favoured clearly mandated holiday breaks over directed working hours or days, with this preference heightened by reduced budgets and increasing responsibilities. NAHT highlighted that budget cuts had led to school leaders acting as temporary caretakers during holiday periods, requiring them to attend the building and carry out checks during closures.
- 3.30. There was strong support for introducing explicit guaranteed break periods within the STPC(W)D. NAHT proposed that leaders should have the right not to be contacted during two weeks of the summer holiday and one week at both Christmas and Easter, except in exceptional circumstances. ASCL Cymru recommended that minimum guaranteed break periods during school closures be written into the statutory document, while UCAC similarly supported protected time in the summer holiday, noting that much of this period is currently spent on preparation work and managing student results.
- 3.31. NEU argued that the absence of protected holiday entitlement was a significant contributor to burnout and retention issues, stating in oral evidence, "*we know there's a recruitment and retention crisis and [...] if headteachers are burning out because of workload rolling over into their own holiday times and especially times with family, I think we need to put something in place as a matter of urgency.*"

## Weekend and holiday working expectations

- 3.32. ASCL Cymru reported that working over the weekend was highly prevalent amongst its members. UCAC stated that neither teachers nor leaders should be asked to work weekends or holidays. NEU supported protected leave but stressed it should not undermine or replace existing statutory holiday entitlements.

## Role of local authorities and clarity over responsibility

- 3.33. Several consultees identified the role of the local authority as critical in enabling protected holiday breaks. NAHT and ASCL Cymru argued that responsibilities relating to site management and building works during holidays should sit with local authorities as landlords, rather than defaulting to headteachers. NAHT stated, *“In some cases, we would argue that school leaders are taking on statutory responsibilities that are not theirs, that are the local authority responsibilities, for example, things like site management and the facilitation of building repairs. [...] And that’s a bit of a mission creep because, you know, we’ve never, we never used to have that [...] coupled with the fact that schools and local authorities alike are struggling with a difficult financial situation, things that are not statutory, like having a caretaker, like having property managers, go by the wayside because obviously school leaders are going to prioritise teachers and the delivery of frontline education. But those roles still need to be picked up by other people, and they are largely being picked up by school leaders.”*
- 3.34. ASCL Cymru further emphasised the need for statutory protection to prevent local authorities making what they considered to be unreasonable demands on headteachers. They felt it was important that the Cabinet Secretary for Education’s letter to Directors of Education in September 2025, stating that school leaders are entitled to uninterrupted school holidays and time off at weekends, is included in the STPC(W)D to ensure it is not forgotten in the future. They stated, *“The reality is all headteachers are employed by the local authority. So, yes, we can go to our governing body and say this is our working directive, but if the local authority wishes to direct its staff outside that, as in you will open this building at this time, you will close this building at that time, school leaders need the protection that that isn’t okay.”*

## Operational models and practical implementation

- 3.35. To support protected rest time, ASCL Cymru and NASUWT proposed rota systems across senior leadership teams for essential on-site presence during school closures. They also called for clearer guidance on what constitutes an ‘emergency’ that would justify contacting headteachers during protected periods, such as safeguarding incidents or serious site issues.
- 3.36. Community Wales and NAHT highlighted practical measures to reinforce culture change, including communication protocols, such as email signature notices indicating no expectation of response outside working hours and agreements not to send non-urgent communications during holidays. Good practice was cited where local authority engagement resulted in agreed approaches on communication and delegation.

## Concerns about unintended consequences

- 3.37. WLGA considered existing arrangements sufficient and advised against formal inclusion in the STPC(W)D, stating: *“there is the ability for schools working with governing bodies and school leaders to determine how they can best support leaders and enable and protect some of their time. It doesn’t need to be explicitly added to within the School Teachers’ Pay and Conditions Document. We think there’s enough of a relationship between governing bodies, the headteacher [...] that it’s not necessary.”*

It raised concerns about operational challenges for smaller schools, implications for other staff groups, such as caretakers, and the risk of creating a “two-tier system” where school leaders had stronger protections than other local school staff. The WLGA noted that concerns regarding uninterrupted rest had not been raised to them, so were unclear why it was now being raised as an issue, and that there was no evidence that a problem existed in this area.

## Wellbeing and workforce sustainability

- 3.38. Many consultees framed protected holiday entitlement as integral to improving leaders’ wellbeing. NAHT argued that non-contact time and rest would support mental health and help address recruitment and retention challenges. UCAC highlighted the importance of work-life balance for overall wellbeing, while NEU indicated the impact excessive work pressures could have on leaders’ health and performance, stating in oral evidence, *“If you want to do the most effective job, and all of our school leaders are really committed to what they’re doing, they’re going to try and fit it in as and when. There are not enough hours in the day, it will eat into weekends, it eats into evening, it eats into holiday, and then, you know, you’re not going to be the best practice, you’re not going to do the most effective job because you aren’t taking care of your own health.”*
- 3.39. Broader wellbeing recommendations included statutory wellbeing safeguards, workload stress risk assessments, staff wellbeing boards, and embedding wellbeing requirements within statutory documents. WLGA supported protected time off as essential but emphasised it should be part of a holistic approach to leader wellbeing (alongside workload management, job design, etc.).
- 3.40. In oral evidence sessions, Community Wales suggested that Estyn could play a role in ensuring headteacher wellbeing, by including this as an element of inspections in the same way as teacher workload and wellbeing are included. However, they acknowledged challenges in establishing responsibility for this and the need to avoid further reporting burden for Estyn. ASCL Cymru suggested that the local authority should have a duty of care in relation to school leaders’ workload and wellbeing.
- 3.41. In both written and oral evidence, ASCL Cymru highlighted a desire for more opportunities for flexible working for school leaders. It noted that in England, the Department for Education (DfE) has ensured the SPTCD has a requirement for schools to have a flexible working policy and has provided a range of resources for schools to implement the policy.
- 3.42. However, in Wales, it felt there were cultural barriers to flexible working (e.g., negative perceptions around working from home), which needed to be addressed. It felt that the Welsh Government should be more proactive in making changes to the STPC(W)D, stating, *“it’s about that messaging, this is where the DfE are really upfront about this and they’ve got a lot of resource there. And the STRB have said themselves, this needs to be, you know, a DfE directive. There needs to be more action on this, but it’s got to be led by the government. They’ve got to set that example. [...] the DfE have done some case studies about co-headship and things like that. So, you know, setting that out there that actually this can happen and it can work and it can be really, really beneficial for the staff and for the school as well.”*

## Culture change and new ways of working

- 3.43. In oral evidence, NAHT and Community Wales reflected on the balance between what should be mandated in the SPTC(W)D and what should be flexible at the local authority or school level. Community Wales noted a risk of “over-legalising” by including everything in a document and suggested Welsh Government guidance could be a more appropriate approach.
- 3.44. While several consultees (ASCL Cymru, NAHT, Community Wales) agreed that school governing bodies had an important role in overseeing leaders’ wellbeing, NAHT highlighted that there is variability in priorities and the level of engagement of governing bodies across Wales. NAHT and ASCL Cymru emphasised that school governors are volunteers and may not have expertise in the complexities of education management. NAHT suggested that relying on these to enforce non-statutory guidance could not be guaranteed to be effective, possibly risking greater inequity nationally, stating, *“We’ve got really supportive governors who are ultimately volunteers who give their time freely to support the school. And we would never be critical of those people. However, in a lot of cases, those people are [...] not comfortable in challenging the local authority on the roles and responsibilities of a school leader.”* Community Wales further suggested that governing bodies should receive training on protecting leaders’ time to ensure consistent and appropriate approaches nationally.
- 3.45. In oral evidence, NAHT and NASUWT proposed that every new Welsh Government initiative should be accompanied by a workload impact assessment to ensure that school leaders do not either have to work additional hours or sacrifice other important work. NAHT noted that such initiatives could often come with unintended consequences for schools and leaders, stating in oral evidence, *“Welsh Government [is] putting money into things like clubs during the holiday. But often there needs to be a senior member of the school staff on site for those projects to work, so, you know, that again is an expectation and there’s a bit of a guilt trip there that, you know, headteachers want these things to run but you need a member of the senior leadership team to be there. And again, headteachers are very unlikely to say, oh it’ll be my deputy head. So well-meaning projects but with unintended consequences.”*

## 4. Conclusions and Recommendations

- 4.1. To address the second part of the sixth remit, the IWPRB has developed a series of recommendations, which take into account the research findings, and feedback from consultees.

### Definition of a school leader in the context of the sixth remit

- 4.2. Our first consideration prior to addressing the matters for recommendation was to agree on what constituted a 'leader' in the context of the sixth remit. Part 2 of the STPC(W)D specifies the leadership pay group, and paragraph 4.4 of the STPC(W)D states the job titles of those on the leadership pay range – headteachers, deputy headteachers, and assistant headteachers.
- 4.3. Paragraph 50.4 states that headteachers, deputy headteachers, assistant headteachers, and teachers on the pay range for leading practitioners are not subject to working time provisions as specified for teachers. Therefore, we have considered whether leading practitioners should be included within the scope of our deliberations. Leading Practitioners “do not operate on time-bound contracts and are not subject to the working time provisions in paragraphs 50.2 to 50.12 of the Document” (section 3, paragraph 87).” However, the STPC(W)D further states that teachers in the leading practitioner pay range hold the same professional responsibilities and benefit from the same rights as all other teachers, other than a headteacher, and this position is clarified in paragraph 48.1. Although leading practitioners are paid on a separate pay scale from classroom teachers, they do not have the provision of directed working time (195 days and 1,265 hours annually) afforded to classroom teachers. Therefore, they could reasonably be considered as part of the leadership group.
- 4.4. The Leading Practitioner role is defined as a qualified teacher whose primary purpose is to model and lead the improvement of teaching skills. The STPC(W)D distinguishes their professional responsibilities from those of headteachers, deputy headteachers, and assistant headteachers, all of whom hold whole-school responsibilities or play a major role in developing the strategic direction for the school, managing staff and resources and are explicitly referenced in paragraph 4.4 of the STPC(W)D as being paid in accordance with the relevant leadership pay ranges.
- 4.5. On balance, we do not consider that the role of leading practitioner carries the same breadth of leadership demands as those roles referenced in paragraph 4.4 of the STPC(W)D. As outlined in the Comparison of responsibilities for headteachers, other leaders, and teachers in Wales in Chapter 2 (Research on Leaders' Conditions of Service), headteachers and deputy and assistant headteachers have distinct responsibilities from all other teachers, including leading practitioners. The STPC(W)D states that headteachers have a whole-school responsibility for leading on the organisation, strategy, and development of their school, and deputy and assistant headteachers must play a major role in supporting the headteacher to fulfil these responsibilities. We therefore conclude that leading practitioners should not be considered as leaders for the purposes of this report.

- 4.6. We note that the Cabinet Secretary for Education intends to consult on moving the role of the Additional Learning Needs Coordinator (ALNCo) to the leadership pay range.

## Recommendations

- 4.7. The recommendations presented in this report are interconnected and are all aimed at enhancing the work-life balance of school leaders. They should not be viewed as discrete or optional measures; their impact depends on being implemented as a coherent package. In particular, reductions in workload and changes in working culture are reliant on a system-wide effort, addressed with urgency and sustained commitment over the coming years. Implementing these recommendations collectively is therefore essential to securing meaningful and sustainable improvements in conditions for school leaders.
- 4.8. The IWPRB has heard from a significant number of consultees that a sustained systemic cultural change is needed in schools, in order to reduce workload and to influence perceived expectations surrounding leader availability. We understand that the reasons behind leaders' current high working hours are complex and influenced by a variety of factors, including commitment to the profession, supporting colleagues, workload, expectations of stakeholders, and often individual behaviour to drive and maintain professional standards. We recognise external issues beyond schools' or leaders' control include pressures on funding, implementation of curriculum and assessment reform, and challenges faced by learners and their families, or those who undertake parental responsibility.
- 4.9. We have heard evidence from many consultees who describe a culture in which school leaders feel the need to be continually available, with expectations of responsiveness extending into evenings, weekends and school closure periods. Practices such as routine out-of-hours communication, blurred boundaries around what constitutes "emergencies," and the normalisation of leaders absorbing tasks previously undertaken by wider support staff were reported to contribute to this pressure. Some consultees, including Community and NAHT, noted that cultural shifts, such as clear communication protocols and explicit norms around protected time, are essential alongside structural changes. Without addressing these embedded cultural expectations, consultees suggested that formal protections alone would be insufficient to reduce excessive working hours or improve leaders' work-life balance.
- 4.10. Further evidence from some consultees surrounded inconsistent levels of engagement with local authorities in terms of facilitating protected time off and working hours. Consultees also identified structural factors driving out-of-hours work. NAHT and ASCL Cymru reported that school leaders are increasingly absorbing responsibilities that should sit with local authorities, due to financial pressures and the consequent diminishing support roles in local authorities.
- 4.11. While the majority of consultees noted that working patterns were informed by a range of factors including governing bodies, school size and rurality, local authority practices, and individual personalities, many (including Church in Wales, Community Wales, NEU, NAHT, and ASCL Cymru) felt that top-down directives could send important messages to signal the need for cultural change.

- 4.12. We agree with those consultees who believe that cultural change is necessary, and the message flowing through our recommendations is to support such a change. Doing so will require a sustained effort at national and local level, to ensure that expectation is managed, communication is clear with all stakeholders, and a sustained drive to reduce workload remains a priority.
- 4.13. We note that our legal briefing outlined that headteachers could be exempt from the WTR (1998) directions, but we do not believe it is desirable, in this context, to be engaged in legal polemic about whether they are, or are not. From our perspective, we believe that the vision for our schools, their leaders and teachers should not be about achieving minimum standards for legal compliance nor about whether headteachers are exempt: our vision should be aspiring to develop a strong work-life balance for *everyone*. We therefore include headteachers in all of our recommendations below and for clarity, all recommendations apply to headteachers, deputy headteachers and assistant headteachers.
- 4.14. In making our recommendations, we have taken into account the fact that while school leaders' working hours are reported to be high during term time, schools are closed for 13 weeks each calendar year. This means school leaders have access to 13 weeks of rest throughout the year. This provision is both atypical and favourable when compared to the total reward package of most other benchmarked professions outlined in Chapter 2 (Research on Leaders' Conditions of Service).
- 4.15. **Recommendation 1: The IWPRB recommends that school leaders should be entitled to 33 days plus eight public holidays of uninterrupted annual leave per annum and that the Welsh Government amends the SPTC(W)D to include this provision from September 2026.**
- 4.16. The WTR (1998) states that all workers in the UK are legally entitled to 5.6 weeks (or 28 days), inclusive of public holidays, of paid annual leave per annum. At present, the STPC(W)D does not define an annual leave entitlement for either teachers or leaders. Since nothing in the STPC(W)D may be taken in conflict with the Council Directive 93/104/EC, this implies an entitlement to the statutory minimum annual leave. While teachers have a stated working time of 195 working days per year, this provision is not in place for leaders, creating open-ended requirements for availability throughout the year.
- 4.17. Evidence from the research outlined in Chapter 2, table 2 (Comparison of time off entitlement), indicated that in not having a defined annual leave entitlement, school leaders in Wales are an outlier amongst these benchmarked professions.
- 4.18. Evidence from the majority of consultees consistently highlighted the need for an unambiguous provision for protected annual leave for school leaders. Consultees differed in the exact approaches they favoured; for example, UCAC recommended a set period of uninterrupted annual leave during the summer school closure, while NAHT proposed four weeks designated uninterrupted annual leave spread across Easter, Christmas, and summer school holidays.
- 4.19. Despite these differences in approach, there was broad agreement that guaranteed uninterrupted rest time is necessary. ASCL Cymru notably stated that protected annual leave was more of a priority issue for their members than guaranteed working hours.

- 4.20. Whilst the Welsh Government and WLGA suggested that current arrangements were adequate to allow school leaders to have time off during school closure periods, both recognised the benefits of protected annual leave.
- 4.21. ASCL Cymru, UCAC, and NAHT all reported that leaders frequently work during school closures due to operational pressures, budget challenges, and responsibilities such as building checks or oversight of building works during school closure periods. This was reported to be a particular risk for leaders in smaller schools with smaller leadership teams. This evidence demonstrates that, often, in practice, many leaders are unable to take uninterrupted breaks, reinforcing the case for establishing a defined minimum annual leave entitlement.
- 4.22. In determining our recommendation for the number of days of uninterrupted annual leave, we have taken into account the conditions of service of other benchmarked professions (Chapter 2, table 2 Comparison of time off entitlement ). Annual leave entitlement ranges from 30 days plus eight public holidays (Navy Commander) to 37 days plus eight public holidays (Chief Executive or Principal of a Further Education College), and 40 days for school leaders in Scotland.
- 4.23. This recommendation intends to guarantee, as far as is practicable, a minimum period wherein school leaders' annual leave is uninterrupted. We recognise that there may, exceptionally, be circumstances in which communication with a leader during annual leave is unavoidable. In line with the 'force majeure' derogation under Regulation 21(e) of the WTR (1998), this should apply only where a leader's activities are affected by unusual, unforeseen, or exceptional circumstances beyond the employer's control, or by an accident or the imminent risk of an accident, which could not have been avoided despite the exercise of all due care. In a school setting, this may include emergency situations where i) the situation is critical to business operations or safety, for example, damage to the school building, adverse weather, or critical incident response, and ii) no suitable alternative source of information or action is available.
- 4.24. On the basis that school leaders have 33 days of uninterrupted annual leave, eight public holidays, and 195 days of directed time per annum (based on teacher working days, and a reasonable assumption that leaders would be working during this time), leaders have 25 days of additional paid leave during school closure periods outside term time. Governing bodies, in discharging their duty of care, should not expect school leaders to be available during additional paid leave. It is nonetheless recognised that there may be occasions when this is required to carry out professional responsibilities, as set out in the STPC(W)D, and any circumstances agreed locally.
- 4.25. This recommendation should not supersede any more favourable local arrangements (e.g., where a defined annual leave entitlement is already included in a leader's contract).
- 4.26. **Recommendation 2a: The IWPRB recommends that the Welsh Government leads on the development of a strategy aimed at securing a reduction in leaders' current working hours to 1,650 annually, with implementation to be completed by September 2029.**

- 4.27. **Recommendation 2b: The IWPRB recommends that the Welsh Government clarifies the STPC(W)D with reference to leaders having the same overarching rights conferred on teachers, under paragraphs 51.1 and 51.2, by September 2026.**
- 4.28. The factors influencing our conclusions and recommendations relating to working hours and setting a guaranteed limit are multifaceted.
- 4.29. We recognise the complexity of reducing leaders' working hours, and that a reduction cannot be achieved immediately simply by amending the STPC(W)D. To do so could be seen as being disingenuous. We recognise that even if a maximum working time were specified in the STPC(W)D, there is a distinct difference in stating a maximum time and achieving a maximum time. Despite the 35-hour limit in Scotland – which has been in place since 2001 – the 2025 [AHDS study](#) found headteachers reported 53.8 weekly working hours on average. Therefore, the IWPRB is not recommending the inclusion of a guaranteed limit on working hours in the STPC(W)D at this point. Nonetheless, we have listened to views of consultees, and agree with those who stated that the culture surrounding working hours needs to change. Therefore, the IWPRB believes it is appropriate to have a clear target to signal the need for change in culture and practice.
- 4.30. The evidence shows that the current absence of a limit to working hours in the STPC(W)D places leaders in Wales out of step with other benchmarked professions analysed in Chapter 2 (Comparison of time off entitlement ). With the exception of school leaders, all leaders have set limits on weekly working hours ranging from 37 to 41; many of these sectors also require high degrees of flexibility. Directed time (195 days, or 1,265 hours, per annum) is already in place for teachers in Wales.
- 4.31. Similarly, evidence shows that Wales is one of a small number of OECD jurisdictions (including England, Greece, Italy and Luxembourg) in which working hours for school leaders are not defined.
- 4.32. Several consultees (ASCL Cymru, NAHT, NASUWT, UCAC, and NEU) indicated a preference for a defined limit to working time to be specified within the STPC(W)D. NASUWT called for a 35-hour working week, in line with Scotland. UCAC proposed a specification of working days per annum, so that leaders' working time would align more closely with teachers' working time, up to a maximum of 200 days annually. ASCL Cymru suggested a tiered approach, where different levels of leadership would have a different guaranteed limit, with headteachers at the highest level and 'working back' to 1,265 hours over 195 days. It also suggested using OECD data to reach an appropriate number. NAHT and NEU did not specify an approach but supported the principle. Community Wales, however, supported the idea that the STPC(W)D should include protections against extreme working hours, but felt that local arrangements may be more appropriate than a statutory limit.
- 4.33. Consultees who supported a limit on leaders' working hours, while acknowledging these challenges, felt that specifying a limit would send an important signal regarding the need for change. They felt that this move would indicate to school leaders that their health and wellbeing were being taken seriously, and that their challenges in recent years were being recognised and beginning to be addressed.

- 4.34. The Welsh Government was more guarded in its view, as was the WLGA, fearing unintended consequences. In particular, they felt that a guaranteed limit on working hours could be misaligned with the flexibility and autonomy required of school leaders. The Welsh Government stated that they were wary of a “prescriptive” approach, which could impact schools’ ability to operate effectively. The WLGA raised concerns about how any guaranteed limit would interact with nuanced local contexts and the flexibility required for school operations. Reflecting this consideration, the Church in Wales suggested that any limit should specify days annually rather than hours per day or week, as this may be more suitable to account for the rhythm of the school year.
- 4.35. Despite the absence of working time limits within the STPC(W)D, the WTR (1998) provides protection for some school leaders, as they place a maximum legal working time of 48 hours per week over a 17-week period. The IWPRB highlights that this 48-hour limit refers to maximum allowable working hours. As such, this should not be considered an acceptable ‘target’ number of working hours.
- 4.36. Upon reviewing the evidence, we have determined that a broad recommendation to reduce leaders’ working hours - without clear parameters or measurable outcomes - would fail to provide the strategic clarity and targeted support required to address the systemic pressures currently facing school leaders in Wales.
- 4.37. We have also concluded that the 1,265 hours applied to teachers is not appropriate for school leaders. The comparison of responsibilities discussed in Chapter 2 (Comparison of time off entitlement ) demonstrates the breadth of the role of the school leader, its strategic nature, and its whole school responsibility.
- 4.38. The IWPRB recommends 1,650 hours as an appropriate and realistic number to reflect the responsibilities of all school leaders. Based on 39 working weeks across the school year, this is approximately 42 hours per week. This aligns with the OECD average and other benchmarked professions (see Chapter 2 (Comparison of time off entitlement )).
- 4.39. An annual limit is considered more appropriate than a weekly limit, given the structure of the school year and periods of school closure. This approach recognises the concerns of the Welsh Government and WLGA regarding impacts upon flexibility and aligns with suggestions by other consultees, including the Church in Wales and UCAC.
- 4.40. The 1,650 hours should be a maximum limit and not a requirement or expectation. This figure is intended to provide an upper boundary for safeguarding a work-life balance and ensuring reasonable working conditions; in practice, leaders should be supported to work below this ceiling wherever possible.
- 4.41. We believe that setting a maximum limit alone is unlikely to secure meaningful change without a coordinated and sustained strategy. For this reason, rather than recommend an immediate amendment to the STPC(W)D, we recommend that the Welsh Government develops and enacts a comprehensive strategy focused on workload reform and system-wide cultural change. Working towards a quantified limit provides an important target to signal the need for change, but only a broader strategic approach will create the conditions in which such a limit can be realistically achieved and sustained.

- 4.42. Regarding Recommendation 2b, it would appear that the STPC(W)D is being interpreted in differing ways. Part 7 of the STPC(W)D refers to the “contractual framework within which all teachers, including headteachers, operate”. Part 7 then uses terminology such as “headteacher” (paragraph 45), “teachers other than a headteacher” (paragraph 49) and “all teachers” (paragraph 51). We believe that any misinterpretation could be avoided by clarifying terminology in paragraphs 51.1 and 51.2, to make it clear that these paragraphs also refer to school leaders. This would provide the clarity that school leaders and teachers may not be expected to work on any Saturday, Sunday, or public holidays, nor undertake midday supervision.
- 4.43. We support the Welsh Government’s previous commitment to implement a consistent policy of workload impact assessments as part of the development of any new policy or initiative affecting schools. This will prevent efforts to reduce hours from being counteracted by new changes introduced.
- 4.44. To ensure these recommendations are being effectively implemented, headteachers’ working hours should be reviewed annually by governing bodies, and other leaders’ working hours should be reviewed annually by headteachers.
- 4.45. In implementing a limit on leaders’ working hours and protecting their rest time at weekends, it is essential to recognise that meaningful improvement depends not only on regulatory change but also on a shift in the wider culture and systems within which school leaders operate. Consultees emphasised that leaders’ working hours are driven as much by expectations, norms, and structural pressures as by any formal requirements, and that without cultural and organisational change, statutory limits alone may have limited impact. The intent of these recommendations is to promote a cultural standard that goes beyond legal compliance, leading to an environment in which leaders’ non-working time is respected, workload is managed sustainably, and schools’ operational functioning no longer relies on the continual availability of leaders.
- 4.46. **Recommendation 3: The IWPRB recommends to the Welsh Government that a future remit include a review of paragraph 46.2 of the STPC(W)D to define a minimum protected amount of time to which all headteachers are entitled for the purpose of discharging their leadership and management responsibilities.**
- 4.47. Paragraph 46.2 of the STPC(W)D stipulates that headteachers are entitled to a “reasonable” amount of headship time. This ambiguity does not ensure that school leaders, particularly those in smaller settings, can fulfil their leadership and management duties, alongside teaching responsibilities, effectively and without unsustainable pressures.
- 4.48. From our evidence, we note the position in the Republic of Ireland, where headteachers with a teaching commitment are allocated ‘release’ days. Evidence also provides information regarding teaching time for headteachers in OECD countries. Across OECD jurisdictions, statutory guidance generally specifies minimum or maximum teaching time for school leaders. In most cases, requirements to teach and limits on teaching time are variable depending on school contexts like level and size, and the OECD reports that, in practice, teaching time of leaders depends heavily on individual school circumstances.

- 4.49. We concur with the consultees' views that headteachers in smaller schools face distinct workload and work-life challenges in managing their statutory duties alongside teaching responsibilities. The Church in Wales, UCAC, WLGA, and Community Wales all emphasised the difficulties linked to smaller leadership teams, as headteachers are less able to delegate tasks appropriately. They argued that this can lead to headteachers being required to take on all duties personally, from staff CPD to safeguarding, to site maintenance. In cases where leaders also have teaching responsibilities several days per week, this workload may become unsustainable, spilling into evenings, weekends, and school closure periods.
- 4.50. This evidence suggests that without guaranteed non-teaching time, headteachers in small schools may struggle to manage their responsibilities sustainably.
- 4.51. Additional research and consultation are required to quantify the minimum proportion of protected headship time that is sufficient for headteachers in Wales. Therefore, we recommend that the Welsh Government include a review of paragraph 46.2 in a future IWPRB remit, to enable a specific recommendation to be made to address the issues outlined.
- 4.52. **Recommendation 4: The IWPRB recommends that the Welsh Government undertakes and publishes a longitudinal study to gather data on the working hours and conditions of leaders (and teachers) in Wales, starting from September 2026.**
- 4.53. In order to ensure that the recommendations above have a measurable impact, it is essential that reliable, up-to-date data is available in the future to monitor progress on any changes in school leaders' working conditions. At present, the most recent Wales-specific data on teachers' and leaders' conditions is the 2021 EWC study, and no further comprehensive national research is available. This means there is limited available data to enable an understanding of the number of hours being worked by leaders (or teachers) in Wales, the rhythm of these hours across the school year, and the nature of work that requires leaders to work additional hours. In addition to limiting monitoring capability, this creates a significant gap when it comes to evidence-informed discussions and decisions.
- 4.54. Several union consultees conducted their own member surveys, which they referred to in their evidence. However, ASCL Cymru noted a lack of official nationally representative data available to monitor school leaders' working hours, suggesting that this benchmarking data be gathered annually or at least every two years. A few consultees, including the Welsh Government and NASUWT, cautioned that any new monitoring mechanisms should not add additional burden or pressure to schools or leaders.
- 4.55. Similar to England's Working Lives of Teachers and Leaders Study, a longitudinal study should be implemented in Wales to ensure up-to-date data informs discussions and decisions on teachers' and leaders' hours and conditions.
- 4.56. This recommendation should be implemented from September 2026, and the report should be published regularly.

## Implementation considerations

- 4.57. Effective implementation of the above recommendations is reliant on action both from the Welsh Government and at both a local authority and school/governing body level. Local arrangements should be put in place in discussion with each school's governing body, leadership team, and/or the local authority to ensure appropriate delegation and cover during weekends, public holidays, and leaders' annual leave. Dictation of exact arrangements is outside of the IWPRB's remit, and we recognise the importance of making allowances for the local context and retaining flexibility.
- 4.58. It is envisaged that each school in partnership with its local authority should develop a communication protocol. Important within this will be a definition of what events warrant emergency out-of-hours communication, including communication with those who have parental responsibility. Events categorised as emergencies may include, for example, safeguarding incidents, natural disasters, or break-ins on school premises. They should not include, for example, planned building works, fire alarm testing, or routine health and safety checks. Any non-urgent communication with stakeholders, including the Welsh Government, local authorities, members of the governing body, parents, or other school leaders or staff, should be limited to working hours only (i.e., Monday to Friday, excluding public holidays).
- 4.59. Consultees provided a range of practical suggestions for how changes to annual leave and working hours might work locally. ASCL Cymru and NASUWT proposed rota systems to share on-site responsibilities during school closures, and, along with the Church in Wales, called for clearer definitions of "emergency" situations that warrant contacting leaders outside normal hours. Community Wales suggested practical cultural changes, such as email signatures stating there is no expectation to respond outside working hours, while NAHT advocated agreements on communication etiquette, noting positive practice in areas where such agreements had been developed with the local authority.

## Additional comment

- 4.60. We note that implementation of Recommendation 1 may create an anomaly between the conditions of service for leaders and teachers. Whilst teachers are to be available for 195 days annually, there is no clear reference in the STPC(W)D to their annual leave entitlement, to ensure uninterrupted rest. We believe this needs to be reconsidered.

# Appendix A – Cabinet Secretary’s Remit Letter 2025



Llywodraeth Cymru

Welsh Government Lynne Neagle AS/MS

Ysgrifennydd y Cabinet dros Addysg Cabinet Secretary for Education

Our ref: MA/LN/0212/25

Mrs Sharron Lusher

Chair

Independent Welsh Pay Review Body

C/o:

Secretariat

Independent Welsh Pay Review Body

[Secretariat@iwprb.wales](mailto:Secretariat@iwprb.wales)

27 January 2025

## **SCHOOL TEACHERS’ PAY AND CONDITIONS**

### **YEAR 6 REMIT: MATTERS FOR REPORT**

Dear Sharron,

I would like to take this opportunity to first of all thank you once again for your work and that of the Independent Welsh Pay Review Body (IWPRB) in providing us with both your strategic review report and your fifth report into Teachers’ Pay and Conditions in Wales.

Together, these reports have provided detailed insight into issues at the time and, through your recommendations, provided very useful potential resolutions. As you know, we have been able to increase teachers’ pay by 5.5% this year and provide an additional £5m for ALNCos, alongside our commitment to progress work on recommendations 4-7 in the context of the review of the ALN Code over the coming months. We expect to set out the next steps on this by summer 2025.

Throughout recent years, we have seen the teaching profession in Wales face a number of significant challenges. I am pleased that since the devolution of powers over teachers’ pay and conditions here in Wales, we have been able to address a number of the concerns of the profession. These have been achieved through the partnership working of all key stakeholders alongside the very helpful reports and recommendations received from the IWPRB.

I am mindful of the conclusions and recommendations of your strategic review of the structure of Teachers' and Leaders' pay and conditions in Wales (April 2024) and your Review of the roles and responsibilities of supply teachers in Wales employed through local authorities or directly by schools (April 2024). I am also aware of the Public Accounts and Public Administration Committee report on Supply and Demand: covering teacher absence (December 2024).

Alongside this, I am aware, as you are, of the reform programme and the impact that it is having on the need for high-quality professional learning, the wider need to support teacher wellbeing and address workload, support leaders and all school staff. I have recently confirmed my commitment to work with all partners to develop an education workforce strategic plan, which seeks to recognise the professionalism and quality of our teachers and school staff in support of our learners, promote wellbeing, recruitment and retention, and improve the quality of teaching and learning.

In this context, I consider it important that we agree on a timeline and implementation plan for the key issues that the IWPRB and related reports have raised on pay and conditions and ensure we are clear and transparent on the timeline and work needed to progress these. I am also mindful of the challenging financial landscape and workload both within local authorities and schools.

In 2025, Government officials will be working closely with the Pay Partnership Forum or subgroups thereof to support the development of a prioritised plan around the range of existing pay and conditions recommendations for the staff that the IWPRB has responsibility for. I expect this to begin with the recommendations in the strategic review, which are most immediate in terms of timeline and priority—specifically teachers' working times, workload and pay scale—and expect the proposals on these to report by September 2025

I am very grateful for the work of the IWPRB and the effort that you, as the Chair, and your Board put in on an ongoing basis, and particularly whilst the work to confirm the secretariat arrangements for the coming year is being put in place. It is a high priority for us to ensure that you have appropriate support and that there is a strong and sustainable solution going forward.

For 2025/26, I expect that the Independent Welsh Pay Review Body should have particular regard to:

- the need to ensure consistent and reasonable pay arrangements, which encourage teacher professionalism, together with supporting recruitment and retention of sufficient quality and quantity of teachers and leaders;
- recruitment and retention data;
- wider economic and labour market conditions, including the public sector financial context;
- identification of the cost of any proposed changes to pay and conditions;
- a need for coherence across the teachers' pay system in Wales, providing simplification and standardisation that can be applied to all teachers and school leaders in Wales.

The IWPRB must also have regard to relevant legal obligations of relevant bodies, particularly equalities legislation relating to: age, disability, sex, marital status, sexual orientation, gender reassignment, race, religion or belief, or pregnancy and maternity.

### **Matters for Recommendation**

I refer to the IWPRB the following matters for recommendation in light of the considerations above:

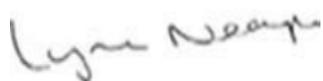
What adjustments should be made to the salary and allowance ranges for classroom teachers, unqualified teachers, and school leaders, to ensure the teaching profession in Wales is promoted and rewarded to encourage the recruitment and retention of high-quality practitioners?

In order to allow maximum time for consideration of, and consultation on, your recommendations, I require you to provide a report to me by no later than 21st May 2025.

Following submission of the May report: What adjustments should be made to Leaders' Conditions of Service, and in particular, the consideration of whether guaranteed working hours (or limits on), as well as protected holiday entitlement and weekends for leaders, should be included in the STPC(W)D?

As the work progresses on the approach to previous recommendations, it may be that we add elements to this remit as part of our commitment to move towards a multi-year rolling workplan.

I look forward to receiving your recommendations on these matters.



### **Lynne Neagle AS/MS**

Ysgrifennydd y Cabinet dros Addysg

Cabinet Secretary for Education