

Craig Marchant and Anthony Craggs
Secretariat Office
School Teachers' Review Body
Windsor House
10 Victoria Street
London
SW1H 0NB

13 December 2024,

Dear Craig and Anthony,

BATOD response School Teachers' Review Body (STRB) – 2024/25

Executive Summary

BATOD recommends a 10% minimum pay award for all teacher groups to support recruitment and retention, aiming to restore the 14% loss since 2010. We urge the Government to fully fund pay uplifts to avoid burdening school budgets.

BATOD calls for uniform pay structures, including mandatory second special educational need (SEN) points for qualified teachers of deaf children and prescribed values for Teaching and Learning Responsibility (TLR) payments. We stress the need to address barriers faced by deaf individuals in teaching, noting poor diversity and underrepresentation of male Qualified Teachers of Deaf Children and Young People (QToDs).

BATOD advocates for increased awareness of the Disabled Students' Allowance (DSA) and the need for bursaries and funding options for training teachers of deaf children. Self-funding ToDs face significant barriers, and BATOD calls for compulsory training to challenge discriminatory practices in recruitment.

The apprenticeship route in England supports trainees already employed as ToDs but needs additional funding and incentives to encourage more teachers to pursue this path.

1. Introduction

1.1. The British Association of Teachers of Deaf Children and Young People (BATOD) welcome this opportunity to submit representations and evidence to the School Teachers' Review Body (STRB) and thanks you for your consideration of its views.

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- 1.2. We would like to remind the STRB of BATOD's unique position as the only professional body which represents the interests of QToDs throughout the United Kingdom. BATOD would also wish to remind the STRB that its members work in a range of situations and locations, not only in schools. Furthermore, the QToD's specialist role covers a very wide age range: from the point of very early identification via the Newborn Hearing Screening to Further and Higher Education settings.
- 1.3. QToDs are essential in providing and promoting curriculum access for children and young people (CYP) who are deaf (we use this term to include all degrees and types of deafness). In mainstream school settings, the intervention of a QToD is essential in promoting high achievement towards social and educational outcomes. Additionally, QToDs have a crucial role in supporting the Government's early intervention initiatives and ongoing improvements to outcomes for all CYP. QToDs are represented in every Local Authority (LA) in England and carry out essential intervention to deaf CYP across the entire educational age range. QToDs work within both the maintained and non-maintained sectors. Early intervention is a key function of QToDs, and they work in close co-operation with National Health Service (NHS) and Social Care services.
- 1.4. In relation to deaf children and other low incidence needs, an approach which relies only on upskilling all mainstream teachers is unlikely to be effective and can be seen as poor value for money. 86% of mainstream teachers received inadequate training to educate deaf CYP (NDCS 2022). NDCS frequently report data shows that deaf CYP achieve entire grade less at GCSE. The full equalities analysis for 2024 GCSE results recently published, reflect CYP with SEND have performed markedly worse than CYP with no identified SEN across all headline measures of attainment. BATOD considers that the minimum standards for training ToDs for the mandatory qualification (MQ) are encapsulated in the Training and Development Agency for Schools (TDA) specification used in England and Wales and bought into by Northern Ireland. This includes the range of competences and, critically, two periods of university assessed teaching practice in all but one instance where there is one period. QToDs are essential in providing and promoting curriculum access for CYP who are deaf and supporting their language skills, emotional and social development, and mental wellbeing.
- 1.5. We would also remind STRB that the context of the work of many QToDs is very similar to that of teachers of CYP with other low incidence special educational needs eg teachers of children with vision impairment (VI), multi-impairment (MSI), and profound and multiple learning difficulties (PMLD).
- A. The adjustments that should be made to the salary and allowance ranges for classroom teachers, unqualified teachers, and school leaders in 2025/26.
- What is your specific proposal on this question?

BATOD recommends a 10% minimum pay award (in line with recommendations made by unions) uniform across all teacher groups to support recruitment and to reduce the risks to retention of more experienced teachers and leaders.

A pay award of 5.5% was an essential first step in the reversal of the real terms pay cuts inflicted upon teachers and school leaders under the previous ten Education Secretaries, however, for teachers in the middle of the salary scale, the decline has been around 9-10% and starting salaries have fallen by approximately 5% in real terms. Differential pay increases are unfair, and

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multi-year pay awards cannot keep up with living costs. Teacher shortages are exacerbated by poor pay, with surveys highlighting unmanageable workloads and stress due to insufficient staffing and pay.

Clearly, there is still some way to go to restore the 14% that teachers and school leaders have lost since 2010 and BATOD would expect this to be addressed in future pay rounds. The Government's commitment to additional investment to fund this pay award was welcome news to school leaders who are juggling overstretched budgets resulting from years of funding cuts. If schools are expected to fund future pay awards this will be detrimental to school budgets. Schools are already hyper conscious of how they utilise their funding and pay awards need to be reflected in budgets and staff employed not just based on SEN formulae for pupil census or establishments that have higher teacher to pupil ratios. It is also important to bear in mind that oncosts for employment will also be affected with schools having to make allowances for increased national insurance contributions.

In addition to a pay uplift, uniformity across authorities to ensure that once qualified the second SEN point should be mandatory for those teachers of deaf CYP who hold the relevant MQ. Differential pay increases are unfair, and multi-year pay awards can't keep up with living costs. Teacher shortages are exacerbated by poor pay, with surveys highlighting unmanageable workloads and stress due to insufficient staffing and pay.

TLR payments should also be supported by prescribed values to help promote fairness in recognition of additional management and leadership responsibilities. Variations between educational settings and LAs on the levels and values of TLR payments increases inequality within and between schools, LAs areas and complicates the career path for QToDs.

Uniformity of a pay structure for Sensory Specialists heading Sensory Support Teams would help to support concession planning as there would be a clearer path for promotion within the team and a better understanding of leading a Sensory Support Team if run by specialists. Heads of Sensory Support Service contracts vary greatly throughout England with some being paid on a Teacher's Leadership Scale and others being paid as part of the LA's management pay scale. Moving from a pay scale that provides Teachers Terms and Conditions to an employee to one that does not can be seen as a negative move for practitioners and may result in a lack of viable career progression and in non-qualified specialists leading specialised teams.

How should acute teacher shortages be addressed?

BATOD would advise, when addressing acute teacher shortages, careful consideration is given to barriers faced by deaf individuals on the routes in teaching (and specialist QToDs). BATOD membership indicates 11% of the BATOD QToD members identify as deaf. However, diversity in the profession across the UK is poor. There is also under representation in this specialised field of male QToDs.

Routes in to teaching and to obtaining the mandatory QToD qualification should be reviewed to allow alternative albeit rigorous routes for capable candidates for whom the current conventional routes are a barrier. The DSA is supported to cover the study-related costs you have because of a mental health problem, long-term illness or any other disability. This would be a good way of encouraging inclusion but more needs to be done to make people aware of this opportunity.

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Potential students need to be made aware that DSA can be awarded on its own or in addition to any student finance. It depends on individual needs - not your household income and there is no need to pay back DSA.

BATOD has highlighted the need for a bursary option in meetings with all UK governments. The BATOD Recruitment and Retention paper (2009) recorded that in 2009 the Training and Development Agency (TDA) for schools in England introduced funding, to 95% of LAs for 40 additional teachers to train for a MQ for teaching deaf children with sensory impairments during 2009 and 22 in 2010 (2 cohorts of students). The reasons for the additional places were to build capacity, to meet new demands from increasing number of children with complex needs and to improve the quality of provision.

BATOD feels funding avenues need to be supported. ToDs in training will usually be funded by their employing LAs school or academy and may compete for funding against teachers seeking other qualifications and courses, and a number (less than 10%) fund themselves or successfully secure a funding grant from charity bodies such as Ovingdean Hall Foundation, Birkdale, Lawrence Werth. Ovingdean Hall Foundation is restricted to only the four English course providers. Birkdale, Lawrence Werth and Jennifer Gough Bursary restricted to only applications on the University of Manchester course. The University of Leeds is the only university to offer a deaf education study bursary (one award).

It is also important to note that self-funding ToDs also face the barrier of arranging accessibility for the teaching placements which require the individual to take a month of unpaid leave from any employment role they may have added to this is the fact that Access to Work funding is not available for volunteer activities, ie a self-funded teaching placement and would therefore add additional barriers to access.

Another worrying factor that negatively discriminates against deaf students wanting to train as a teacher is that during a Post Graduate Certificate in Education (PGCE) course they face the additional burden of training the school environment on deaf friendly practices for 'employees', their mentor, and wider school awareness - in addition to trying to successful complete their placement. Preconceptions of too many professionals even within teaching are that some professionals assume individuals who prefer to communicate using British Sign Language (BSL) is that deaf students are unable to provide education in line with hearing education mainstream/peri capacity. This causes additional stress and the challenge of what to disclose on application regarding their deafness for fear of not being selected. Additional training should be compulsory to challenge discriminatory practice within recruitment processes.

Trainee ToDs from independent or non-maintained special schools are usually funded on the MQ courses by their schools and there is usually a limit as to how many teachers can train at any one time meaning that there could be delays in qualified practitioners working with deaf CYP.

The apprenticeship route (England only) which is hoped to soon become functional, would be delivered by universities that already deliver the MQ. The apprentice gets paid a full salary but has time off to train, and the employer receives government money from the Levy Fund to pay for the course. All employers are able to draw from the Levy Fund as they have already paid into it. These funds cannot be used to pay some other costs associated with apprentices (such as wages, travel and subsidiary costs). This will support trainees already employed as ToDs but will do little to encourage or support teachers employed in mainstream or special schools to study as there would be no benefit to their current employers, hence the need for additional funding streams and incentives.



What is the key evidence that supports your proposal?

BATOD appreciates that schools have the flexibility to differentiate the remuneration they offer to teachers to reflect a range of factors, including local recruitment and retention; roles and responsibilities; and specialist qualifications. However, differential pay increases, for example those which provide a higher increase at starting pay but lower increases for more experienced teachers and school leaders, are fundamentally unfair. A multi-year pay award cannot take account of the accelerating rise in general living costs. According to Consumer price inflation, UK - Office for National Statistics

"The Consumer Prices Index including owner occupiers' housing costs (CPIH) rose by 3.2% in the 12 months to October 2024, up from 2.6% in September.

On a monthly basis, CPIH rose by 0.6% in October 2024, up from 0.1% in October 2023.

The Consumer Prices Index (CPI) rose by 2.3% in the 12 months to October 2024, up from 1.7% in September.

On a monthly basis, CPI rose by 0.6% in October 2024, up from being little changed in October 2023.

The largest upward contribution to the monthly change in both CPIH and CPI annual rates came from housing and household services, mainly because of electricity and gas prices; the largest offsetting downward contribution came from recreation and culture.

Core CPIH (excluding energy, food, alcohol and tobacco) rose by 4.1% in the 12 months to October 2024, up from 4.0% in September; the CPIH goods annual rate rose from negative 1.4% to negative 0.3%, while the CPIH services annual rate was unchanged at 5.6%.

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The National Education Union (NEU) notes that in their latest survey of over 8,000 National Education Union members only 1% of respondents reported that their workload was manageable "all of the time", 41% of teachers described their workload as "unmanageable" citing some of the reasons as being poor work-life balance and insufficient staffing levels. 92% of support staff reported that pay was a cause of stress.

According to the National Foundation for Educational Research (NFER) many teachers report that their workload and the stress of the job have increased. The main drivers of excessive workload include planning and preparing lessons, resource preparation, and marking and feedback. Teachers also face challenges with data entry for tracking and reporting, as well as addressing disruptive behaviour. According to a report by the NASUWT, four in every five teachers say that their workload has negatively affected their physical and mental health. Additionally, two-thirds of teachers are seriously considering leaving the profession due to excessive workload.

Since 2010 levels, teacher's pay has been cut¹ in real terms. Average wages in the UK have risen at a slower pace than prices and workers need a larger proportion of their wages to buy the same goods. Teacher shortages are harming education, and poor pay is driving teachers away from their posts.



The Tes published in 2023 the main scale teacher pay in nations. Some English LAs may contract their staff as QToDs and subsequently contract them on Soulbury or local arrangements. QToDs employed by the NHS are employed under NHS pay and conditions.

In London, although they do get the inner London weighting/allowances, it is vital to offer more to good retain staff eg TLRs, leadership scale.

	England outside of London from Sept 2023 with DfE pay offer	Wales from September 2023	Scotland from January 2024
M0*	N/A	N/A	£32,217
M1	£30,000	N/A	£38,655
M2	£31,680	£30,742	£40,848
М3	£33,455	£33,210	£43,218
M4	£35,328	£35,769	£45,960
M5	£37,538	£38,586	£48,516
M6	£40,479	£42,464	N/A

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The overall number (FTE) of qualified teachers in state-funded schools has not kept pace with increasing pupil numbers. This means the pupil to teacher ratio has increased and the teacher vacancy rate has risen over this period. There is a crisis in postgraduate teacher recruitment, its target was only achieved once since 2015/16. In England, 24% of all of those who receive an ITT qualification decide not to go on to teach in a state school.

Recruitment, retention and vacant posts are issues for all educational settings and services. This is especially true for QToDs.

BATOD's website is the first choice for advertising jobs posts with over 80 posts advertised there each year. BATOD carried out a survey of deaf education professional posts advertised on the BATOD website in academic year 2023/2024: of approximately 82 jobs listed between August 2023 and July 2024 from 58 settings, of which 41 settings listed single job submissions and 17 settings who submitted multiple jobs.

There were approximately 11 adverts relisted for the same job role following unsuccessful recruitment.

A majority of the 82 job listing were roles in England, although Scottish settings typically advertise on the Scottish job platforms, there has an increase of listings from Scotland and Wales.

Single listing: 41 responses for single listings of which all but one post was for a QToD or Resource provision lead/Head of Service/Head of Special School roles. For the 26 QToD related roles (24 successful appointments), 1 received no applications from QToDs. 25 of the 27 listings successfully recruited to the role.

The one multiple listing received responses and successfully recruited to the advertised posts.

10 of the 27 single listing received responses immediately or within one week, 10 of the 27 single listing received responses eventually.

There has been an increase in the number of settings experiencing challenges accessing an advertising budget to support recruitment. Again, this year, there was feedback noting the difficulty in attracting to the QToD role.

Consortium for Research into Deaf Education (CRIDE) 2023 data shows that more than a quarter of education services are finding it challenging to recruit new QToDs to permanent or supply posts, often because of a lack of qualified applicants.

Most adverts continue to state that if the applicant is not a QToD, then would they be willing to train. However, there is a significant lack of funding by employers for specialist teacher MQ.



With regards to QToD shortages, evidence is drawn from studies carried out by CRIDE, of which BATOD is a founding member, which clearly shows that over the last two decades the numbers of QToDs continues to decrease as the current workforce reaches retirement age (see table 1 below). The CRIDE 2023 age profile data (table 1) reflects there is some movement towards a lower average QToD age profile, particularly in Northern Ireland. However, the data is also reflecting a loss in the cohort of experienced QToDs as 48% of ToDs were aged 50 and over, and due to retire in the next 10 to 15 years. In 2021 this stood at 50%.

Table 1: CRIDE 2023 age profile data

	England	Northern Ireland	Scotland	Wales	Total
Aged 49 or under	334.27 (49%)	19.6 (77%)	91.24 (60%)	23.6 (64%)	468.71 (52%)
Aged between 50-59	291.4 (43%)	5.8 (23%)	50.7 (33%)	11.1 (31.1%)	359.1 (40%)
Aged between 60 and 64	51.6 (8%)	0 (0%)	8 (5%)	1,8 (5%)	61.4 (7%)
Aged 65 or over	7.2 (1%)	0 (0%)	2.6 (2%)	0	9.8 (1%)
Total	684.47	25.4	152.54	36.6	899.01

In addition to the concerns of falling numbers of experienced QToDs, if the general teaching population also continues to fail to secure sustainable recruitment levels, there will be an additional factor impacting on future QToD numbers. There may be a period approaching when it is likely that more QToDs will leave the profession or retire than the numbers available to join our workforce. These fears are echoed by families as highlighted in a BBC article (February 2024) "The mum of two deaf children fears her family and others will have to "fend for themselves" if the numbers of teachers of the deaf continues to fall."

In 2024, CRIDE carried out its 14th annual survey of specialist education services for deaf children on educational staffing and service provision for deaf children, covering the 2023/24 academic year.

The CRIDE report reveals that in terms of changes since 2023, the total number of referrals over the calendar year has increased from 6,073 to 7,481. The proportion of referrals through the newborn hearing screening programme has decreased from 18% to 14% but referrals for children identified outside newborn hearing screening and before statutory education has increased from 22% to 24%. The number of referrals for children identified outside newborn hearing screening but after they had started statutory education has increased from 60% to 62%. The increase of CYP being detected later in life may have consequences for the amount of input required by specialist teachers as more direct work would be required.

Despite the increase in CYP numbers the numbers of QToDs has not increased. It is a significant concern that 35% of LAs reported difficulties in recruiting to posts and a negative 24% change in the number of ToDs between 2011 and 2024. This equates to incremental year-on-year decreases in numbers of QToDs, as their caseloads continue to increase.



There are over 46,000 deaf children in the UK, an increase of 3% from 2023. The numbers of deaf CYP continue to climb in line with the increase in the overall population and greater numbers of significantly disabled children (where deafness is identified) are surviving at birth. The latest national pupil projections continue to show that lower births have been recorded since the end of 2016 and that the population in special schools has increased. However, the number of QToDs in employment working in a peripatetic role or, in a resource provision and/or in a special school or college not specifically for deaf children has decreased by 5% since 2023 and decreased by 24% since we started the survey in 2011. There were at least 701 full-time equivalent (fte) specialist support staff posts (other than ToDs) directly employed by services, of which at least 56 fte (8%) are vacant posts. There are a reported 220 resource provisions, a decrease from 227 in 2023. Looking at the spread of resource provisions across England, on average, there is one resource provision for every 213 deaf children. The NDCS reports that 40 of England's 150 councils have no specialist teaching units with a shocking QToD to deaf CYP ratio average of 1QToD: 62 deaf CYP. Outside of London, the highest is in Derby (1:151).

There is difficulty with recruitment and retention in all four UK countries with an observable increase in the number of job listing post pandemic. In 2019, National Deaf Children's Society (NDCS) who has been campaigning against cuts to QToD since 2011, reported "we know there has been a 17% drop in the number of qualified Teachers of the Deaf across the UK. We also know that over half of Teachers of the Deaf are due to retire in the next ten to fifteen years". The joint NDCS/BATOD survey in 2019 of 625 QToD from across the UK asked questions about their jobs and about specialist support for deaf children.

The findings included

- i. the majority (58%) reporting "there is less support available for deaf children", in comparison to in 2014.
- ii. almost half of ToDs believing that deaf children are less likely to make good educational progress now, than in 2014 when the Government in England made big reforms to the education system for children with special needs.
- iii. vast majority (85%) expressing their workload has increased since 2014. 87% are working additional hours to keep up with their workload and 96% say they feel stressed in their job role. More than 60% of Teachers of the Deaf are working the equivalent of a whole extra day per week, unpaid, just to catch up.
- iv. 17% indicating they were considering leaving the profession as a result of pressures of the job too.

Following a recent BATOD National Executive Council discussion on retention and recruitment, members reported concerns over a depleting workforce due to the

- lack of experienced staff to mentor new recruits.
- cost in terms of funding and time for mandatory courses.
- lack of suitable bases and office space as LAs close office buildings.
- Sensory Support Team managers not always having a the MQ in deaf education (or Vision Impairment/Mult-Sensory Impairment).
- Furthermore, in 2023, National Sensory Impairment Partnership (NatSIP) surveyed heads of specialist education services and provision for learners with sensory impairment on recruitment of Qualified Teachers of Sensory Impairments (QTSIs). This received 44 responses from across the UK, the majority of which were from within England.



NatSIP survey key findings: Over 4 in 5 heads had tried to recruit in the last three years.

- 30% had to go through 2 or 3 rounds of recruitment before they could appoint anyone.
- 41% said there was a significant delay of more than a term before they could recruit someone.
- Only 19% were able to recruit a qualified teacher of sensory impairment (QTSI) with the MQ most are recruiting a teacher and then funding their training for the MQ.
- When asked about the impact of any delays or not being able to recruit a QTSI, heads referred to increased workload/stress for existing staff and reduced support for children with SI.
- The main direct costs associated around not being able to recruit a QTSI related to supply cover.
- On average, respondents reported 0.5 unfilled QTSI posts in their service/school.

B. An assessment of any changes to TLR payments concerning the existing pro-rata rule.

What specific changes, if any, do you propose to TLRs in respect of the pro-rata rule?

BATOD proposes that the pro-rata rule for the TLR portion awarded to teachers is removed and that TLR scales are unified and made more readily available to staff not employed in schools.

BATOD appreciates that schools or, for many QToDs who are centrally employed, the LA are responsible for determining TLR payments. The school teachers' pay and conditions document (STPCD) provides for three broad bands for the values of TLR payments – TLR1, TLR2 and TLR3. There can be more than one level of TLR payment within each band. As each employer determines for itself the number of levels of TLR payments within the two bands and the specific values of the TLR payments at each level variations between schools/LAs on the levels and values of TLR payments increases inequality within and between schools/LAs and as previously mentioned complicates the career path for teachers.

What evidence supports your proposals?

BATOD membership feedback reports that the awarding of TLRs is not consistent. It is felt by members that in areas such as London, that it is vital to offer more in order to be able to retain skilled staff for example, TLRs, leadership scale. With the current and predicted teacher shortage, especially within some resource provisions for deaf children, often the most vulnerable deaf children in an area, that are in un-attractive locations and/or those attached to mainstream settings with poorer reputations, BATOD feels it is essential resource provision QToDS are offered suitable TLR payments to retain the specialist workforce

- whilst the pay is pro-rota, the quantity of workload is not, requiring full-time commitment from members on part-time hours.
- BATOD agrees with NEU "Where a part-time teacher undertakes the full additional responsibilities of a promoted post, it would be unfair, unethical and potentially unlawful, if they did not receive the full value of the TLR payment for those responsibilities simply because they are employed on a part-time contract. In such cases, their contractual working time can be adjusted in order that it both fully reflects the additional time spent undertaking those additional responsibilities and provides the full additional payment."

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The School Teachers Pay and Conditions document 2024 section 20.1, states that "The relevant body may award a TLR payment to a classroom teacher for undertaking a sustained additional responsibility, for the purpose of ensuring the continued delivery of high-quality teaching and learning and for which the teacher is made accountable."

In addition, section 47 shows that TLR1 or TLR2 is only awarded "to ensure the continued delivery of high-quality teaching and learning" and you could consider how your role supports this. Also, section 51, "The overarching criterion for the award of TLR1s and TLR2s includes provisions that the responsibility for which the TLR is awarded must be 'sustained' and that the TLR be awarded 'in the context of the relevant body's staffing structure'".

C. How the current pay framework can best support teachers from all backgrounds and with protected characteristics, including by promoting flexible working.

The STRB itself stated that it "should be able to fully exercise its role and avoid being restricted by affordability considerations" (STRB 2022:11). Like other professional bodies, BATOD has no confidence in the Review Body's independence. The independence of the Teachers' pay review body is still a topic of debate. While the STRB is designed to provide independent advice to the Prime Minister and the Secretary of State for Education on teachers' pay and conditions, there have been concerns about its autonomy.

Recently, the STRB was urged to assert its independence and not feel constrained by affordability considerations when making pay recommendations. However, the education secretary has asked the STRB to consider the financial pressures on schools in its recommendations. These constraints undermine the STRB's independence.

• Which aspects of the current framework should be improved to better ensure the protection of teachers from all backgrounds?

Currently there is a lack of visibility with regards to specialist roles such as the QToD role. Most mainstream teachers have little experience of teaching deaf CYP and may only do so occasionally. The majority of trainee teachers receive very minimal special educational needs and disability (SEND) training, if there was more exposure to specialist roles a larger number of teachers from different backgrounds would be aware of the possibilities of specialist teacher training.

BATOD has championed the creation of an apprenticeship route for qualified teachers to achieve the specialist MQ. Once the apprenticeship is operatable, LA specialist education services and schools will be able to draw from funding available through the apprenticeship levy to cover most of the training costs.

Academies are not required to follow the national school teacher pay provisions and teachers employed centrally by LAs may have pay scales that vary from the recommended framework. This is likely to negatively impact on recruitment.

In addition, the following are proposed to help ensure teaching and specifically training in deaf education are more widely accessible for applicants from all backgrounds:



- Research on the structure of educational establishments in relation to supporting CYP who are deaf to better understand how to encourage fair representation.
- Clear pathways for promotion within SEN.
- Motivations and incentives that will not put pressure on school budgets such as:
 - o car share/buy schemes
 - o travel cards
 - o relocation allowances
 - o funding for additional training
 - o competitive starting salaries
 - o 'golden hello' incentives to encourage talented people from the private sector in to teaching and teaching SEN.
- What is your evidence for this?

BATOD membership indicates 11% of the BATOD QToD members identify as deaf. However, diversity in the profession across the UK is poor.

- What are your specific proposals for improvement and how would they be implemented?
- What evidence do you have on existing good practice that supports flexible working for teachers?

Improvement opportunities and experiences for deaf students at college, university and other educational settings may influence more deaf individuals to pursue a career as a QToD. In addition, the routes to the QToD qualification have progressed over the years.

In England, individuals can enter the QToD MQ course with Qualified Teacher Learning and Skills (QTLS) status. The QTS, a Level 6, can teach in primary or secondary depending on which course they do, and the QTLS, a Level 5, only can teach in post-16. Some deaf QToDs have worked in schools full time and did a Teaching and Learning foundation degree at the same time to acquire QTS, working four days a week and attending university one day a week. For those individuals, via the Teaching and Learning foundation degree, it took four years but meant they could get the experience they needed, work and earn, and do their degree and teaching degree all at the same time.

There is no data collection yet regarding how many MQ students who are deaf start the course and how many graduating from the MQ course.

• What additional proposals do you have to facilitate flexible working – and what are the practical and cost considerations?

BATOD recognises the DfE definition of flexible working as "arrangements which allow employees to vary the amount, timing or location of their work." While school-based roles will not necessarily lend themselves easily to flexible working other than part time roles, the peripatetic nature of some QToD roles may more easily be able to absorb flexible working initiatives such as:

- job shares
- phased retirement

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- staggered hours
- compressed hours
- annualised hours
- time off in lieu (TOIL)
- · remote working

• What other issues should be considered in reviewing this matter?

While remote working allows a certain level of flexibility, consideration should be given to:

- isolation due to closure of joint working office spaces
- lone working and safety protocols
- extended travel over large areas
- · backfilling of posts if job shares and phased retirement is agreed
- carer progression for teachers working outside of a school structure
- peer to peer support.

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

Yours sincerely

Teresa Qual

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