THE SOULBURY COMMITTEE

THE REPORT OF THE SOULBURY COMMITTEE ON THE SALARY SCALES AND SERVICE CONDITIONS OF EDUCATIONAL IMPROVEMENT PROFESSIONALS, EDUCATIONAL PSYCHOLOGISTS AND YOUNG PEOPLE'S/COMMUNITY SERVICE MANAGERS

2010 edition

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REPORT OF THE SOULBURY COMMITTEE ON THE SALARY SCALES AND SERVICE CONDITIONS OF EDUCATIONAL IMPROVEMENT PROFESSIONALS, EDUCATIONAL PSYCHOLOGISTS AND YOUNG PEOPLE'S/COMMUNITY SERVICE MANAGERS

1. MEMBERSHIP

The Membership of the Committee is as follows:

Chair:

The Chair of the Committee shall rotate at each meeting between the two Sides

Employers' Side:

| Local Government Association | 5 |
|--|---|
| Welsh Local Government Association | 1 |
| Officers' Side | |
| National Union of Teachers | 4 |
| Association of Professionals in Education and Children's | 5 |
| Trusts | |
| Association of Educational Psychologists | 4 |
| National Association of Youth and Community Education | |
| Officers | 2 |
| The Leader of the Officers' Side ex officio | 1 |

2. CATEGORIES OF SOULBURY OFFICERS

- 2.1 The Committee determines the salaries and service conditions of the following categories of officers:
 - (i) Educational Improvement Professionals
 - (ii) Educational Psychologists
 - (iii) Young People's/Community Service Managers
- 2.2 The salary scale chosen for each level of post within each category should take account of the relative weight of duties and responsibilities allocated to individual posts within the local authority, having regard to the need to recruit, retain and motivate staff of the required quality. Broad guidelines for each level within the different categories of officers are set out below.

2.3 The Soulbury Committee believes that consultation at local level with the associations representing Soulbury officers is an important part of establishing appropriate pay structures for all categories of Soulbury officers.

3. EDUCATIONAL IMPROVEMENT PROFESSIONALS

General

3.1 Salary scales for educational improvement professionals should consist of not more than four consecutive points from the range (subject to any additional points needed to accommodate discretionary scale extensions and/or Structured Professional Assessment points). The salary rates for educational improvement professionals are set out in Appendix A. Appendix E sets out a statement of general considerations in connection with the pay of educational improvement professionals.

Educational Improvement Professionals

- 3.2 Postholders will give advice on educational, organisational, management and related children's service's issues in connection with the role of the local authority. Particular duties may include:
 - advice to the local authority, schools and other bodies on design and implementation of development plans;
 - developing and implementing the role of the local authority in raising standards by challenging and supporting schools;
 - contributing to the development of pupils in and out of schools and working collaboratively with related children's services to that end;
 - taking part in formal inspections;
 - assisting schools with their own self-evaluation;
 - working with schools of concern to bring about sustained improvement;
 and
 - undertaking the role of school improvement partner.
- 3.3 Postholders undertaking the full range of duties at this level should not normally have a minimum lower than point 8 on their pay spine.

Senior Educational Improvement Professionals

- 3.4 These are posts carrying substantial managerial and/or professional responsibility over and above posts for educational improvement professionals within the local authority. Postholders may in particular direct the work of a group of educational improvement professionals.
- Postholders undertaking the full range of duties at this level should not normally have a minimum lower than point 13 on their pay spine.

Leading Educational Improvement Professionals

- 3.6 These are posts which carry managerial and professional responsibilities at whole service level for educational improvement services within a local authority as determined by the Director of Education/Children's Services.
- 3.7 Postholders undertaking the full range of duties at this level should not normally have a minimum lower than point 20 on their pay spine.

Educational Improvement Consultants

- 3.8 Educational improvement consultants usually assist schools in relation to specific initiatives or areas of specialism. Postholders undertaking the role of an educational improvement consultant will not have a minimum lower than point 1 of their pay spine.
- 3.9 Where educational improvement consultants provide advice and support relating to local education systems, the raising of educational standards and the improvement of outcomes for children and young people and are paid on the Soulbury spine, their pay and grading arrangements should relate appropriately to the arrangements for others paid on that spine

Job Description

3.10 Each educational improvement professional is to be provided by the Director of Education/Children's Services with a job description, which should be subject to periodic review in the light of changing educational and organisational circumstances.

4. EDUCATIONAL PSYCHOLOGISTS

- 4.1 A fully qualified educational psychologist has:
 - (a) an Honours Degree in Psychology or recognised equivalent qualification;
 - (b) substantial relevant experience working with children in education or children's services or both; and has
 - (c) successfully followed a course of specific post graduate professional training as an educational psychologist

In addition an educational psychologist is required to be registered to practise with the Health Professions Council (HPC).

Note: Requirement (a) above confers eligibility for graduate basis for registration with the British Psychological Society.

Appendix A sets out the pay scales for educational psychologists.

Educational Psychologists

- 4.2 Within the framework of their particular service's organisational structure educational psychologists paid on Scale A usually work in defined locations or groups of schools within local authority areas. They may be expected to undertake:
 - (i) direct casework (including statutory duties in the terms of the Education Act 1996), working in close liaison and collaboration with parents and colleagues from education, health and social services;
 - (ii) a variety of multi-service based, multi-disciplinary team-work on behalf of children and their families;
 - (iii) a range of more generalised advisory and consultative work in schools, especially relating to children's developmental and learning needs;
 - (iv) some in-service training for teachers and others;
 - (v) some research and evaluation responsibilities;
 - (vi) regular personal post-experience training;
 - (vii) supporting and working with specialist local authority functions and agencies (e.g. behaviour support, learning support, sensory support, Portage etc).

For educational psychologists, the local authority psychological service should provide a career structure in its own right. The qualifications of educational psychologists are substantial. It is reasonable to expect that educational psychologists will look to the Soulbury structure to provide them with a pattern of a career development.

- 4.3 Scale A provides an extended pay structure (Appendix A) for educational psychologists which ensures that the individual pay scale for each educational psychologist may reflect job content, experience and other factors such as recruitment and retention.
- Individual EPs will be placed on an individual pay scale of up to six points which will be points 1-6, 2-7 or 3-8 of Scale A. The choice of the individual pay scale is at the discretion of the authority (subject to the guaranteed assimilation entitlements for post holders in post under the previous structure as set out in JESC 164). Decisions will be based on an assessment of recruitment and retention and other local factors. Authorities have discretion to appoint above the minimum of the selected scale.
- 4.5 Educational psychologists paid on Scale A are also eligible for the award of up to 3 structured professional assessment points. The individual six point scale will be supplemented by such SPA points, providing the individual with the eligibility to progress to a maximum of points 9, 10 or 11 in each case. SPA points can be awarded at any point during an individual's progression within their pay scale.

Supervision of Trainees by Main Scale Educational Psychologists

4.6 Where a local authority does not have separate grading arrangements for recognising the supervision of trainees, a main scale educational psychologist who is required to supervise trainees will be awarded an allowance equivalent to one additional incremental point on Scale A for the duration of the period of the supervision. This would be a temporary monetary allowance only and would not allow for progression from one pay scale to another.

Senior Educational Psychologists

- 4.7 Senior educational psychologists have duties and responsibilities above those of officers on scale A. They may have
 - (i) specific line management responsibilities for two or more officers on Scale A: or
 - (ii) specialised responsibilities of a broadly equivalent level; or
 - (iii) duties as deputy to the principal educational psychologist.

Local authorities have to select a scale of up to four consecutive points (subject to any additional points needed to accommodate discretionary scale extensions and/or structured professional assessment points) selected from Scale B

Principal Educational Psychologist

- 4.8 Principal educational psychologists are the officers to whom has been assigned the responsibility for organising and managing the educational psychology service and accountability for the professional work of the local authority's other educational psychologists.
- 4.9 In addition to their core role, principal educational psychologists often assume additional responsibility for managing other areas of local authorities' services relating to work with vulnerable children.
- 4.10 Local authorities have to select a scale of up to four consecutive points (subject to any additional points needed to accommodate discretionary scale extensions and/or structured professional assessment points), selected from Scale B. The scale for the principal educational psychologist undertaking the full range of duties at this level should not normally have a minimum lower than point 4 of Scale B.

Educational Psychologists (Pre-Final Qualification)

- 4.11 The Soulbury Committee recognises two groups of professionals whom it considers as Educational Psychologists (Pre-Final Qualification): Assistant Educational Psychologists and Trainee Educational Psychologists.
- 4.12 Assistant Educational Psychologists are not qualified to carry out the full range of duties and responsibilities of fully qualified officers on Scale A and should therefore be paid on the Assistant Educational Psychologists scale.
- 4.13 Those local authorities who employ Assistant Educational Psychologists should take positive action to ensure that these employees achieve qualified status as soon as possible. It is the aim that no officer should remain on the Assistant Educational Psychologists' scale for more than 4 years.
- 4.14 Trainee Educational Psychologists in the second year and third years of their training should be paid on a point selected from the six-point Trainee Educational Psychologists pay range as set out in Appendix A. They should be employed by local authorities on contracts of employment under the terms of the Soulbury Report and with the same contractual entitlements as other Soulbury paid officers of the local authority, and not engaged on any other basis.
- 4.15 Individuals' placement within the Trainee Educational Psychologists pay range in the second year and third year of training should be determined by employing authorities on the basis of local assessments. Such assessments should appropriately recognise the work undertaken by the individual and reflect the individual's range of duties and responsibilities. They may also reflect other relevant factors such as recruitment and retention.
- 4.16 While Trainee Educational Psychologists will be employed on the basis that they will be available for work for three days per week in the second year and four days per week in the third year of training, it is not intended that their pay rates should be applied on any pro rata basis.
- 4.17 During their training, Trainee Educational Psychologists should expect to be provided with appropriate levels of training, support and supervision and workloads commensurate and appropriate with their professional development as educational psychologists.
- 4.18 Trainee Educational Psychologists in the first year of training are not employed by local authorities.

5. YOUNG PEOPLE'S/COMMUNITY SERVICE MANAGERS

General

- 5.1 Young People's Service Managers and officers are concerned with securing a range of provision to meet the personal development needs of young people through formal and informal education. This may include the development of youth work; the connexions service; youth offending and inclusion services; teenage pregnancy; and other associated services for young people concerned with the social, educational, safety and cultural needs of young people of all ages. Community Service Managers and officers may undertake similar roles to those of Young People's Service Managers but also be involved in the delivery of informal educational opportunities for the whole community.
- 5.2 The Soulbury Committee has established the salary scale for Young People's/Community Service Managers set out in Appendix A for local authorities to use in determining their organisational structure to meet the service needs in their area. This scale is also suitable for use by the voluntary/third sector.
- 5.3 Salary scales should consist of not more than four consecutive points from the range (subject to any additional points needed to accommodate discretionary scale extensions and/or structured professional assessment points).
- 5.4 The differential between the salary of the Young Peoples/Community Service Manager and the salary of the highest paid practitioner (within scope of the JNC for Youth and Community Workers) being managed by the YPCSM shall be the equivalent of a minimum of one Soulbury salary increment.

Young People's/Community Service Managers

- 5.5 The managerial and professional responsibilities of a Young People's/Community Service Manager may include:
 - Advice to the local authority, its officers and elected members, management bodies, heads of establishments, salaried and voluntary workers and teachers to meet the needs of individuals and groups on the following:
 - the organisation of groups and projects;
 - the safety and safe use of facilities and equipment;
 - the quality of service provided and approaches to improving the service;
 - safeguarding young people.
 - The appointment, training, supervision, induction, management and assessment of staff and volunteers.

- The preparation of budgets and co-ordination of responses to administrative and management requirements, including the administration of grant schemes and grant.
- The promotion of individual and group interests and promotion of their participation in schemes and projects.
- 5.6. He/she maybe concerned with all young people's and community service activities in a geographical part of the area and/or with one or more specialist activities.

Senior Young People's/Community Service Manager

5.7 These posts carry substantial managerial and/or professional responsibilities over and above those of Young People's/Community Service Managers. The particular duties and responsibilities of officers in the senior range will be determined by the job description. This may include responsibility for the work of a group of young people's/community service managers and managers of other services for young people; responsibility for management functions such as the appointment, supervision, development of staff employed in providing services for young people; and designing and developing areas of the curriculum for these services. The scale for the Senior Young People's/Community Service Manager undertaking the full range of duties at this level should not normally have a minimum lower than point 4 of the Young People's/Community Service Manager salary range set out in Appendix A to this Report.

Principal Young People's/Community Service Manager

- These are posts which carry managerial and professional responsibility for the running of young people's and community services in an authority. This will include day to day control of the service and giving appropriate advice on the operation, development and other needs of the service.
- 5.9 The scale for the Principal Young People's/Community Service Manager undertaking the full range of duties at this level should not normally have a minimum lower than point 7 of the Young People's/Community Service Managers' salary range set out in Appendix A to this Report.

6. **EXTENSIONS TO LOCAL SCALES**

6.1 The Director of Education/Children's Services has the discretion to extend local scales for Soulbury officers (with the exception of main scale educational psychologists on Scale A) as set out in Appendix C.

7. STRUCTURED PROFESSIONAL ASSESSMENTS

The Soulbury Committee has agreed a framework to recognise the contribution of Soulbury officers through a Structured Professional Assessment (SPA) to be made locally. The national framework is set out in Appendix D.

8. INCREMENTAL DATES, ORGANISATION AND ANNUAL REVIEW

- 8.1 Educational improvement professionals and educational psychologists are to receive their annual increment on 1 September each year.
- 8.2 Young People's/Community Service Managers are to receive their annual increment on 1 April of each year.
- 8.3 Educational improvement professionals educational psychologists and young people's/community service managers have an annual salary review date of 1 September each year.

9. **LONDON AREA PAYMENTS**

9.1 The allowances and areas for which these allowances are paid and the date of the implementation of payment for revised allowances shall be as determined from time to time. The current rates are set out in Appendix B.

10. **CONDITIONS OF SERVICE**

- 10.1 The conditions of service of officers dealt with under this report shall be not less favourable than those prescribed for the local government services staff of the authority. The NJC for Local Government Services have agreed that officers within scope of this report should be allowed to pursue appeals relating to conditions of service through the appropriate Local Government Services machinery.
- 10.2 However, the Soulbury Committee has reached agreement on conditions of service relating to local consultation and facilities for recognised unions, a grievance procedure and a collective disputes procedure in the following terms:

11. LOCAL CONSULTATION AND FACILITIES FOR RECOGNISED UNIONS

11.1 The Soulbury Committee recommends to local authorities full recognition of those unions and associations represented on the national body. Such recognition includes the provision of facilities for representatives as accorded to other teaching and non-teaching staff unions and regular consultation with representatives on all guestions affecting their conditions of service.

11.2 The Committee wishes to encourage local agreements on the appropriate form such consultation should take, whether this is by a formal joint committee or by some other explicit and effective means of consultation.

12. **GRIEVANCE PROCEDURE**

12.1 The Soulbury Committee recommends that each individual officer should be informed of the procedure available to him or her if a grievance (other than on salary grading) is felt by such an officer. The Committee advise that each authority should formulate a grievance procedure for Soulbury staff in line with the ACAS Code of Practice on handling discipline and grievances (the 2009 version can be found http://www.acas.org.uk/index.aspx?articleid=2174, subject to local variation and having regard to the particular structure of the advisory service in the authority.

13. **COLLECTIVE DISPUTES PROCEDURE**

- 13.1 The Committee recommends that arrangements be established at local level to facilitate discussion between the authority and its staff and their recognised representative organisations (see paragraph 11). Full use of such machinery should enable an issue which arises between the authority and the unions and associations represented on the Soulbury Committee to be resolved satisfactorily, as should be the aim.
- 13.2 Where, however, an issue arises which cannot be resolved in this way and is not a matter which can be referred to the Soulbury Committee under the terms of paragraph 16 of the Soulbury Report, then if both the parties locally agree*, it should be referred elsewhere.
- 13.3 As the parties locally may agree it may be referred either:
 - (a) to a third party, or a joint panel chaired by a third party, under arrangements to be made locally for conciliation or mediation as the parties shall agree; or
 - (b) to the Soulbury Committee who will establish a panel representative of both sides appropriately chaired to consider the matter and make agreed recommendations to the parties.

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^{*} Local authorities in pursuance of statutory duties and being answerable to the electors, cannot be expected to settle by negotiation, or to submit to outside arbitration, the level of their rate call, or the share of their income which they allocate to a particular service. As a consequence of budgetary policy however, local authorities will take policy decisions on matters such as work load, job security and possible staff transfers which are proper matters for local negotiation. In between budgetary policy and individuals' conditions of service, there may be an area where opinions will differ about negotiability. Local authorities, in co-operation with recognised organisations, should seek to define conditions of service matters that are appropriate for local negotiation so as to minimise this area of doubt, but the Joint Secretaries are ready, on request, to help resolve particular cases.

- 13.4 Underlying these arrangements is the expectation that whichever procedure, (a) or (b), is adopted by the parties, both will act in good faith in attempting to resolve the dispute on the basis of any recommendations made to them.
- 13.5 Where the parties to the dispute jointly ask either (a) the local approved third party or (b) the Soulbury Committee to determine the issue, the determination shall be binding.
- 13.6 A local authority and a staff organisation should not take action to implement any matter in dispute which has been referred to a third party until the procedure has been exhausted.
- 13.7 The services of the Joint Secretaries are also available to assist the parties.

14. APPEALS AGAINST SALARY GRADING

- 14.1 An officer shall be entitled to appeal to his/her employing authority on any question relating to his/her grading within the ranges set out in this Report.
- 14.2 The Soulbury Committee recommends that it is most important that a formal and fair local appeals procedure is adopted. This should provide for a statement of case to be submitted by the appellant, normally with his/her notice of appeal. The authority should prepare a statement in response and the hearing of the appeal should be conducted in accordance with the procedure that applies to local government services staff of the authority.
- 14.3 Further advice is available from the joint secretaries to the Soulbury Committee.

15. **NEW APPOINTMENTS**

An officer appointed under this Report for the first time shall be placed at the minimum of the scale deemed appropriate by the authority having regard to the provisions of this Report. Where the officer has had previous experience which the authority considers should be regarded as equivalent value to service under this report, the authority shall determine a higher incremental point up to the maximum.

16. **INTERPRETATION**

16.1 Questions relating to the interpretation of this report shall be considered and determined by the Committee. The Committee is also prepared to advise in exceptional cases where difficulties arise regarding the application of the Committee's recommendations for an individual officer. Any questions for consideration by the Committee should be submitted by local authorities through the Employers' Side or by an association of officers through the Officers' Side.

16.2 The Joint Secretaries of the Soulbury Committee will be ready to assist with any enquiries which authorities or officers may wish to put to them about the application of the Report.

17. APPLICATION OF THE AGREEMENT TO ALL STAFF

17.1 The Soulbury Report exists to prescribe the pay and conditions for those officers described in paragraph 2 above. The Soulbury Committee affirms that the structures and provisions of the 2010 edition of the Soulbury Report are and remain appropriate for officers in these categories.

18. CONTINUING PROFESSIONAL DEVELOPMENT

18.1 The Soulbury Committee has agreed a national framework for Continuing Professional Development (CPD) which is set out in Appendix F

19. WORK LIFE BALANCE AND WORK-RELATED STRESS

19.1 The Soulbury Committee recommends that local authorities should take steps to address the need for a proper work life balance and work-related stress often experienced by Soulbury officers. Guidance is set out in Appendix G.

APPENDIX A SALARY RATES

1. EDUCATIONAL IMPROVEMENT PROFESSIONALS (EIPs) (paragraphs 3.1 to 3.10)

| Spine point | Salary from 1.9.09 |
|----------------------|--------------------|
| 1 | 32,353 |
| 2 3 | 33,512 |
| 3 | 34,606 |
| 4 | 35,714 |
| 5 | 36,817 |
| 6 | 37,920 |
| 7 | 39,079 |
| 8 | 40,192* |
| 9 | 41,491 |
| 10 11 | 42,649 43,792 |
| 12 | 43,792 44,899 |
| 13 | 46,152** |
| 14 | 47,269 |
| 15 | 48,503 |
| 16 | 49,620 |
| 17 | 50,739 |
| 18 | 51,837 |
| 19 | 52,969 |
| 20 | 53,554*** |
| 21 | 54,679 |
| 22 | 55,658 |
| 23 | 56,738 |
| 24 | 57,705 |
| 25 | 58,741 |
| 26 | 59,749 |
| 27 | 60,781 |
| 28 | 61,827 |
| 29 | 62,876 |
| 30 | 63,924 |
| 31 | 64,961 |
| 32 | 66,016 |
| 33 34 | 67,071 68,151 |
| 3 4 35 | 69,228 |
| 36 | 70,337 |
| 37 | 71,427 |
| 38 | 72,529 |
| 00 | 10 _ / |

| 39 | 73,616 |
|----|------------|
| 40 | 74,702 |
| 41 | 75,795 |
| 42 | 76,885 |
| 43 | 77,975 |
| 44 | 79,071 |
| 45 | 80,164 |
| 46 | 81,257 |
| 47 | 82,356 |
| 48 | 83,446**** |
| 49 | 84,539**** |
| 50 | 85,632**** |
| | |

Notes:

Salary scales to consist of not more than four consecutive points, based on the duties and responsibilities attaching to posts and the need to recruit and motivate staff.

^{*} normal minimum point for EIP undertaking the full range of duties at this level

^{**} normal minimum point for senior EIP undertaking the full range of duties at this level

^{***} normal minimum point for leading EIP undertaking the full range of duties at this level

^{****} extension to range to accommodate structured professional assessments.

2. EDUCATIONAL PSYCHOLOGISTS (paragraphs 4.1 to 4.18)

EDUCATIONAL PSYCHOLOGISTS - SCALE A

| Spine | Salary from |
|-------|-------------|
| point | 1.9.09 |
| 1 | 33,934 |
| 2 | 35,656 |
| 3 | 37,378 |
| 4 | 39,100 |
| 5 | 40,822 |
| 6 | 42,544 |
| 7 | 44,165 |
| 8 | 45,786 |
| 9 | 47,305 |
| 10 | 48,825 |
| 11 | 50,243 |

Notes:

The 11-point scale A provides for up to 3 additional SPA points to be added to the postholder's entitlement on the appropriate 6-point range (see para 4.5 of the Report).

SENIOR AND PRINCIPAL EDUCATIONAL PSYCHOLOGISTS (B) SALARY RANGE

| Spine point | Salary from 1.9.09 |
|-------------|--------------------|
| 1 | 42,544 |
| 2 | 44,165 |
| 3 | 45,786* |
| 4 | 47,305 |
| 5 | 48,825 |
| 6 | 50,243 |
| 7 | 50,825 |
| 8 | 51,912 |
| 9 | 52,989 |
| 10 | 54,085 |
| 11 | 55,159 |
| 12 | 56,255 |
| 13 | 57,370 |
| 14 | 58,447 ** |
| 15 | 59,575 ** |
| 16 | 60,693** |
| 17 | 61,818** |
| 18 | 62,942** |

Notes:

Salary scales to consist of not more than four consecutive points, based on the duties and responsibilities attaching to posts and the need to recruit, retain and motivate staff.

- * Normal minimum point for the principal educational psychologist undertaking the full range of duties at this level
- ** Extension to range to accommodate discretionary scale points and structured professional assessments

TRAINEE EDUCATIONAL PSYCHOLOGISTS

| Salary |
|-------------|
| from 1.9.09 |
| 21,801 |
| 23,397 |
| 24,991 |
| 26,587 |
| 28,182 |
| 29,777 |
| |

ASSISTANT EDUCATIONAL PSYCHOLOGISTS

| Spine | Salary |
|-------|-------------|
| point | from 1.9.09 |
| | 26,799 |
| | 27,893 |
| | 28,988 |
| | 30,076 |
| | |

3. YOUNG PEOPLE'S/COMMUNITY SERVICE MANAGERS (paragraphs 5.1 to 5.9)

| Spine point | Salary from 1.9.09 |
|----------------|-----------------------|
| 1 | 33,555 |
| 2 | 34,653 |
| 3 | 35,751 |
| 4 | 36,871* |
| 5 | 38,009 |
| 6 | 39,120 |
| 7 | 40,256** |
| 8 | 41,547 |
| 9 | 42,258 |
| 10 | 43,357 |
| 11 | 44,450 |
| 12 | 45,546 |
| 13 | 46,633 |
| 14 | 47,731 |
| 15 | 48,831 |
| 16 | 49,933 |
| 17 | 51,042 |
| 18 | 52,142 |
| 19 | 53,237 |
| 20 | 54,355*** |
| 21 | 55,496*** |
| 22 | 56,661*** |
| 23 | 57,851*** |
| 24 | 59,066*** |

Notes:

The minimum Youth and Community Service Officers' scale is 4 points.

Other salary scales to consist of not more than four consecutive points based on duties and responsibilities attaching to posts and the need to recruit retain and motivate staff.

^{*} normal minimum point for senior youth and community service officers undertaking the full range of duties at this level (see paragraph 5.6 of the Soulbury Report)

^{**} normal minimum point for principal youth and community service officer undertaking the full range of duties at this level (see paragraph 5.8 of the Soulbury Report)

^{***} extension to range to accommodate discretionary scale points and structured professional assessments

APPENDIX B

LONDON AREA PAYMENTS

With effect from 1 September 2009 staff in the London area shall receive the following:

- (a) at the rate of £2 903 per annum to officers serving in the inner area.
- (b) at the £1 914 per annum to officers serving in the Outer area.
- (c) at the rate of £740 per annum to officers serving in the Fringe area.
- (d) officers normally serving in the London area but temporarily employed elsewhere shall continue to receive London area payments at the rate appropriate to their normal area of employment.
- (e) in the case of an officer required to serve in different parts of the London areas, or partly outside that area, the officer shall be deemed to be serving in the area in which he is required to spend more than one half of his time.
- (f) for the purpose of this paragraph –

The "Inner Area" means the area of the London Boroughs of: Camden, City of London, Greenwich, Hackney, Hammersmith & Fulham, Islington, Kensington & Chelsea, Lambeth, Lewisham, Southwark, Tower Hamlets, Wandsworth, Westminster (the former Inner London Education Authority), and the London Boroughs of Barking and Dagenham, Brent, Ealing, Haringey, Merton and Newham.

The "Outer Area" means Greater London, excluding the Inner area.

The "Fringe Area" means:

Berkshire: the districts of Bracknell, Slough, Windsor and Maidenhead.

Buckinghamshire: the districts of Beaconsfield and Chiltern.

Essex: the districts of Basildon, Brentwood, Epping Forest, Harlow and Thurrock.

Hertfordshire: the districts of Broxbourne, Dacorum, East Hertfordshire, Hertsmere, St.

Albans, Three Rivers, Watford and Welwyn Hatfield.

Kent: the districts of Dartford and Sevenoaks.

Surrey: the whole County.

West Sussex: the district of Crawley.

The "London Area" comprises the Inner area, the Outer area and the Fringe area.

APPENDIX C

CRITERIA FOR EXTENDING LOCALLY-DETERMINED SCALES BY UP TO TWO ADDITIONAL POINTS

- 1. These criteria apply to all Soulbury-paid officers with the exception of educational psychologists paid on Scale A.
- 2. In addition to progressing to the maximum of the local scale, up to two additional increments can be paid when the authority is satisfied that in the case of an individual, one or both of the following criteria are met:
 - (i) difference in the duties and responsibilities of individual posts of a minor kind (i.e. significant but not sufficient to grade the post at the next higher level);
 - (ii) variations from place to place in the ease or difficulty of recruiting and retaining suitably qualified and/or experienced staff.

APPENDIX D

NATIONAL FRAMEWORK FOR STRUCTURED PROFESSIONAL ASSESSMENTS

- 1. The Soulbury Committee has reached agreement to introduce local assessments to recognise the contribution of Soulbury Officers to the authority's role in raising standards in schools, improving involvement of young people in community activities and the promotion of child development and learning. This agreement provides a framework for local decisions relating to an assessment of the officer's contribution.
- 2. The Committee recognises that arrangements for the assessment of Soulbury Officers' contributions will have been designed locally. The Committee does not want to introduce new arrangements but will consider providing an outline of good practice on local procedures if this is required. The Committee has agreed that all local procedures will need to provide for reviews in cases where officers believe they have grounds to challenge a local assessment.
- 3. The key aim is arrangements that provide for a structured assessment by the Director of Education/Children's Services of the officer's contribution. Local arrangements will need to provide for:
 - The opportunity for officers to apply to their Director of Education/ Children's Services after four years' continuous Soulbury service with one or more local authorities. In normal circumstances, this would be after not less than two years in the current post. Directors of Education/Children's Services can consider applications before the four years, in exceptional cases. A new local assessment will not be necessary where a local review has already taken place.
 - Assessments will be based on the officer's contribution over the relevant period.
 - Local assessments need to be based on the range of duties and responsibilities and achievements against targets and objectives for the post. This assessment of the overall contribution will need to take account of the following for the first level:
 - <u>Development</u> Officers must show that they are fully informed of the developments in their area of specialism.
 - <u>Developing the services</u> Officers must make a recognised contribution to the policy, planning and meeting of performance targets for their authority.
 - <u>Improving standards</u> Officers must make an identified contribution to the improvement and evaluation of service delivery across all appropriate aspects of the authority's functions.

- <u>Management and Administration</u> Officers must manage and assess resources to provide efficient delivery of services.
 - <u>Equal opportunities</u> Officers must contribute to the development of the authority's policies in improving access to their services and in raising achievement levels for their local communities.
- For the second level, officers' contributions will need to be based on showing that they have made a sustained contribution to the efficiency and effectiveness of the service.
- To qualify for the award of the 3rd SPA point, officers will:
 - need to demonstrate that they have made an exceptional contribution to the development of the service over a sustained period, for instance in developing the Children's Services agenda in the authority; and
 - be involved in a programme of CPD focused on the requirements of the service and the aspirations of the officers for their own professional development.
- The award of a 3rd SPA point will not be made until at least 2 years after officers have achieved SPA point 2.

Salary Rewards

4. Officers who have been assessed as achieving the first level will receive an additional pay point on the Soulbury spine. Those achieving the second level will receive a second point on the Soulbury spine. Those achieving the third level will receive a third point on the Soulbury spine. These additional points will extend normal scale maxima by up to three points.

APPENDIX E

EDUCATIONAL IMPROVEMENT PROFESSIONALS – GENERAL STATEMENT ADOPTED BY THE SOULBURY COMMITTEE

Educational improvement professionals are drawn from different sources, including senior members of the teaching profession. Their role is to advise local authorities and educational institutions on a wide range of professional, organisational, management, curriculum and related children's services issues, with the overall aim of enhancing the quality of education and related services.

The precise organisational structure of educational improvement services within local authorities varies according to a broad range of local factors and circumstances.

Consequently the national framework for the pay and grading of educational improvement professionals needs to accommodate that broad range of local factors and circumstances, set against the reality that, for reasons of recruitment and retention, pay scales also need to pay regard to those of senior members of the teaching profession, among others.

The Soulbury Report pay structure for educational improvement professionals defines four categories:

- Leading educational improvement professional (LEIP);
- Senior educational improvement professional (SEIP);
- · Educational improvement professional (EIP); and
- Educational improvement consultants.

LEIPs will carry managerial and professional responsibilities at whole service level. SEIPs will undertake significant managerial and/or professional responsibility over and above those of EIPs but below that of LEIPs.

Where educational improvement consultants provide advice and support relating to local education systems, the raising of educational standards and the improvement of outcomes for children and young people and are paid on the Soulbury spine, their pay and grading arrangements should relate appropriately to the arrangements for others paid on that spine.

For each of these categories, the Soulbury Report provides that their individual pay scales should not normally have a minimum lower than a prescribed point on the Soulbury pay spine. Authorities may, however, need to have several grading options at different levels within the categories to allow for differentiation according to the local distribution of responsibilities and the size of the authority concerned.

APPENDIX F

CONTINUING PROFESSIONAL DEVELOPMENT FOR SOULBURY OFFICERS: A NATIONAL FRAMEWORK AND GOOD PRACTICE EXAMPLES

Introduction

The Soulbury Committee believes that access to high quality professional development will help ensure that officers can continually update their skills and allow them to keep abreast of developments in their professional field.

The Committee recognises that continuing professional development must be related closely to the education development plan – and linked plans and strategies – of the local authority and to the changing demands on the services provided by Soulbury officers. It must also take account of development frameworks including performance management processes and any statutory registration requirements set by appropriate professional bodies. Procedures that seek to develop the skill base of Soulbury officers on a continual basis will also be a vital part of recruitment and retention strategies.

This document sets out a national framework agreed by the Soulbury Committee on the continuing professional development of Soulbury officers. It is accompanied by examples of good practice, which gives details of existing CPD provision in a number of authorities relating to the various categories of Soulbury officers.

The good practice examples set out in the Soulbury section of the LG Employers website provides a range of examples of good quality arrangements already established by individual authorities (see http://www.lge.gov.uk/lge/core/page.do?pageId=119421).

Other authorities may have established arrangements of similar quality. Such arrangements will provide the levels of support and development which the Soulbury Committee recommends.

The National Context

There are a number of significant policies being developed at Government level, in consultation with other stakeholders, which have a significant effect on the role of Soulbury Officers.

In England, these policies include:

- The Children's Act and The Children's Workforce Strategy, which seek to ensure that all services for children at national and local level are "joined up".
- The New Relationship with Schools, which seeks to put in place new systems of support for schools from Government and local authorities.

- Removing Barriers to Achievement, which will set minimum standards for SEN
 advisory and support services to achieve greater consistency in quality,
 availability and cost effectiveness.
- Transforming Youth Work, and Resourcing Excellent Youth Services, which emphasises the importance of training and professional development.

Similar initiatives are being pursued in Wales by the Welsh Assembly Government.

These policies will need to be developed locally alongside local initiatives that will be tailored to meet the needs and resources at local level.

The framework also has to take into account professional standards. In this context, for school improvement professionals, the National Standards and Training and Development Framework published by the Department for Education and Skills in February 2003 are an important point of reference. Educational psychologists are now required to be registered with the Health Professions Council (HPC) which sets out standards for CPD which must be met in order to maintain their registration.

The framework is designed as an important tool to support:

- raising educational standards;
- career progression;
- performance management;
- structured professional assessment; and
- maintenance of registration/qualifications (where appropriate).

Developing a Local Strategy

This framework envisages that all local authorities will have a strategy to provide continuous professional development, including:

- providing good quality induction for newly appointed staff, by way of:
 - personal support through a "mentor";
 - awareness raising, through work shadowing and visits to schools and other appropriate locations;
 - provision of information on relevant policies and procedures; and
 - appropriate training necessary to undertake the role.
- keeping staff up-to-date with recent developments and preparing them for changing roles, including through regular meetings of teams to maintain individuals' awareness and understanding of current education initiatives
- providing staff with the skills for appropriate career development, by way of:

- skills development, including generic interpersonal skills and specific skills (sources for training will include Ofsted/Estyn, local authorities and trade unions); and
- experience and/or understanding of different roles within central local authority services, including HR and governor services, and in other relevant locations in order to develop complementary skills.
- linking development to an effective performance management process to identify individual development needs and the development needs of the organisation, through:
 - agreeing appropriate and reasonable targets for individuals which are linked to wider organisational performance targets and the schools or other relevant work areas for which individuals are responsible; and
 - the establishment of professional development portfolios.

The Committee recommends that, in developing a local strategy for professional development, authorities should consult fully with locally represented unions and associations representing Soulbury officers.

Finally, the Committee recommends that authorities should consider, in the context of their local CPD strategy for Soulbury officers, the possibility of using one or more of the various mechanisms available to employers and staff to accredit their systems of workforce development.

Characteristics of Effective Training and Development

Training and development should:

- be based on a rigorous needs analysis and matched both to appropriate standards and individual learning styles;
- be focused on the development of skills, knowledge and understanding;
- contribute to an individual's professional portfolio;
- enable a "professional learning community" to be developed and extended;
- be integral to the professional leadership role in the service;
- encourage e-learning; and
- be set in the context of an individual's role, job description and career progression within the wider children's services agenda.

Workforce Development and Workforce Planning

The Soulbury Committee recognise that continuing professional development needs to take place within the context of workforce development and workforce planning. There

are a number of developments on workforce planning that should be tailored to meet the particular needs of Soulbury services. The bursary scheme for trainee educational psychologists in their first year of training is an example of national policy on workforce planning for one specific area.

Targets and Funding

The Soulbury Committee recommends that clearly-defined targets should be set locally for development achievements and for the training and professional development of Soulbury officers in all of the Soulbury groups.

Such targets should take account of targets across the authority. They should also take account of the existing targets and requirements already applicable to some Soulbury groups. Education psychologists, for example, are required to fulfil the HPC standards with regard to CPD in order to maintain their registration. For the youth service, the Government has put forward a target in its *Transforming Youth Work* initiative of 2-5% of budgets to be spent on CPD that has now been endorsed by the JNC for Youth and Community Workers.

Equal Opportunities

The Soulbury Committee recommends that authorities should adopt for their Soulbury Officers the Equality Standard for Local Government, which has been developed by the Employers' Organisation for local government in partnership with the Commission for Racial Equality, the Disability Rights Commission and the Equal Opportunities Commission.

Points of Reference

There are a number of useful sources for further information relating to continuing professional development, workforce development and workforce planning. These include:

- 1. The Recruitment, Retention and Training of Local Authority School Improvement Staff (National Foundation for Educational Research 2002).
- 2. National Standards for Educational Improvement Professionals (NAEIAC/NS001).
- 3. Training and Development Framework: National Standards for School Improvement Professionals (DfES Ref: LEA/0188/2003).
- 4. Developing a High Performance Culture: the Local Government Workforce Development Plan 2001-2004 (Local Government National Training Organisation 2001).
- 5. Guide to Workforce Planning in Local Authorities (Employers' Organisation for Local Government July 2003).

6. The Local Government Pay and Workforce Strategy (Office of the Deputy Prime Minister/Employers' Organisation for local government,) Nov 2007 http://www.lge.gov.uk/lge/core/page.do?pageld=119977

The unions and associations representing Soulbury officers also publish or provide a range of relevant materials and other assistance with regard to CPD and performance management.

For further information on related areas of activity please see http://www.lge.gov.uk/lge/core/page.do?pageId=119421

APPENDIX G

WORK LIFE BALANCE AND WORK-RELATED STRESS

The Soulbury Committee recommends that all local authorities take steps to address Soulbury officers' need for a proper work-life balance and the work-related stress often experienced by those officers.

To that end, it draws the attention of authorities to the following guidance documents, which have been endorsed by the Soulbury Committee as offering appropriate advice and guidance to employers:

- Addressing Stress at Work: a guide to strategic and operational interventions
 that councils can take to prevent and manage work-related stress the
 Employers' Organisation (and now LGE) guide to the strategic and operational
 interventions that councils can take to prevent and manage work-related stress
 (now out of print);
- Management Standards for Work-Related Stress the Health and Safety Executive's (HSE) voluntary guidance on tackling work-related stress; and
- Finding the Balance: work-life policies in practice the guidance document on work-life balance produced by the NJC for Local Government Services.

A further document *Work-Related Stress: a guide - Implementing a European Social Partner Agreement* is also commended by Soulbury. http://www.lge.gov.uk/lge/aio/58641

The Soulbury Committee reminds employers that, under the Health and Safety at Work etc Act 1974, employers have a general duty to ensure, so far as is reasonably practicable, the health and safety of their employees at work. This includes taking steps to make sure they do not suffer stress-related illness as a result of their work.

Employers also have a specific duty under the Management of Health and Safety at Work Regulations 1999 to undertake risk assessments to seek to identify and eliminate or control risks to employees' health, safety and welfare. Stress is one of the risks to health, safety and welfare that must be assessed.

EO (now LG Employers): ADDRESSING STRESS AT WORK

The Employers' Organisation (now LG Employers) guide *Addressing Stress at Work* was designed to be "a guide to strategic and operational interventions that councils can take to prevent and manage work-related stress".

Despite the guide now being out of print the principles of control outlined within the guide and below remain recognised good practice in the prevention and management of work related stress.

Primary interventions involve consideration of the preventative strategies that can be used to address the sources of stress in the workplace. They focus on organisational issues and work design. Secondary interventions involve the use of control strategies to assist individuals to recognise the symptoms of stress and to develop their coping skills and resilience. Tertiary interventions involve reactive measures to assist in the recovery and rehabilitation of stressed employees.

The guidance also sets out some practical ways for employers to combat stress, including model document templates for risk audits and risk assessments.

The Soulbury Committee has endorsed the principles outlined in *Addressing Stress at Work* and urges all local authorities to adopt practices to prevent work-related stress for their Soulbury-paid staff as set out in that document's recommendations. Local authorities are also encouraged to consider undertaking a risk audit or risk assessment in order to identify and address work-related stress among their Soulbury-paid staff. A brief summary of the guidance is attached as Annex 1.

Further information on LG Employer's work on health, safety and wellbeing can be found at http://www.lge.gov.uk/lge/core/page.do?pageId=119909

HSE: MANAGEMENT STANDARDS FOR WORK-RELATED STRESS

The Soulbury Committee believes that the HSE *Management Standards for Work-Related Stress* form a very useful 'toolkit' for addressing work-related stress.

The Standards provide an audit tool to assess the impact on employees of six stressors identified by research as being implicated in the development of work-related stress. The stressors are demands, control, support, relationships, role and change.

The standards have been further developed to assist organisations improve the capabilities and competencies of their managers which is often recognised as being a cause of workplace stress.

The Soulbury Committee recommends, therefore, that all local authority employers of Soulbury-paid staff adopt and implement the voluntary Management Standards. Repeated application of the Standards audit tool can be used to monitor the effectiveness of stress prevention and management interventions over time.

Employers have a legal duty to ensure that all risks including risks to mental health arising from work are properly assessed and controlled. The Management Standards approach helps employers work with employees and their representatives to undertake risk assessments for work-related stress.

Organisations adopting the Standards are expected to undertake a risk assessment which covers each of the above six stressors. The HSE has developed a suite of tool kits and support material to assist organisations in using the management standards. Additional guidance is also available to assist putting in place interventions to prevent

and manage work related stress. Additional tool kits are available to examine management competencies and behaviours which will reduce the likelihood of stress in the workplace. It is recommended that employers view this material on the HSE website at www.hse.gov.uk/stress

A brief summary of the standards and the process of implementing them is attached as Annex 2.

NJC: FINDING THE BALANCE: WORK-LIFE POLICIES IN PRACTICE

The NJC for Local Government Services guidance document *Finding the Balance: work-life policies in practice* aims to set out the ways by which working arrangements may be linked with the improvement of services to the public. It seeks to encourage a social partnership approach to finding the right balance between service demands and what it calls 'employee responsive' working practices. It is designed to support local authorities, employees and trade unions in developing the necessary know-how to work in partnership and to develop positive working practices that are in tune with new service requirements.

The Soulbury Committee has endorsed the NJC's *Finding the Balance* and urges all local authorities to examine their existing working practices for their Soulbury-paid staff in the light of the document's recommendations.

The text of this document may be downloaded from http://www.lge.gov.uk/lge/core/page.do?pageId=119775&path=119703.119661.11964 1.119628.118956&activeId=119709

ACTION POINTS FOR LOCAL EMPLOYERS

In the light of the above the Soulbury Committee recommends to local employers that they should:

- consider the risk of stress among their workforce;
- take steps to remove the risk; or
- reduce the risk by any necessary changes in working practices or by introducing appropriate protective or supportive measures where removal of the risk is not possible.

Annex 1

The Employers' Organisation (now LG Employers): Addressing Stress at Work - a guide to strategic and operational interventions that councils can take to prevent and manage work-related stress

Despite the guide being out of print the primary, secondary and tertiary inventions outlined below remain good management practice in the prevention and management of work related stress.

The guide gives information on how to identify and deal with stress at a strategic and operational level and on how to recognise those who are stressed and the implications for the individual and the organisation.

Specifically, the guide considers the three different levels of approach to managing stress risks: primary interventions, secondary interventions and tertiary interventions:

Primary interventions These involve consideration of the preventative strategies that can be used to address the sources of stress in the workplace. Primary intervention policies to combat stress include:

- Formulating a stress policy to raise awareness and understanding and to establish a positive climate for tackling the issues around stress at work.
- Regular risk assessment and stress audit and surveys. Risk assessments, carried
 out by appropriately trained risk assessors, systematically evaluate hazards at
 work and the risks posed by those hazards, and identifies a range of measures to
 address them. A confidential audit or survey of the workforce may also be used
 to enhance the findings of a risk assessment and to separately identify and
 address workplace stressors. It can help make stress a legitimate topic for
 discussion in the workplace, measure the sources and impact of stress and
 identify the level of stress management intervention that is required.
- Building a workplace culture that is supportive and allows workers to express concerns without fear of penalties helps develop a stress-free environment.
- Considering work demands and the level of control individuals have over their workload.
- Providing support and training to employees and to maintain a balance between employees work and their personal life.

Secondary interventions These involve the use of control and preventative strategies to assist individuals to recognise the symptoms of stress and develop their coping skills and resilience. Secondary interventions include:

Occupational health counselling and employee assistance programmes to control
and minimise incidences of stress. Such services can help to provide advice and
support for employees to help reduce stress. The may also be able to help with
particular actions such as contributing to stress management training or
undertaking health assessments.

- Training to employees and managers to help people to adapt the way they work
 to reduce the risk of developing work-related stress. Training will involve the
 provision of personal skills training to help employees undertake their job more
 effectively and to manage the demands placed upon them. Managers may also
 require training to assist their organisational and people management skills and
 help them achieve organisational objectives.
- Secondary interventions are also intended to improve people's ability to cope with pressure. Positive lifestyle choices that people make are one of the factors that can help individuals cope with pressure.

Tertiary interventions These involve reactive measures to assist in the recovery and rehabilitation of stressed employees. Tertiary interventions include:

- Dealing with absence due to stress. Where absence is due to mental illness including stress-related conditions, employees may require particularly sensitive handling and support. Employers may need to suggest referral for specialist advice and support, for example, from employee assistance or occupational health services.
- Occupational health, counselling and employee assistance programmes. A range
 of support interventions that local employers can use in cases where individuals
 are suffering from staff such as the expertise of occupational health, counselling
 or Employee Assistance services.

Annex 2

The Health & Safety Executive: *Management Standards for Work-Related Stress*

In September 2000, as part of its Stress Priority Programme, the HSE decided to develop standards of good management practice against which employers can gauge their performance in tackling a range of key stressors. The Standards were launched in November 2004. The Standards are part of a voluntary approach aimed at helping managers to measure their organisation's performance in tackling stress.

Although the Standards are voluntary, they will provide a basis for assessing employers' efforts to tackle workplace stress, and could render them liable to formal action by HSE inspectors should their response be inadequate.

The Management Standards approach has, therefore, been developed to:

- reduce the levels of work-related stress;
- reduce the number of employees who go off sick or who cannot perform well at work because of stress; and
- 'shift the UK workforce from an undesirable state to a desirable one.'

The HSE wants employers to work with employees and their representatives to implement the Management Standards approach and introduce a process of continuous improvement. The HSE acknowledges that their approach is not designed to eliminate stress, but that it is a way of encouraging organisations to assess stress risks and introduce practical measures towards improving their workplaces.

The HSE emphasises the importance of employee engagement to the approach, saying 'consultation with the workforce is the key to developing effective solutions'. Employers will be able to use the Management Standards to prioritise areas of highest risk.

Stress and the Standards Approach

Stress has been described by the HSE as "the adverse reaction people have to excessive pressure or other types of demand placed upon them". Although stress itself is not a disease, it is recognised that excessive or prolonged stress can be a cause of mental and physical illness. Stress is always considered undesirable and should be distinguished from pressure, which may provide a challenge, which stimulates employees to perform, at their peak. This level of performance cannot be sustained and persistent pressure will lead to stress.

The Standards and supporting processes are designed to:

- help simplify risk assessment for stress;
- encourage employers, employees and their representatives to work in partnership to address work-related stress throughout the organisation; and

 provide the yardstick by which organisations can gauge their performance in tackling the key causes of stress.

The Standards

The Standards are expressed as a set of statements grouped under six headings, known as 'stressors'. They are: demands, control, support, relationships, role and change.

Demands

This includes issues like eg workload, deadlines, work scheduling, physical environment etc. The standard is that: employees indicate that they are able to cope with the demands of their jobs; and systems are in place locally to respond to any individual concerns

Control

This includes issues like how much say individuals have in the way they do their work, decision-making authority, autonomy, pacing, interruptions. The standard is that: employees indicate that they are able to have a say about the way they do their work; and systems are in place locally to respond to any individual concerns.

Support

This includes the encouragement, sponsorship and resources provide by the organisation, line management and colleagues. The standard is that: employees indicate that they receive adequate information and support from their colleagues and superiors; and systems are in place locally to respond to any individual concerns.

Relationships

This includes promoting positive working to avoid conflict and dealing with unacceptable behaviour, quality of line management, freedom from bullying/harassment. The standard is that: employees indicate that they are not subjected to unacceptable behaviours, eg bullying at work; and systems are in place locally to respond to any individual concerns.

Role

This includes whether people understand their role within the organisation and whether the organisation ensures that people do not have conflicting roles. The standard is that: employees indicate that they understand their role and responsibilities; and systems are in place locally to respond to any individual concerns.

Change

How organisational change is managed and communicated. The standard is that: employees indicate that the organisation engages them frequently when undergoing an organisational change; and systems are in place locally to respond to any individual concerns.