

**Department for Business and Trade and
Department for Work and Pensions open call for
evidence: Parental Leave and Pay Review**

GENERAL COMMENTS

1. NASUWT welcomes the opportunity to respond to the Department for Business and Trade (DBT) and the Department for Work and Pensions (DWP) open call for evidence on parental leave and pay.
2. NASUWT – The Teachers' Union – represents teachers and headteachers across the United Kingdom.
3. NASUWT recognises the need for good jobs that help hard-working families and create a stronger economy. It is therefore welcome that the Government should look at how it can enhance the opportunity for people to find, advance and stay in work, including by making life better for families,¹ as part of its plan to *Make Work Pay*.²
4. The Union believes that employers have a duty to keep and retain staff, as well as seek to recruit those who wish to return to work after a break in employment, including parents who have taken a period of parental leave (i.e. maternity leave, paternity leave or Shared Parental Leave (SPL)).
5. However, it is evident that current structures in place for parental leave and pay do not reflect modern life. As such, they are not working as well as

¹ <https://questions-statements.parliament.uk/written-statements/detail/2025-07-01/hcws757>

² <https://www.gov.uk/government/collections/make-work-pay>

they should be for vast swathes of working parents, thereby entrenching gender stereotypes about caring and parental responsibilities that contribute to the ‘motherhood penalty’ and the persistence of the gender pay gap in the UK labour market.

6. NASUWT acknowledges the intent of the Government to reset the approach and understanding of parental leave and pay, and what it wants the system to achieve,³ although the Union would countenance against any tinkering around the edges of a broken system and urge the Government to use this opportunity to address the flaws in the system.
7. The Union appreciates that any changes, such as those put forward in this consultation, will have a cost implication. However, given the current situation and the acknowledgement that the system has not worked,⁴ the Union believes it is a question of whether the Government can afford *not* to make the substantial changes and take the bold political decisions necessary to support working families effectively and address the UK’s gender-unequal system.⁵

SPECIFIC COMMENTS

Please tell us in what capacity you are primarily responding:

- As an individual
- As an academic, or on behalf of an academic or research organisation
- As a large enterprise, with at least 250 employees
- As a medium enterprise, with between 50 and 249 employees
- As a small enterprise, with fewer than 50 employees
- As a large public authority, with at least 250 employees
- As a small or medium public authority, with fewer than 250 employees
- On behalf of a civil society organisation or group
- On behalf of an organisation that represents employers
- On behalf of an organisation that represents employees – for example, trade unions

³ <https://questions-statements.parliament.uk/written-statements/detail/2025-07-01/hcws757>

⁴ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

⁵ Ibid.

- Other

If you are responding on behalf of an employer or another organisation, what is its name?

National Association of Schoolmasters Union of Women Teachers (NASUWT – The Teachers’ Union).

Do you think that the current parental leave and pay entitlements support the objectives, as set out in the Review Terms of Reference below?

	Yes:	No:
• Providing sufficient time off work with adequate pay to support maternal health		X
• Supporting economic growth through labour market participation by enabling more parents to stay in work and advance in their careers, including reducing the gender pay gap		X
• Ensuring adequate resources and leave for parents to facilitate the best start in life by supporting the healthy development of young children		X
• Providing parents with the flexibility to make balanced childcare choices, including co-parenting		X

For each objective, briefly explain the reasons for your selection above. Please provide any evidence (including links) to support your view.

Objective one:

Maternal health: support the physical and mental health, recovery and wellbeing of women during pregnancy and post-partum by giving them sufficient time away from work with an appropriate level of pay.

8. NASUWT does not believe that the current statutory parental leave and pay system meets the objective of supporting the physical and mental

health, recovery and wellbeing of women during pregnancy and post-partum by giving them sufficient time away from work with an appropriate level of pay.

9. For example, the current rates of statutory pay are woefully inadequate and unfit for purpose. Indeed, the Sixth Report of session 2024/25 of the Women and Equalities Committee, *Equality at Work: Paternity and Shared Parental Leave* noted that the low rates of statutory pay was ‘perhaps the most damaging problem across the board’,⁶ representing considerably less than half of the National Living Wage (NLW) and out of kilter with the cost of living.⁷
10. Indeed, all statutory entitlements are remunerated at the rate of either £187.18 a week or 90% of an employee’s average weekly earnings, whichever is lower, with the exception of Statutory Maternity Pay (SMP) for the first six weeks.
11. This equates to just 44% of the NLW for a 35-hour working week and represents a steady decrease in the relative value of 19% since 2012 – when SMP was worth 63% of the adult rate of the then National Minimum Wage.⁸ This compares with average weekly earnings of £682, based on the Office for National Statistics (ONS) as of March 2024, and is equivalent to just 35% of median weekly pay for female employee jobs in the UK in 2024.⁹
12. The situation is compounded when considering that SMP is only paid for the first 33 of the 52 weeks of maternity leave that mothers or the primary adopter are entitled to, meaning that the remaining 13 weeks are unpaid, unless the employer has an enhanced occupational maternity scheme in place.

⁶ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

⁷ Ibid.

⁸ <https://maternityaction.org.uk/wp-content/uploads/Pushed-into-Poverty-2025-FINAL.pdf>

⁹ <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/regionbyindustry2digitsticshetable5>

13. The 39 weeks' duration of paid maternity, parental and home care in the UK falls way short of the Organisation for Economic Co-operation and Development (OECD) average of 51 weeks.¹⁰
14. It therefore comes as no surprise that that payment rates for maternity leave in the UK are among the worst in the OECD, with UK mothers only being entitled to 11.7 weeks of full pay during their maternity leave – a figure that is higher than only Ireland, Australia, Switzerland and the United States when total paid leave available to mothers is included.¹¹
15. Indeed, most European countries set rates at more than 50% of a parent's average earnings before leave, with some offering between 80% and 100% of earnings for at least a portion of the leave entitlement.¹²
16. Despite the fact that teachers working in the public sector are more likely to be amongst the 13% who receive occupational maternity pay (OMP),¹³ it is clear that this has not kept pace with the levels of maternity pay available to eligible employees in other public sector professions (e.g. 26 weeks of enhanced maternity pay at or near full pay).¹⁴
17. Whilst other eligible public sector employees can expect to receive 21.5 weeks on full pay, rising to 26 weeks if you exclude those working in the NHS, a teacher on maternity leave employed in England and Wales under the provisions of the Burgundy Book can only expect to receive full pay for four weeks.¹⁵
18. This is equivalent to receiving just £2,434.62¹⁶ and does nothing to address the significant recruitment and retention crisis in a profession that is overwhelmingly female populated.¹⁷

¹⁰ https://www.oecd.org/content/dam/oecd/en/data/datasets/family-database/pf2_1_parental_leave_systems.pdf

¹¹ Ibid.

¹² <https://committees.parliament.uk/publications/48254/documents/252625/default/>

¹³ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

¹⁴ https://www.cipd.org/globalassets/media/knowledge/knowledge-hub/reports/employer-focus-on-working-parents-report_tcm18-111075.pdf

¹⁵ <https://www.nasuwt.org.uk/static/1ceb1fc6-481e-4f1b-aff69864d89f8096/8b1d260a-d610-4de8-855bcc9096a5a72e/Conditions-of-Service-for-School-Teachers-in-England-and-Wales-Burgundy-Book.pdf>

¹⁶ Based on an M1 teacher salary for 2024/25 of £31,650.

¹⁷ <https://www.ethnicity-facts-figures.service.gov.uk/workforce-and-business/workforce-diversity/school-teacher-workforce/latest/#main-facts-and-figures>

19. This represents a difference in excess of 17 weeks of full pay, so it is not surprising that the derisory low levels of SMP-available results is a significant drop in income for teachers who have become new mothers.
20. Indeed, research undertaken by NASUWT shows that just over three-quarters (76%) of teachers stated that they would have liked to have taken more time off for maternity/paternity/adoption leave, yet 84% cited financial reasons as the key barrier to taking additional maternity/paternity/adoption leave.
21. The situation is even more prescient for those who only qualify for Maternity Allowance (MA), such as supply teachers working for employment agencies, who may only qualify for MA. As such, they are only eligible to receive the flat rate of £187.18 and not 90% of their average weekly earnings for the first six weeks (if employed for at least 26 weeks out of the 66 weeks before the expected week of childbirth (EWC) and find 13 weeks or four months in which they earned over £30 per week on average).
22. Coupled with this is the fact that MA is treated differently to SMP for the purposes of Universal Credit. For mothers in receipt of Universal Credit, MA is treated as 'unearned income' and is deducted pound for pound from any Universal Credit received, whereas SMP is treated as 'earnings' and largely disregarded under the work allowance and taper rate for Universal Credit.¹⁸
23. As such, mothers on low pay or those in insecure employment, such as supply teachers, can find themselves further disadvantaged, with some being £6,000 worse off during their maternity leave.¹⁹
24. As a consequence, it is reported that there has been a 45% drop in the number of MA grants in recent years, disproportionately impacting on low-

¹⁸ <https://maternityaction.org.uk/wp-content/uploads/MA-briefing-on-MA-UC-May-2020.pdf>

¹⁹ <https://maternityaction.org.uk/wp-content/uploads/Pushed-into-Poverty-2025-FINAL.pdf>

paid women and families who already suffer a detriment in the labour market.²⁰

25. Modelling undertaken by the Women's Budget Group suggests that implementing parity of treatment of SMP and MA under Universal Credit rules in 2025 would cost only £7.99 million per year, amounting to only 0.003% of annual benefits and tax credit spending.²¹

26. Despite the description of SMP as 'a measure of earnings replacement',²² the evidence suggests that the current rate of SMP is failing to provide mothers on maternity leave with the ability to maintain themselves and their children at a suitable standard of living, with the recent cost-of-living crisis further exacerbating the situation.

27. Research by Maternity Action shows that new mothers are pushed into poverty and debt by the critically low levels of maternity pay. This has a detrimental impact on both their physical and mental maternal health.

28. For example, 65% of respondents stated being worried 'a lot' about money when pregnant or on maternity leave, and 55% stated that they relied on their credit card or borrowed money while they were pregnant or on maternity leave.²³

29. In addition, half of new mums reported spending less on healthy food due to the high cost, and just under a quarter (24%) stated that they had gone without food themselves to feed their children.²⁴

30. Furthermore, 66% stated that they had struggled a lot or sometimes to buy the things they needed, and 57% had reduced the number of hours they heated their home.²⁵

²⁰ <https://maternityaction.org.uk/2024/01/forced-to-return-early-the-impact-of-low-rates-of-maternity-pay/>

²¹ <https://maternityaction.org.uk/pushed-into-poverty-the-cost-of-living-on-maternity-leave-2025/>

²² <https://www.gov.uk/hmrc-internal-manuals/employment-income-manual/eim76360>

²³ <https://maternityaction.org.uk/wp-content/uploads/Pushed-into-Poverty-2025-FINAL.pdf>

²⁴ Ibid.

²⁵ Ibid.

31. This impacts significantly on the mental and physical wellbeing of mothers, with many reporting mental and emotional consequences associated with the short-term and long-term financial impacts of maternity leave.²⁶
32. Furthermore, money worries had caused loneliness and isolation for new mothers due to the prohibitive cost of things like baby groups and transport to visit family and friends.²⁷
33. Given this, 36% stated that their partner had taken on additional work, and 57% reported that they were planning to return to work earlier than they had wanted to or had already done so, with all the associated potential impacts on mental health, bonding and work performance.²⁸
34. Even more concerning is evidence that mothers are sometimes forced to return to work before they have physically recovered from having a baby (i.e. injuries sustained during labour), with 40% reporting that they had taken 12 weeks or fewer of maternity leave 'because the pay is so poor'.²⁹
35. Further evidence that the current statutory entitlement fails to provide new mothers with sufficient time off to protect maternal health comes from the fact that 46% of mothers reported that they could only afford to take time off while they were receiving OMP, with 9% reporting they did not take any time off, and that income 'appears to be a determining factor'.³⁰
36. The complex and restrictive rules around eligibility for SMP and MA further disadvantage and exclude certain mothers. For example, some women miss out on SMP because they have not been employed by the same employer for at least 26 weeks by the end of the 15th week before the EWC – a situation that can occur just because they have changed jobs at the 'wrong' time.

²⁶ Ibid.

²⁷ Ibid.

²⁸ Ibid.

²⁹ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

³⁰ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

37. This can impact on teachers who may, through no fault of their own, find themselves in a situation where the school they work in becomes an academy or joins part of a multi-academy trust (MAT). The change in employer from one entity to another can impact on maternity entitlements due to the fact that continuity of service for the purposes of access to any statutory and occupational maternity leave and pay has broken.
38. It should not be the case that women suffer a detriment in accessing their statutory entitlements because they have reduced their earnings or changed jobs.
39. In addition, taking a period of sick leave during the calculation period can impact on earnings and consequently reduce the amount of maternity pay a mother is entitled to receive.
40. Furthermore, eligibility for SMP is impacted by employment status, with those who are self-employed excluded from receiving SMP because of being self-employed, whereas women taking insecure, intermittent and precarious work, such as supply teaching, who are in receipt of variable earnings and hours of work, are particularly vulnerable to issues associated with eligibility.
41. The lack of a 'day one' right to maternity leave for those who are not classed as employees, such as supply teachers as agency workers, further impacts on issues associated with mental and physical health during pregnancy and post-partum, particularly when consideration is given to the fact that they may not qualify for either SMP or MA.
42. It cannot go unnoticed that with the right to 'leave' comes the right to return to the same job or a suitable alternative. This has a significant impact on agency and other casual workers (i.e. supply teachers) working on long-term assignments who find that after taking time off they have no right to return to the assignment they were undertaking.

43. The *Parental Rights Survey* found that among mothers where no statutory leave was taken, the proportion that said they were not entitled to any leave was higher than average among workers (58%).³¹
44. The use of such blunt eligibility criteria penalises some groups and further compounds issues associated with their mental and physical health during pregnancy and post-partum.
45. Given this, it is not surprising that this has been identified as a key flaw in the system that is ‘deeply unfair’³² and must be addressed through the inclusion of all self-employed and non-employed parents (e.g. agency workers).
46. The introduction of Statutory Paternity Leave and Statutory Paternity Pay (SPP) in 2003, as well as Shared Parental Leave and Pay (ShPP) back in 2015, were seen as an attempt to reduce barriers to parenthood and enhance gender equality in both the home and the workplace.
47. Indeed, evidence suggests that enabling fathers to spend time with their children in the first 12 months is shown to improve the mental and physical health of mothers, improve educational outcomes and even reduce the divorce rate.³³
48. Furthermore, a woman’s partner taking parental leave is associated with a 34% increase on the likelihood of a woman being physically ready to return to work.³⁴
49. However, the evidence suggests that derisory levels of leave and pay (e.g. SPP and ShPP paid at the same rate as SMP),³⁵ as well as restrictive eligibility criteria subject to employment status, continuity of service and the mother transferring parts of her leave (‘maternal transfer model’),³⁶ are

³¹ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

³² <https://committees.parliament.uk/publications/48254/documents/252625/default/>

³³ http://www.progressive-policy.net/downloads/files/CPP_Parental-Leave-report_June-2023.pdf

³⁴ Ibid.

³⁵ £187.18 a week or 90% of their average weekly earnings (whichever is lower).

³⁶ Shared Parental Leave (SPL) and Pay (ShPP) provides for families to share up to 50 weeks of leave and 37 weeks of pay by the mother/birth parent/adopter giving up/transferring some of their leave and pay entitlements to their partner.

having a negative impact on maternal health because fathers and co-parents are unable to take a sufficient period of well-paid leave to support the mother while recovering from childbirth.

50. This is particularly prescient amongst lower income households and those in insecure, intermittent and precarious employment, such as supply teachers as agency workers.³⁷

51. Indeed, financial constraints were identified as one of the key barriers to the take-up of SPL, with 25% of mothers and 30% of fathers reporting that they had not used SPL due to the impacts on family finances.³⁸ Furthermore, 43% of fathers who took some parental leave did not use the full entitlement due to financial hardship.³⁹

52. Disappointingly, the Chartered Institute for Personnel and Development (CIPD) and the Trades Union Congress (TUC) reported that employers were less likely to enhance paternity pay, and even less likely to enhance SPL, than maternity leave for employees.⁴⁰

53. Given this, it is no wonder that 80% of fathers stated that they are only offered the bare minimum of two weeks' paternity leave by their employers,⁴¹ and that the Equal Parenting Project described SPL as a 'financial non-starter for most'.⁴²

54. As a consequence, many fathers/co-parents find themselves in the position of having to save up annual leave in order to take time off after the birth of their child because they cannot afford to take SPL or ShPL on the current statutory rates of pay.

55. Whilst welcoming the intent behind the introduction of SPL, given the evidence, NASUWT contends that the extremely low take-up of 1% of

³⁷ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

³⁸ Ibid.

³⁹ <https://committees.parliament.uk/writtenevidence/137247/pdf/#:~:text=Findings%20from%20PTS's%202023%20'State,leave%20due%20to%20their%20finances.&text=20%25%20of%20recent%20fathers%20said,or%20adoption%20of%20their%20child.>

⁴⁰ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

⁴¹ http://www.progressive-policy.net/downloads/files/PPP_Parental-Leave-report_June-2023.pdf

⁴² <https://committees.parliament.uk/publications/48254/documents/252625/default/>

employee mother and 5% of employee fathers⁴³ suggests that it has failed to provide fathers/co-parents with the ability to take extended leave and support the mother while recovering from childbirth.

Objective 2:

Economic growth through labour market participation: support economic growth by enabling more parents to stay in work and advance in their careers after starting a family, particularly to improve both women's labour market outcomes and the gender pay gap; reduce the 'motherhood penalty'; and harness benefits for employers.

56. NASUWT does not believe that the current statutory parental leave and pay system meets the objective of supporting economic growth by enabling more parents to stay in work to advance their careers, particularly women.

57. The Union believes that the UK parental leave system has not kept pace with changes in society. This means that it is still very difficult for fathers/co-parents to afford to take significant amounts of well-paid leave when their child is born.

58. As a consequence, outdated norms persist that reflect and entrench the gendered division of childcare between mothers and fathers/co-parents, specifically promoting the belief/ideology that mothers should bear the responsibility for significantly more childcare compared to men.

59. The unequal distribution of caregiving responsibilities is a key contributor to gender inequality in the labour market. For example, estimates suggest that women provide 450 million hours of unpaid childcare each week compared to 186 million by men.⁴⁴

60. Furthermore, data from the ONS shows that there were almost 1.4 million women who were economically inactive in April to June 2025 because they were looking after their family or home, compared to 229,000 men.⁴⁵

⁴³ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

⁴⁴ Ibid.

⁴⁵ <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/economicinactivity/datasets/economicinactivitybyreasonseasonallyadjustedinac01sa>

61. Given this, the gender pay gap currently stands at 13.1% and has only been falling on average by 0.9 percentage points over the last five years. It will not close until 2040 at current rates.⁴⁶

62. Indeed, analysis from the Institute for Fiscal Studies (IFS) found that once accounting for changes to educational attainment, there had been very little progress on closing the gender earnings gap over the last 25 years. The same analysis noted that gender gaps in employment and wages increase substantially immediately upon parenthood,⁴⁷ which contributes to a gender pensions pay gap of 36.6%.

63. Despite the overwhelming majority of the teaching workforce being female, the 2024 School Workforce Census (SWC) data for England shows that average salaries are higher for male teachers than they are for female teachers across all grades.⁴⁸

64. The average salary for all teachers, including those in leadership roles in 2023/24, was £46,200. For male teachers, the average salary was £48,625, whereas the average salary for female teachers was £45,426. The pay premium for male teachers in 2023/24 was £3,199, which represents a gender pay gap of 6.6% in the teaching profession across all grades of teacher in 2023/24.

65. However, in relation to headteachers, the gender pay gap is at its most extreme. In 2023/24, the average salary for men was £85,419 compared to £76,771 for women. The pay premium for male headteachers is £8,648, which represents a gender pay gap of over 10.1% in 2023/24.

66. Both the gender pay and pensions gaps are driven significantly by the fact that many women have little option other than to work part time or leave the labour market altogether when after they have a family.

⁴⁶ <https://www.tuc.org.uk/news/tuc-gender-pay-gap-means-women-work-first-48-days-year-unpaid>

⁴⁷ <https://ifs.org.uk/news/barely-any-change-gender-earnings-gap-last-25-years-once-you-account-increases-womens>

⁴⁸ <https://explore-education-statistics.service.gov.uk/find-statistics/school-workforce-in-england/2024>

67. It has been argued that the focus on the ‘maternal transfer model’ and the absence of a substantive individual, non-transferable entitlement to paid parental leave for fathers/co-parents means that mothers spend less time in paid work and more time working part time than fathers. This has had a detrimental impact on women’s careers, long-term earnings and drives the persistent and relatively large gender pay gap in the UK economy.⁴⁹

68. For example, the average employment hours worked by men barely changes after they become fathers, whereas the employment of women falls sharply from in excess of 90% to below 75% following childbirth. Amongst those women who remain in paid work, the hours of work fall from around 40 to less than 30 per week. Furthermore, the wages earned per hour stagnate for working mothers, while continuing to grow uninterrupted for fathers.⁵⁰

69. Given this gap in earnings, women often return to the workplace on a part-time basis following maternity, often in lower paid jobs that lack career progression, in order to access the part-time flexibility that enables them to manage childcare responsibilities (the ‘motherhood penalty’).⁵¹

70. NASUWT notes that flexible working requests come disproportionately from female teachers as they make up the vast majority (75%) of the teaching workforce. This is a significant contributory factor to the aforementioned gender pay gap in teaching, as many women teachers are forced to resign Teaching and Learning Responsibilities (TLRs) or even from their substantive contracts of employment and consider employment elsewhere.⁵²

71. This includes taking up posts at a lower value because there is no guarantee to pay portability – this also includes working as supply teachers, who are often subject to the vagaries of intermittent, insecure and

⁴⁹ http://www.progressive-policy.net/downloads/files/PPP_Parental-Leave-report_June-2023.pdf

⁵⁰ <https://ifs.org.uk/inequality/wp-content/uploads/2021/03/BN-The-careers-and-time-use-of-mothers-and-fathers.pdf>

⁵¹ <https://timewise.co.uk/article/a-question-of-time-whats-happening-with-part-time-working-in-the-uk/> and <https://timewise.co.uk/article/article-real-reasons-behind-gender-pay-gap/>

⁵² <https://www.nasuwt.org.uk/static/44c65415-8095-4917-81d661e22fb70e12/eefcd53f-9633-4b01-ae49edaa09a5df1c/Flexible-Working-Survey-Report-2023-England.pdf>

precarious employment. Where flexible working requests are accepted, those teachers report suffering unfair treatment, including career setbacks, particularly those teachers in leadership positions, or those with additional responsibilities.⁵³

72. It cannot go unnoticed that the Impact Assessment for SPL identified policy objectives aimed at giving parents more choice and flexibility in how they cared for their child in the first year by increasing the share of leave fathers could take, as well enabling both parents to retain a strong link with the labour market.⁵⁴

73. However, the extremely low take-up of SPL suggests that the impact it has had on achieving the aforementioned objectives and addressing gender imbalance in the labour market is limited, with the Institute for Policy Research stating that ‘the policy has not, on average, led to a greater take-up or longer leave by fathers’.⁵⁵

74. Indeed, it remains the case that mothers are more likely than fathers to request a change to their employment for childcare reasons (56.2% of mothers compared to 22.4% of fathers).

75. Despite facing significant barriers to accessing the flexible working they need, it remains the case that mothers are still more likely than fathers/co-parents to ask for flexible working.⁵⁶

76. There is a wealth of evidence from a number of countries that suggests that the introduction of an individual, non-transferable parental leave entitlement has been associated with a smaller gender pay gap and a smaller labour market participation gap between men and women.

⁵³ <https://www.nasuwt.org.uk/static/3284d4dc-bd06-4313-b0f5ef72c2209159/Evidence-Submission-to-the-STRB-35th-Report-December-2024-England.pdf>

⁵⁴ <https://assets.publishing.service.gov.uk/media/5a7b007ee5274a34770e8af9/13-651-modern-workplaces-shared-parental-leave-and-pay-impact-assessment2.pdf>

⁵⁵ [https://www.bath.ac.uk/publications/shared-parental-leave-did-it-work/attachments/shared-parental-leave-did-it-work-policy-brief\(2\).pdf](https://www.bath.ac.uk/publications/shared-parental-leave-did-it-work/attachments/shared-parental-leave-did-it-work-policy-brief(2).pdf)

⁵⁶ <https://pregnantthenscrewed.com/mothers-are-twice-as-likely-as-fathers-to-ask-for-flexible-working-after-parental-leave/>

77. For example, research by the Centre for Progressive Policy (CPP) analysing labour market outcomes from OECD countries between 1975 and 2021 found that the introduction of paid paternity leave of at least six weeks was associated with a 4% smaller gender pay gap and a 3.7% smaller labour force participation gap.⁵⁷
78. In Sweden, the uptake of parental leave⁵⁸ by fathers was associated with higher earnings for women, with maternal earnings up 6.7% for every additional month that a father/co-parent took.⁵⁹
79. Furthermore, research into the introduction of the Quebec Parental Insurance Program in Canada found that the introduction of a ‘daddy quota’, comprised of periods of five weeks at 70-75% of earnings, had increased participation by over 250%. The research also found evidence that this reduced sex specialisation and influenced decisions regarding the allocation of resources to childcare, domestic work and paid work.⁶⁰
80. In Norway, the introduction of a four-week ‘daddy quota’ in 1993 has resulted in 90% of men accessing their entitlement to paternity leave. Coupled with this, there has been a reduction in the gendered participation in the labour market.⁶¹
81. NASUWT believes that a ‘daddy quota’ that is a well-paid individual and non-transferable entitlement, offered on a ‘use-it-or-lose-it’ basis, has the potential to significantly increase the uptake of paternity leave by fathers and eligible partners, as well as yield transformative results in the way mothers and their partners share work and childcare.
82. Indeed, modelling undertaken for the Joseph Rowntree Foundation found that if SPL was extended to six weeks at 90% of average weekly earnings

⁵⁷ http://www.progressive-policy.net/downloads/files/CPP_Parental-Leave-report_June-2023.pdf

⁵⁸ Parental leave in Sweden is paid out for 16 months (13 out of the 16 months based on income), with each parent being entitled to eight months, and three months reserved for fathers/co-parents only.

⁵⁹ http://www.progressive-policy.net/downloads/files/CPP_Parental-Leave-report_June-2023.pdf

⁶⁰ <https://committees.parliament.uk/publications/48254/documents/252625/default/> and <https://www.journals.uchicago.edu/doi/abs/10.1086/703115>

⁶¹ <https://apolitical.co/solution-articles/en/norways-daddy-quota-means-90-of-fathers-take-parental-leave>

(capped) then this could deliver £2.68 billion to the wider economy,⁶² whilst the Institute for Policy Research found that expanding UK paternity leave to six weeks (taken flexibly in the first year of a child's life) at 90% of average weekly earnings could deliver £12.8bn in annual net social benefits.⁶³

83. As stated previously, NASUWT maintains that serious consideration has to be given to simplifying the UK parental leave system to ensure that *all* parents can stay in work and advance their careers, irrespective of employment status.

84. It simply cannot be the case that self-employed mothers in receipt of MA are only able to work for ten Keeping in Touch (KIT) days before becoming liable to disqualification from MA, whereas mothers who are employees and in receipt of SMP are able to undertake self-employed work beyond their ten KIT days without impacting on their entitlement to SMP.⁶⁴

Objective 3:

Best start in life: ensure sufficient resources and time away from work to support new and expectant parents' wellbeing and facilitate the best start in life for babies and young children, supporting health and development outcomes.

85. NASUWT does not believe that the current statutory parental leave and pay system meets the objective of ensuring the best start in life, including the provision of sufficient resources and time away from work to support new and expectant parents to facilitate the best start in life and healthy development of young children.

86. The arguments set out above detail the detrimental impact that the woefully inadequate rates of statutory pay have, including pushing many households into debt and poverty, and the fact that they are out of kilter with the cost of living.⁶⁵

⁶² <https://www.jrf.org.uk/work/improving-statutory-paternity-leave-would-benefit-families-and-the-economy>

⁶³ <https://www.bath.ac.uk/publications/costs-and-benefits-of-improved-leave-for-fathers-in-the-first-year-too-good-to-ignore/>

⁶⁴ <https://assets.publishing.service.gov.uk/media/682f1c14a599d03a16bff42e/dmqch62.pdf>

⁶⁵ Ibid.

87. NASUWT maintains that the evidence detailed throughout this submission demonstrates that many families simply cannot afford to take their entitlements and this has far-reaching impacts on mothers and families, including those associated with mental health, social isolation, increased financial dependency and strained relationships.

88. For example, research by the TUC has found that half of families struggle financially when dads or partners take paternity leave, and another half felt they were unable to take enough time off as paternity leave to support their families.⁶⁶ Indeed, fathers who did not take statutory leave were more than three times as likely as mothers to say this was because they could not afford to (35%).⁶⁷

89. Furthermore, the *Parental Rights Survey* found that only 58% of fathers received full pay during their paternity leave, whilst 23% did not receive full pay at all. In comparison, just 17% of workplaces offered additional paternity pay.⁶⁸

90. In addition, household income and employment status plays a critical role both the awareness of and take-up of any form of statutory parental leave, as well as whether or not a mother or father/co-parent is able to access any additional leave entitlements through an enhanced occupational scheme.⁶⁹

91. As a consequence, take-up of statutory parental leave decreases in line with household income, with only 14% of dads/partners with a household income under £25,000 taking a more generous form of paternity leave, compared to 35% where the household income is in excess of £80,000.⁷⁰

92. NASUWT believes that it is important to recognise that as well as woefully inadequate rates of statutory pay associated with various different types of parental leave, other associated benefits have also not kept pace with inflation, such as the Sure Start Maternity Grant and Healthy Start.

⁶⁶ <https://www.tuc.org.uk/news/1-2-families-struggle-financially-when-dads-take-paternity-leave-tuc-poll>

⁶⁷ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

⁶⁸ Ibid

⁶⁹ Ibid.

⁷⁰ <https://www.tuc.org.uk/news/1-2-families-struggle-financially-when-dads-take-paternity-leave-tuc-poll>

93. The Sure Start Maternity Grant has remained at £500 since it was last increased in 2002⁷¹ and Healthy Start has only been increased twice (2009 and 2021). Analysis has shown that goods and services costing £500 in 2002 now cost approximately £928.94 as of June 2025 (using CPI inflation data).⁷²
94. Poverty is associated with low income and employment status and can be compounded by a number of other significant factors, including ethnicity and disability. The potential health impacts of poverty and low income during pregnancy and maternity include issues associated with maternal and infant mortality, stillbirth, child development and childhood mental health issues.⁷³
95. NASUWT believes that the introduction of the ‘two-child limit’ back in 2015 should be considered, given the emerging evidence of the impact this is having on those low-income families with three or more children in terms of access to benefits and pushing more of them into relative poverty.
96. The policy disproportionately affects households that are less able to increase their income through employment, particularly single parent households and families with younger children who struggle to afford a wide range of essential items for their children.⁷⁴
97. In addition, the provision of good-quality childcare is critical following a period of leave to enable mothers and fathers/co-parents to return to work and re-enter the labour market. Childcare costs for many families are significant, so it is important to consider what action can be taken to ensure that there is access to affordable and high-quality childcare for *all* mothers and fathers/co-parents, irrespective of income or employment status.

⁷¹ <https://hansard.parliament.uk/Commons/2003-03-28/debates/5ac2480d-b4f9-4909-b08e-903572b573ae/SureStartMaternityGrants>

⁷² <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

⁷³ <https://maternityaction.org.uk/wp-content/uploads/Pushed-into-Poverty-2025-FINAL.pdf>

⁷⁴ <https://cdn.sanity.io/files/66yos3po/production/b5ea89d3a76ae988a771018194d205f89832f147.pdf>

98. For example, research suggests that the funded hours for childcare and early education have always benefitted higher income families, with only 20% of families in the bottom third of the earnings distribution being able to access the full 30 hours.⁷⁵
99. Furthermore, the IFS has found that the expansion of the funded hours will have little benefit for the poorest third of families.⁷⁶
100. Evidence from the OECD suggests that good-quality, affordable childcare is a key driver in achieving better female labour market participation. There was a positive correlation between the provision of childcare services for parents of children under three years old and female participation in the labour market.⁷⁷
101. Indeed, the United Nations Children's Fund (UNICEF) report, *Where Do Rich Countries Stand on Childcare?*, analysing access to childcare across 41 high- and middle-income countries, ranked the UK 35 out of 41 countries.⁷⁸
102. The Union believes that the importance of breastfeeding during the first six months of a baby's life⁷⁹ means that workplaces must do more to ensure that there are appropriate facilities available to breastfeed, express and store milk in workplaces.

Objective 4:

Childcare: support parents to make balanced childcare choices that work for their family situation, including enabling co-parenting, and provide flexibility to reflect the realities of modern work and childcare needs.

103. NASUWT does not believe that the current statutory parental leave and pay system meets the objective of supporting parents to make balanced childcare choices that work for their family situation, including co-parenting,

⁷⁵ <https://www.suttontrust.com/wp-content/uploads/2021/08/A-Fair-Start-Summary-Report.pdf>

⁷⁶ <https://ifs.org.uk/articles/what-you-need-know-about-new-childcare-entitlements>

⁷⁷ http://praha.vupsv.cz/fulltext/ul_1594.pdf

⁷⁸ https://www.unicef-irc.org/publications/pdf/Family-Friendly-Policies-Research_UNICEF_%202019.pdf

⁷⁹ <https://www.nhs.uk/baby/breastfeeding-and-bottle-feeding/breastfeeding/how-to-stop/>

and providing flexibility to reflect the realities of modern work and childcare needs.

104. The reasons detailed above demonstrate that the detrimental impact that the lack of a substantive individual, non-transferable entitlement to paid parental leave for fathers/co-parents is having on flexibility in childcare choices and to more equitable sharing of childcare between parents.
105. In the UK, the length of leave taken by parents is closely tied to the statutory entitlements, so changing the entitlement (as referenced above) could have a strong influence on behaviour. Indeed, 57% of prospective parents say that they or their partner would take six weeks of paternity leave if paid at 90% of their current salary.⁸⁰
106. The arguments set out throughout the Union's submission show that whilst SPL offers some choice and flexibility in sharing parental responsibilities, it is clear that this is limited to a very small number of parents, and, as such, it remains the case that many parents cannot access the flexibility they need following a period of parental leave.
107. Research by the TUC has found that 31% of working mothers had not asked for any flexible working, and 36% had only asked for some of the flexibility they needed. Of those working mothers who had only requested some of the flexible working they needed, 73% stated that the reason they did not request all of the flexible working needed was because they believed the request would be turned down.⁸¹
108. In addition, 50% of respondents stated that they were put off making a flexible working request due to worries about the harm this could have on their future career prospects.⁸²
109. Furthermore, other studies have shown that 19% of recent parents who requested flexible working had their request denied, and 26% had their

⁸⁰ http://www.progressive-policy.net/downloads/files/PPP_Parental-Leave-report_June-2023.pdf

⁸¹ <https://www.tuc.org.uk/research-analysis/reports/denied-and-discriminated-against>

⁸² Ibid.

request ‘partially met’, with the impact of such decisions disproportionately impacting on younger and lower income parents.⁸³

110. Whilst it remains the case that mothers (56.2%) are more likely than fathers (22.4%) to change their employment for childcare reasons or ask for flexible working, mothers still face significant barriers to accessing the flexible working they need.⁸⁴
111. The struggle to balance childcare and work for families is also compounded by the lack of availability of affordable and flexible childcare. For example, research from the Women’s Budget Group in 2022 found that 1.7 million women were prevented from taking on more hours of paid work due to childcare issues, equating to up to £28.2 billion of lost economic output every year.⁸⁵
112. Despite changes to the legislative framework for flexible working from April 2024,⁸⁶ as well as those planned in the Employment Rights Bill, NASUWT maintains that the Government needs to take a much stronger approach in order to provide flexibility to reflect the realities of modern work and childcare needs.
113. Legislation exists in many European countries that entitles parents to reduce their working hours specifically during the first few months to combine care and (part-time) employment. For example, Dutch workers have the legal right to request changes to the hours they work (*Wet Aanpassing Arbeidsduur*), as well as the right to request flexible working (*Wet Flexibel Werken*).⁸⁷
114. Despite a significant body of evidence demonstrating the benefits of flexible working in schools, such as the retention of experienced staff, promoting

⁸³ [file:///hq-fs03/Paulw\\$/NNO%20files/EQUALITIES/CPP_Parental-Leave-report_June-2023.pdf](file:///hq-fs03/Paulw$/NNO%20files/EQUALITIES/CPP_Parental-Leave-report_June-2023.pdf)

⁸⁴ <https://pregnantthenscrewed.com/mothers-are-twice-as-likely-as-fathers-to-ask-for-flexible-working-after-parental-leave/>

⁸⁵ <https://wbq.org.uk/wp-content/uploads/2022/03/Childcare-and-gender-PBB-Spring-2022-1.pdf>

⁸⁶ <https://www.nasuwt.org.uk/advice/conditions-of-service/flexible-working/flexible-working-great-britain.html>

⁸⁷ <https://www.kvk.nl/en/managing-and-growing/flexible-working-act-in-practice/>

wellbeing and improving work/life balance, NASUWT believes that the uptake of flexible working in education remains stubbornly low.

115. Whilst acknowledging the intent and desire of the Department for Education (DfE) to increase opportunities for flexible working, including revising its advice and guidance and addressing the negative perceptions of flexible working in schools,⁸⁸ it remains the case that there are still a number of teachers and school leaders who believe that flexible working is incompatible with a career in teaching.⁸⁹
116. For example, more than six in ten (64%) of those not currently working flexibly, or whose only cite flexible working as occasional days off or leaving early, disagreed that they would be confident requesting flexible working arrangements, and 34% of those considering leaving state education cited lack of flexible working opportunities as a reason for leaving.⁹⁰
117. The evidence available to NASUWT confirms that many schools are highly resistant to recognising teachers who wish to benefit from flexible working, regarding part-time and job-share teachers as 'less committed'.
118. The experiences of being a parent and a teacher suggest that the attitude and approach towards flexible working by schools/colleges is still a cause for concern, as demonstrated by research undertaken by NASUWT of 3,298 teachers who were parents in 2020.⁹¹
119. Just over two-fifths (42%) responded that they had asked their employers for flexible working because of their parental responsibilities. Disappointingly, three in ten (30%) teachers reported that their request was not granted. This is compounded by the fact that 37% of teachers who responded to the Union's flexible working survey stated that they were

⁸⁸ <https://www.flexibleworkingineducation.co.uk/uploads/toolkit/addressing-the-negative-perceptions-of-flexible-working-in-schools.pdf>

⁸⁹ <https://www.gov.uk/government/publications/working-lives-of-teachers-and-leaders-wave-2/working-lives-of-teachers-and-leaders-wave-2-summary-report>

⁹⁰ Ibid.

⁹¹ <https://www.nasuwt.org.uk/static/3284d4dc-bd06-4313-b0f5ef72c2209159/Evidence-Submission-to-the-STRB-35th-Report-December-2024-England.pdf>

forced to consider alternative employment as a result of their flexible request being refused.

120. Of even greater concern is the fact that just over two-thirds (67%) of teachers reported that they were not given the right to appeal the decision by their employer to reject their request for flexible working, despite this being good practice and recommended in the Advisory, Conciliation and Arbitration Service (ACAS) guidance in relation to flexible working.
121. NASUWT's *Wellbeing at Work Survey 2024* shows that a majority of teachers report a lack of flexible working opportunities, with just under three-fifths (58%) reporting that their school does not provide flexible working opportunities.⁹²
122. Research into graduate career aspirations continues to confirm that younger graduates are more likely to enter and remain in professional occupations that offer flexible employment practices and permit inclusive and collaborative decision-making.
123. Detailed economic analysis and calculations show that the financial benefits of flexible working greatly outweigh any initial costs associated with it. For example, the Pragmatix Advisory Flex Model, published as part of the Flexonomics Report in November 2021, calculated the estimated net benefit to the economy of increasing flexible working in the education⁹³ sector by 50% to be £5 billion.
124. The same report calculated that the cost to organisations in the education sector of employees leaving their job earlier than they would have is £300 million. This includes the cost to replace staff who leave, as well as the loss of productivity from losing more experienced staff. This cost is a real risk to schools that routinely reject requests for flexible working.
125. Of even greater concern is the fact that some teachers indicated that the only way to access flexible working arrangements was through dropping

⁹² <https://www.nasuwt.org.uk/static/17ad7ef2-879e-40d4-96b3c014e605746a/Teachers-Wellbeing-Survey-Report-2024.pdf>

⁹³ The categorisation of 'education' is from the ONS UK standard industrial classification of economic activities.

out of the permanent teacher workforce and entering the intermittent, insecure and precarious world of supply teaching, including through outsourced employment agencies.⁹⁴

126. Given the evidence detailed above, NASUWT believes that serious consideration must be given to both financial and non-financial levers that can be used to address the lack of flexible working in schools.

Are there further / other objectives that you would like to see included as part of the Parental Leave and Pay Review?

Yes:	No:
X	

Please list and briefly explain each one, including providing links to any relevant evidence.

127. NASUWT welcomes the fact that the review of parental leave and pay focuses on a range of important and fundamental cross-cutting and overlapping considerations, as set out by the Government in its terms of reference.⁹⁵

128. In addition, the Union believes that any attempt to address the current flaws in the parental leave and pay system should meet the following objectives:

- Seek to drive a cultural shift at home and in the workplace that challenges gendered assumptions and promotes greater gender equality by promoting more equitable sharing of childcare responsibilities between parents.
- Provide both parents and children with the opportunity to spend quality time together in the early years of a child's life.
- Seek to drive a cultural shift that embeds and normalises workplace and legislative change to support all working parents, including for adoptive and surrogate parents.

⁹⁴ <https://www.nasuwt.org.uk/advice/supply-teacher/supply-teacher-annual-survey/supply-teacher-annual-survey-england.html>

⁹⁵ <https://www.gov.uk/government/publications/parental-leave-and-pay-review-terms-of-reference/government-review-of-the-parental-leave-and-pay-system-terms-of-reference>

- Support birth mothers to recover from birth and breastfeed, including the provision of appropriate facilities to accommodate this in the workplace, as appropriate.
- Extending access to well-paid leave, including for single parent families, kinship carers and multiple births.
- Reduce pregnancy and maternity discrimination, by rebalancing the responsibility for childcare more equally between mothers and fathers/partners, and strengthening redundancy protections for pregnant women, new mothers and parents.
- Cut the gender pay gap and address the 'motherhood penalty', specifically in teaching by increasing the pay of teachers on maternity leave by providing a day one right to at least 26 weeks of fully paid occupational maternity leave (OMP) for both permanently employed and supply teachers (with a view to adapting this over time to become 26 weeks of fully paid parental leave), ensuring the portability of maternity rights for teachers across all employers, and removing the requirement to pay back any maternity leave for teachers who do not return to work.
- Enable fathers/co-parents to spend significant time as primary carers for their children in the early years.
- Make parental rights accessible to all workers, regardless of employment status, and address difficulties faced by self-employed parents, especially given the interplay between different employment types, socio-economic status and income.
- Ensure that the parental leave and pay system provides well-paid financial support and security rather than exacerbating financial stress and insecurity, including addressing the low levels of statutory pay (e.g. increasing the rates to 90%/100% of normal weekly earnings) and the complicated nature of the system (e.g. qualifying periods and eligibility and criteria) through the provision on a non-transferable standalone right for each parent, which is not dependent on the other partner sacrificing some of their leave.
- Provide families with increased freedom and increased agency and choice in how they manage their family and caring responsibilities.
- Ensure that existing contractually enhanced policies are protected and encourage enhanced contractual leave, including through collective bargaining.
- Unleash the wasted potential in the labour market, boost workplace productivity and help employers recruit and retain staff.

- Create a holistic system that supports all family types, including kinship carers, and takes a joined-up approach to other types of leave that workplace policies and support working parents may rely upon (e.g. flexible working, childcare, unpaid parental leave).

Please prioritise the objectives, including any additional objectives, in order of importance (with 1 being most important).

1. Providing sufficient time off work with adequate pay to support maternal health.
2. Supporting economic growth through labour market participation by enabling more parents to stay in work and advance in their careers, including reducing the gender pay gap.
3. Ensuring adequate resources and leave for parents to facilitate the best start in life by supporting the healthy development of young children.
4. Providing parents with the flexibility to make balanced childcare choices, including co-parenting, and advancing gender equality by promoting more equitable sharing of childcare responsibilities between parents.

ADDITIONAL COMMENTS

129. If the intent of the Government is to ensure that the parental leave and pay system better supports working families, then NASUWT maintains that it must ensure that ‘excluded groups’, such as kinship carers, single parents and those who experience multiple births, are considered moving forwards

130. Kinship carers currently have no specific rights to any form of paid leave other than that offered by the employer, such as that operated by B&Q that offers employees six weeks at 100% of contractual pay and 33 weeks at 50% of contractual pay. It has been argued that the lack of any statutory provision is pushing some into poverty and the benefits system.⁹⁶

⁹⁶ <https://committees.parliament.uk/publications/48254/documents/252625/default/>

131. The Union understands that it is common in other countries for single parents to receive a second parent's entitlement or to be able to transfer it to a family member/friend.
132. For example, in Germany, single parents receive a two-month paid leave 'bonus', whereas in Sweden, single parents are able to transfer up to 90 days of paid leave to significant others.⁹⁷
133. In regards to multiple births, it has been noted that fathers/co-parents attribute financial, physical and emotional stresses to the shortfall in paid parental leave.⁹⁸ Indeed, multiple birth fathers are under a 'triple level of pressure' associated with assisting in the care of their babies, prioritising work and financially supporting their family during a highly demanding time.
134. Whereas countries like Sweden allocate an additional 180 days for each additional child for the first 12 years of the child's life, by contrast the UK ranks 'among the lowest of all advanced economies in terms of [...] multiple births support'.⁹⁹
135. The considerable degree of uncertainty that exists about statutory entitlements and time off after birth¹⁰⁰ suggests that there is a need for the Government to give consideration to better official guidance, in order to help workers gain a better understanding of their rights and employers to comply with their obligations.
136. This could include the integration of legal advice into maternity services, thereby enabling access to entitlements and exercising their rights at work, such as Maternity Action's Maternity Rights Advice Service health justice partnerships in the North West of England.¹⁰¹
137. Coupled with this is the need to ensure that parental rights can be adequately enforced through a well-funded and well-resourced

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Ibid.

¹⁰⁰ https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf

¹⁰¹ https://maternityaction.org.uk/wp-content/uploads/Evaluating-HJPs_challenges-and-opportunities_FINAL.pdf

enforcement framework, specifically the Statutory Payment Dispute Team within HMRC.

The vital role of trade unions

138. Trade unions have a vital role to play in ensuring that workers are better informed and empowered in respect of their employment rights, including those relating to parental leave and pay.

139. NASUWT believes that measures should be introduced to promote and support collective bargaining/collective agreements and the right of trade unions to access workplaces and enhance contractual leave through collective bargaining.

140. Evidence suggests that the involvement of trade unions is crucial in negotiating improved terms and conditions, and putting in place mechanisms to remedy breaches of these terms and conditions.¹⁰²

Matt Wrack

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¹⁰² https://www.employment-studies.co.uk/system/files/resources/files/Parental_Rights_Survey%202019.pdf