Consultation
Did you take part in any consultation exercise preceding the Bill, and if so, did you comment on the financial assumptions?
1. No

If applicable, do you believe your comments on the financial assumptions have been accurately reflected?
2. N/a

Did you have sufficient time to contribute to the consultation exercise?
3. N/a

Costs
If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.
4. We feel the financial implications do not reflect sufficiently the potential financial impact on local authorities, particularly in relation to already stretched existing budgets having to absorb additional costs.

Part 1: Promote equity of attainment for disadvantaged children and closing the gap.
The ‘attainment gap’ has been prevalent in Scottish Education for a considerable time, but remains a high priority for the authority. However, we would challenge the assumption that the need for early and deep intervention with both the child and their family to close the gap needs no further investment. For example our lowest 20% in P1 and P2 total 484 children and many of these would benefit from a deeper more intensive intervention than current budgets allow, particularly given the population growth in the county.

In addition the number of ASN referrals emanating from pre-nursery and nursery has increased by 88% in just the last 5 school sessions including the current session which has not yet finished. This places a prioritisation requirement on Educational Psychologists and other ASN teams.

The ability to re-allocate teachers to these vulnerable groups is a possibility and is being explored against the backdrop of the teacher number guarantee.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. We feel the estimated costs and savings are reasonable and accurate although they will put pressure on existing budgets if no additional funding is allocated to local authorities.

Part 2 s 4-16: Expand provision of Gaelic medium education
We currently provide Gaelic medium education via a neighbouring authority, recompensing accordingly. When GME receives a greater profile and demand increases it is unlikely our partner authority could meet demand and therefore, in our case, given schools are at near maximum capacity with population growth in train, it would be likely that either additional partner capacity or a new unit in authority would have to be sourced. We feel the amount specified for a new unit, acknowledging we are unaware of specification appears low.

**If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?**

6. No, with increasing school rolls, teacher guarantee, budget savings and flat grant there is little manoeuvrability in identifying additional funds. As in Q4 above there are many financial pressures to be addressed in relation to existing budgets and any additional financial costs that are not subject to specific or additional funds will impact adversely. It is difficult to anticipate how much will be required to meet any increased expenditure but additional funding to local authorities should be allocated to meet these costs.

**Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?**

7. We feel, as mentioned above, that some of the estimates are low and feel compelled to point out the additional burden that will be placed on LAs e.g. as a result of increasing ASN rights, this will increase ASN referrals as a whole.

**Wider Issues**

**Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?**

8. Please see answer 7

**Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?**

9. Yes there may well be but unable to quantify these costs at this point.