Consultation

Did you take part in either of the Scottish Government consultation exercises which preceded the Bill and, if so, did you comment on the financial assumptions made?

1. SCIS responded to the Scottish Government’s consultation on the Bill, however we did not comment on the financial assumptions made as, we felt more detail was required before we were able to do this.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?

2. N/A

Did you have sufficient time to contribute to the consultation exercise?

3. Yes.

Costs

If the Bill has any financial implications for your organisation, do you believe that these have been accurately reflected in the FM? If not, please provide details?

4. SCIS is responding on behalf of the independent school sector, rather than commenting on direct costs associated with the organisation SCIS.

5. The following points reflect the financial implications for the independent sector:

6. The Named Person

The FM identifies at paragraph 62 that “training is currently provided by the Scottish Council of Independent Schools, at a cost of £95 per person, per day, and is, therefore, estimated to be £41,800 for Head Teachers and Depute Head Teachers.”

7. We would question this assumption, which has not been the subject of consultation with SCIS or with our member schools. Although SCIS does offer Continued Professional Development (CPD) courses, that Named Person training could be incorporated into, we have not assumed this role. In addition, we have not previously provided training relating to the Child’s Plan, as it has not been relevant to the teachers who attend our courses, and therefore this could not be easily subsumed into existing training.

8. Our preferred method of training Named Persons in the independent sector is cited in the Business Regulatory Impact Assessment (BRIA) which states, “Staff from these (independent schools) are already attending training that is being delivered by
local authority partners”. SCIS believes that, to ensure that Scotland is getting it right for every child – irrespective of educational institution - training of Named Persons should be inclusive of independent schools. Children who attend these schools live within Local Authorities where they are entitled to use support services paid for through their parent’s contribution to income and council tax. This method of training, with the exception of Edinburgh, would only entail an additional few from independent schools attending each local authority training event.

9. Where independent schools develop separate training events, a budget, similar to that of the NHS’ contained in Table 13, should be included in the FM to account for any training materials that will not be provided for by the Scottish Government and the backfilling of staff. We would like to take this opportunity to state that if this were the case it, SCIS believes that it would contradict a desirable outcome of the GIRFEC approach: to encourage multi-agency working. Training of Named Persons by a third party could not satisfy the policy of ‘getting it right for every child’ effectively.

10. The costs of £398,097 (summarised in Table 8) has been calculated for backfilling staff for training days in regards to local authority schools, however, the same has not been considered in the FM for independent schools. Allocated Named Persons from independent schools may also require backfilling staff for training days as, some Head Teachers and Deputy Heads do teach; therefore this cost should be included in the FM.

11. The population of children aged 5-18 in independent schools appears to have been underestimated as, there are 29,626 pupils in primary and secondary education in SCIS’s 72 member schools alone. Conversely, the Scottish Government’s census states that the number of independent school pupils in Scotland totalled 30,427 in the same year (2012). This figure covers an additional 28 schools and, therefore seems unrealistic. If the number of pupils attending independent schools was higher, this could increase the additional cost in teacher staffing time per year significantly.

12. In Table 15 of the FM, private organisations are described as having 38 working weeks to a year, however all 18 of our additional support needs schools offer more than 38 placement weeks. In addition, boarding school pupils require supervision outwith school hours in addition to the regular ‘working week’, increasing the possible admin support hours required of a Named Person per week. Furthermore, if Named Persons in independent schools are to continue their role throughout school holidays these additional hours of work would need to be included in the FM.

13. Early learning and childcare
The assessment that there will be no cost to other bodies, individuals or businesses in relation to provisions regarding early learning and childcare should be questioned. The BIRA report states that there could be a negative impact on partnership providers if “current levels of funding from local authorities to deliver the entitlement are not increased”. Although the FM assigns £1,226,365 for ‘partner provider
uprating’, local authorities are only advised to set a minimum payment level for pre-school education, which poses a cause for concern.

**Do you consider that the estimated costs and savings set out in the FM and projected over 15 years for each service are reasonable and accurate?**

14. No, the FM itself does not appear to project that far in advance. For the 7 years that it does appear to project for, SCIS believes that:

15. In regards to early learning and childcare, the cost for partner provider uprating should continue to increase in line with inflation rather than only increasing in line with inflation when the Bill’s provisions are first implemented. This is shown in Table 17 by the figure for partner provider uprating remaining the same between 2014 and 2020.

16. The Summary of Additional Costs should include a budget for the expected increase in demand for partner providers (due to an increase in the number of families utilising free childcare and the extension of childcare hours). It would be useful to include information detailing how the figure of £1,226,365 has been reached for partner providers and, if it has been calculated for the existing number of partner providers with no inclusion of an increase in demand.

17. That the veracity of the statement regarding on-going Named Person training being absorbed into existing CPD courses depends on how specific Named Person training is/how long it will take, and therefore whether it can be subsumed into existing structures. If SCIS were unable to include this in existing training it would add further costs to independent schools and should be budgeted for in the FM.

**If relevant, are you content that your organisation can meet the financial costs associated with the Bill which your organisation will incur? If not, how do you think these costs should be met?**

18. Again, SCIS is responding on behalf of the independent school sector, rather than commenting on direct costs associated with the organisation SCIS.

19. As previously stated, we think that the cost of training should be met centrally. Furthermore, early learning and childcare costs should continue to be met by local authorities and realistically budgeted for (to include inflation and increases in demand).

**Does the FM accurately reflect the margins of uncertainty associated with the estimates and the timescales over which such costs would be expected to arise?**

20. SCIS does not believe that margins of uncertainty have been accurately reflected in the FM as; budgets are not shown to increase in line with inflation; expected increases in demand are not included; and continued training of Named Persons is not thought to be required. There could be a further cause for concern if the models of flexibility that have been used “in advance of consultation with local populations”, in relation to the Bill’s childcare provisions, are not representative and accurate. This would affect the indicative additional staff costs considerably.
Wider Issues
Do you believe that the FM reasonably captures costs associated with the Bill? If not, which other costs might be incurred and by whom?
21. N/A

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?
22. N/A