

Natalie Don-Innes MSP
Minister for Children, Young People and the Promise
Scottish Government

Liz Smith CBE MSP Scottish Parliament

By email

31 July 2025

Dear Minister

Schools (Residential Outdoor Education) (Scotland) Bill

As set out in several letters to you and in our meetings, I have undertaken extensive work to ensure that the Parliament's will at Stage 1 can be respected and that my Bill can progress to the amending stages. Under the Standing Orders of the Parliament, this, of course, involves a financial resolution being lodged by the Scottish Government in September.

You will see in Annexe B amended costs which myself and my team have worked on throughout June and July. I hope we can discuss these in detail at the meeting on 12th August and also, most importantly, hear from you what level of costs the Scottish Government considers is affordable.

We have worked to develop detailed policy proposals that would notably reduce the cost of the Bill, including focussing delivery on P6/7 pupils and also targetting provision for those young people experiencing deprivation and those with additional support needs. I have also said that I am content to delay commencement should the Bill pass.

As set out in the attached indicative costings, it is clear to me that the suggested amendments to the policy would significantly reduce the cost of implementing the Bill. Limiting the policy to primary pupils, whilst protecting universal access, could reduce the costs by up to £11 million based on my estimates. Limiting the policy to all primary pupils with additional support needs or in receipt of the Scottish Child Payment could reduce the costs by as much as £18.4 million per annum.¹

¹The Financial Memorandum that accompanied the Bill estimated that the cost of providing residential outdoor education would cost up to £35,219,600 per annum.

At our meeting on 12 August, it would be helpful to establish the Government's position on the policy proposals I have made, and to consider the draft Government amendments that you committed to providing in June when you gave evidence to the Education, Children and Young People Committee. The relevant extract of the *Official Report* is below for ease of reference:

Liz Smith: Can I get it on the record that, at the same [June] meeting, the Scottish Government will be doing the same thing and proposing amendments, as the committee has requested?

Natalie Don-Innes: Absolutely.2

Having spent a very substantial part of recess working with and visiting the sector (see Annexe A) there is clear determination to move the Bill forward as soon as possible. There is also a strong message coming back from the sector about the benefits of preventative spend and I know this is something of interest to the members of the Education, Children and Young People Committee and other parliamentarians from across the political spectrum.

I look forward to meeting you on 12th August.

I am copying this letter to Jenny Gilruth MSP, Cabinet Secretary for Education and Skills, Shona Robison MSP, Cabinet Secretary for Finance and Local Government, Kate Forbes MSP, Deputy First Minister and Cabinet Secretary for Economy and Gaelic, John Swinney MSP, First Minister, and to Douglas Ross MSP, Convener of the Education, Children and Young People Committee.

Yours sincerely

Liz Smith CBE MSP

Liz Smith

² Official Report Col 68, 11 June 2025, Education, Children and Young People Committee

ANNEXE A - Update on work undertaken during first half of recess

As I intimated to you at our previous meeting on 1 July, I have been making every effort to visit several outdoor centres and to further engage with the providers and with the staff and carers who accompany young people on their residential visits. These visits have taken me to very different areas of Scotland and to very different types of centres. The visit to Hoy on Orkney, which I particularly wanted to undertake because of its increased engagement with young people from the islands, has not yet been possible because of time constraints and weather-related problems for sailings, but I hope this will happen soon.

Everywhere I went, I was extremely impressed by the passion and commitment of all those involved in residential outdoor education and by the data I was shown which demonstrates the very positive benefits delivered for our young people. I was also struck by the strong relationships built up between the outdoor centres and several local authorities – for example, the very strong, historical bonds between Ardroy Outdoor Centre and Fife Council schools and also, now, with Stirling Council. Indeed, when I visited Ardroy, I also met young people from families seeking asylum in the Stirling area, so strongly did Stirling Council feel residential opportunities could help them settle in Scotland.

As we know, there is significant variation in the infrastructure - Loch Eil and PGL Dalguise are outstanding for new facilities and disability facilities, as is the Arthur Grant Centre and the renovated hostel in Glen Nevis but centres like Ardroy and Broomlee are in much need of capital upgrades. What is very encouraging, is the determination within the sector to improve the facilities across the board so that the centres are as inclusive as possible for pupils with very different needs. Significant strides have been made in some centres such as PGL Dalguise for looking after pupils with physical disability and there is growing interest in the sector that Scotland would benefit from a Calvert Trust style centre (like the one in Kielder but accessed by several young people from Scotland) which specialises in catering for disability groups. There is also growing interest for formal collaboration between the public and private sectors when it comes to infrastructure provision and, like me, the sector has been encouraged by recent statements by the Scottish Government that it wants to see better collaboration across the board. PGL are extremely keen to engage with the Scottish Government about this matter.

The centres I visited were not reporting any major staffing issues within schools. What they are reporting, much to their concern, is that the number of pupils getting residential experiences is falling despite the demand level remaining high. I am told that for each block booking made at some centres between 15%-20% of the young people who have applied to go will not turn up. A very substantial reason for this was given as the increased anxiety levels amongst young people and parents being unwilling to allow their youngsters to attend if there are mobile phone restrictions.

There is clearly a "mix" of who pays - the schools, local authorities, family contributions, a few charitable subsidies. The sector is entirely relaxed about who pays so long as more young people are able to benefit from residential experiences. In relation to this, the sector is working on new joint social media and web pages in order to promote the

sector more comprehensively and to improve communication. This should be ready very soon.

ANNEXE B - Indicative cost projections based on different delivery models

As stated previously, my strong preference is, of course, to maintain universal provision of residential outdoor education for children and young people. While I am content to consider targeted provision for those who qualify for the Scottish Child Payment and those with additional support needs within the legislation, I would envisage that, in practice, all children and young people would have the opportunity provided to them. Existing, commonly used funding streams, including PEF, parental contributions and school fundraising, amongst other sources, would continue to be called upon.

In addition to providing costings for a more targeted approach, I have also revisited figures in the Financial Memorandum to ensure they reflect the most up-to-date data. In relation to ancillary costs, evidence was presented by representatives of outdoor centres at Stage 1, which shows that, in the majority of cases, these are already covered as part of the experience. This is certainly something that has been borne out on my visits to a range of outdoor centres.

A key consideration is that the costings below, whichever approach were to be adopted, would by no means be entirely new spend. For example, evidence given at Stage 1 demonstrated that a significant portion of Pupil Equity Funding is already being used to send pupils on residential outdoor education, with 62% of such funding reportedly allocated for this purpose. This includes many pupils in receipt of the Scottish Child Payment who are already receiving support to attend ROE.

Option 1 - Universal provision solely in primary school

The Financial Memorandum envisages that residential outdoor education will apply to both primary and secondary schools. Discussions with you have suggested that a more cost-effective means of delivering the policy would be for it to take place in primary schools only. The Bill already provides for guidance from the Scottish Government which can set the age range for delivery of the policy.

Primary school cohort

According to the most recent Scottish Government data³, there were 57,090 pupils in P6 and 56,882 pupils in P7 in local authority and grant-aided schools in 2024. Nearly 114,000 pupils in total. I am assuming that all primary children would be offered the opportunity for residential outdoor education in either P6 or P7 (not both). In practice, it is very likely that these experiences will take place in P7. I am therefore using the figure of a total cohort of 57,000 taking part in residential outdoor education per year as a basis for my calculations.

Assuming for numerous reasons, as is the case at present, that a proportion (estimated at 15 to 20%) of pupils are not in a position to take up the opportunity for residential outdoor education, then the cohort attending each year would be between around 45,600 to 48,450. To allow for some variation I have based my calculations on a slightly broader range of 45,000 to 50,000.

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³ Pupil+census+supplementary+statistics+2024+-+March.xlsx

The Financial Memorandum estimated that "the cost of a week's residential outdoor education for a primary school pupil will be in the region of £300 to £400 per week per pupil, and for a secondary school pupil it will be in the region of £400 to £600." The cost per pupil will therefore be lower for primary school provision than for secondary school provision. However, in acknowledgement of Stage 1 evidence, I have used the higher figure in the FM for primary school pupils of £400 each per week as the basis for my calculations. I have adjusted this figure for inflation to reflect 2027-28 anticipated real-terms costs.

Later commencement – inflation adjustments

Given your indication that the Scottish Government would require longer than I envisaged to implement the legislation, I have adjusted the original Financial Memorandum figures for inflation on the basis that commencement would occur in 2027-28. I had assumed in the Financial Memorandum that it would be in 2026-27. It may be that the Government envisages a later commencement, and I am open to discussions on that given the capacity and workforce requirements to implement the policy.

Staff costs

In respect of staff costs, by targeting provision to primary school pupils, issues around backfilling will not arise to anywhere near the same extent as would be the case in secondary school. The Scottish Government figure of £333 per day, based on teacher salary and on-costs divided by 190 days a year, was previously provided. I note that the Government memorandum on the Restraint and Seclusion in Schools (Scotland) Bill states that "the £333 rate has recently been re-calculated to capture an increase in salaries and revised on-cost conditions and is now estimated at £356 per day (a 7% rise)."

Complex additional support needs

A criticism of the Financial Memorandum from the Scottish Government was the lack of funding provided for pupils with complex additional support needs. The lack of data available hindered my ability to produce these figures, and as previously discussed there is clearly a willingness from the sector to provide support, including infrastructure, for those with complex additional support needs. In addition, as set out in previous correspondence, there are numerous centres currently in operation with extensive capacity in this regard.

As was highlighted in evidence at Stage 1, for the vast majority of pupils with ASN attending mainstream schools there will be no additional cost implication of one week's residential outdoor education over and above the cost of other pupils. There is a much smaller cohort of pupils with complex additional support needs, and these pupils will certainly require much more targeted support, including one-to-one support in many instances.

There are currently 529 pupils of P6 and P7 age in special schools in Scotland. Assuming the ROE takes place in one year, presumably P7, the cohort to complete residential outdoor education in one year would be 265 pupils. Again, I assume that

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⁴ Page 6 Financial Memorandum

15 to 20% do not attend (this is the same assumption as for mainstream pupils), making the cohort attending per year 212 to 225.

As previously discussed, the lack of data on ASN makes calculating the cost of support very challenging. However, I am aware that for those with very complex needs the support required to attend ROE is extensive, for example with support staff being on duty through the night to provide around the clock care for some pupils.

I appreciate the Government's concerns that a lack of an allocation of funding for these pupils may mean that my previous calculations were underestimates. To that end, my revised calculations include £1.5 million of funding that seeks to reflect the additional staffing (at increased cost based on pay rises), accommodation and transport requirements for the relatively small cohort with very complex needs. I consider this is likely to be an overestimate but want to ensure that my calculations enable one to one care and that all other necessary supports can be in place for every pupil with complex ASN.

Transport costs

In relation to transport costs, the Financial Memorandum projections have been adjusted for inflation and recalculated assuming that 45,000 to 50,000 pupils attend. These figures (£872,000 to £969,000) remain lower than the Scottish Government's projected costs for transport that you provided in your letter dated 3 May 2025. In the interests of reaching consensus on the financial estimates I have included your higher estimates in my revised calculations below (£1,218,000 to £1,440,000). This is likely to be an overestimate as these figures relate to both primary and secondary school.

Guidance

I have also factored in below the costs of producing guidance, again adjusted for inflation.

Table 1 – Cost of pupils in P6/P7 funded to complete residential outdoor education

	Low estimate	High estimate
Cost of pupils attending ROE	£19,165,500	£21,295,000
Complex ASN related costs	£1,500,000	£1,500,000
Transport costs	£1,218,000	£1,440,000
Costs of producing guidance	£0	£6,846
Total costs	£21,883,500	£24,241,846

In summary, these revised calculations above include increased costs compared to the original Financial Memorandum in numerous areas. This includes to account for: inflation (in line with the Government proposal of delayed commencement), increased transport costs (in line with Government estimates), increased staffing costs (in line with Government pay increases), higher weekly costs per week of primary school ROE (reflecting stakeholder evidence at Stage 1), and a new budget line specifically for targeted support for those with complex additional support needs (addressing criticism from the Government).

Even with all these increases, when the policy applies solely at primary school level the estimated costs of the policy are significantly reduced. The Financial Memorandum that accompanied the Bill estimated that the cost of providing residential outdoor education would cost up to £35,219,600 per annum.⁵ The revised estimates, based on this model above, reflect significantly lower costs, with the policy costing up to £24,241,846 per annum. This is a difference in the region of £11 million.

Option 2 - Targeting funding to particular groups of children and young people

As discussed, my strong preference is to retain universal provision, as set out above in the estimates relating to primary school attendance. Should provision become targeted then I consider that this provision *must* include those with an additional support need <u>and</u> all those eligible for the Scottish Child Payment (SCP) attending primary school.

Scottish Child Payment

Your letter dated 3 May 2025 included options to target provision for residential outdoor education in relation to free school meals income criteria and/or the SCP. As those in receipt of the SCP are eligible for free school meals, and the cohort of pupils in receipt of the payment is higher than the cohort eligible for free school meals, I have worked on the basis that targeted funding in relation to deprivation or those experiencing poverty should be based on receipt of the SCP.

Option 2 in your letter of 3 May scales the cost of the Bill in line with the proportion of P6-S4 pupils who are in receipt of Scottish Child Payment (39.2%). This option is costed by the Scottish Government at £9,700,000 to £16,300,000. The option is based on the policy being implemented across primary and secondary schools and it is reasonable to assume the lower estimate will be a much more accurate reflection of the costs when applied solely to primary school (as per your letter, this figure covers transport, staffing and guidance). I note that your letter does not account for inflation to 2027-28 and therefore I have uprated this figure to reflect 2027-28 costs. On that basis the figure is close to £9,900,000.

Based on the methodology and figures provided under my Option 1 above I calculate that uptake of ROE specifically for those in receipt of the Scottish Child Payment will be between 17875 and 18992 pupils and that associated costs will be in the region of up to £8,700,000 million.

I am therefore using £8,700,000 to £9,900,000 as a reasonable range of estimates for funding this cohort of children and young people.

Additional support needs

According to the most recent data, 40.5% of all pupils have an additional support need. Assuming that 40.5% of pupils in primary school have an additional support need, then this would mean that there are 46,159 pupils in P6 and P7 with an

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⁵ Available at: Financial Memorandum accessible

additional support need. Again, assuming ROE takes place in P6 or P7 (not both, and most likely in P7), then the total cohort in primary school available to attend residential outdoor education (ROE) each year would therefore be in the region of 23,100. It is again reasonable to assume that 15 to 20% of these pupils may not complete a ROE experience for numerous reasons, making the cohort 18,480 to 19,635.

In line with the school population as a whole, it is reasonable to assume that at least 40% of those in receipt of the Scottish Child Payment will have an additional support need. My calculations have therefore factored in the need to avoid double counting of pupils that are both in receipt of the Scottish Child Payment and have an additional support need of some kind.

My calculations also include the additional £1,500,000 allocated above under my option 1 for those with complex additional support needs. On that basis the targeted provision model for all primary children in receipt of the SCP and/or with an ASN would cost in the region of £15,289,000 to £16,832,000.

Again, despite factoring in increased costs in all the ways set out on page 6, these estimates are up to £18.4 million lower than the initial estimates in the Financial Memorandum.