

Children, Young People and Education Committee inquiry into School Funding



December 2018

Dear Chair,

I write on behalf of the National Deaf Children's Society Cymru with regard to the committee consultation into school funding. Unfortunately, due to limitations on our time at present, we are unable to provide a full and detailed response. Nevertheless, I wanted to take this opportunity to highlight the following key points:

- The National Deaf Children's Society Cymru believes it is important to ensure local authorities/regional consortia retain overall control of funding for supporting learners with hearing impairment. This is because, given the relatively low incidence nature of deafness and the specialist nature of the support required, it is difficult to plan and retain support at a school level, where needs will be prone to fluctuation. Indeed, this is also a particular issue when considering support for learners with temporary hearing loss.
- The National Deaf Children's Society does, however, provide some guidance to assist with the development of service level agreements and with commissioning of services. These are available [here](#).
- We are conscious that more responsibility for Additional Learning Needs (ALN) will pass to schools when the new Additional Learning Needs and Education Tribunal Wales Act comes into force in September 2020. This legislation will also place new responsibilities on local authorities with regard to ALN in the early years. We urge that Estyn and Regional Consortia assume specific roles in monitoring ALN spending and ensuring that funding for this crucial support is appropriately planned for.
- Although this inquiry focuses on school funding, we wish to take this opportunity to highlight two issues with regards to FE funding. Firstly, we are concerned that a number of local authorities have recently reviewed and cut funding for transport for ALN learners in FE. We were disappointed that the Welsh Government did not respond to calls for transport to form part of the statutory IDP template under the new Additional Learning Needs and Education Tribunal Wales Act. Given the current economic

climate, cutting transport for post-16 learners with ALN appears to be regarded as a cost saving. We understand that the Welsh Government has committed to a review of transport guidance and we would urge the Committee to emphasise the need for this important issue to be addressed within such a review.

Secondly, the Welsh Government has been planning for some time to devolve funding for ALN support for FE learners to local authorities and FEIs. The population within an FEI/local authority requiring support of this nature can fluctuate greatly year on year and the support itself can be high in cost. As such, we have long expressed reservations about how funding formulas will take account of these needs, but also crucially, how FEIs and local authorities will be held to account on ALN spending given that the funding will be non-ring fenced and held within general funding settlements and the RSG. We are concerned that this issue is further exacerbated by the fact that, under the new legislation, decisions on whether a learner will receive support in a mainstream FEI or is eligible for a specialist FE placement will ultimately rest with FEIs and local authorities. Since it is not within the financial interest of either to place the young person, we are concerned that this could present potential difficulties. We have been raising these issues, but are conscious that no resolution appears to have been reached. Indeed, within the recent Ministerial statement on FE Funding, the Minister highlighted that the review on FE funding in relation to ALN is still ongoing.