

SNAP Cymru evidence to the National Assembly for Wales Children, Young People and education Committee. Consultation on the general principals of the Additional Learning Needs and Education Tribunal (Wales) Bill.

SNAP Cymru calls for the committee to consider that:

1. Section 61 of the bill (avoidance and resolution of disagreements), subsection 3 should read 'The arrangements under subsections (1) and (2) must include provision for parties to a disagreement to access help in resolving it from persons who are independent from the Local Authority.'
2. Families should receive information from Local Authorities that is clear, transparent and about the law, regulations and the code rather than their own local policies.
3. Policies and provision across Wales should not be a post code lottery and should be delivered on a policy and a procedure for Wales. Good practice should be better shared and provision must be enhanced, accepting that the whole transformation agenda will take time. (Points 48 to 50 of this document)
4. SNAP Cymru disputes the information found in the ALN and ET (Wales) Bill Explanatory Memorandum incorporating the RIA and explanatory notes (specifically section 8) and calls for the committee to urgently scrutinise the document and its findings. (Paragraphs 51 to 68 of this document which covers the number of cases involved and the actual costs and funding from local authorities)

SNAP Cymru's Charitable Objectives are:

5. To provide or assist in providing information, advice and support to enable children and young people and their parents or guardians to participate fully and equally in society.
6. To assist parents and guardians in their understanding of relevant legislation and through this to facilitate their children's contribution and involvement in life choices.
7. To facilitate the partnership of young people, parents and professionals in decisions relating to education and inclusion.
8. Independent Social Return on Investment analysis (SROI) estimates that for every £1 invested in SNAP Cymru activities there is £20.61 of social value created. (Wavehill, SNAP SROI Model, March 2014)
9. SNAP Cymru services are Quality Assured. We hold the Community Legal Services Specialist Quality Mark in Education Advice; The Investors in People (Bronze); Investing in Volunteers quality Award; The Queens Diamond Jubilee Award for Volunteering. Our training unit is accredited by Agored Cymru to level 4, and our website has been selected as an example of excellence in bilingual contemporary media in Wales as part of the Digital National Archive.

Services for families

10. SNAP Cymru is a Welsh Charity that provides a range of services to support children, young people and families. We help families solve their problems and empower them to move on with their lives. We are best known for our Parent Partnership Service which is currently a statutory duty S332A, Education Act, 1996 and SEN COP 2:16. This service provides independent accurate information, advice and support for parents, children and young people (0-25) who have additional learning needs, or problems that are preventing them reach their potential. The advice we provide is accurate, impartial, honest and reliable, and is provided through our national helpline, interactive website, and for those that need more support, through our specialist casework and advocacy services.
11. We aim to promote partnership between children, young people, families and professionals, helping them to seek agreement on the provision of support for children and young people. By encouraging open dialogue and negotiation real conflict is avoided, leading to better outcomes for children and young people.
12. Working throughout Wales from SNAP Cymru offices, drop in centres, surgeries, telephone support and home visits SNAP Cymru works holistically with families using a partnership and empowerment model. By providing key working, accurate information, objective advice, direct independent professional specialist advocacy, support and training we empower families and promote true partnership between all stakeholders. The focus of our work encompasses a range of issues including: assessments, statements of special educational needs, barriers to communication, bullying, school attendance, exclusion, health, and training, transition, preparing for adult life, work and social care. We also help parents, carers, children and young people to understand and complete forms/reports, with preparing and attending appointments, meetings, appeals, and tribunals.
13. SNAP Cymru is rooted in local communities across Wales, giving us extensive local knowledge of local policy and practice as well as legislation and national policy. SNAP Cymru's flexible staff and volunteers are able and willing to work collaboratively and quickly to identify and respond to emerging need and trends.

Casework information. The evidence base for this information is derived from the SNAP Cymru database including the feedback from families and professionals who have accessed the service.

14. There has been a significant increase in the number of families SNAP Cymru are working with. This increase is a trend across Wales.
15. The number of referrals received in the first two quarters of 2016/17 is equivalent to the number of referrals received for the whole of last year, 2937. Each referral raises two or more problems to deal with.

16. SNAP Cymru understands there are a number of reasons for the overall increase in referrals with the main reason being reported by families is anxiety and uncertainty by parents and carers about the measures in the ALN Bill. Staff and volunteers have responded to the increase in referrals in a timely and effective manner. The significant increase in demand and the feedback from families illustrates the need for an independent service works that can work holistically with families using a partnership and empowerment model that includes key working.
17. The number of problems presented in the first two quarters of 2016/17 has risen to 7,290 from the whole year total 2015/16 of 5,579. This is a significant increase. If this trend continues to the end of the year we will have dealt with more than twice as many problems as last year.
18. There was a minimum of two problems presented per referral, the problems presented included: Access to Services, Education, Access to Services, Health Access to Services, SSD, Advocacy, Amendment to Statement, Annual Review, Appeals, Admission, Appeals Exclusion, Appeals - SEN Tribunal, At Risk of Exclusion, Benefits & Grants, Bullying, Cease To Maintain Statement, Communication Breakdown, Complaints, Local Authority, Complaints School, Disagreement Resolution Informal, Discrimination, Early Years Provision, Educational Provision, Exclusion, Fixed, Exclusion Illegal, Exclusion Internal, Exclusion Permanent, Home Education, Home Tuition, IEP / IDP, NEET, No Placement, Non Attendance, Note in Lieu, Placement, Proposed / Draft Statement, Refusal to Assess, Refusal to undertake Statutory Assessment, School Assessments, Statement, Statutory Assessment, Transition, Transport.
19. By providing key working, accurate information, objective advice, direct independent professional specialist advocacy, support and training SNAP Cymru has empowered families and promoted true partnership between all stakeholders. The majority of families SNAP has worked with reported increased confidence to advocate effectively on behalf of their child and improved relationships with professionals with the majority of children and young people reporting that they were actively supported to participate in decision-making about their future and where appropriate, to make choices

Scope of SNAP Cymru's Activities

Informal dispute resolution (SNAP Cymru and Local Authority practice of 'Early avoidance of Disagreements')

20. In 67% of cases actioned by SNAP there is evidence that there was an avoidance of escalation to formal disagreement. SNAP Cymru has helped by building trust and understanding bringing all sides together in mutual trust and respect. Communication can be a major barrier, our officer's and volunteers have worked informally to resolve issues, plan and facilitate meetings, empowering and supporting both parents and professionals, encouraging partnership working. These crucial activities have helped to avoid disagreements escalating, and reduced conflict. This work has also helped to avoid

escalation to formal processes including complaints and appeals to the Special Educational Needs Tribunal Wales (SENTW). Most Local Authorities in Wales have an open-door policy in relation to working with SNAP Cymru and are eager to meet with families at the earliest possible time to avoid dispute and conflict.

School Exclusion

21. The number of referrals received where the problem presented concerned exclusion in the first two quarters of 2016/17 is nearly double the number of referrals received for the whole year of 2015/16. The total referrals for Q1 and Q2 were 697 and for the referrals 2015/16 were 338. Problems concerning exclusion issues represent 23% of the total referrals. The children and young people concerned have Additional Learning Needs.

Formal Appeals and Complaints

22. SNAP has de-escalated the situation in respect of possible formal appeals to SENTW. In 12% of the referrals received by SNAP Cymru families the possibility of appealing to SENTW was discussed of which 71% were considering appeal to SENTW with only 22% of those considering an appeal actually lodging an appeal with SENTW. SNAP Cymru has helped by building trust and understanding bringing all sides together in mutual trust and respect. Communication between families and professionals can be a major barrier, our officer's and volunteers have worked informally to resolve issues, plan and facilitate meetings, empowering and supporting both parents and professionals, encouraging partnership working. These crucial activities have helped to avoid disagreements escalating, and reduced conflict. This work has also helped to avoid escalation to formal processes including complaints and appeals to SENTW.

Grievance against Local Authority or School

23. There is a significant increase in the number of parents expressing a grievance against the LA or the school, it is a trend across Wales. The total number of complaints about the school or LA in 2015/16 was 177 approximately 20% of the number of complaints of Q1 and Q2. SNAP Cymru sees this as a response to parents' anxiety and uncertainty about the provision in the Education Bill as one of the reasons for the significant increase.

Hours of support evidenced on individual named case files

24. Minimum of 3 Hours per case. This represents 35% of the cases worked on during Q1 and Q2. These were the lower input cases which most often were handled from start to finish through the Telephone help centre and/or via email from the SNAP Cymru website. This service has been provided to triage, listening and understanding problems offering early advice and guidance and referring more complex or contentious cases to our Casework Teams. The aim has been to reduce conflict through early intervention.

25. Over 7 Hours per case. This represents 32% of the cases worked on during Q1 and Q2. These are generally the cases where families required a listening ear and support with filling in forms and reports, and with preparing for appointments, meetings, appeals, and tribunals. Most of these cases were forwarded from the telephone help centre to the casework service for more intensive support.

26. Up to 20 Hours per case. This represents 21% of the cases worked on during Q1 and Q2. Some families required more specialist support with complex problems, or they needed more help with understanding their child's ALN, and developing positive relationships with school and the professionals working with their child. SNAP Cymru caseworkers worked with the families to help them understand the issues, their rights roles and responsibilities of all partners in the process. We helped them understand reports and fill in forms, and explained about the benefits of working together in partnership, about the avoidance of disagreements, and gave information and helped with appeals, discrimination issues and complaints.
27. More than 20 Hours per case. This represents 12% of the cases worked on during Q1 and Q2. Cases of over 20 hours represented a smaller number. However, these were usually very complex, time-consuming cases requiring specialist support from skilled and experienced staff. The type of casework included Pupil Disciplinary Committee/ Independent Appeals, SENTW Appeals, Discrimination and Complaints. The kind of work carried out included preparation, advocacy, and facilitation of meetings, and in some cases, support at appeals and tribunals.
28. SNAP Cymru calls for fairness, transparency, access to information, advice, advocacy, avoidance of disputes and dispute resolution in the new additional learning needs system.
29. SNAP Cymru believes in strong, empowered and resilient families. Providing support for families when they need it most. Providing Independent Advice, Information, Dispute and Avoidance Services.
30. SNAP Cymru believes that free impartial advice is crucial and valued by the people receiving it. The significant increase in demand and the feedback from families illustrates the need for an independent service that can work holistically with families using a partnership and empowerment model that includes key working. It is vital that families receive accurate information and advice about ALN legislation and the code. We believe that information, advice, support, advocacy and dispute resolution services should be wholly independent.
31. Many families perceive and report that Local Authorities prefer their own interpretation, their own policies and procedures rather than legislation, regulation and the code. Their experience to date has not given them confidence in a new system. Many report that they have been pushed into accepting provision that falls short in meeting their children's needs and have been left with no right of appeal. Under the current system where parents have accepted provision without a statement and things have gone wrong for their child they tell us that they feel disempowered and hopeless, passed from school to Local Authority and back again, one blaming the other, sadly wasting precious time for their child or young person. Unfortunately, we have evidence that many parents have been unaware of their rights prior to a consultation with SNAP Cymru. Parents need transparency, need information and explanation, expect to be told of all options open to their child. Our

experience is that this does not always happen. Parents report that they have had to give up as they feel that they cannot compete with the Local Authority. Schools too report that they are not always happy with arrangements and have spoken to SNAP and parents stating that often any additional funding attached to the arrangement is minimal and only agreed for a very short block of time; that it often comes with no additional advice, training or EP time, and that often the child or young person's needs are such that they require a full assessment which should include outside agencies assessment and advice and does not.

Evidence to Support Independence

32. In response to the information found in the ALN and ET (Wales) Bill Explanatory Memorandum incorporating the RIA and explanatory notes: Page 98 7.41 – 7.43
- 33.7.41 Evidence from a local authority which has introduced the role of additional learning needs family support officer as a way to avoid disagreements has seen a significant fall in the number of appeals to tribunal.
- 34.7.42 The additional learning needs family support officer is responsible for providing advice and support with assessments, statements and annual reviews, including preparation for and support at meetings.
- 35.7.43 Children and young people should also benefit through having a more efficient and less formal approach to resolving disagreements.

SNAP Cymru Response

36. Whilst we recognise the benefits of having Local Authority personnel with time, patience and an in-depth knowledge of rights in legislation, we present a wider picture for Carmarthenshire. We bring to the attention of the committee that there has been an increase in referrals to SNAP Cymru in all LAs across Wales. Carmarthenshire receives 6 monthly reports from SNAP Cymru relating to the annual SLA for Parent Partnership Services including Disagreement Resolution.

Example 'SNAP Cymru Executive Summary' report for Carmarthenshire for the period 1st April 2016 to 30th September 2016.

37. The evidence base for the report is derived from the SNAP Cymru database including the feedback from families and professionals who have accessed the service.
38. There has been an increase in demand for the services available from SNAP Cymru from families in Carmarthenshire. There has been an increase in the number of referrals received. This increase is a trend across Wales.
39. The number of referrals received in the first two quarters of 2016/17 is 86, 62% of the number of referrals received last year, 139. Each referral raised a minimum of 2 problems.

40. There has been a significant increase in the numbers of problems presented. The numbers of problems presented in the first two quarters of 2016/17 exceeds the number of problems presented for the whole year of 2015/16 by 38 to 177. The total for last year was 139.

Highlights from the Carmarthenshire report:

41. In 98% of cases actioned by SNAP there is evidence that there was an avoidance of escalation to formal disagreement. SNAP Cymru believes that it is essential that each of the parties involved understand the problems each other's point of view, SNAP Cymru has helped by building trust and understanding bringing all sides together in mutual trust and respect. Communication can be a major barrier, our officer's and volunteers have worked informally to resolve issues, plan and facilitate meetings, empowering and supporting both parents and professionals, encouraging partnership working. These crucial activities have helped to avoid disagreements escalating, and reduced conflict. This work has also helped to avoid escalation to formal processes including complaints and appeals to SENTW

42. SNAP has de-escalated the situation in respect of possible formal appeals to SENTW. In 33% of the casework families discussed the possibility of appealing to SENTW of which 14% stated they were considering appealing to SENTW. Of the 28 cases only 6, 21%, lodged an appeal with SENTW. (some of these cases may be withdrawn from SENTW through informal or formal disagreement resolution)

43. SNAP Cymru provided avoidance of dispute at local level in 96% of cases to help resolve matters. SNAP believes that it is essential that each of the parties involved understand the problems of each other's point of view, SNAP Cymru has helped by building trust and understanding bringing all sides together in mutual trust and respect.

44. 60% of the cases in Q1 and Q2 had a complaint against the school or the LA on one of the matters. There is a significant increase in the number of parents expressing a grievance against the LA or the school, in Q2. Whilst there is a trend across Wales the number of complaints and the increase in Q2 is particularly significant in Carmarthenshire. (SNAP Cymru Interim Report to Carmarthenshire Local Authority, Executive Summary, P.2)

Independent information, advice, dispute, avoidance, and advocacy

45. Whilst we believe the introduction of Carmarthenshire's family support officer role is effective in so much as we cannot provide sufficient services for families on the current rate of commissioned services from Carmarthenshire. We can also evidence an increase in referrals to SNAP Cymru's independent service from the same Local Authority over the same time period. Parents perceive the service from SNAP Cymru as independent and tell us they are more confident when using our service. Evidence from the stakeholder events has been

overwhelmingly in favour of independence when it comes to delivering information, advice, dispute, avoidance, and advocacy.

Supporting Evidence

46. During the recent participant events in Cardiff and Llandudno parents and carers said: 'This needs to be really tight'. 'Local Authorities often put their own policies before the law'. 'There would be more of an adversarial situation without SNAP Cymru support.' 'Independent support is badly funded.' Parents state that Local Authorities have not been truthful with information to them in the past and expressed how difficult and stressful a time they had trying to get LAs to commit support for their child. They also felt strongly that: Advice and avoidance and resolution services and advocacy should be independent and not funded by LA- should be funded directly by Welsh Government directly. 'Disagreement resolution-parents want someone on their side'. 'We need honest Options/choices identified-informed.' 'Catching early years is so important, we need early information, mediation rather than tribunal.' 'Early information provision and dispute resolution – 'should not be an LA person.'

The evidence from the stakeholder event of 26th January also supports independence:

47. 'Families need information, advice and advocacy support as early as possible. The independence of this advice is vital.' 'Parents are more likely to accept decisions they may not necessarily like if an explanation comes from an independent, credible source.' (6.3 P.12) 'Advocacy to support should be available from an independent source from the early disagreement avoidance stages through to the dispute resolution stages. Families need support 'from start to finish, including when attending tribunal.' (6.4 P.13) 'The Bill does not include provision for parent partnerships'. 'Currently, local authorities contract with organisations such as SNAP to provide parent partnership services.' (6.4 P.13)

SNAP Cymru calls for the committee to consider that:

48. Section 61 of the bill (avoidance and resolution of disagreements), subsection 3 should read 'The arrangements under subsections (1) and (2) must include provision for parties to a disagreement to access help in resolving it from persons who are independent from the Local Authority.'
49. Families should receive information from Local Authorities that is clear, transparent and about the law, regulations and the code rather than their own local policies.
50. Policies and provision across Wales should not be a post code lottery and should be delivered on a policy and a procedure for Wales. Good practice should be better shared and provision must be enhanced, accepting that the whole transformation agenda will take time.

Funding Disagreement Resolution Services

51. SNAP Cymru disputes the information found in the ALN and ET (Wales) Bill Explanatory Memorandum incorporating the RIA and explanatory notes (Pages 115 onwards incorporating 8.72 – 8.103):
52. RIA 8.76 states: During the 30-month period October 2013 to April 2016, SNAP Cymru dealt with approximately 12,600 cases on behalf of 20 local authorities. The following is disputed:
- a. For information the 12,600 refers to the number of cases available to the responder from the electronic data base and the source of the percentages given, and not the number of cases received in a 30 month period.
53. RIA 8.77 states: The primary reason for 3,485 of these was the resolution of disagreements around wanting or having a statement of SEN. The average cost per case, where appeal to SENTW is avoided, is £2,000. Thus, 20 of the 22 local authorities in Wales spent an average of approximately £2,788,000 a year funding disagreement resolutions services for 1,394 disagreements around wanting or having a statement. Grossing these figures up from 20 local authorities to 22 local authorities equates to £3,066,800 per year for funding disagreement resolutions services for 1,533 disagreements across 22 local authorities. This is equivalent to £3,164,000 in 2016-17 prices.

SNAP Cymru Response

54. The above implies that the 20 Local Authorities have funded SNAP Cymru (as the major provider) to provide disagreement resolution services at the total cost of £2,788.000 per year (2013 – 15 prices) and £2,876.400 (2016 -17 prices) (Table 15 Page 139).
55. This is not the case and brings this and further sections of the assessment report into disrepute. Clearly there has been misunderstanding in the information gained which is disappointing to SNAP Cymru as the misinformation /interpretation has set our service practice in a very poor light in relation cost implications for Local Authorities and families. The committee should consider the following:

True cost of supporting families

- 56.1 where a case progresses to SENTW - Average cost of supporting a family from their initial concerns or complaints through to SENTW appeal is £4,125 (118 hours average)
- 57.2 where a case is resolved through formal disagreement resolution without recourse to tribunal - Average cost of supporting a family who want to appeal to tribunal but where we provide a successful formal mediation session (average 57 hours) £2000. Total number of cases in these two categories in the period described - 30 months, was 20

NB. PLEASE NOTE THIS IS THE COST TO SNAP CYMRU BASED ON INDICATIVE STAFF COSTS AND NOT THE AMOUNT BEING PAID BY THE LOCAL AUTHORITIES IN WALES.

58. The costs to Local Authorities for Formal Disagreement Resolution is £600 for each case. These are very few. Of the fewer cases where SNAP Cymru has been involved in Tribunal

there has been no additional costs to the Local Authority above the agreed SLA commissioned services for Parent Partnership Services. All services provided by SNAP Cymru have been free at the point of delivery for the last 30 years. The vast majority of cases brought to SNAP Cymru are resolved informally at local level. We have delivered a successful avoidance of formal dispute service through an independent, objective but impartial services. Practice is based on an empowerment model providing key working and or advocacy when required and as funding allows. The Parent Partnership Services have been enhanced by additional funding including fundraising, volunteering and Welsh Government/Local Authority Family First and Disability Discrimination Advice funding.

Looking back 30 months from February 17.

59. Almost all cases - totalling 7,135 were resolved in times ranging from 2 to 180 hours, without appealing to SENTW, at a cost of £70 to £4,400 to SNAP Cymru. The average case time is around 10 hours outside of Families First contracts. Of the 7,125 cases that did not result in an appeal to SENTW around 71% received informal disagreement resolution. These cases brought 17,000+ matters seeking resolution: ranging from education provision and exclusion through to complaints and appeals.

60. The costs to Local Authorities for Formal Disagreement Resolution is £600 for each case (17/18 cost to LA.) This cost is split between preparatory casework with all parties including administration and the dispute resolution session with all parties. These Formal sessions are very few and some of these can be resolved at the preparatory stages, reducing the costs to LAs by 50%. On the fewer cases where SNAP Cymru has been involved in Tribunal there has been no additional costs to the Local Authority above the agreed SLA commissioned services for Parent Partnership Services including volunteer Independent Parental Supporters (IPS). All services provided by SNAP Cymru have been free at the point of delivery for the last 30 years. The vast majority of cases brought to SNAP Cymru are resolved informally at local level. We have delivered a successful avoidance of Formal Dispute service through an independent, objective but impartial service based on an empowerment model providing key-working and or advocacy when required and as funding allows. The Parent Partnership Services have been enhanced by additional funding including fundraising, volunteering and Welsh Government/Local Authority Family First and Disability Discrimination Advice funding.

61. This case load, when costed at a true cost of fully funded service delivery, should cost over £1.6 million per year but as it is supported by volunteering activity plus subsidised by other charitable giving, grants and sale of services and goods it is delivered at well below these costs to LA Commissioners. However, in these past two years SNAP Cymru has used its reserves to continue to provide services in each of the last two financial years and will do so again in this current financial year:

14/15 = - £40,548

15/16 = - £21,680

62. The use of reserves to subsidise Local Authority work is unsustainable, our reserves are now depleted to 3 months running costs. We are running a very tight ship and getting

exceptional value for every £ spent. The actual costs funded by local authorities in 2014-2015 was £720,000 and £823,000 in 2015-16. Thus it is clear that local authorities are getting amazing value for money but also that their level of funding will need to increase if they want the same number, or more, cases dealt with in the future. SNAP Cymru's total income for the 30-month period specified in the RIA document was £2,502,057

63. Within the Welsh Government Explanatory Memorandum and Regulatory Impact Assessment dated December 2016 it is stated that Local Authorities have been funding SNAP Cymru to the tune of £2.7 Million pounds, per annum, strictly for the handling of approximately 1,394 cases per annum. Unfortunately, this is not possible. Whilst we would dearly love to be so well funded, it is not a reflection on reality. Within the time-period specified (30 months), SNAP Cymru has received, from all sources (Including grants, fundraising, donations & Charity shops), 2.5 Million pounds in income. This 2.5 million pounds has provided casework, advice and disagreement resolution services to 12,600 cases across Wales. It is simply not reasonable to suggest that 1,394 instances of disagreement resolution, has cost Local Authorities 2.7 Million pounds per year, when the total amount of money they provide to the purveyors of this service is, on average, £574,434 per annum. This is the amount of money we receive for provision of Parent Partnership services from Local Authorities. This service is enhanced by funding from the Families First project which enables us to provide additional support for the most vulnerable families. However, even with this included, the total funding for the Provision of all Parent Partnership Services, including disagreement resolution, is just £814,201 per annum.

64. The figures arrived at within this report form the basis for a great deal of mathematical calculations made regarding how much services cost and projections about how much money could be saved under alternative models. However, as demonstrated above, the central claim regarding the amount of cost incurred by local authorities, is not backed up by any evidence. The attribution of a £2.7 Million pounds cost per annum for services provided to 1,394 cases has absolutely no basis in reality and is in fact an order of magnitude away from offering even a partial representation of the true funding picture. Reliable data is the cornerstone of good decision making. As such, all conclusions drawn from this grossly misrepresentative figure, cannot be considered sound.

Cost

65. The actual costs funded by local authorities in 2014-2015 was £720,000 and £823,000 in 2015-16. Thus it is clear that local authorities are getting amazing value for money but also that their level of funding will need to increase if they want the same number, or more, cases dealt with in the future.

66. The actual total funding received from Local Authorities in relation to Parent Partnership Services and Disagreement Resolution is:

2012/2013	£678,800.88
2013/2014	£674,786.48
2014/2015	£554,840.74

2015/2016 £591,482.10

2016/2017 £595,465.39

67. Additional funding from a range of source including fundraising, shops and Welsh Government, (Disability Discrimination Advice, Inclusive Play, Families First) enhances this service.

2012/2013 £166,354.50 + ESF Convergence £430,245.00 (2012/2013 only)

2013/2014 £221,398.67

2014/2015 £203,419.54

2015/2016 £227,141.67

2016/2017 £214,921.00

Audited accounts available upon request from Denise Inger, Chief Executive Officer, SNAP Cymru email denise.inger@snapcymru.org and, also available via the Charities Commission website as public documents.

68. SNAP Cymru calls for the committee to have significant scrutiny to the findings in the ALN and ET (Wales) Bill Explanatory Memorandum incorporating the RIA and explanatory notes, specifically 115 onwards incorporating 8.72 – 8.103 which are factually incorrect.

Funding advice, information, avoidance of disagreement and advocacy services

69. Many families tell us that they would not have resolved their problems without our support. However, we can only do this if we receive sufficient funding. Whoever provides information, advice, dispute resolution and advocacy services, they will need to be consistently highly trained and adequately resourced in order to deliver and meet demand.

70. In just two quarters of this year SNAP Cymru has received nearly 3,000 referrals to the service and worked with over 7,290 problems. This in just 6 months!

71. 75% of referrals required the support from a caseworker - 2,250 cases. This is double the workload expected of each skilled and experienced caseworker. So, putting it quite simply we need more capacity to meet demand, adequate funding to provide the quality of service expected.

72. SNAP Cymru is presently receiving less than half the funding it needs to meet current demand. We know we are not alone, and that we all must work within very limited resources, however, if Welsh Government and Local Authorities are committed to ensuring the rights of children and families and equality for the most vulnerable in Wales a fair funding formula needs to be agreed for whoever provides it.

73. SNAP Cymru believes there will be an unavoidable surge of anxiety from families and professionals. Change is always difficult to achieve and it will take considerable time before the transformation agenda is achieved. Effective communication and engagement of all

stakeholders will be key and it will be vital for schools FEI's and LAs to have transparent systems, clear consistent messages across Wales and sign up from all professionals involved.

74. Whilst statutory IDPs are welcome they will not remove all the problems experienced in the current system. Costs savings identified are grossly overestimated and whilst we would wish for a smooth transition to include young people up to 25 we do not envisage that the systems will not be challenged. There is likely to be difficulties between Local Authorities and FEI's and schools and this will not be missed by young people and families, resulting in low confidence and anxiety which in itself will cause dispute. The assumption of there not being any disagreement or appeals because there is no statement is not the reality. We do believe the legislative changes will bring about a fairer system over time but this will not be without costs.
75. SNAP Cymru welcomes the considerations to early years and all our young people 0-25 within our education systems with ALN to have an IDP where needed but we must recognise that this will have additional risks of disagreements and appeals and that young people and families must have independent information advice, support and advocacy where required.
76. SNAP Cymru notes the WLGA responses and agree that it is 'highly likely that the system will be tested in the short to medium term and there is a risk that local authority resources could be stretched if the full implications of extending the statutory system in terms of additional disagreements/appeals are not properly addressed now. It is equally the case that any rise in appeals will have a significant impact on the Education Tribunal'.