



National Assembly
Finance Committee

Financial estimates
accompanying legislation

7th June 2017



CLILC • WLGA

(1) Introduction

1. The Welsh Local Government Association (WLGA) represents the interests of local government and promotes local democracy in Wales. Its primary purposes are to promote better local government, to promote its reputation and to support authorities in the development of policies and priorities which will improve public service and democracy. The WLGA is a membership organisation and represents all 22 local authorities in Wales, the 3 fire and rescue authorities and the 3 national park authorities as associate members.
2. Local Government is a vital partner for the Welsh Government in delivering its broad social and economic outcomes. There are clearly few areas where councils do not make a crucial contribution to national outcomes. In the fourth Assembly term the Welsh Government tabled a legislative programme comprising over 21 proposed Bills at the outset of 2011. This programme was amended as the fourth term progressed but many of the Bills had significant implications for local government.
3. There is a wider context beyond the legislative implications. Since 2009, ongoing austerity has seen core funding reduced considerably. This has had to be absorbed by local government and the cuts to service provision have been immense. Contextually, an example, would be that during the period that the Planning Act (Wales) gained Royal assent in July 2015 the planning service has seen huge cuts to a level reaching 53%.
4. The implications of law making across other levels of government can be just as impactful if they create pressures that ultimately must be absorbed by local government. Both the European Council/Parliament and the UK government promulgate legislation that has an impact on local government in Wales. Much of the Welsh Government's legislative programme had dependencies and links to other legislation that could be better planned and the implications better assessed in times of unprecedented funding reductions. This is about better financial planning. It is also about the recognition that we need a New Burdens Doctrine in Wales which is robust and properly monitored.
5. The previous position in Wales was enshrined in the agreement concluded between the then Finance Minister, Sue Essex AM, and the previous Leader of the WLGA, Sir Harry Jones, in December 2003. Behind this was the principle that was recognised by the then Welsh Assembly Government that "any new responsibilities and new initiatives must be fully funded before they are passed onto local government and that all new grant schemes must follow the protocol". This agreement, however, never stuck and the result is that legislation emerges the funding of which is often subject to post hoc justification.
6. The position in England is also problematic. The New Burdens Doctrine which arose from the implementation of the Localism Act in 2011 saw guidance issued to

government departments that requires them not only to justify any new duties and other bureaucratic burdens placed on councils but also to state how much they will cost and where the money will come from. Whitehall departments must estimate the costs of implementation and any recurring costs for three years. The guidance states that Whitehall Departments must assess the impact of policies on council tax in each individual year: 'Departments cannot argue that short-term costs will be offset against long-term savings. Only specific identified cost savings (rather than vague, non-specific, or unquantifiable savings) can be offset against identified costs.' Once a cost estimate is made, it is to be discussed with the English LGA.

7. A recent study by the Public Accounts Committee in 2015 chaired by Meg Hillier MP nevertheless showed that the reality did not match the rhetoric. The [report concluded](#) that the [new burdens doctrine](#) does not guarantee funding for significant new costs in a host of different policy areas. This has created "considerable uncertainty" for councils, as there has not been sufficient clarity from the Department for Communities and Local Government about what is assessed and funded as a new burden and what is not. Areas where the regime is not expected to meet additional costs include the [national living wage](#) and changes to employers' [national insurance contributions](#), according to the report.
8. Both in England and Wales the issues this haphazard approach causes are multiple. The most pronounced is the fact that if new costs to councils are not adequately funded then services will suffer. There is also a real danger of cost-shunting with huge pressures falling on already stretched services.
9. Local Government's experience of the financial implications of Welsh Government's legislative programme might be mixed but there have been examples of good practice. In terms of local government, what might be considered good practice is nothing more than good and early engagement by Welsh Government with all stakeholders and post-implementation evaluation. Sometimes that is not as straight forward as it appears.

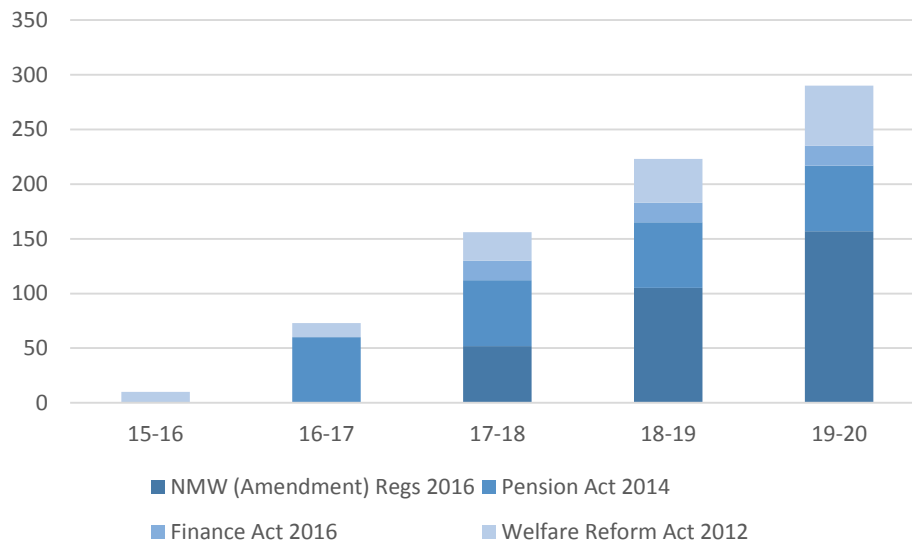
(2) The broader context and medium term financial planning

10. We have set out the broad financial context for local authorities in stark terms to the Committee most recently into its inquiry into the Draft Welsh Government Budget 2017-18, where the financial implications of legislation was also touched upon. While the WLGA is generally supportive of all major legislation we have been concerned for a while that that new legislation leads to unfunded pressures. Furthermore, these are not being considered alongside the programmes of other legislative bodies and there is little consideration of the added impact of austerity on local government and wider public services.
11. One of the WLGA's major concerns is the WG approach to financial planning, which has been virtually non-existent beyond annual incremental budget setting. The previous administration, despite being committed to an ambitious legislative programme that was driven by the First Minister's Delivery Unit, lacked a coherent approach to financial planning. The back-drop over this period was the one of deep austerity where Local Government Budgets were being subjected to unprecedented cuts.
12. In his [Financial Resilience Report](#), the Auditor General has calculated that between 2010-11 and 2016-17, there was a real-terms reduction of £761 million (17%) in aggregate external finance (core grant) for local government. This has had varying impacts across local public services with some experiencing real terms reductions of over 50%, and spending at levels not seen since the 1990s.
13. There is no doubt that local public services continue to bear the brunt of austerity in Wales and this is likely to continue well in the next Parliament. Legislation should be planned in a co-ordinated and coherent way recognising that significant funding for new functions and responsibilities is unlikely to materialise soon. If funding for new responsibilities is required it should be very clear where the funding is coming from.

(3) Consideration of UK Government Legislation

14. One of the main effects of UK Government legislation has been to increase the cost base of local government without additional funding being made available. The figure below shows the cumulative impact of 4 pieces of legislation. Except for the Welfare Reform Act, most have impacted on the workforce costs of local government in Wales. It is a key point as £3.5bn of local government expenditure is attributable to payroll.

Figure 1: Impact of UK Government Legislation since 2015-16, £m



Source: WLGA

15. The Pensions Act 2014, the National Minimum Wage (Amendment) Act 2016 and the Finance Act 2016 will have added around £235m to the cost base of local government by the end of 2019-20. Some measures cause one-off increases to the cost base such as the loss of the National Insurance rebate due to the introduction of the single tier pension (the Pension Act) and the introduction of the Apprenticeship Levy (the Finance Act). The introduction of the National Living Wage produces cumulative increases to the cost base that reverberate many years into the future.
16. We understand that the Welsh Government itself may have additional cost imposed where functions are devolved with funding cuts that it chooses not to pass on. For example, when the old system of Council Tax Benefit was replaced under the Welfare Reform Act 2012, the Welsh Government had to find an additional £22m when it introduced regulations for a new Council Tax Reduction Scheme in 2013-14. However local authorities were left to bear the risk for any future cost implications consequent on changes to caseload numbers and council tax rates.

(4) The Case Study Acts and the broader legislative programme

17. Our experience of new legislation and associated impact assessments is mixed. Where there is good and early engagement with local government, generally satisfactory outcomes in terms of implementation are being achieved. The Housing (Wales) Act was a good example of where Welsh Government and local government have worked together on ground-breaking legislation. For local government, it is not just new legislation but any policy change by the Welsh Government that potentially has cost implications.

Social Service and Wellbeing (SSWB) Act

18. The WLGA has been very supportive of the principles and ambitions of the SSWB Act, but believe some of the costs have been underplayed and some of the benefits oversold. The very nature of this enabling legislation meant that it was difficult to analyse with any degree of rigour, as we found out when commissioning the Institute for Public Care to analyse the cost implications of the Bill. This was a joint endeavour, along with the NHS Confederation, ADSS Cymru and the WCVA.
19. There was also a period when the Civil Service maintained an opening gambit that the provisions of the Act would be “cost neutral” which strained credibility. This formed a theme going back to other initiatives the most pronounced of which was the introduction of the Foundation Phase in 2008 which generated a huge debate at the time and was significantly underestimated in financial terms (see former [Finance Committee report](#))
20. In our evidence to the Health and Social Care Committee during scrutiny of the SSWB Bill, we highlighted our concerns over the available funding and resourcing for the Bill along with the level of detail contained in the Explanatory Memorandum (EM) and Regulatory Impact Assessment (RIA). We highlighted serious concerns about the resource impacts of the Bill and the risk of committing to the duties of the Bill ahead of knowing the resource impacts. By the nature of the Bill’s scope and the extent of new duties (as opposed to discretionary powers) to be conferred on local government we believed that new burdens would be placed on authorities and, as a result, the Bill would not be cost neutral.
21. We highlighted concerns over the limited scope of the RIA in that it underestimated the financial impact of the proposed changes. The costs identified in the Bill’s RIA were limited to analysis around additional training costs and cost benefits in relation to reduced administration, complaints and litigation. This led to the RIA to conclude that, “the additional benefits of implementing the Bill will outweigh the additional costs of implementation over the long term.” Though it was recognised that this was “a simple comparison based upon the intent of the primary legislation”.

22. The RIA was the only substantive evidence presented to justify the costing of the Bill at that time. It identifies itself that, “the accurate prediction of the costs and benefits to effect such a major change will be realised over time...there is a measure of uncertainty about some of the costs and benefits provided in this RIA.” The RIA further recognises that there will be, “additional costs in future years when different Parts of the Bill are implemented, but these have not yet been quantified at this stage given that further clarity on the content of future regulations is required before more detailed costing work can be undertaken.” Evidencing the challenge of identifying accurate cost implications for local authorities, particularly when based on a limited analysis of only a few of its many facets.
23. Evidence was also received from other stakeholders during stage 1 scrutiny highlighting the fact that the RIA did not identify costs that would fall on other partners such as the NHS.
24. These issues led the Health and Social Care Committee to conclude in their stage 1 report:
- “We are not satisfied with the information that has been made available on the total cost of the Bill and have not received any evidence to convince us that the Bill will be ‘cost neutral’ in the long term.”
25. Whilst we recognise the difficulties in projecting the costs of new duties prior to implementation, the RIA did not seek to determine the costs of much of what would be determined by regulation. There is much weight put on the role of preventative services with savings anticipated in the longer term, though the RIA stated that these cannot be quantified. A 2014 Welsh Government commissioned report by LE Wales included an examination of the impact of the provision of preventative services.
26. This work did not include the costs associated with the provision of preventative services but did identify that by 2037, as a result of access to preventative services under the SSWB Act, compared against a baseline based on existing practice, the number of non-residential social care service users is predicted to be reduced by 2,000, from 76,000 to 74,000 – a 2.5% reduction. Whilst this should provide some savings in the long term these preventative services still need to be developed and require additional investment. It is unlikely they will release the significant savings expected, particularly within the context of a population living longer, increasingly with multiple conditions which need support for longer.
27. The RIA’s undertaken on Regulations under the Act did consider further some of the cost implications of the changes being made. Since the key proposals were based on a new model of social care, for which there is no precedent, this makes potential costs difficult to identify. As one RIA identified, “the assumptions that have been made...are

based on data that has not been fully tested...potential outcomes may differ from those that have been predicted.” We believe that the Welsh Government would have benefitted from an increased involvement of external partners in the financial assessment of the Act, enabling greater external challenge to assumptions made when developing RIAs, particularly when there are complex funding arrangements.

28. The RIA did identify areas which would result in additional costs to local authorities and we welcomed the additional funding that was made available through the Delivering Transformation Grant to support implementation of the Act. However, there remains a need to monitor the impact of the legislation. For example, changes made to charging for short-term placements (Respite Care) where these types of placement are now to be considered under the non-residential care charging arrangements – one local authority, for example, is anticipating a pressure of £100k associated with this change.
29. We have seen recent examples of policy changes being implemented which have required amendments to Regulations under the SSWB Act. These include changes to the increase in the maximum weekly charge and increases in the capital limit for residential care. Welsh Government have commissioned independent research to try to identify the cost implications for these changes and continue to work and engage with local government to monitor the impact of these changes against anticipated costs from the research. There is clear evidence of emerging of additional costs.
30. One authority in North Wales estimates that it faces an increase in the its cost base of £0.55m as a result Act and many more report cost increases due to elements of the Act. Some authorities are now carrying out detailed assessments around the impact of the Act and other regulatory impacts. At Annex I is detailed assessment of the cost pressures in one authority, detailing additional recurring costs £2.55m, although just over half of these relate to the National Minimum Wage and the Deprivation of Liberty Standards (DOLS).

Qualifications (Wales) Act

31. The WLGA supported this legislation as it transferred the regulatory function from Welsh Government to an independent regulator separate from government. There was also a proposal to merge the WJEC with Qualifications Wales - which we also supported - but it never happened. In terms of cost, we said that Qualifications Wales needed to be funded appropriately but avoiding duplication, needless bureaucracy and proportionately to the function. The financial impact memorandum was weak but the Act was not contentious.

Housing Act

32. In terms of the Housing Act, WG did commission some research (undertaken by Cardiff University) to feed into aspects of their RIA. We were also sceptical of the costs for the proposal relating to temporary accommodation and undertook our own assessment which led WG to rethink their plans (and eventually drop them as being too costly).
33. Other financial assessments under the Housing Act, and on-going dialogue with the Minister and WG officials, did lead to some additional funding for the homelessness prevention elements of the Act. The WG committed to providing tapered funding for 3 years to make the changes necessary and embed the legislative changes.
34. Welsh Government have also provided funding to local authorities to support some activities associated with Part 1 of the Housing (Wales) Act 2014 which relates to the introduction of the mandatory Registration and Licensing scheme for PRS landlords and agents. The funding (£500k in 2016-17 and £275k in 2017-18) covers activities not recoverable through the fees for the Rent Smart Wales scheme.

Wellbeing of Future Generations Act

35. The Well-being of Future Generations Act is more about doing things differently rather than doing additional things. In that sense it should not have placed too many additional financial pressures on local authorities which was our experience. A lot of Act is about behaviour change, that's applies equally to financial assessments. Lifetime costing requires upfront investment to realise benefits over the long term (e.g. energy efficiency measures in housing; landscaping that minimises ongoing maintenance requirements; future proofing flood defence schemes).
36. It could put additional pressure in terms of requirements for staff training. Again, this should realise dividends in the long term as it should lead to more actions that take account of the five principles (integration, collaboration, long term thinking, involvement and participation). This should result in more projects being delivered that are (i) really needed and (ii) delivered in the way beneficiaries want – avoiding abortive spend or projects that have to be revisited over time because they are not doing what is required.
37. The RIA for the Wellbeing of Future Generations Bill came in for a more thorough evaluation by the Wales Audit Office. It raised an important point about opportunity costs those arose where costs have to be absorbed by local authorities. Where the costs have to be absorbed and activity is displaced from elsewhere, the WAO were critical of the WFG RIA and stated (p.8):

In relation to the Welsh Government's view that additional costs of the Bill may need to be absorbed within existing resources, as expressed during the Environment and Sustainability Committee's evidence session on 29 September 2014, we consider it unhelpful that the Regulatory Impact Assessment does not make this intention clear. The absorption of costs within existing resources is an opportunity cost, in terms of the other activity forgone. The intention to fund additional costs in this way should be explicit in the Regulatory Impact Assessment.

The opportunity costs are rarely assessment by the Welsh Government.

Other legislation

38. The Regulatory Impact Assessment for the **Planning Act** suggested that if LAs took a decision to develop Strategic Development Plans the costs would be offset because LDPs could become 'lite'. In fact, some LAs are having to start reviews of their LDPs now and the SDPs could take up to five years to develop. As a result they are reluctant to invest in SDP production and are looking at alternative ways of developing regional plans (not SDPs) to inform their joint work. These potentially could take on increased material weight in planning decisions as they become more fully developed.
39. It is still early days on the **Environment Act** but one issue that has arisen is in relation to collection of waste from businesses and public buildings. The Act will require separate collection and some LAs will have to invest to ensure they can offer this. However, it is important that the requirement for separate waste collections is imposed equally on private sector waste collectors - otherwise some will seek to offer a cheaper 'one bin' solution that will undercut the prices LAs are able to offer.
40. In public protection, there is also good evidence that where there is early and open central/local government dialogue regarding policy intent, the final drafting and implementation of legislation has (or is expected) to work well. Where there is detailed understanding of the operational and resource issues which the impact of legislation will impose on local government.
41. There have been difficulties in this area. In our written evidence to the Health & Social Care Committee during the scrutiny stages of the **Public Health Wales Bill** we asked for a full regulatory risk and impact assessment to understand the consequences of the proposed legislation on enforcing authorities and on those subject to regulation. Such were the deficiencies that we asked that full cost recovery options should be considered or in the absence of a cost recovery mechanism (ie fees & charges) additional resource should be made available to local authorities specifically for the purpose of this legislation.

42. We are largely satisfied that proper consideration has been given to the new responsibilities in the Bill (Act), and that a combination of new finance and the ability of LA's to recover costs via fees and charges is satisfactory to be able to properly discharge the functions. Further dialogue is expected in framing a large number of subordinate regulations.

(5) Concluding remarks

43. Many authorities are having to juggle a number of unfunded pressures with unprecedented reductions in funding. The schedule at Annex II is not an untypical assessment of additional unfunded burdens over the next 3 years. We believe that there should be full and early engagement with all stakeholders in the formulation of legislation and that the financial impacts should not be assessed in isolation but part of the whole programme. The Welsh Government should be budgeting for the whole of the Assembly term and this should be the basis of the planning horizon. There also needs to be a clear reinstatement of a set of core principles for funding new burdens.

44. The impact of legislation should also be assessed after it has been implemented so that the estimation techniques and approach might be improved. This should be done independently of government. In conclusion, what we would like to see is a return to the protocol where Welsh Government fully funded the costs of new legislation, a reinstatement of the 'Essex-Jones agreement'. We call for this in the WLGA manifesto.

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Actual Example for a medium sized local authority - Social Services portfolio pressures as a result of recent legislation/case law/regulatory requirements

- ***Draft submission for consideration as evidence to Welsh Government Finance committee on the financial impacts of recent legislation***

The current Social Services financial pressure areas arising directly from recent legislation and regulation which merit inclusion within the evidence to be presented by the WLGA are:-

<u>No.</u>	<u>Social Services Pressure area :-</u>	<u>Legislative influence :-</u>
1.	Autism Spectrum Disorder - new responsibilities	Social Services & Well-being (Wales) Act 2014
2.	Domiciliary/non-residential care charging cap - restriction on income generation to cover costs	Social Care Charges (Wales) Measure 2010
3.	Deprivation of Liberty Safeguarding (DOLS) Assessments	Supreme Court ruling March 2014
4.	Charging for Short term care provision	Social Services & Well-being (Wales) Act 2014
5.	External care provider fee inflation - National Living Wage	The National Minimum Wage (Amendment) Regulations 2017

1. **Autism Spectrum Disorder (ASD)**

Prior to April 2016, people with high functioning ASD and who didn't have dual diagnosis of Learning Disability, Physical Disability/Sensory Impairment or Mental Health were ineligible for services within the Council's eligibility criteria. However, the Social Services & Wellbeing (Wales) Act 2014 which came into force on 6th April 2016 introduced new eligibility criteria which opened eligibility to people within a number of conditions. It is expected however that a significant number of people will claim eligibility for service under these new eligibility criteria which would lead to specialist and expensive care provision.

The projected increase in activity resulting in additional service costs as indicated above has been calculated based on a total of 10 service users as below :-

4 people needing short term intervention based on previous costs - total £0.013m

5 people needing specialist ASD day services for 5 days per week based on £40k per person = £0.200m

1 person needing specialist placement based on recent costs provided by Autism Together = £0.130m

Total of £0.343m

This approach is predicated on the assumption that we can provide the most cost effective, and least intensive service to meet needs.

2. Domiciliary / non-residential care charging cap

The Welsh Government's Domiciliary Care charging cap is set in 2017/18 at a level of £70 per week. This continues to prevent the Council from generation of additional revenue from those service users who have been financially assessed as being able to pay more than this level towards the costs of their social care provision. The table below illustrates the additional income the Council could generate if the cap were to be increased or removed entirely. These estimates are based on a sample of 200 service users who currently pay towards their care at the level of the current £70 per week cap. A significant number of these service users choose to pay at the level of the cap without disclosing their personal financial information for financial assessment. The estimated loss of income is based on this sample being projected up based on the total number of service users currently paying towards their care at the current £70 cap level.

<u>Level of weekly charge cap</u>	<u>£80</u>	<u>£90</u>	<u>£100</u>	<u>No cap</u>
Est. additional annual income / lost revenue opportunity	£0.265m	£0.465m	£0.686m	£2.548m

3. Deprivation of Liberty Safeguarding (DOLS) Assessments

The Mental Capacity Act Deprivation of Liberty Safeguards (DOLS) was implemented on 1st April 2009. It provided a legal framework which protects people living in care homes and hospitals who are vulnerable because of mental disorder and problems with their mental capacity. From this point up to March 2014 the number of requests for DoLS authorisations received remained relatively low due to a number of factors including case law and specific guidance.

However, in March 2014, the Supreme Court issued a judgement which greatly increased the number of people who could be seen as being deprived of their liberty. This led to the need to allocate significant additional financial resource in order to manage the additional volume of assessments needing to be carried out. The additional resource needed included staffing for Social Worker capacity and solicitors and also funding for payments to Doctors approved under Section 12 of the Mental Health Act 1983 to undertake part of each assessment, and fees for Court of Protection applications for some cases. **There are additional recurring annual costs of £0.290m** in order to comply with the new requirements, with the only financial support being £0.009m which was transferred into the RSG settlement from 2017/18. This being the FCC share of an all Wales total allocation of £0.184m to support DoLS. **This leaves a recurring annual shortfall of £0.281m** as a result of the Supreme Court ruling in 2014.

4. Charging for Short term care provision

The Social Services & Wellbeing (Wales) Act 2014 changed the charging rules in respect of service users with short term care placements. From April 2016, the Act requires that for short term care placement of up to 6 weeks, Local Authorities can only charge the service user their domiciliary care charge. Therefore, if the service user doesn't receive domiciliary care, their short term care placement must be provided free of charge. It has been found from experience in 2016/17 that this change is costing the Council £0.100m per year in lost revenue.

5. External care provider fee inflation - National Living Wage

The Council is having to pay significantly more to its external care providers and direct payment recipients due to the need to pay for higher quality care services as demanded by the Care and Social Services Inspectorate Wales (CSSIW), the Social Services & Well-being (Wales) Act 2014 and the Regulation and Inspection of Social Care (Wales) Act 2016. In addition to this there has been significant inflationary as influenced in recent years by increases in the National Minimum Wage and from 1st April 2017 the National Living Wage. The table below illustrates the rate of growth in payments to external care providers and service users who are direct payment recipients who organise their own care to be funded by their direct payment.

External Care providers/Direct payment recipients :	2015/16 Actual £(m)	2016/17 Actual £(m)	2017/18 Budget £(m)
Total payments in year	38.107	41.653	43.848
Increase on previous year	-	3.546	2.195

The increase in costs of £2.195m from 2016/17 to 2017/18, has been partly offset by some of the additional funding allocated by Welsh Government for funding of Social Care in 2017/18. It is estimated that the authority has benefited by a total of £1.058m of additional funding/charging capacity which leaves a net unfunded pressure of £1.140m

6. Summary of additional cost pressures of Welsh and UK Government and case law

The total value of net cost pressures influenced by various legislation, case law and regulatory/quality requirements is illustrated within the table below:-

No.	<u>Social Services pressure area :-</u>	<u>Additional cost pressure</u> <u>£(m)</u>
1.	Autism Spectrum Disorder - new responsibilities	0.343
2.	Domiciliary/non-residential care charging cap - restriction on income generation to cover costs (if cap raised to £100)	0.686
3.	Deprivation of Liberty Safeguarding (DOLS) Assessments (net)	0.281
4.	Charging for Short term care provision	0.100
5.	External care provider fee inflation - National Living Wage	1.140
	Total :	2.550

Modelled medium-term budget pressures for an average council

	£m		
	17-18	18-19	19-20
UK & Welsh Government Unfunded Pressures			
NMW (Amendment) Regs 2016 - includes review of pay spine and 3rd Party Provider impact	2.364	4.773	7.136
Finance Act 2016 - Introduction of the Apprenticeship Levy	0.818	0.818	0.818
Welfare Reform Act 2012 - including Housing Benefit Grant Reduction	0.661	0.806	0.952
Single Environment grant – Estimated reduction on transfer into RSG which will impact negatively on service collection	0.190	0.290	0.390
Respite care –maximum charge £70/week when costs much higher	0.150	0.150	0.150
Housing Wales Act 2014 – compulsory registration of landlords Oct 16	0.046	0.046	0.046
Well Being Future Generations Act 2015 – funding of public service boards	0.038	0.038	0.038
Community Safety – Counter Terrorism & Security Act – funding of channel panel	0.025	0.025	0.025
Welsh Language Standards £50k in 2017-18 with further cost pressures expected in subsequent years but not yet costed.	0.050	0.050	0.050
Requirement for increased Autistic Spectrum Disorder provision in both Key Stage 2 & 3, Welsh and English.	0.263	0.263	0.263
Increased legislative responsibility in respect of implementing Deprivation of Liberty Standards (DoLS).	0.089	0.089	0.089
Increased staffing cost for children's social workers in line with NJC and Care Council for Wales recommendations.	0.066	0.066	0.066
Increased requirement to fund supported lodgings and "When I am ready" service in line with SSWB Act 2014.	0.280	0.280	0.280
Sustainable Urban Drainage (SUDS) officer to meet statutory requirements.	0.047	0.047	0.047
Total	7.884	10.639	13.348