My name is Donald Richards.

I am Head of Deaf Studies at Donaldson’s School, Linlithgow.

Donaldson’s is Scotland’s national residential and day school for pupils who are deaf or have language and communication difficulties.

Donaldson’s is a Grant Aided Special School and is a registered Scottish charity and has been in existence since 1850.

Donaldson’s is one of the largest single employers of Deaf people in Scotland. Currently, we have 10 members of staff eligible to claim Access to Work support.

The demands on colleagues are varied and complex. The school not only provides a stimulating programme of education but also therapy and care. Although not an every day requirement staff do need to be supported on a regular basis by Sign Language Interpreters and Electronic Note-takers.

A number of years ago Donaldson’s reached an agreement with ATW that resulted in the school taking responsibility for managing the communication support requirements for those staff who received ATW funding.

As part of this process, the school entered into Service Level Agreements with Communication Support agencies which ensured consistency of approach as well as service and financial efficiencies.

In doing so the school effectively arranges the communication support, pays for it and then claims its cost back from ATW at a later stage. These arrangements have worked well and have ensured that staff are relieved of any immediate financial burden if they had to make any direct payments themselves.

One other impact of these arrangements is that staff are not adversely impacted by the “30 hour rule”. However, other changes proposed by ATW will have significant implications on our staff’s ability to maintain their position in secure employment and the schools own commitment to ensuring that they do so.

From preliminary discussions with ATW staff these changes have or are planned to be introduced by stealth.

At no time has Donaldson’s as a major stakeholder ever been consulted or asked about the impact these proposed changes to funding arrangements would have on our organisation or its staff.
It has simply been left up to “front line” ATW staff to communicate the changes during their programme of regular reviews which, for example used to take place annually but are now apparently to take place after 13 weeks, 26 weeks and 52 weeks adding further layers of bureaucracy which we will need to address internally.

In financial terms, and again without any consultation or for that matter consideration of our charitable status ATW advisors have indicated that when budgets are reviewed and updated for individual members of staff Donaldson’s will not be able to claim the mileage or VAT costs which are levied by the communication support provider. Based on costs generated in 2012/13 we estimate that this would result in an annual shortfall of £10k. Costs which in real terms should and may well have to be passed onto our staff.

In addition, and once again without any consultation or advance notice, only last month ATW staff advised Donaldson’s that future payments would be “capped” at £35ph where agency staff are used for communication support and in the case of freelance staff being used the “cap” would be £25. This unilateral decision is of huge concern to Donaldson’s and will have significant budget implications for the school and the Service Level Agreements we have with our existing communication support agencies whose costs are above the “capped” amounts as advised by ATW Advisors but within the guidelines set by professional bodies such as The Scottish Association of Sign Language Interpreters. Again, deficits may well have to be passed onto our staff.

Another area of concern relates to an announcement made within the last few weeks by an ATW Advisor to the effect that in future ATW will only pay for the use of 1 communication support worker even in circumstances when the assignment and professional rules require the use of 2 communication workers. Again this has been communicated to Donaldson’s without any forewarning or consultation.

The impact of this proposal may well be critical to the future employment prospects of staff here at Donaldson’s. For example, the school has one Deaf colleague who requires support from an Electronic Note taker. The member of staff is required to attend a minimum of 6 In Service Days a year. For each of these assignments the member of staff will require 2 Electronic Note takers to support them which is in accordance with professional protocols and standards. The estimated cost for this service is around £600 per day. If ATW are only going to pay for one of these Notetakers then presumably the burden for the remaining share ( £300 ) may well have to fall on the member of staff concerned. The member of staff is employed as a Classroom Assistant and has a annual salary of around £16k. It has to be assumed that if these costs are transferred to an employee that they would find these costs unsustainable and endeavour to find secure employment elsewhere.

I understand that colleagues on the Scottish Parliaments Cross Party Group on Deafness ( CPGD ) have already written to the Work and Pensions Committee on much broader issues concerning ATW and how it affects deaf people in Scotland and we continue to support their views.

In addition, we believe that the implications of the changes by ATW are far reaching. Indeed, the consequences of implementing such changes may not have been fully understood or appreciated by ATW, however the same may not necessarily be said for our deaf colleagues who may well be faced
with some very difficult choices in terms of equality of access and opportunity in the employment market.

I hope these comments are of assistance to the Work and Pensions Select Committee.

Thank you

31 July 2014