

Children's, Young Persons & Education Scrutiny Commission Report

Review of Ash Field Academy's
Residential Provision

Date of meeting: 11 July 2023

Lead member: Cllr Vi Dempster

Lead director/officer: Martin Samuels

Useful information

- Ward(s) affected: All
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- Report version number: 1.4

1. Summary

- 1.1. The purpose of this report is to provide details of the findings, following a consultation exercise proposing to end funding of over £400k per annum for the Residential Provision at Ash Field Academy from 1 September 2024 (Appendix 1).
- 1.2. Ash Field Academy is a special school, providing education to children and young people between the age of 4 to 19 years with additional learning, communication and sensory needs ranging from profound and multiple learning / physical disabilities to moderate learning disabilities. All pupils attending the school have an Education, Health and Care Plan (EHCP). Both the school and its residential provision is rated as outstanding by OFSTED, and the quality of support offered to the children and young people is not in question.
- 1.3. The provision is currently funded via the High Needs Block (HNB), which overspent by £4.6m in 2022/23. The HNB is intended solely for provision of education and should not be spent on non-educational activities.
- 1.4. A formal consultation was launched on 26 September 2022 and closed on 9 January 2023. Council Officers met with pupils, their families / carers, staff and their union representatives during December 2022 and January 2023. A total of 378 respondents replied via the Council's Citizen Space platform (Appendices 2a and 2b). Information and testimonials were also submitted by some pupils.
- 1.5. A formal petition was also submitted, with a total of 1261 valid signatures (1809 not valid), triggering a formal discussion with senior officers. It is proposed the petition will be discussed as a separate, but linked item at the Children's, Young Persons & Education Scrutiny Commission meeting on 11 July 2023.
- 1.6. Of the 378 responses submitted:
 - 94% did not support the proposal
 - 3% were in support of the proposal
 - 2% partially supported the proposal
 - 1% did not respond to the question

The key concerns and the Council's responses are detailed at paragraph 5.4.

- 1.7. Despite the objections, the consultation exercise found little justification for funding the residential provision from the High Needs Block, and the social learning benefits offered by the provision could be delivered within the normal 25-hour school week (as it is in other schools). The provision is used by 35 to 45 (22-28%) of the 160 pupils attending the school, which demonstrates the academy can meet the needs of its other children and young people within the normal 25-hour school week.
- 1.8. The cost of the provision equates to approximately £10k per pupil, per year, which is in addition to the monies paid by the local authority for the education provision at the school. It should be noted that as of 31 August 2022, the Academy had £2.7m of revenue reserves, nearly 46% of its annual revenue budget of £5.98m. It may be open to the Academy to draw on this funding to continue operating the provision.
- 1.9. Therefore, it is recommended that the funding for the service is withdrawn from September 2024 as detailed at Option 3, and that the council should work with the academy, to explore the potential for alternative funding, other than from the council for the provision, although no guarantee can be made. It should also be noted that the Council is looking to cease the funding, but any decision to close the facility will be for Ash Field Academy.

2. Recommended actions/decision

- 2.1. The Children's, Young Persons & Education Scrutiny Commission is recommended to note the content of the report and provide comment / feedback on the outcome of the consultation exercise, which proposes the withdrawal of the funding for the residential provision with effect from 1 September 2024.

3. Scrutiny / stakeholder engagement

- 3.1. Details of the communications and engagement for the consultation plan and activities are detailed at Appendix 3.
- 3.2. The Academy governors, pupils, families / carers and staff and their union representatives have been engaged throughout the review process and were informed prior to the launch of the consultation in September 2022, which had been delayed due to the death of HM The Queen.
- 3.3. A discussion took place at the Schools' Forum on 21 September 2022 and involved a presentation of the proposal for the consultation.
- 3.4. A report was taken to Children, Young People and Education Scrutiny Commission on 25 October 2022, where an extensive discussion took place. The conclusions from the Commission were;

- a) noting the content of the report,
- b) extension of the consultation period,
- c) comments and suggestions from the commission are fed into the consultation,
- d) the commission object to the withdrawal of funding in principle from Ash Field Academy and
- e) officers engage further to explore expanding their residential provision to take in other children from across the city, and if the school decides to expand their provision the council to assist finding alternative funding sources and provide funding through its general fund or other services funds such as the NHS.

- 3.5. A meeting was held with school staff, parents and pupils on 7 December 2022 to discuss the proposals of the consultation and make representations to the council regarding the provision (see appendix 4 and 5a, 5b and 5c for full details). A further meeting was held on 6 January 2023 with Cllr Cutkelvin in attendance to meet staff, pupils and parents.
- 3.6. City of Leicester Association of Special Schools (CLASS) and the Parent Carer forum were contacted and informed about the consultation.
- 3.7. The Department of Education requested details on the consultation, which were shared in November 2022.

4. Background and options with supporting evidence

- 4.1. Executive approval was given for a formal consultation exercise to take place, proposing to cease the funding for Ash Field Academy's Residential Provision from the High Needs Block (HNB) with effect from 1 September 2024. The HNB is ring fenced for the provision of education and with the increased number of children and young people being assessed as needing an Educational Health and Care Plan (EHCP) priority needs to be given to the education of these children.
- 4.2. The High Needs Block for the local authority was overspent by £4.6m in 2022/23, resulting in the LA's overall DSG (dedicated schools grant) reserve being £6m as at 31 March 2023. The local authority is required to submit a deficit recovery plan to the Education Skills Funding Agency (ESFA) by September 2023 detailing how the Council will eradicate the now recurring annual overspend from the High Needs Block and the LA's overall DSG deficit position.
- 4.3. Extensive consultation and engagement took place between September 2022 and January 2023, and the feedback has been collated and analysed to inform this report and recommendations for the City Mayor / Executive to consider.
- 4.4. Based on the details and information gathered 3 options have been considered, as detailed at paragraph 5.15. Option 3 is the preferred option, which seeks to remove the funding from the High Needs Block with 1 September 2024.

5. Detailed report

5.1. This report summaries the findings of the consultation, key themes identified and the council's response, and how the Equality Impact Assessment (EIA) has been taken into consideration. It then provides some comparator information of pupils accessing residential support from Ash Field, and other special schools at Nether Hall and Westgate, with similar disabilities before drawing to a conclusion.

Consultation findings summary

5.2. The consultation findings report (Appendix 2a) confirmed there were 378 respondents to the consultation. Of those responding 356 (94%) were not in support of the proposal, 7 (2%) partially supported the proposal, and 12 (3%) support the proposal, 3 (0.8%) did not answer the question. All individual comments can be found in Appendix 2b.

5.3. The key themes identified in the feedback received have been categorised as follows:

1. The provision is educational
2. It's immoral to close the provision
3. There is no alternative provision available
4. The provision is supportive and provides respite
5. There is the need to explore alternative funding for the provision
6. The provision is cost effective in the long term
7. It is a social opportunity for the pupils at Ash Field Academy
8. Concern over staff redundancies
9. A recognition of the value of the provision

5.4 In response to each of these points above:

1. The provision is educational

5.4.1. The education aspects of Education, Health, and Care Plans (EHCPs) are written for the identified education need, and provision is required to be delivered during the 25 hours of the normal school week. It should be noted that there are children with similar disabilities who are attending other special schools that do not have a residential provision and they are able to deliver these requirements of their EHCPs within the 25-hour school week. Also, there no teaching staff allocated to the Ash Field residential provision.

5.4.2. In the Children and Families Act 2014 (annex 3 of the Code of Practice) certain types of healthcare or social care support may be considered as educational and training. This requirement would need to be recorded in Section F of a child's EHCP, meaning the local authority would be required to ensure this provision was available and this would be funded from the High Needs Block. None of the children or young people attending Ash Field Academy have this requirement documented in their EHCPs.

5.4.3. Recommendations around provision within EHCPs, are made by a range of professional including Heath, Social Care, the school and Educational

Psychologist, as part of the annual review process. The final decisions on EHCPs are made by the Resource Allocation Panel, made of multi-disciplinary professionals.

2. It's immoral to close the provision

5.4.4. Whilst we recognise the provision is Ofsted rated outstanding, the conditions on how the high need block grant is spent are clearly outlined by the government, within the Children's and Families Act 2014. Leicester City Council, despite a range of interventions to date to manage the HNB expenditure continues to experience statutory demand for high needs support exceeding the grant resources available. Therefore there is a requirement to look at all other options to reduce this overspend and resultant deficit.

3. There is no alternative provision

5.4.5. An alternative to the provision at Ash Field Academy exists and is available for pupils through the Disabled Children's Service (DCS). This alternative service is managed by Leicester City Council and provides short break/ respite provision or offers a personal budget through which families can buy the package of support that best suits their needs. There are currently 283 children and young people in receipt of such support, which is based on a statutory assessment and provided with a funded package for social care support.

5.4.6. Included in the 283, there are approximately 30 who attend Barnes Heath House on a regular basis for overnight respite. The average stay is 2 nights per month. However, priority is given to children who are looked after who have complex needs, and this does impact on the number of children and young people who can receive respite support at that facility. There is currently a strategic review in progress regarding short breaks within the council, and the proposal to cease funding for Ash Field Residential Provision only in September 2024 allows the council time to have completed the review and implemented any changes needed.

4. The provision is supportive and provides respite

5.4.7. It is fully recognised that the residential provision provided at Ash Field Academy is supportive and provides respite, as stated by staff and parents throughout the engagement and consultation. However, the High Needs Block is specifically ringfenced for education provision. Therefore, should there be social care or health needs of the pupils, this would need to be funded through alternative routes, either the local authority's General Fund or via the NHS.

5. There is the need to explore alternative funding

5.4.8. There is potential for alternative funding for the provision to be identified from other sources, be it from the NHS or through a funded package of social care support, and it is recommended that officers help facilitate this, working alongside the school. There is the option for the school to look at funding through raising charitable funds themselves and seeking parental contributions, where possible.

6. The provision is cost effective in the long term

5.4.9. It was suggested from many contributors throughout the engagement and consultation process that the young people accessing the service have greater independence and therefore fewer needs from social care, although there is no evidence to show this will be the case.

Additionally, the provision was seen as preventative in terms of mental health, wellbeing and preparing for adulthood. However, these skills can and should be included within the curriculum for all pupils, as they are in other Special Schools.

7. It is a social opportunity for pupils at Ash Field Academy

5.4.10. It is recognised the provision offers social opportunity for pupils who would not normally have access to community or social activities due to their complex health conditions, as stated by several pupils and parents, in a safe environment with trained staff. Whilst the Council recognises the social benefits the residential provision provides to 35 to 45 of the 160 pupils attending the academy, the school could choose to offer after school clubs and groups to enable its children and young people to experience social activities.

A residential review also took place at Millgate School in 2021, with similar issues raised. The final recommendation identified that whilst the provision was excellent, it was not educational as described in section F of the pupils EHCPs, and an agreement was reached to withdraw the funding. The Trust has since reviewed its budgets and identified an approach to continue operating the provision by offering social care residential placements on a longer-term basis.

8. Concern over staff redundancies

5.4.11. The consultation feedback identified staff redundancies as a concern. It should be noted that it would be a choice of the school whether they chose to close the provision rather than a direct decision by the council.

9. Recognition of the value of the provision

5.4.12. Whilst it has been recognised throughout the engagement and consultation process that the residential provision at Ash Field Academy is noted as outstanding by Ofsted. The provision costs approximately £400k per annum and only supports 35 to 45 (22-28%) of the 160 pupils attending the school.

It should be noted that there are over 1,000 pupils based in Special Schools across the City, who do not have access to this type of provision, and whilst it would be good to offer this to all pupils with special educational needs and disabilities, unfortunately, the funding is not available, and priority needs to be given to the provision of education.

Consultation meetings feedback

5.5. Meetings were held with pupils, families / carers, staff, and their union representatives in December 2022, and again in January 2023, see Appendices 4 (local authority records), 5a, 5b and 5c (Ash Field Academy records). A range of themes from these discussions included:

- Opportunity for pupils to gain further skills and socialise in a safe environment with their peers. Also, that they have learnt so much from accessing the provision.
- It takes young people with disabilities longer to learn than can be done in the standard 25-hour school week, such that this provision offers extra support to learn.
- Provides families with valuable respite, and the risk potential of family break downs, if it was not available.
- The provision is educational for the pupils and if the provision closes there would be further costs for social care.
- Wanting to understand the reasons for the proposed withdrawal of the funding.
- That it is an outstanding facility and therefore why change it?
- The impact pupils felt it would have on them if it was not available to them and to future pupils.
- The perception from staff that references to residential provision have been removed from section F of EHCPs.

5.6. The questions and points raised during the discussions are noted within the appendices, however the council wish to be clear that the use of residential provision to support children and young people in educational provision is rare. For most pupils, the type of skills gained in this provision can be supported within the usual school day. In exceptional cases where residential provision is recommended it is predominantly due to social care needs or a full-time arrangement (38- or 52-week provision) due to the high complexity of need. This would therefore not apply to pupils attending Ash Field Residential provision as this a temporary part-time provision, should their needs change recommendations can be made by professionals at annual review meetings.

5.7. Additional emails and letters were received in response to the consultation and can be found in appendix 6. A health professional also submitted a Safeguarding Policy which can be found on Ash Field Academy School website [safeguarding-and-child-protection-policy-nov-22-rd-sept-23.pdf \(primarysite-prod-sorted.s3.amazonaws.com\)](#) , in reference to providing a safety net in terms of social care. There is no evidence to demonstrate the residential provision is used for children and young people who have a statutory social care need for this type of support.

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5.8. A report was taken to the commission to discuss the proposals on 25 October, leading to extensive discussions, and representations made by a parent of a former pupil and a staff union member. Details of the meeting and discussion can be found here [Agenda for Children, Young People and Education Scrutiny Commission on Tuesday, 25 October 2022, 5:30 pm \(leicester.gov.uk\)](#). The Commission moved to object to the funding being withdrawn and requested officers engage with Ash Field Academy to explore expanding their residential provision to take children from across the city and if the school decided to expand their provision the council to assist funding alternative funding sources and provide funding through its general fund or other services such as the NHS.

Officers have engaged with the Head Teacher and Governors, but they have refused to consider other funding options until after a decision is made about the funding.

Comparator Information (Ash Field / Nether Hall and Westgate)

5.9. Table 1. below shows the number of pupils from Ash Field, Nether Hall and Westgate who access the short breaks services, accessing either Direct Payments or Barnes Health Provision. For reference the identified health conditions of those pupils is also included. This shows similar conditions across both Ash Field, Nether Hall and Westgate. Of the 20 pupils who access Barnes Health from the 3 schools above, 8 of those pupils also access the residential provision at the Ash Field Academy.

Table1: Breakdown by school

School	Direct Payment	Barnes Health	Health Conditions
Ash Field Academy (160 pupils)	48	7	Physical, Profound & Multiple learning Disabilities, Visual Impairment, Medical, Severe Learning Difficulties, Language Delays, General Learning Difficulties, Epilepsy, Downs Syndrome.
Nether Hall School (132 pupils)	37	6	Physical, Profound & Multiple learning Disabilities, Visual Impairment, Medical, Severe Learning Difficulties, Language Delay, General Learning Difficulties, Autism.
Westgate School (180 pupils)	43	8	Medical Epilepsy, Language Delay, General Learning Difficulties, Communication, Interaction, Autism.

Conclusion

5.10. This report has sought to address whether the £400k used to fund Ash Field Academy is the correct use of the High Needs Block (HNB) funding grant, for education provision. It has been acknowledged throughout the review and subsequent consultation the Ash Field Academy’s Residential Provision, is an Outstanding provision as recognised by OFSTED and continues to be highly valued by pupils and parents who access this facility.

5.11. As stated above the HNB is part of the DSG from the government with clear criteria on how it can be spent. This budget is ring-fenced and therefore no additional monies can be added to or transferred out and used in other areas. Like many other local authorities nationally Leicester City’s HNB is in significant deficit on an annual basis, however there are clear expectations on the local authority from the DfE to develop a recovery plan to ensure this deficit is eliminated. The LA have already taken significant steps to address the deficit and this has required an in-depth review of all areas of spend in the HNB, resulting in funding reviews, including in the areas of Special School funding, Millgate Residential Provision and Mainstream School top-up funding.

5.12. The review of Ash Field Academy's Residential Provision was not to ascertain whether it was a good provision, but to understand if the funding of this provision meets the conditions of the HNB grant. Educational provision as defined in the grant, is "that outlined in Section F of an EHCP", as identified by professionals. The grant conditions are clear that any funding to meet health or social care needs should be funded by relevant agencies.

5.13. It has been identified that there are pupils with similar needs who are attending other Special Schools within the City, these pupils have their preparing for adulthood needs met, through the 25 hour a week curriculum. Their only access to residential provision would be through the Council's Barnes Heath House provision. Additionally, of the 160 pupils in Ash Field Academy only 35 to 45 access the residential provision, and all other pupils within the school have these needs met within the school day.

5.14. In conclusion, the recommendation of the review is that whilst it is an outstanding provision, it is not a requirement in section F of the EHCP of any of the pupils attending the academy, therefore, it should not be funded from the High Needs Block grant.

5.15. Summary of the options with preferred option

Option 1: Do nothing and continue to fund the provision from the High Needs Block

Advantages

- Provision remains open to the pupils at Ash Field School.
- Potentially less demand for the local authorities Disabled Children's Service.

Disadvantages

- Provision continues to put additional strain on the High Needs Block funding, at a time when the Council must develop a recovery plan, detailing how the local authority is going to bring the overspend back into budget.
- Continues the inappropriate use of the High Needs Block funding.
- There are only a small number of pupils with EHCPs in the city and those pupils attending the school who can access the residential provision

Option 2: Continue to fund the Ash Field Academy provision, via the LA general funds, and to widen access to pupils beyond the school

Advantages

- Provision remains open to the pupils at Ash Field School
- Expansion of short break provision availability in the City
- Potentially less demand for the local authorities Disabled Children's Service
- Equality of provision availability for all pupils with EHCPs in the City

Disadvantages

- The general fund is overspent and cannot fund a non-statutory service
- Reduced access to current pupils from Ash Field Academy
- Unclear if Ash Field Academy can support/accept external pupils and registration implications

Option 3: (Preferred) Cease funding the provision from September 2024, and the LA to work with the school to find alternative funding as the school has indicated it would be interested in doing so.

Advantages

- Reduction on the High Needs Block grant overspend and the inappropriate use of the grant.
- Equality of provision availability for all pupils with EHCPs in the City

Disadvantages

- Potential increase in demand for Disabled Children's Service short break service.
- If the Academy chose to close the provision because of the funding ceasing, there may be some staff redundancies.

5.16. Option 3 is the preferred option, ceasing the funding for the residential provision from the High Needs Block. If the academy ceases the provision this would be their choice whether or not to close or reduce the provision.

6. Financial, legal, equalities, climate emergency and other implications

6.1 Financial implications

6.1.1 Once a decision has been made the LA will need to seek further approval from the DfE to reduce Ash Field's HNB funding for the residential provision.

6.1.2 Whilst approval may be required the DfE are also emphasising the need for LAs to ensure that HNB funding is being used appropriately as one element in the LA's efforts to reduce their in year and cumulative DSG (dedicated school grant) deficits. As per the HNB operational guidance, DSG HNB funding can only be used to meet the educational costs of pupils. Some children and young people may require residential educational placements, particularly those with the most complex needs, which are full time in nature and under these circumstances this would be paid for by the HNB.

6.1.3 The LA has been incurring significant in year deficits in the HNB funding, as a result of rising demand for EHC plans outstripping the additional funding provided by the DfE. The deficit between grant allocation and expenditure in 2022/23 is £4.6m (£6.1m in 2021/22) which means the LA's cumulative deficit on its DSG reserves is now £6m at the end of March 2023.

- 6.1.4 Government has extended the legislation they put in place in 2020 which means that LA's DSG deficits cannot be funded from LA's general funds to prevent council tax services being cut to fund the education budget. The legislation runs out in March 2026 and the DfE have indicated that there will be *no* further extension. The DfE have said that *'it is crucial during this extension, we all play our part. Alongside the SEND improvement plan, the DfE will support all LAs to look at what positive action can be taken now to bring high needs costs under control, to bring down DSG deficits and to prepare for wider SEND system reform... which would address the unintended consequences of the 2014 reforms.'*
- 6.1.5 This means that pressure is being applied to the LA to eliminate the HNB deficits and the LA is currently drafting a management recovery plan which is a requirement for all LAs with a DSG deficit.
- 6.1.6 As outlined in the report the LA has taken steps already to reduce the cost of HNB provision (special school funding review including the phasing out of non-educational residential provision at Millgate, review of SEND support to mainstream schools together with expansion of in-house capacity to avoid high-cost independent sector placements).
- 6.1.7 The preferred proposal in this report to end HNB funding for this provision would make a further significant impact on reducing our underlying HNB deficit.
- 6.18 The general fund budget for the disabled children's service is already being used to ensure that the LA is meeting its statutory obligations for the cohort of children and young people with needs. There is considerable pressure on this service as demand has increased in recent years. The LA's severe overall financial position has been outlined and emphasised in the 2023/24 budget report. The LA is not in a position to expand and pay from the general fund further provision to the extent that it is non-statutory.
- 6.1.9 For context, as at 31 August 2022 Ash Field academy trust had £2.73m of revenue reserves which is 45.6% of their annual revenue of £5.98m. Our in-house special schools equivalent percentages are considerably lower at 1.7%, 3.6%, 9.2% and -35.6%.

Martin Judson, Head of Finance

6.2 Legal implications

Part 3 of the Children and Families Act 2014 sets out the duties placed on Local Authorities for children and young people in England with SEND. High Needs Block (HNB) funding provides the funding for support packages for an individual with special educational needs in a range of settings. The purpose of the HNB is to ensure equality and equity of opportunity for all children and young people irrespective of their need.

It should be noted that some of the decision-making around SEN provision, particularly the level of provision and type of placement to be provided under an EHCP, can be determined by the SEND Tribunal regardless of the authority's position. If educational provision is

specified in an EHCP, the local authority is under a duty to secure that. It is therefore important to ensure that residential provision is not specified in any individual EHCPs.

The preferred option highlights a potential saving. When taking decisions, the Council needs to be mindful of the welfare of the children and young people who may be affected and not simply seeking to address financial concerns. The decision to cease the funding from the HNB does not necessarily mean the residential provision will close; the future of the provision is a decision for the Academy.

Julia Slipper, Principal Lawyer (Education & Employment), tel: ext 6855

6.3 Equalities implications

6.3.1 Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which means that, in carrying out their functions, they have a statutory duty to pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act, to advance equality of opportunity between people who share a protected characteristic and those who don't, and to foster good relations between people who share a protected characteristic and those who don't.

6.3.2 Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6.3.3 The report recommends ceasing funding the residential provision from September 2024. This has been covered in the Equality Impact Assessment (Appendix 7) on the residential provision and that is part of a wider review of the operating model.

6.3.4 There is potential that if funding is removed and alternative provision/funding is not found, it will impact on disabled children and their families that are currently using the residential provision, and this is likely to be a disproportionate negative impact for the protected characteristics of age and disability, particularly on those children with complex needs. It is therefore important to review the Equality Impact Assessment to monitor with any potential risks identified and consider if any mitigations are possible.

6.3.5 The report also references a potential mitigation of using Disabled Children's Service short break service but recognises the increased demand on the service may not be sustainable and that many children may not be eligible for the service. As such it must be recognised some direct support may need to be given to the children and their families to adjust, should the residential placements cease if funding is removed.

Kalvaran Sandhu, Equalities Manager, Ext 6344

6.4 Climate Emergency implications

6.4.1 There are no significant climate emergency implications directly associated with this report.

Aidan Davis, Sustainability Officer, Ext 37 2284

6.5 Other implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

None

7. Background information and other papers:

8. Summary of appendices:

Appendix 1: Ash Field Academy Consultation Details

Appendix 2a: Ash Field Academy Consultation Findings Report

Appendix 2b: Ash Field Academy Consultation anonymised comments

Appendix 3: Ash Field Academy Consultation: Communications Plan

Appendix 4: Record of questions, answers, and statements from 7 December 2022 engagement meeting – LA Record

Appendix 5a, b & c, Staff, Parents and Pupils consultation meeting 7 December 2022 – Ashfield Record

Appendix 6: Ash Field Academy Residential Provision consultation emails received

Appendix 7: Equality Impact Assessment

9. Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?

10. Is this a “key decision”? If so, why?