

Schools Forum

26th November 2019

Schools Funding Consultation 2020/21

Introduction

1. Dedicated School Grant (DSG) to Local Authorities is allocated in blocks. There are blocks of funding for Early Years, Schools, High Needs and Central School Services. The Education and Skills Funding Agency (ESFA) uses the national funding formula to calculate the blocks within the DSG that are allocated to local authorities. Local authorities currently have some flexibility in how this funding is allocated to schools, within the framework and constraints set out by the ESFA.
2. Following reports to Schools Forum on 8th October 2019 a consultation exercise was undertaken on proposals for next year funding arrangements.
3. This paper sets out the results of the recent local consultation with maintained schools and academies which covered preferences for the schools funding formula and a 0.5% transfer from the Schools to High Needs block for 2020/21. The schools forum should take into account the views of the schools responding before making their decision.

Background

4. The ESFA has not confirmed the date that the National Funding Formula will be fully implemented so it is possible there could be further transitional years beyond 2020/21. However the government has reaffirmed their intention to move as soon as possible to a hard NFF, where schools' budgets are set on the basis of a single national formula and local authorities are no longer involved in this decision.
5. The council recently held a consultation on school funding arrangements for 2020/21, between 1st and 19th November 2019. A copy of the consultation document issued to schools is attached at **Appendix B** to this report.
6. It should be noted that the options regarding the schools funding formula within the consultation have been calculated based on October 2018 pupil data, which was the basis for the indicative funding published by the ESFA for consultation purposes. The final local authority allocations are due to be confirmed in December 2019 taking into account October 2019 pupil data.
7. The proposals in this report regarding the Schools Funding formula may therefore be subject to change. A Schools Forum meeting has been

arranged for 21st January 2020, where the full final proposals will be confirmed prior to submission to ESFA.

Summary of Consultation Responses

8. Of the 78 schools consulted with, 36 responses were received (compared to 16 in the previous year). Comments and key themes from the responses have been summarised in the relevant sections below.
9. The breakdown of the 36 responses (which is a 46% response rate) is as shown in the table below:-

LA Primary	17
LA Secondary	1
Primary Academy	11
Secondary Academy	4
Special Academy	3
TOTAL	36

10. All 36 responses included a response to all 4 questions. Further detail on each of the proposals and consultation responses are provided below. A log of consultation response comments are set out in **Appendix B**.
11. The first three questions related to the Schools Funding formula and are considered together.

Question 1 - Do you agree, funding permitting, to increase the formula factors in line with the NFF. This is an increase of 4% to the formula's core factors (plus lump sum), except for the Free School Meals and PFI factors which will be increased at inflation.

Question 2 - Do you agree to set the MFG at the plus 1.84% with the option to increase further if funding and DfE permitted?

Question 3 - Do you agree to adjust the Basic Entitlement AWPU if funding allocated to the LA is greater than that needed to fulfil the complete introduction of the National Funding Formula?

12. The council is required to apply a funding formula in order to allocate schools block funding to schools. The ESFA sets a range of factors we are able to use in the formula. Within each of these factors there are also certain restrictions that can apply for example the application of minimum per pupil funding levels.

Consultation Responses

13. All 36 responses fully supported the proposals in Questions 1 to 3.

14. Schools Forum is asked to support the proposals for the schools funding formula for 2020/21 noting that:-

- a. All Schools Forum members may vote on this proposal.
- b. The local authority is required to consult with Schools Forum on the funding formula, however the local authority retains the final decision on the formula to be used.

Question 4 - Do you support retaining the transfer but at a reduced level of 0.5% (£0.66m) from the Schools Block to High Needs Block in 2020/21?

15. The council consulted on a 0.5% (£0.66m) transfer from the schools block to the High Needs block. Information was provided to schools on the background to the proposal as part of the consultation document. The full consultation document is attached as an appendix to this report, but in summary the key points are:

- a. The ESFA expects most movements from schools block will be due to pressures on high needs budgets.
- b. The High Needs block in Stockton, in common with many around the country, is under considerable pressure due to increasing demands.
- c. The latest High Needs block projections for 2019/20 show the position has worsened with in-year net pressures of £0.876m.
- d. The DfE have announced that the High Needs NFF for 2020/21 will also have the same factors as at present, with £700 million of additional funding nationally. For Stockton this means an estimated additional £2.7m. However, the Governments High Needs budget announcement only refers to one years funding for 2020/21 and looks no further ahead.
- e. Without the transfer the cumulative overspend at the end of 2020-21 is projected to be £3.1m and without further additional grant £6.4m by 2022-23.
- f. Achieving the savings specified in the plan is going to be extremely challenging.
- g. From 2020/21, deficits on High Needs can only be recovered from DSG grant.
- h. Local authorities will continue to be able to transfer up to 0.5% of their Schools Block to the high needs block of the DSG, with schools forum approval. A disapplication will be required to the Secretary of State for transfers above 0.5%, or any amount without schools forum approval.
- i. The transfer is at a reduced level from current year of £1.4m to £0.66m, releasing the remainder into Schools Budgets.
- j. Indicative calculations show that a transfer of 0.5% (£0.66m) to High Needs from Schools Block would facilitate an overall 4.25% increase in school budgets through the schools funding formula.

16. The presentation elsewhere on today's agenda provides further information including the current position and plans to manage High Needs Budget.

Consultation Responses

17. Of the 36 responses received 30 (83%) supported the proposal and 6 (17%) did not. Some respondents provided comments, in general these recognised the pressure on the High Needs Block and the need for further work to review costs.
18. The movement of up to 0.5% (approximately £0.66m) from the Schools block to High Needs is a Schools Forum decision. In the event that Schools Forum does not agree with the proposal, the DfE are able to decide, if the local authority requests this.
19. Schools Forum is asked to consider and vote on a proposal to transfer 0.5% (£0.66m) from the schools block to the high needs block in 2020/21 noting that:-
 - a. All Schools Forum members may vote on this proposal.
 - b. It is a Schools Forum decision on whether to accept this proposal. In the event that Schools Forum does not agree with the proposal, the DfE are able to decide, if the local authority requests this.

Recommendation

20. Schools Forum is asked to support the proposals for the schools funding formula for 2020/21 noting that:-
 - a. All Schools Forum members may vote on this proposal.
 - b. The local authority is required to consult with Schools Forum on the funding formula, however the local authority retains the final decision on the formula to be used.
2. Schools Forum is asked to consider and vote on a proposal to transfer 0.5% (£0.66m) from the schools block to the high needs block in 2020/21 noting that:-
 - a. All Schools Forum members may vote on this proposal.
 - b. It is a Schools Forum decision on whether to accept this proposal. In the event that Schools Forum does not agree, the DfE are able to decide if the local authority requests this.

David New
Senior Finance Manager



School Funding 2020/21 - Consultation Document

PURPOSE

To seek views from maintained schools, academies and free schools on several proposals in respect of Schools and High Needs Budgets for 2020/21. This consultation ends on **Monday 18 November 2019**.

BACKGROUND

The Government have announced that nationally schools budgets will rise by £2.6 billion in 2020/21, £4.8 billion in 2021-22 and £7.1 billion in 2022/23, compared to 2019/20 funding levels. This includes an increase of £700 million more in 2020/21 for High Needs and an additional £66m for early years providers

The DfE will publish final dedicated schools grant allocations for LA's in December 2019. The teachers' pay grant and teachers' pension employer contributions grant will both continue to be paid separately from the National Funding Formula in 2020/21. Rates will be published in due course.

SCHOOL BUDGET

The DfE have confirmed the following key elements of the schools National Funding Formula (NFF) in 2020/21:

- a. The government's intention to move to a 'hard' NFF for schools – where budgets will be set on the basis of a single, national formula. They recognise this represents a significant change and will work closely with local authorities, schools and others to make this transition as smoothly as possible.
- b. In 2020/21 local authorities will continue to have discretion over their schools funding formulae. However, as a first step towards hardening the formula, from 2020-21 the government will make the use of the national minimum per pupil funding (MPPF) levels, at the values in the school NFF, compulsory for local authorities to use in their own funding formulae.
- c. The minimum per pupil funding (MPPF) amount for 2020/21 will increase to £3,750 (from £3,500) for primary schools and £5,000 (from £4,800) for secondary schools, with the primary schools minimum then rising to £4,000 in 2021/22. The DfE ran a Minimum per pupil funding (MPPF) consultation which closed on 22 October which proposed to exclude premises factors from the MPPF.

- e. The funding floor will be set at 1.84% per pupil, in line with the forecast GDP deflator, to protect per pupil allocations for all schools in real terms. This minimum increase in 2020-21 allocations will be based on the individual school's NFF allocation in 2019-20;
- f. Schools that are attracting their core NFF allocations will benefit from an increase of 4% to the formula's core (i.e. pupil led) factors;
- g. Pupil mobility funding will be allocated via a formulaic approach rather than on an historic basis; (The Council does not use this factor in its local formula)
- h. LAs will have the freedom to set the Minimum Funding Guarantee (MFG) in local formulae between +0.5% and +1.84% per pupil; as well as to use a gains cap.
- i. Growth funding will be based on the same methodology as this year, with the same transitional protection ensuring that no authority whose growth funding is unwinding will lose more than 0.5% of its 2019-20 schools block allocation;
- j. Final Dedicated Schools Grant allocations will not be known until December 2019.

Formula Factors Increase

As mentioned above, as part of the 2020-21 operational guidance for local authorities there is a proposed increase to the NFF core factors. It is proposed to increase the formula's core factors by 4%, except for the Free School Meals and PFI factor which will be increased by inflation. As presented, the lump remains at the same level as in the current year but could be increased if funding allowed. The proposed factors for 2020/21 both with and without a high needs transfer of 0.5% (as discussed in the section below) compared to 2019/20 are shown in **Appendix 1**.

Minimum Funding Guarantee

For the current year the Council in consultation with Schools Forum set formula factors to at least the National Funding Formula (NFF) factor values with a Minimum funding guarantee (MFG) at the maximum level of +0.5%.

The MFG is set by the Council following consultation with schools and the Schools Forum. In 2020-21 this can be set between +0.5% and +1.84%. The Minimum Funding Guarantee (MFG) is a way to protect schools funding on a per pupil rate. It is proposed to implement a +1.84% MFG so all mainstream schools see an increase at this level for pupil led factors. It is understood the DfE are considering increasing this limit further so if funding availability allowed we could increase this percentage further.

Basic Per Pupil Entitlement

Otherwise referred to as AWPU (age weighted pupil unit) this is a compulsory formula factor that assigns funding on the basis of individual pupils, with the number of pupils for each school or academy based on the previous October pupil census. These are not the minimum per-pupil funding levels referred to earlier. Stockton proposes that if there is any funding remaining after

ensuring that all the formula factors and protections have been fulfilled that the balance will be allocated to all pupils through the basic entitlement (AWPU) factor.

Question 1 - Do you agree, funding permitting, to increase the formula factors in line with the NFF. This is an increase of 4% to the formula's core factors (plus lump sum), except for the Free School Meals and PFI factors which will be increased at inflation.

Question 2 - Do you agree to set the MFG at plus 1.84% with the option to increase further if funding and DfE permitted?

Question 3 - Do you agree to adjust the Basic Entitlement AWPU if funding allocated to the LA is greater than that needed to fulfil the introduction of the National Funding Formula?

HIGH NEEDS BUDGET

The High Needs block supports provision for pupils and students with special educational needs (SEN) and disabilities (SEND), from age 0 to 25, and alternative provision (AP) for pupils who, because of exclusion, illness or other reasons, cannot receive their education in mainstream schools.

As schools will be aware since the introduction of the new SEND code of practice in 2014, there has been a year on year increase in the demand placed on the High Needs Block due to increased numbers of children requiring SEN support and Education, Health Care Plans (EHCP). This can be seen from the table below:-

	2014/15	2015/16	2016/17	2017/18	2018/19	% Increase over Period	Period (years)
Number of Education, Health and Care Plans	929	1049	1193	1328	1452	56%	4
Permanent Exclusions	17	18	35	43	56	229%	4
Non Statutory SEN - new approved applications	N/A	N/A	N/A	274	327	19%	1

The Council had to submit a deficit recovery plan to the DfE as the deficit on High Needs was more than 1% of the Boroughs overall Dedicated Schools annual grant. More recently the position has worsened with in year net pressures of £0.876m in 2019/20. This is mainly due to increased diagnosis of ASD and identification of children with more complex SEMH needs. The PRU is full meaning we are having to find alternative placements with a disproportionately high number of children having been excluded since schools return from the summer break. We also have very limited capacity in primary special school capacity, again which means children are more likely to have to be educated outside of the Borough. We continue to progress actions to help mitigate some of the pressures but there is a high risk that this upward trajectory of spend will continue.

The DfE have announced that the High Needs NFF for 2020/21 will also have the same factors as at present, with £700 million of additional funding nationally. For Stockton this means an

additional £2.7m. However, the Governments High Needs budget announcements only refer to one years funding for 2020/21 and look no further ahead.

The table below shows the latest projected position on High Needs. A breakdown of these figures are set out in **Appendix 2**. Without the transfer the overspend at the end of 2020-21 is projected to be £3.1m and without further additional grant £6.4m by 2022-23. It should also be noted that achieving the savings specified at these levels is going to be extremely challenging.

High Needs Position	2020/21	2021/22	2022/23
	£m	£m	£m
Brought Forward Spend Pressure from Previous Year	3.715	3.145	4.859
In- Year Projected Spend Pressure	3.238	4.015	4.960
Potential savings from actions	-1.056	-2.301	-3.387
Additional Grant	-2.752	TBC	TBC
Cumulative Overspend Assuming no Schools Budget Transfer	3.145	4.859	6.432

In the Governments current consultation “Clarifying the Specific Grant and Ring-fenced Status of the Dedicated Schools Grant” they intend to make it clear that from 2020/21 deficits can only be recovered from DSG grant.

Local authorities will continue to be able to transfer up to 0.5% of their schools block to the high needs block of the DSG, with schools forum approval. A disapplication will be required to the Secretary of State for transfers above 0.5%, or any amount without schools forum approval.

Last year the Forum supported a transfer of £1.4m (or 1.1%) from Schools to High Needs Block. It is proposed that this is reduced to £0.66m (0.5%) in 2020/21 which will both support the High Needs position and also enable the release of £0.74m into schools budgets to be distributed via the funding formula. This will be in addition to the increased funding the Government allocates to the schools block for mainstream schools.

Initial calculations based on indicative DfE DSG 2020/21 allocations show if we transferred £0.66m to High Needs from the schools block, schools would receive a 4.25% increase in overall budget through the school funding formula.

The Council consider this proposal a fair balance where the transfer will be minimised to ensure schools receive the maximum possible increase in their budgets to reflect the pressures that they have identified in recent years, whilst the shortfall in the HN budget is partially addressed.

Question 4 - Do you support retaining the transfer but at a reduced level of 0.5% (£0.66m) from the Schools Block to High Needs Block in 2020/21?

TIMETABLE

The outputs from the consultation will be reported to the School Forum meeting on 26 November 2019.

The table below summarises the next steps

<u>Date</u>	<u>Process</u>
19 November 2019	Consultation closes
26 November 2019	Consultation outcomes to Schools Forum
28 November 2019	Deadline for SoS Disapplication request to be submitted (if needed).
21 January 2020	Deadline for submission of final 2020 to 2021 APT to ESFA
28 February 2020	Deadline for confirmation of schools budget shares to mainstream maintained schools.

Consultation Questions

Question 1 - Do you agree, funding permitting, to increase the formula factors in line with the NFF. This is an increase of 4% to the formula's core factors (plus lump sum), except for the Free School Meals and PFI factors which will be increased at inflation.

	Response	Comments
Yes		
No		
No views		

Question 2 - Do you agree to set the MFG at the plus 1.84% with the option to increase further if funding and DfE permitted?

	Response	Comments
Yes		
No		
No views		

Question 3 - Do you agree to adjust the Basic Entitlement AWPU if funding allocated to the LA is greater than that needed to fulfil the complete introduction of the National Funding Formula?

	Response	Comments
Yes		
No		
No views		

Question 4 - Do you support retaining the transfer but at a reduced level of 0.5% (£0.66m) from the Schools Block to High Needs Block in 2020/21?

	Response	Comments
Yes		
No		
No views		

Please complete and certify this sheet and return with your consultation replies to: david.new@stockton.gov.uk by 5pm on Monday 18th November 2019 at the very latest.

Or by post to:
 David New
 Finance and Business Services
 Municipal Buildings
 Church Road
 Stockton on Tees
 TS18 1LD

If you submit a signed copy by email you need not also return a paper copy. We will accept unsigned electronic copies received before the deadline provided that the covering email confirms that a signed copy has been sent and that the signed copy reaches us within two days of the above deadline.

Name of School:

.....
Chair or Clerk to Governors (Please specify) **Headteacher**

.....
Print Name

.....
Print Name

Appendix 1

Illustrative Factor Values

	(A)	(B)		(C)	
	2019-20 Factor values	2020/21 Factor Values with 0.5% transfer to HN	% Incr	2020/21 Factor Values with no transfer to HN	% Incr
<u>Pupil-led factors</u>					
Primary (Years R-6)	£2,747	£2,857	4.0%	£2,878	4.8%
Key Stage 3 (Years 7-9)	£3,863	£4,018	4.0%	£4,048	4.8%
Key Stage 4 (Years 10-11)	£4,386	£4,561	4.0%	£4,595	4.8%
FMS - PRIM	£440	£450	2.3%	£450	2.3%
FMS - SEC	£440	£450	2.3%	£450	2.3%
FSM6 - PRIM	£540	£560	3.7%	£560	3.7%
FSM6 - SEC	£785	£815	3.8%	£815	3.8%
IDACI (P F)	£200	£210	5.0%	£210	5.0%
IDACI (P E)	£240	£250	4.2%	£250	4.2%
IDACI (P D)	£360	£375	4.2%	£375	4.2%
IDACI (P C)	£390	£405	3.8%	£405	3.8%
IDACI (P B)	£420	£435	3.6%	£435	3.6%
IDACI (P A)	£575	£600	4.3%	£600	4.3%
IDACI (S F)	£290	£300	3.4%	£300	3.4%
IDACI (S E)	£390	£405	3.8%	£405	3.8%
IDACI (S D)	£515	£535	3.9%	£535	3.9%
IDACI (S C)	£560	£580	3.6%	£580	3.6%
IDACI (S B)	£600	£625	4.2%	£625	4.2%
IDACI (S A)	£810	£840	3.7%	£840	3.7%
EAL 3 Primary	£515	£535	3.9%	£535	3.9%
EAL 3 Secondary	£1,385	£1,440	4.0%	£1,440	4.0%
Low Attainment - Prim	£1,022	£1,065	4.2%	£1,065	4.2%
Low Attainment - Sec	£1,550	£1,610	3.9%	£1,610	3.9%
Lump Sum (per school)	£110,000	£110,000	0.0%	£110,000	0.0%
Sparcity	£0-£25k	£0-£25k	0.0%	£0-£25k	0.0%
Rates	Actual	Actual		Actual	
PFI	Actual	Actual		Actual	
Min per pupil funding - Primary	£3,500	£3,750		£3,750	
Min per pupil funding - Secondary	£4,800	£5,000		£5,000	
MFG	0.50%	1.84%		1.84%	
Capping	2.65%	3.93%		8.09%	

Appendix 2

Budget Plan 2019/20 to 2022/23 - Revised		Projection		
		2020/21	2021/22	2022/23
		£	£	£
Top-ups etc. (Excluding Base Funding)				
Maintained Schools (Mainstream)		1,020,152	1,059,710	1,100,802
PRU		595,715	595,715	595,715
Academies	Mainstream	2,022,612	2,177,463	2,344,169
Academies	Special	3,486,445	3,535,303	3,584,845
SBC - Academies (Post-16)		643,200	646,416	649,648
Post-16 Other Colleges and Misc		1,165,800	1,171,629	1,177,487
Agency Placements		4,376,457	4,885,435	5,508,348
Nursery - PVI sector		169,794	182,793	196,788
Out of Area Specialist placements in Academies & Maintained Schools		1,374,318	1,479,535	1,592,808
		14,854,493	15,734,000	16,750,610
Base Funding (Incl. recoupment)				
EMS Maintained Schools and ARP Protection		1,035,362	853,305	697,264
PRU		750,000	750,000	750,000
Academies - EMS - Mainstream and Endeavour		1,123,000	1,123,000	1,123,000
Academies Special		5,050,000	5,050,000	5,050,000
Post-16 Places		1,900,000	1,900,000	1,900,000
SEN Support and Inclusion		3,175,399	3,255,469	3,339,543
		13,033,760	12,931,774	12,859,807
Total High Needs expenditure		27,888,254	28,665,773	29,610,417
DSG High Needs Block Funding				
Initial HN DSG allocation		(24,530,138)	(24,530,138)	(24,530,138)
Early Years Block - SEN Inclusion fund		(120,000)	(120,000)	(120,000)
Total Funding		(24,650,138)	(24,650,138)	(24,650,138)
In Year High Needs Funding gap		3,238,116	4,015,635	4,960,279
Potential Savings				
Improved contracting of Hearing and Vision Impairment services			(190,954)	(327,349)
Reduced use of Private Occupational Therapy services		(50,000)	(50,000)	(50,000)
EMS provisions - mapping exercise		(125,000)	(250,000)	(250,000)
Post 16 - mapping exercise		(64,167)	(168,333)	(210,000)
Reduction in the Number of Independent Special School Placements		(585,000)	(1,170,000)	(1,755,000)
Reduction in the cost of ASD independent / OOA Special School Placements		(34,500)	(69,000)	(103,500)
Out of Area - specialist maintained /academies- stem growth to 2019/20.		(97,735)	(202,952)	(316,225)
Tees Valley Free school				(175,000)
Sub-total potential savings		(956,402)	(2,101,240)	(3,187,074)
Additional Funding				
Additional High Needs DSG		(2,752,768)		
Joint Commissioning		(100,000)	(200,000)	(200,000)
Sub-total potential additional funding		(2,852,768)	(200,000)	(200,000)
Total Potential Savings / Additional Funding		(3,809,170)	(2,301,240)	(3,387,074)
Revised Estimated In Year Budget gap / (saving)		(571,054)	1,714,396	1,573,205
Brought Forward DSG Deficit		3,715,500	3,144,445	4,858,841
Carry Forward DSG Budget Deficit		3,144,445	4,858,841	6,432,046

Appendix B

LOG OF CONSULTATION RESPONSES

Question 1 - Do you agree, funding permitting, to increase the formula factors in line with the NFF. This is an increase of 4% to the formula's core factors (plus lump sum), except for the Free School Meals and PFI factors which will be increased at inflation.

<u>RESPONSE NO.</u>	<u>COMMENT</u>
1	<ul style="list-style-type: none"> • National Agreement • Essential increase to cope with cost pressures from pay awards, increases in costs.

Question 2 - Do you agree to set the MFG at the plus 1.84% with the option to increase further if funding and DfE permitted?

Question 3 - Do you agree to adjust the Basic Entitlement AWPU if funding allocated to the LA is greater than that needed to fulfil the complete introduction of the National Funding Formula?

<u>RESPONSE NO.</u>	<u>COMMENT</u>
1	This should be reviewed regularly to ensure schools attract highest possible funding.

Question 4 - Do you support retaining the transfer but at a reduced level of 0.5% (£0.66m) from the Schools Block to High Needs Block in 2020/21?

<u>RESPONSE NO.</u>	<u>COMMENT</u>
1	<p>Whilst we support retaining the transfer at a reduced level of 0.5% from the Schools Block to High Neds block in 2020/21, we would like some assurance that the same 1.84% increase is afforded to pupils in special schools as is the case for pupils in mainstream education. As no increase is due to be applied to the base funding of £10k, this needs to be addressed through top-up funding. The easiest way to ensure per pupil increases are not double funded would be a separate range of top-up values for pupils in special schools and academies. This distinction of bandings for children in mainstream compared to special schools is widely used across other Local Authorities.</p> <p>We are aware from colleagues in special schools in other Local Authorities such as Sunderland, that top-ups have been increased for the past two years. Also as stated above, other Local Authorities have separate banding arrangements for special schools and academies. To name but a few, Middlesbrough, Redcar & Cleveland and Sunderland. We would therefore, hope that SBC recognises the specialist nature of special schools and academies in line with other local authorities.</p>
2	However a detailed plan needs to be developed to show each area of expenditure and how this supports students with "in LA" provision and it is

	essential that extra alternative education provision is developed to reduce PEX expenditure. Alongside this a strategy needs to be worked up as to how we provide the best SEND curriculum within the LA rather than the cost with placing outside the LA.
3	However, I worry that the transfer of any money from the Schools Block to the High Needs Block only masks the growing problem in High Needs funding.
4	However, need a firm plan to recover the deficit.
5	But high needs funding should be better distributed to schools. We have to constantly chase outstanding monies that are owed to us and it is not managed effectively. We support high needs funding but we would like it to be paid to us when we are awarded it to support children in our school.
6	However need a firm plan to recover the deficit overall COG response. Can we say we would not agree to a 3rd year without a robust recovery plan in place because there is no way we would agree to even a second year in school!
7	It is unfortunate to have to continue to support from the schools block but reassuring to see the reduced level in spite on increasing demand. It would be useful to see LA plans for keeping provision within the Borough and not continuing to buy in from other authorities with the associated higher cost. hopefully reducing the subsidy further.
8	I think that there needs to be an urgent review of SEND funding of Enhanced Mainstream Schools that have funding for pupils but don't have the pupils in the school. Schools are being asked to take in pupils with SEND without sufficient funding to meet needs meaning a burden on the school's budget especially where there is an increasing cluster of these pupils in mainstream. Where there are empty places in Enhanced Mainstream Schools the funding should be clawed-back and allocated to actual pupils with complex SEND in schools who do not have sufficient funding. As part of this consultation on the transfer of the Schools Block to the High Needs block we should have been given accurate and up-to -date information on what funding each Enhanced Mainstream School is being given and how many pupils are actually in the school against that funding.
9	Taking this money from main stream schools, should not be the solution to assisting an underfunded system. 'Robbing Peter to pay Paul' is not a long term solution and taking funding away from the main stream could have a detrimental effect on both pupils and staff. Highlighting the areas of under funding should be raised to the post election government as an action for them to find further additional funding than that already promised by the current government.