

## Schools Funding Reform: Next steps towards a fairer system Consultation comments

### IDACI/Banding

5. Would like to lower the bottom score to enable more pupils to qualify

Higher funding in Lower IDACI bandings

Continuation to question 5 - we would like a lower banding threshold. In conclusion - This new funding system would be detrimental to the children in our School - it is most unfair - the children who live in our area shouldn't miss out purely because of where they live - they have the same rights as all other children. Under this new framework - they will miss out by £20000 per year - how is that going to work - less tailored teaching time, fewer resources, bigger classes?? Thank you for taking the time to read this. I really hope, for the sake of our children, there is something that can be done.

Q5. Band 0 IDACI should attract some funding

Q5 - Lower band 1

Q5 - A small weighting for band 0 and / or a little more weighting at that lower end.

Q5 - Banding should include a lower weighted funding for IDACI scores between 0.1-0.2

Q5 - Funding band to be lower i.e. lower weighting for a new band to incorporate IDACI score of 0.1 - 0.2.

Q5 - Funding should be included for lower banding 0 (pupils who fall within 0.1-0.2)

Q5 - IDACI Banding should have a lower threshold for funding

Q5 - IDACI banding. Should include funding for children who fall within 0.1 - 0.2 instead of no funding for less than 0.2

Q5 - Lower the lower limit

Q5 - Lower Threshold should be applied to include funding for pupils between 1.0 - 2.0

Q5 - Lower threshold to include funding for 0.1 - 0.2 IDACI score

Q5 - Reduce the IDACI lower limit

Q5 - Reduce the IDACI lower limit

Q5 - Reduce the lower score limit for Band 1

Q5 - Score lower limit Band 1 reduced, doesn't measure on entry attainment

Q5 Banding should be incremental and should increase equally from band 1 upwards

Q5 I would support a lower threshold i.e. an additional band to include funding for 0.1 - 0.2 IDACI Score

Q5. IDACI band 0 should have a weighting linked to it.

Q5. Would prefer a lower banding

Qn 5 : Would prefer IDACI funding to start at a lower level

Q5. Lower banding. As a small school with the majority of children in band 0 (89%) we would attract no funding at present for these children. We would welcome a further band at the lower end of the scale for IDACI score

Qn 5: We would prefer a lower threshold for funding to start

Question 5 - would like some funding for Band Zero

Question 5 - would like to see funding for Band Zero

Question 5 - Do not agree with banding in respect of nil funding for IDACI score below 0.2. Do not agree with weighting - think it should be equal weighting for each band.

Question 5 - Lower threshold bandings need to be better funded than currently.

Question 5 - some funding for Band Zero

Question 5 - would like some funding for Band Zero

Question 5 - would like some funding for Band Zero

Question 5 - would like to see some funding for Band Zero

Question 5 - would want some funding for Band Zero

Re Question 5: I feel it would be more beneficial for the 0.1 - 0.2 to attract funding (rather than no funding for less than 0.2).

Re: Qn 5 - The DFE Banding should include IDACI 0

School has low deprivation and educational needs at school - low funding in AEN factor. IDACI 100% in Band 0

The only comment I have to make is in relation Question 5 - Please lower the threshold banding.

With reference to question 5 we would like a lower threshold to start on IDACI scale. XXXX is seen to be an affluent area but we do have many families with quite severe needs.

With regard to question 5 (weightings) although we have answered "not sure", if we could have commented then we would have requested for a lower threshold for funding to commence. 62% of our pupils fall into the IDACI Banding 0 where no funds are allocated

Would like the IDACI Lower score limit reducing

Q5. need to teach every child regardless of parental income - there should be some funding in IDACI Band 0

Q5. IDACI Band 0 should receive some funding, e.g. rural deprivation, or should lower the threshold to 0.05/0.1

Q5 - Prefer to see a lower threshold included in the IDACI banding so funding is received for scores between 0.1-0.2

Q5. There should be some funding in IDACI band 0 or at least a lower threshold

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IDACI bands - all bands should receive some funding, including Band 0.

Q5. minimum level of funding for IDACI band 0

Q5. There should be some funding for IDACI band 0 or at least a lower threshold, e.g. 0.1.

Q5. do not agree with IDACI banding - Band 0 should receive some level of funding

Q5. IDACI banding - should be some funding for all bands, regardless of parent's income

QUESTION 5 -ALL CHILDREN HAVE DIFFERING NEEDS.

Q5 The IDACI band weightings should be spread out further, support is required for all children.

Q5 Band 0 and 1 to be 0.2 weighting, band 2 stay at 0.4

Would want lower thresholds for the lower bandings on the IDACI index (see Q5)

Question 5 - would like some funding for Band 0

Question 5 - Would like funding for Band 0

Question 5 - Would like funding for Band 0

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Question 5 - Would like funding for Band 0

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Question 5 - Would like funding for Band

In response to question 5 would like IDACI bands to start at 0.1

Q5 - take from Band Zero

Q5 - would like funding from Band Zero

Q5. OUR DATA SHOWS GROUPS IN BANDS 0 & 1

Question 5 - Band 1 to start with a lower IDACI score limit

For IDACI 0 to be recognised & included in the DFE banding.

Question 5 - Would like funding for Band 0

Children in our school have a low deprivation group. However it states 90% of our school would fall into IDACI 0 banding and therefore receive no funding. I would like the weighting to be adjusted and recalculated.

For Question 5, we think there should be a 0 - 6 weighting breakdown and there needs to be an actual weighting at 0.

IDACI banding structure does not take into account that many children who fall into band 0 do also have additional needs which go unrecognised by this formula. Just because families don't fall into the lower income bracket it doesn't automatically mean they don't have issues requiring intervention e.g. "borderline" income families

IDACI should have a higher weighting towards the lower bands.

Question 5 - would like some funding for Band zero

**LCC Comment** – IDACI banding received by far the most written responses on the consultation, with a significant majority suggesting the introduction of funding for Band Zero pupils. Since the original county council consultation was published, DfE have revised their proposals for IDACI banding, introducing an additional sixth band. However, the new band is at the higher end of the banding framework. The funding formula pro-forma that must be submitted to the EFA to check compliance with the national framework does not allow funding to be attributed to Band Zero pupils, so we do not have the local flexibility to respond to the suggested introduction of Band Zero funding.

Q5. An additional banding at the top of the IDACI scale

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**LCC Comment** – Since the original county council consultation was published, DfE have revised their proposals for IDACI banding, introducing an additional sixth band at the higher end of the banding framework. Significant modelling work has been undertaken to revise IDACI in response to the national changes.

Question 5. Would prefer a heavier weighting toward the band 3 in IDACI banding as more of my children fall into this category and a lesser weighting to the far band say Band 1 0.2 Band 2 0.2 Band 3 0.8 Band 4 0.8, Band 5 1.0

Question 5 - Would it not be better to do an average?

Q5 - Banding 1 and 2 should have different weightings

Q5 - Band 1 should equal 0.2wtg

Q5 Fewer weightings and more weighting to higher bands

Q5 Fewer bandings

Question 5 would like the IDACI to be lower in banding 1

Q5. lower the IDACI score limit for Band 1

Re Q5 (IDACI bands) - The bottom threshold for band 1 should be lower, allowing some of the current zero funded students to move into this category

Question 5 would like the IDACI to be lower in banding 1

IDACI - Banding to move towards lower (1-4) attracting higher weighting, Raise the scores for bandings (1-4).

Q5. We would like an additional IDACI banding lower down the scale to attract funding sooner.

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Too much funding is targeted towards deprivation, particularly with the Pupil Premium

Re Q5 - Suggest- Lower limit of band 1 moved down to 0.1 Weighting of band 2 increased to 0.5 to differentiate from band 1.

Q.5 We would need a lower threshold for funding to start at 0.1

Q5. Seems to be a lack of correlation between the socio-economic indicators and the IDACI scale

Re question 5. Would prefer to start IDACI 1 at lower limit of 0.10

Question 5. Would prefer IDACI 1 to start lower than 0.20

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Q5. Would like the IDACI 1 band to start lower, at 0.10, therefore more children will get funded re: supplementary question 1 Would like more explanation on where the 35% / 40% figures have been derived from

Q5. Would like the IDACI 1 band to start lower than 0.20 so more children will get funded

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Q5. A banding lower down the scale in order to attract funding sooner

Question 5 - We feel that the figures do not take into account the fact that overall our multiple deprivation factor is 67 ( D ). We would like this to be reflected by a lower banding threshold being introduced.

Q5. The school would want a lower threshold for funding to start.

Question 5 - Weighting should be increased for the mid-range IDACI bands

**LCC Comment** - *In the light of school responses and further information from DfE, the IDACI bandings have been significantly remodelled to reduce turbulence.*

.QUESTION 5 ACCORDING TO THE IDACI FIGURES 94% OF OUR PUPILS ARE IN BANDS 0-3, WE FEEL THAT THIS DOES NOT REPRESENT SOME OF THE POVERTY OF THE AREA.

**LCC Comment** – *Data to support IDACI banding is provided by DfE and cannot be altered by the LA.*

Pupil premium should target deprivation rather than IDACI/FSM via formula funding

**LCC Comment** – *the allocation methodology for the PPG is prescribed by DfE*

Split AEN and Deprivation factors. FSM EVER6 - HT feels that this benefits High Schools.

**LCC Comment** – *This Ever6 measure identifies additional pupils at both primary and secondary, but proportionately more so in secondary. It also offers greater stability.*

## SEN/AEN

Concerns regarding small school/rural issue with regard to loss of current SEN statement funding, could deprivation/AEN funding be targeted more proportionately?

Question 1 - would like top up funding for Band D statements School has increasing number of A-D statements, low % FSM and deprivation, so additional funding for statements needed.

Contingency funding should be available to support additional mid-year aen when pupils with substantial sen factors (up to band d statements) are admitted other than in September. This is because the aen funding and associated staffing are allocated to match the pupil requirements. Mid-year admissions then do not attract additional funding and can result in schools having to reduce the planned support for existing pupils to meet the needs of the new pupils. Some schools develop a reputation for being "good" with SEN pupils, and seem to attract mid-year admissions.

Target AEN/deprivation better to support small schools SEN

Question 1 - School do not receive funding as much due to short SEN Funding

this school is seriously affected by AEN, reduction in budget is very significant, would be unable to meet existing obligations to statemented children under arrangements, need to know legal position for failing to meet statements What are the implications for the inclusion agenda when deprivation is taken as the sole indicator for SEN funding up to and including Band D? At the outset of the consultation it was said that existing statements would be honoured. How do I explain to parents that money is within LCC but the school cannot access the funding?

Lower end SEN funding needs to be fairer for the future.

The AEN/deprivation allocation does not financially support the AEN needs within my school. Too much focus is on deprivation index and schools in our locality lose out on much needed financial resources and are not able to support children within school who DO have additional educational and/or emotional needs.

THE FUNDING OF CHILDREN WITH ADDITIONAL NEEDS IS A CONCERN TO OUR SCHOOL. TO FUND STATEMENTS FROM BAND E UPWARDS WOULD IMPACT ON OUR SCHOOL BUDGET. CONSIDERATION SHOULD BE GIVEN TO INCREASING FUNDING ALLOCATION FOR PUPILS WITH HIGH HIGH INCIDENCE / LOW NEED IE BANDS A-D.

SUPPLEMENTARY Q1 XXX SCHOOL WOULD LIKE FUNDING TO START AT BAND C AND THAT THE FUNDING SHOULD BE MORE EVEN THROUGHOUT THE BANDS. WITHOUT KNOWING WHERE FUTURE FUNDING WILL GO, WE CANNOT GIVE A DEFINITE ANSWER TO Q1

Relief of changes to SEN within the new model - still concerned about the legal implications of meeting statements - glad that the SEN issue has been taken on board, but still concern with future

SEN because funding should be with the child

I have grave concerns regarding the linking of SEN provision with deprivation. Whilst across the country I can understand that deprived areas have higher SEN needs, this is not the case in the Ribble Valley where statemented pupils (Band D and below) are more common in the non selective schools and in particularly small secondary schools which are often a preferred choice by parents. For these schools the notional DfE SEN funding of £4000 is close to the total AWPU these children will attract to the school. Who is going to be the person to explain to these parents that this school cannot meet the needs of their child and that they need to send them to a school in a more deprived area? Currently over 10% of my school's budget comes from statemented pupils (all at Band D or below) in the model this reduces to 3% based on AEN as measured by deprivation.

Headteacher has concerns about the A - D statement funding negatively affecting smaller schools with high levels of low needs (bands A - D).

SMT & Governing Body are fully supportive of the work of the Local Authority. As a small school we have been particularly well supported in all areas. As a school recently recognised as outstanding by Ofsted we acknowledge that much of this recognition came through our work with SEN children and those with significant needs. The funding for SEN is an issue for us, in particular the requirement to fund the first £10,000 for each statement. We currently have 7 children with statements.

**LCC Comment** *This is another significant area of concern for Lancashire schools. The allocation of funding for current Statement funding is defined in the new framework. In response to concerns expressed by schools and the forum, the supplementary Lancashire consultation, published in September, proposes to offer a more generous top-up arrangement for SEN funding from the High Needs Block than required by DfE and also intends to redistribute significant funding away from the prior attainment factor to be allocated through FSM (£2m), IDACI (£22m) and the basic pupil element (£9m).*

As stated in meetings and elsewhere the SEN top up policy will discourage schools from taking on SEN students. As a school we spend a great deal of money (rightly so) on supporting our SEN students (and others). There is clarity in this funding in that the money clearly follows the student. Under the new system this will no longer be the case. Headteachers will no longer have to justify the lack of support they give to SEN students and will encourage them to go elsewhere. This, together with academies and free schools, will lead to distortion of the educational system....been there before !!

I FEEL STRONGLY THAT PUPILS WITH STATEMENTS SHOULD NOT HAVE THE FIRST £10000 OF FUNDING DELEGATED AS THIS PREVENTS TARGETED SUPPORT BEING AVAILABLE.

Statements - would like to see the first £10,000 of funding for each pupil with High Needs reducing.

QUESTION 5 Social deprivation indicator shows the school in Band D and E with IDACI only E is attracting IDACI funding. Banding levels should be adjusted to incorporate "D"

We have a large proportion of statemented children (47) and this will affect this school considerably.

Question 1 - We are an inclusive school and have a high level of statements so would like to see funding for Band C

**LCC Comment** – *this option is not available under the DfE's new funding framework. The level of funding is specified by DfE, made up of £4k basic element and £6k notional SEN funding. In Lancashire this equates to statements bands A-D and the A-D element of bands E and above. The refined model does attempt to minimise the impact of this change by offering more generous top up arrangement.*

Question 1. Would rather have the £110m distributed through AWPU

Move deprivation funding towards basic pupil entitlement

Q1. Would prefer 1/2 through deprivation and 1/2 through AWPU

Question 1 - low deprivation and educational needs at school

Question 1 - would like to see an increase in AWPU

Q1. £110m funding should be distributed through basic pupil element

Q1. £110m funding should be funded through basic pupil element.

Question 1 - Reduce the £110m in Deprivation to increase AWPU.

Reduce AEN and deprivation factors Move more into basic pupil element entitlement over a number of years

Maximise pupil entitlement Simplification and predictability essential for planning purposes

Maximise basic pupil entitlement. Simplification and predictability are essential for planning purposes.

Q1. Funding should be in basic pupil element .

Q1. cannot estimate whether distributing £110m funding through AEN/deprivation or through basic pupil element would be better for school as low deprivation and low pupil numbers so may not receive much of the funding either way

Q1. difficult to say which way school would lose the least if £110m funding was allocated to AEN/deprivation or basic pupil element -

*LCC Comment – the new funding framework requires that a deprivation factor is included in the formula. The Forum, having regard to responses from schools and further modelling of the new formula, will need to assess whether the current £110m provided for AEN and Deprivation factors should continue in the future. As indicated above, the balance of funding between prior attainment, FSM, IDACI and the basic pupil element has been adjusted in the latest modelling to reflect concerns expressed by schools.*

I would be unable to sustain the current support for SEN with changes to funding. It is unfair that schools in less deprived areas will no longer be able to offer quality support to children with additional needs

*Comment – The level of flexibility in the new system is restricted by the framework determined by the DfE. However, the Authority is using what scope exists to model numerous scenarios to reduce the impact at individual school level as far as is possible. Protection will also be provided by the MFG.*

The school has no funding for deprivation using IDACI or FSM Ever 6. They found some questions were not applicable for their small school as they have no deprivation funding, EAL etc

**LCC Comment** - DfE stipulate what factors are allowable under the new funding formula and provide the data in support of each factor. There are a small number of Lancashire schools that do not receive any funding for across IDACI/FSM/EAL factors.

The schools deprivation has increased recently and they see this having a positive impact in AEN. Also, the postcode in the village has been divided, which may have an impact on deprivation score.

**LCC Comment** – The formula is intended to be responsive to the changing circumstances of children in our schools.

The school has a significant number of Gypsy Roma Traveller/Traveller children. A funding factor is needed to reflect the higher cost of supporting children from these communities i.e. a transient or GRT factor.

If the IDACI was accurate then it might be reasonable to use it. In the case of our school, 10% approx of our role is made up from Traveller families who live in trailers in a field. They were not here when the census took place (or at least they didn't engage & went travelling shortly after). So because their field is covered by a postcode that is deemed to be in an affluent area then no consideration at all is made of their extremely challenging circumstances. It is also proposed that October school census data will be used for funding - recent patterns for these families mean that they are expected back after the census (they are currently not on role). We welcome the families and are considered by the county GRT team to be doing an outstanding job with educating them. If the current proposals are adopted, by 2013/14 we will have had to lose most or all of our staffing beyond class teachers and we will have no funding at all to help with educating these children. They need more support than others because when they are not with us they are not at other schools - they are usually in Scandinavia, but not at school there. All the support and flexibility we have been able to use to their advantage will be gone. They don't claim benefits, they are not eligible for FSM, they haven't been considered in the IDACI calculations and now they won't even exist as far as budgeting is concerned! The whole business of delegating SEN funding via the formula penalises smaller schools in rural areas. We cannot possibly sustain our high standards

with a massive budget cut. Maybe the only way forward will be to become an academy so we have more money and fewer statutory obligations?

The proposals indicate that my school which is in a very challenging area of high mobility and high deprivation will lose a person's salary - we need everybody on the staff to perform at the highest possible level for our children. I feel that this is very unfair and does not encourage schools to think creatively about the best support for children with challenging needs

October Census will make a big difference due to the amount of Traveller children the school has. IDACI grading not accurate and won't reflect the travellers attendance

Moving the census date to 1 Oct means a high proportion of our 'regular' traveller pupils will not have returned. They will not be in any school then and so they will skew the numbers for any school they subsequently attend. There needs to be a funding pot which can be accessed by schools receiving such influxes of students - + 10% has a big impact on staffing and other costs when no funding is in place for them.

We have a rather large "Travelling community" in our village and many of the children from this community attend our school. The "travellers" have become quite well known in XXXX and could be said by some to lead an "unorthodox" lifestyle which means that our school attendance records do tend to become somewhat "screwed" as a consequence of their none attendance as they are often away from the parish travelling and are not often on the school role till after October 4th. (it is worth noting however that when they return to the community the attendance figures from the travelling families are equal to those of the rest of the children in school and in some cases even better!). A second point worth mentioning relates to the fact that the travelling families did not fill out the national census form at their sight and so by default you might say DO NOT EXIST for calculation purposes and we (the board of governors) believe that our school funding could adversely be affected if these relevant points are not taken into account. We believe we at XXXX have a special case and ask that all these considerations be taken into account when you implement any changes which you appear to be proposing.

A factor to reflect schools with the highest number of transient pupils and/or with the greatest mobility should be included within the AEN block. This should be used in a similar way to the current scheme transient pupils factor to support schools in the highest area of deprivation to support narrowing the gap.

Our situation is quite unique in that for the previous three years we have had our school numbers increase by over 10% due to traveller children arriving mid October till Easter/May time. In addition to a possibility of them not returning before 4th October, they won't be included in the school's IDACI figures because they didn't complete the national census, so their site doesn't exist.

The IDACI system of evaluating deprivation is sound in principle but our school will lose because we have Irish Travellers who may not be on role for the October census and because they did not take part in the census the local postcode takes no account of them.

**LCC Comment** - since the initial phase of the consultation was launched DfE have announced that an additional 'pupil mobility' factor will be allowed within the formula, but initial modelling of this factor on DfE provided data suggests that it is not sufficiently targeted to protect previous Lancashire allocations. It is proposed to retain funding in the High Needs Block for the Gypsy, Roma And Traveller Achievement service so that central support can continue from April 2013. The new school funding framework will allocate resources to maintained schools and academies using the same formula. The authority has no discretion over census dates.

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Q4-Ever3 or Ever4 would be more favourable to primary schools,

**LCC Comment** – This option is not available under the funding framework

Possibly reduce proportion of notional SEN below 35%

**LCC Comment** – This option could be considered by the forum

There is an anomaly between your calculation of the deprivation indicator and the one that we have been given. According to your data set 98% of our children come from the least deprived areas. Our information ( LSIP Socio-Economic Indicators ) show that 32.2% of pupils are from Band D and E in the Multiple Deprivation Index, with 61.53 % within bands C - E.

**LCC Comment** – Data for all formula factors is provided directly from DfE. The Lancashire modelling has identified this requirement as one of the cases of turbulence.

## Small schools

lump sum should be as high as possible to ensure school remains viable and to subsidise children with special needs.

The lump sum should be set as high as possible to ensure small schools remain viable.

The lump sum should be set as high as possible to ensure small schools remain viable.

The lump sum should be higher to ensure small schools remain viable.

The lump sum should be pitched at such a level so that small schools that are currently viable remain viable.

As a small school I would not want to agree to any changes that would affect our budget in a negative way. Small schools always lose out!

As a small school we are extremely concerned about how we will be affected by these moves. Is there any possibility of additional protection for small rural primary schools who face significant reductions?

a larger lump sum to ensure small schools remain viable

The lump sum should be pitched as high as possible so that very small schools remain viable.

Concerned about the proposed changes to SEN funding esp for statemented pupils

Small schools in rural areas are financially worse off under the new framework. Small schools need additional funding in order to survive.

The removal of factors for small schools is causing great difficulty for schools like mine with low numbers due to falling roles. To maintain a curriculum given the need to reduce staffing due to falling roles would be impossible without MFG when looking at the funding comparisons provided. Lancashire needs to ensure small schools can perform their duty to provide a first class education for its pupils and parents who value those schools.

**LCC Comment:** *Supplementary information from DfE has allowed LAs to increase lump sums to a maximum of £200,000 for one year only. Despite representations made by the LA, the same lump sum rate must still be applied to both primary and secondary schools and academies. The latest modelling has increased the lump sum in the Lancashire formula from £135k per school to £150k. However, to increase this to £200,000 would mean reducing the basic pupil element by £357 per pupil for primary and £85 per pupil for secondary compared to the June model. A higher level of lump sum also produces a greater level of turbulence in individual school budgets.*

IDSS costs have risen significantly in recent years with no increase to service delivery.

**LCC Comment:** *Comments passed to service.*

## Other Formula Factors

AST don't appear to be included in future formula. Due to increased demands on local authorities to moderate and check on tests and levelling. Could ASTs not move over to a newly defined role such as this and also support MIT teams, who may have less personnel. This would help guarantee sustained salaries for ASTs, who were appointed by county, but schools will no longer receive funding to support release time and salary shortfall. It would also keep staff motivated and expertise in teaching and learning there with moderating MIT teams who otherwise might be outsourced anyway.

**LCC Comment** – *The new government school funding framework does not allow a specific AST factor to be included in the funding formula. The LA consultation does seek the views of schools about the de-delegation of resources for School Improvement Support but this can only be agreed at the current level.*

XXX school would like to highlight that we are one of only two schools in Lancashire with a full repair and maintenance lease, which would further deplete our financial resources if the DfE funding reforms went ahead. I know that myself, as the head, and the governing body would want this highlighting to the relevant people. This is especially true given that the fact that our indicative formula modelling puts us with a variance of

concerns re rental issues, previously discussed with Neil Smith

**LCC Comment** – *the LA, with the support of the Schools Forum, has submitted a request to the EFA to allow an additional rents factor to be included in the Lancashire formula. We have been informed that the Secretary of State is minded to approve this request*

They wanted a consideration for rural deprivation, as they have restrictions on spending due to an increased cost to pupils as there are fewer of them e.g. costs of buses.

would like the funding to include an element for rural deprivation

a rural deprivation indicator would help AEN

**LCC Comment** - *The new government school funding framework does not allow a specific rural deprivation factor. The allowable factors for funding deprivation are prescribed by DfE.*

I have ticked for 3 years EAL support because there was not an option to tick for longer than 3 years. Some children who come from homes where no English is spoken at all need more than 3 years funding. It will also mean unnecessary stress for EAL staff in the future

**LCC Comment** - *The option to fund EAL beyond three years is not available under the DfE framework*

Reduce EAL funding as duplicated support as part of AEN.

**LCC Comment** – *The national framework identifies EAL as a separate funding factor with a specific purpose to support pupils for whom English is not their first language. Different indicators are used in the new framework for targeting AEN funding.*

Any clawback of funds only on funding not utilised with the EAL pupil.

Q6 EAL funding, if the funding is provided in year 1 what clawback would there be if the child left in years 2 or 3

**LCC Comment** – *data to support EAL eligible pupils would be provided annually by DfE, so no clawback would be necessary. If EAL children left a school, no funding would be allocated in the next financial year.*

They asked "How are we expected to run a school with fixed and rising costs year on year with less money?" They suggested an increase to the lump sum for small schools to be able to meet costs.

Also as a small school the level of lump sum funding is crucial for a school this size. We are losing £18,364 over the three areas under the funding reform.

**LCC Comment** – *a further update from the DfE has raised the maximum lump sum level to £200k, but the allocation must still be given to all schools. Further modelling work will attempt to strike the right balance for the level of lump sum in Lancashire given the diverse range of schools in the county and the finite funding available.*

Whilst recognising the need for a lump sum to protect small schools this cannot be at the expense of funding for large schools. With over XXX NOR XXX is one of the largest primary schools in Lancashire which can offer significant efficiencies. Conversely, questions need to be asked about the efficiency of retaining some of our smallest schools where alternatives are available.

**LCC Comment** – *the allocation of a lump sum to all Lancashire schools must try to strike a balance between offering protection to smaller schools, whilst remaining affordable as the overall level of resources remains unchanged. Detailed modelling has been undertaken in an attempt to find the appropriate balance and to minimise turbulence at individual school level. Nationally, the government's presumption against the closure of rural schools still applies and the county council has made clear that changes in the funding formula will not be used to make small schools unviable.*

Lancashire is funded lower than other LA's and this seems unfair based on size.

- basic pupil element should be the same for all local authorities. –

**LCC Comment** – *we agree that a significant influence on the level of funding for Lancashire schools compared to other schools is the level of GUF received by Lancashire. The county council and Forum have made numerous representations to DfE on this issue.*

Q2 (off supplementary questions). If uplift applied where will money come from - could some childrens places be paid for twice? Please note that in some areas where there is little deprivation

schools have regularly received less additional funding. If the building is also old and grade II listed then everything costs more and the children attending are deprived of up to date facilities. For example our school does not even have a hall which is atrocious compared to nearby schools and schools nationally

**LCC Comment** - increased funding for any formula factor must come from elsewhere in the schools Budget.

### **Turbulence/Transition**

A drop of almost 5% is not acceptable out of our budget. It will be extremely difficult to run the school with this level of reduction.

I think the new funding projections that have been presented are going to present serious issues for many schools and I think this is very much one step too far. I do fear for Children over the next 3-5 years in the system unless further radical changes take place

**LCC Comment** – since initial modelling was issued to schools considerable work has been undertaken to minimise turbulence. The range of winners and losers has significantly reduced.

Question 7 - I Agree with the capping method but not sure at which level to cap gains at.

Agrees with Capping gains but unsure what to cap gains at.

I agree that there should be a cap on gains, however I do not have sufficient knowledge/understanding to decide what level that should be.

**LCC Comment** – information about the consultation responses to this question and further modelling of the turbulence caused will be provided for the Forum to consider on this issue.

We need a longer term guarantee of funding. Planning on a one year basis can create either a short term mindset or a reluctance to spend delegated funds due to fear of future penalty.

**LCC Comment** – The county council agrees that multi period budgets help schools with long term planning and offer stability, but we have only received a one-year settlement from government and DfE have only provided formula data to us for a single year

Representing views of Governors as discussed at last meeting. A lot of answers are specific to current proposal, if these change then some of our answers are likely to change eg we are currently IDACI '0' band. This new funding mechanism suggests our school would gain additional funding after years where we have been limited as we are not a small school, nor do we have high levels of deprivation/ FSM or SEN. All pupils need funding to give the best possible education and we would welcome the opportunity of additional/ higher funding to enhance provision.

**LCC Comment** – further modelling over the summer months has attempted to reduce the extremes of winners and losers. In the latest model roughly 2/3rds of pupils attending Lancashire Schools gain from the new formula, and the numbers of schools receiving MFG funding is reduced by over 100 to 220 compared to the model previously circulated.

Would like consideration of funding for pupils who are under special guardianship, private fostering or adopted as they are Children looked After

**LCC Comment** - data to support the allocation of funding via allowable factors is provided directly by DfE and the LA has no discretion on this issue. This is one of the reasons for turbulence in modelling for April 2013 budgets.

Q2 - The key stages are under review, if a 3 year KS4 a higher weighting would be more beneficial.

**LCC Comment** - we will need to await future developments.

re question 7 - no cap on gains

We would like to make it clear as a 1.5 form entry school, that our finances have been extremely tight, and we have fought an ever more difficult battle to avoid having to set a deficit budget. This has required very difficult decisions regarding staffing and services, and we feel that the proposal to cap at 1.5% takes away an important readjustment to our budget which the formula clearly indicates is needed and to which we are entitled. We sometimes feel that the needs of a school

such as ours can be over-looked and that it is not only small schools that need protection. Although we do not wish to cause difficulties to others, we do believe that there has been generous allocations to different sized schools in previous budgets, and that the cap proposed currently only serves to protect rather than address possible unfairness. We too wish to work towards a fairer system and how that the cap can be reviewed to something that gives greater balance across school sizes.

Question 7 - would like gains capped at 3.5% ( not at 1.5% as it 2nd model)

**LCC Comment** – *Options were provided in the consultation for a higher level for the cap/no cap. The majority of schools favoured a level of 1.5%.*

re MFG - As a school we would encourage the LA to avoid turbulence whilst reducing polarised funding.

**LCC Comment** – *One of the objectives of the LCC modelling has been to minimise MFG and increase the funding for the lowest funded schools. However the government framework places some restrictions on this.*

- October census - providing financial info on out of date data

**LCC Comment** – *The census date to be used for funding purposes is specified by DfE*

Initial modelling showed our school losing significantly under the new funding formula. A higher lump sum (£150k) and a minimum funding guarantee with a 1.5% cap will assist. Hopefully the modelling and additional top up SEN funding proposed in the supplementary over the summer will assist us further as we have two children in Band E and 4 children in Bands A

I have just looked at my revised indicative ISB for my school issued on 4th September 2012. I am pleased to see that my funding looks to increase rather than decrease as indicated on my initial indicative budget. I feel that my school has lost out in the past as we have low FSM and funding has been channelled towards those children.

**LCC Comment** - *Considerable work was undertaken to minimise turbulence in the model. The number of factors to target pupils with AEN is restricted to prior attainment in the national model.*

Question 7 - With reference to Q7 from the consultation the HT commented that the capping of any funding gains should be on a sliding scale and on a Pro-Rata basis for the size of the school eg pupil numbers.

**LCC Comment** - *Forum will need to consider the comment alongside the analysis of responses.*

Would be interested if there were consultations regarding the MFG. If this were to cease in 2 years time it would cause serious problems for the school

**LCC Comment** *This concern is shared by the County Council*

### **Delegations/De-delegations**

Q10. No to Museum service - don't know what they provide for free at the minute - anything that we have from the museum service at the minute we pay for anyway

**LCC Comment** – *Some elements of the museums service are charged at present, whilst other elements are not. The de-delegation relates to the current core serve only and other aspects of the service would continue to be traded beyond this basic element even if schools opt for de-delegation. .*

I would be extremely loathed to see the de-delegation of the school improvement support element. Schools do not appreciate how vital this service is until an emergency arises. I would be very concerned that if this service were to become a totally traded service the plethora of skills and experience present in the current staffing of this service would be watered down or lost altogether.

**LCC Comment** – *The LA recognises the importance that schools place on school improvement support from the feedback we have received and has therefore encouraged schools to opt for the de-delegation of this service, so that it can continue to provide this valuable support in the future.*

Q8(Milk buy-back) - Would have to do own research

Question 8, how much does it currently cost and what would the difference be?

Q8 - School would like to research before committing

**LCC Comment** – Responses to this initial question on a milk buy-back will allow the county council to judge if the development of an appropriate buy-back service would be welcomed by schools and would be viable. If so, further details of the service offer and costs would be provided to schools before they were formally asked to sign-up to the scheme. At such time, schools could assess the offer compared as compared to other options.

Qn 8: Is it possible for LCC to source milk from local suppliers?

**LCC Comment** – If the County Council offers a buy-back service, it is likely that the contract will be procured on a county wide basis, so that the best value for money could be achieved. Individual schools would be free to decide if they wished to participate in this county contract or make their own local arrangements.

**LCC Comment** - This suggestion matches the existing Insurance arrangements in Lancashire but is not available under the dedelegation framework

Q9 - additional funding needed for aided/foundation schools,

**LCC Comment** – This option is not available under the new funding framework

I much prefer funding to be de-delegated to schools so that we have a transparent view on expenditure for our schools needs.

They would prefer to choose their own supplier for milk

**LCC Comment** - these options are perfectly acceptable and final decisions on dedelagation will be taken by the Forum.

Q10 - Licences & Subscription - Pls provide more information

**LCC Comment** – further information has been provided to this school

Union Staffing Issues need more transparency and explanation.

**LCC Comment** – further information has been provided to this school

Q11 - as long as no separate pots for consultancy/'targeted projects', all schools should have access to improvement funding.

**LCC Comment** – The type of support to be provided was set out in the consultation document

licences and subscriptions - do not know what LCC currently covers and LCC does not make it clear what cover is needed.

**LCC Comment** – advice to schools about licences and subscriptions is available on the schools portal. Decisions about the need for a number of the licences where funding has already been delegated need to be taken at an individual school level.

all central charges to school should reflect pupil numbers.

**LCC Comment** – delegations and recharges predominantly have a pupil number element within them and often a lump sum element to offer some protection for small schools

Q11 - a qualified yes as there would have to be limits to the extent of this as it has the potential to support poorly managed schools and (being cynical) a rationale for money being held centrally 'in case of' scenarios. What happens if the money is not actually required

**LCC Comment** – arrangements for schools requiring special support follow published criteria and funding is issued on a formulaic basis which takes into account school balances. Schools budget

*contributions to the funding of School Improvement resources remain within the Schools Budget.*

Concerns remain about expansion funding and future years funding.

Question 11 XXX school is expanding due to increasing birth-rate in the area. The local authority made a request to the governors of the school to increase pupil intake by ten per year over seven years for this expansion. The governors were not given very much time to make a decision, however, they looked at the financial implications very carefully and agreed to the expansion with the caveat that the school would not be financially disadvantaged by the gradual increase. Verbal reassurances were given that the school would not be financially disadvantaged by the decision to expand to support the local authority in meeting its responsibilities for school places in the area. Expenditure projections additional to new building work were shared early on with the local authority. Officers has given governors reassurance that these financial needs will be met, although he has not been able to outline how it will be done, beyond this school year. Within this consultation, it was surprising for the governors to realise within Question 11, that if schools voted to de-delegate funding to support expanding schools, the local authority may be in a position when it did not have the resources to meet the obligations to the school regarding support for the expansion. The governors of Great Wood are wondering how the results of the consultation are going to impact on the funding of xxx School regarding the continuing expansion, particularly if the majority vote NO to Q11.

**LCC Comment** - *to date a majority of schools favour the dedelegation of school improvement support. If schools responded differently the LA would still honour firm assurance given to individual schools through the 'existing commitments' provision. If it is ultimately agreed to dedelegate this item the LA will have the necessary framework to support school expansion in the coming years.*

Q11. A proportion of money for the reorganisation of schools would be a good idea, however if the advisers/ officers had more rigorous procedures where they would be more proactive in preventing Schools getting into difficulty and therefore not requiring the funds.

Completely agree with de-delegation for School Improvement Support as school wouldn't wish to be without support from the authority

**LCC Comment** – *this kind of positive feedback lead the authority to propose this de-delegation. Officers are continually working to improve early warning systems to help prevent schools getting into difficulty.*

Trade union sub should be used to pay for Trade Union facilities agreement.

The funding of trade union activity from the public purse (i.e. private membership associations) is immoral, it impacts negatively on school improvement too and believe it should cease. Union dues should support union employees, not the state.

**LCC Comment** – *Forum will need to consider the views when deciding on de-delegations*

### **Consultation Document/process**

THE PHRASE "DE DELEGATION" IS UNCLEAR - THIS DOES NOT HELP THE RESPONSE ACCURACY IN THIS CONSULTATION

This was not an easy set of questions to understand. The term 'de-delegation' is particularly awkward to understand.

Too many double negatives within the questionnaire.

The questions were confusing as they seemed to be a double negative. It would be useful to have three responses that do not reflect the individual but the area as a whole ( to stop the responses being on a winner / loser basis )

The questions put forth were written in such a complex way that they assumed the readership to have a degree in finance or statistics. Headteachers are busy people; they need items like this simplifying in order to understand. Make it easy for us please

**LCC Comment** - *seminars and individual briefings with bespoke modelling were provided to assist schools in understanding the consultation We always try to make the consultation easy to understand and response, but we will continue to learn and improve.*

I think it is important to think community wide when considering finance and look at the greater good for ALL schools.

**LCC Comment – agreed**

Appreciate the one to one support and advice in completing the questionnaire

We as a school have appreciated the support of the Finance Officer in understanding the implications involved in this consultation and this support has enabled us to complete the consultation more effectively

I really appreciate the support from our School Financial officer who explained in depth all of these again to me.

In future it would be greatly appreciated if questions could be made a lot more simple! However, it is much appreciated having our finance officers explain the questions.

Our responses to this consultation have been made much easier by the excellent briefing session at Woodlands and the input from the LA Finance Team. Having scrutinised the impact on our school has enabled us to make informed answers and made the consultation process more meaningful to us. Thank you.

Thank you for the thorough consultation for the mechanisms that were put in place to help us to understand it all and what it means to our school.

THANK YOU

**LCC Comment - thank you ☺**

### Comprehensive Comments

¿ SCHOOL LOSING OUT IN SEN FUNDING. ¿ OTHER SCHOOLS MAY BE ABLE TO OFFSET THIS LOSS WITH ADDITIONAL FUNDING FOR DEPRIVATION BUT NOT THIS SECONDARY SCHOOL. ¿ XXXXX HAS HIGH NUMBER OF SEN PUPILS IN BANDS A - D AND IS IN AN AREA OF LOW DEPRIVATION. ¿ THIS NEEDS TO BE ADDRESSED BY LCC - ADDITIONAL FUNDS TO SCHOOLS WITH HIGH GAINS NEED TO BE REDUCED TO BE REDISTRIBUTED ON A MORE EQUITABLE BASIS. ¿ CAPPING SEEMS ONLY WAY TO CORRECT - 1.5% Additional Points made at meeting to discuss Schools¿ Funding Reform - August 2012 1. STILL WANT ALLOCATION OF CURRENT £110M FUNDING THROUGH AEN AND DEPRIVATION FACTORS BUT WANT MORE FUNDING THROUGH SEN AND LESS THROUGH DEPRIVATION. 2. SINGLE BASIC PUPIL ELEMENT - IN SHORT TERM, SINGLE BASIC FUNDING BEST FOR US AS WE HAVE LARGER PUPIL NOS AT KS3 THAN KS4. 3. XXXS POINT OF VIEW, PREFER IDACI DATA FUNDING ONLY / NO PREFERENCE FROM COUNTY. D BANDING - NOT ELIGIBLE FOR FSM BUT STILL A PERCENTAGE OF DEPRIVATION. 4. FSM EVER 6 AS PICKING UP OVER A LONGER PERIOD. 5. IDACI BASED ON 0 N- 5 BANDING - MAJORITY OF xxxxx(84%) BAND O 6. 51 - IDACI / 49 EVER 6. EAL - MORE FAMILIAR WITH LANGUAGE AFTER 1 YEAR , LESS SUPPORT NEEDED AS TIME PROGRESSES- SCHOOL WOULD PREFER 2 YEAR - BALANCED BETWEEN OPTIONS. 7. SHOULDN'T HAVE BIG WINNERS/LOSERS 8. N/A 9. EVEN THOUGH CHURCH SCHOOL AND ALSO HAVE DIOCESAN INSURANCE. MIXED RESPONSIBILITY. PART SCHOOL COVERED BY LCC /DIOCESE. BETTER TO BE SAFE 10. 11. COLLECTIVE RESPONSIBILITY. GOOD SERVICE PROVIDED.

Question 1: Would you support the LA continuing to allocate the current £110m of funding through AEN & Deprivation factors?

Yes; the LA has recently introduced a new funding formula agreed with schools and other parties after full consultation. Therefore it would seem sensible for the LA to use all options available under the proposed national formula to maintain the balance of funding that currently goes into schools.

Question 2: In the secondary sector, would you prefer:

- a single basic pupil element, or
- separate rates for KS3 and KS4

A separate rate for KS3 & KS4; this is in line with the LA funding formula recently established.

Question 3: Which of the available options for funding deprivation would you prefer?

- IDACI Data only
- FSM Data only

- A combination of IDACI/FSM data

A combination of IDACI/FSM would ensure a wider range of deprivation is included.

However whilst FSM EVER6 is preferred on the grounds that it provides some stability from future changes to the welfare benefits system, there is a need to be cautious with the total amount of funding allocated through this factor given it will increasingly become less effective at targeting deprivation. Therefore the majority of funding should be allocated through IDACI.

Question 4: If FSM data is to be used in the formula, would you prefer?

- FSM eligibility
- FSM EVER6

FSM EVER6 is the preferred option for the reasons stated above to question 3.

Question 5: Do you agree with the application of the DfE example weightings as a basis of differentiating the funding rates between IDACI bands?

Yes; in order to continue to target funding at greatest need whilst recognising the full range of deprivation, I agree with the LA model that makes use of the full range of banding available, including the additional Band 6 the DfE included during the summer period.

Question 6: Up to three years funding for EAL pupils will be provided for qualifying pupils entering the compulsory school system. Which option would you prefer?

- Funding based on 1 year
- Funding based on 2 years
- Funding based on 3 years

The 3 year option is preferred, however, it has to be noted that the reduction of support for pupils currently eligible across schools in Lancashire is alarming and therefore the strategy for implementing these proposals should look at ways of minimising the impact of this, particularly on schools with high EAL.

Question 7: Do you agree that gains arising from the revised funding framework should be capped in order to fund the MFG protection that will be provided to schools losing under the reforms and if so at what level should gains be capped?

- Cap gains at 1.5% the same level as MFG
- Cap gains at 2.5%
- Cap gains at 3.5%
- Do not cap gains

Gains under these national funding formula proposals should be capped to 1.5% in line with MFG.

It is important to recognise that the LA recently amended its funding formula with the agreement of schools and this was designed to meet the needs of young people across Lancashire. The national funding formula is less likely to match local needs and therefore gains for schools under this model should be capped to support schools that lose out.

Question 8: Would you be interested in participating in a school milk buy-back service if one were to be offered by the county council?

- Yes
- No

(Not applicable)

Question 9: How would you prefer insurance to be dealt with from April 2013?

- Funding is delegated to schools and the County Council offers a buy-back service
- Funding is de-delegated

The option to delegate funding for insurance is preferred with the offer of a buy back provision for schools to consider. Whilst it is recognised insurance is a statutory requirement, the options for schools need to be maximised to ensure efficiency with cost effective insurance products that meet their particular requirements.

Question 10: Do you support the de-delegation of any budgets for?

- Licences and subscriptions
- Staff costs – trade union duties
- Museum Service (Primary only)
- No de-delegations

Support for de-delegating staff costs to cover trade union duties on behalf of staff across all schools.

Question 11: Would you support the de-delegation of resources for School Improvement Support to

enable the LA to continue to provide support to schools in financial difficulties, or those with additional costs relating to reorganisations or expansion?

- Yes
- No

Yes; it is important for the LA to be able to offer maintained schools support if required particularly when we are facing ever increasingly stringent budget settlements.

Supplementary Question 1: Which proportion of notional SEN should Lancashire apply to low incidence high needs pupils?

- 40%
- 35%

35% is the preferred proportion of notional SEN to apply to low incidence high needs pupils. This level best enables the LA to support schools with significant numbers of pupils with High Needs and is therefore closer to the current financial support provided through the LA formula.

Supplementary Question 2: Should Lancashire apply the reception uplift?

- Yes
- No

Not applicable

Supplementary Question 3: Should Lancashire introduce a mobility formula factor?

- Yes
- No

No; as it is noted that this amounts to a small sum per school and this would be administratively uneconomic. However, it does highlight the problem of using the October census for funding instead of the January census as we currently do in Lancashire. Pupils who join a school after the October census will not be funded until April after the following year; potentially 17 months afterwards. In most cases this is only a small percentage of pupils, however this may cause some problems for schools with a higher level of inward mobility after the October census.

**LCC Comment** – *These comprehensive comments offer a helpful insight across all the consultation questions*

Response to consultation re Lancashire's new formula funding proposals based around the national formula funding strategy

I do not envy colleagues who are involved in tweaking the county funding strategies with their hands tied by the national formula restrictions. It is an impossible job in that the turbulence created is going to leave some schools high and dry. Given this I will not comment on any individual budget situation, even though recent information indicates some really substantial losses and gains are on the cards. The real purpose of all our joint efforts is to ensure the children of Lancashire are supported as effectively in their learning and development as possible.

Many children come into our schools disadvantaged in one way or another and enter schools with skills and abilities well below the average. Some enter school emotionally damaged because of the traumas experienced in their first four years of life. They may be from families who are unable to support their children in becoming "school ready". Some have families who are constantly on the move and never settle, making learning for their children a real mountain to climb. Children may have learning difficulties of one type or another. Whatever their situation when they enter our schools the profession has toiled endlessly to help these children catch up with those who have been supported effectively in the family prior to school. Lancashire is well known for being an inclusive county where everyone counts. Messages from the local authority have focused strongly not only on inclusion but also early intervention, supporting these disadvantaged children from day 1 whenever possible. Some thrive on early additional support and catch up quickly. Others take longer and some never manage it. Whatever the outcome the teachers and local authority know they have done their best for these children. This is an ethos to be proud of and is one which should underpin the way we all work.

In the past this ethos has been evidenced in the formula funding for schools with funding being allocated with children's needs in mind. Those schools with high percentages of needy children received more funding than other schools. Children with SEN, deprived home life and behavioural difficulties all attracted additional funding so schools could work as effectively as possible in helping them catch up. Some of the strategies employed were hugely successful, such as ESAP which, in our school, cut the number of statements and enabled many to remove themselves from the SEN register completely.

Gradually over the past few years these supportive funding mechanisms have been eroded away. Schools with high percentages of needy children are seeing their AEN budgets gradually being swallowed up into the AWPU. We seem to be heading for a place where all children attract the same funding no matter what their needs may be and any additional funding comes under the heading of the Pupil Premium. The gap between the amount of pupil premium a school receives and the funding it received under previous formulas which delivered additional funding directly to those who needed it, will be a chasm. Many schools will be unable to sustain both the outcomes for children and the continual development of standards of achievement we are witnessing at the moment.

I have just been interrupted by a screaming, kicking and shouting 4 year old who does not wish to do as he is being asked. We have no funding for this child but we have allocated a full time learning mentor to try to settle him into school life. Without additional funding we would be forced to adopt less inclusive strategies with this child. We may even find ourselves in a place where the temptation is to avoid welcoming children with similar needs into our school. We don't want our school or Lancashire schools to be even considering such thoughts.

With regard to the current situation and the tweaking going on to reduce turbulence in the new formula, I am seriously concerned that the need to reduce turbulence is in fact fast tracking us to the demise of funding for AEN. I understand that we have the capacity within the government's imposed conditions to maintain a funding stream based on children's prior attainment. In the county's first draft formula some £ 43 million was allocated to this stream, this was allocated using prior attainment measures in the first indicative budget received by schools at the end of June. During the summer break, encouraged by consultation responses received which reflected concern about the measure used to allocate these funds and probably the level of turbulence the first formula created, the sum within prior attainment was altered. Some £33 million was removed and allocated elsewhere within the formula (£9 into basic pupil element, £22 million into IDACI and £2 million into FSM).

Does anyone understand IDACI in terms of how much funding each pupil in each band attracts? The question relating to this on the consultation was virtually impossible to respond to with any depth of understanding on my part.

From a pupil's perspective the amendment to prior attainment has reduced possible TA hours support from 6 hours per week to 1.5 hours per week. (An approximation based on 23% of Lancs children not achieving 78 points last year and a total Lancs pupil population of 87,500).

If it was the intention that the viring of £33 million would then even itself out in terms of what schools receive through the basic pupil element, FSM and IDACI, this does not seem to have happened in the case of our particular school. Our second indicative budget shows an overall reduction of £74,553 in total for AEN in comparison with existing funding.

I cannot begin to think of the justification for viring 9 million from AEN into the basic pupil element. This seems to be based on the same philosophy that ESAP money was taken from the pupil's in greatest need and spread out amongst all children. Yes all schools do have children with particular needs but surely those needs should be measured in some way to ensure best value for the funding provided?

Consultation is a vital part of the process in achieving an effective response to the national funding initiative. Headteachers have responded in numbers due to the use of Finance Officers across the county. What percentage of schools respond to the consultation based on their own situation rather than the well-being of all Lancashire school pupils? Surely the LA should be gauging the response and considering outcomes and possibilities from the perspective of overall children's champion? Shouldn't tweaking of the county formula in response to the government's instructions and restrictions at least maintain equality of opportunity for all children in Lancashire?

How long will MFG be there to protect these schools and what other strategies do colleagues have up their sleeves to ensure these schools remain viable? At a recent meeting one High School Head reported their budget to be 500k in arrears. Another Primary School is reported to be losing 41% of its entire budget. How will seaside schools be supported with the transience problem? They have been identified as particularly vulnerable under the national funding strategy, so what can be done to support colleagues in maintaining the excellent service they provide?

In conclusion I would ask that colleagues look again at the funding based on prior attainment. Cutting this aspect of the formula by three quarters seems fairly draconian to say the least. We are facing increasing numbers of children with difficulties who would have qualified for ESAP funding under previous strategies. Lack of funding based on prior attainment is going to make the task of

sustaining support and securing at least age appropriate attainment a real struggle.

**LCC Comment** – *This responses offers insight into the real challenges faced by Lancashire schools in dealing with the changing financial framework and concludes with a request to re-evaluate the changes in prior attainment funding.*

### **Supplementary Consultation – Uplift**

Supplementary Question 2 - Lancashire should apply the reception uplift unless there is a Nursery on-site.

Supplementary Question 2 - Reception uplift should be applied to account for additional resources for early years / reception class.

Supplementary Question 2 - Reception uplift for resources for Early Years and Reception

**LCC Comment** – *Forum will need to consider comments and analysis of responses from schools*

### **Supplementary Consultation – updated modelling**

In the initial proposal the variance for xxxs would have been £80,000 less than previous years. Subsequent amendments to the formula have resulted in a variance of around £30,000. Schools such as xxxs, which have low levels of deprivation but high levels of special educational needs, will suffer under this model. Such schools would be few in number. To ensure that schools are not disadvantaged for welcoming pupils with a range of Special Educational Needs we would hope that any overall gains and losses would be capped at 1.5%. Also, we would appreciate a consideration of a lower threshold than the Department of Education example weightings in respect of the IDACI bands. I really welcome the way in which Lancashire has conducted the consultation and have altered the formula model accordingly.

I write with reference to the September update to the School Funding reform and have a number of points I wish to make in addition to the consultation document which I will submit separately.

Although I am mindful that the provision for MFG was only available until 2014-2015, I did not expect our budget to take such a hit next year. To have the funding guarantee reduced from £119,701 to £4,772 in one year is too much and is surely against the grain of 'minimising turbulence in individual school budgets'. Helen Denton's letter dated 12<sup>th</sup> September 2012 clearly states 'schools will receive budget protection through the minimum funding guarantee, which will help you plan changes over the longer term'. I am also concerned as to how the AEN can have reduced from £625,217 to £462,376 from the June estimate to the September estimate. I understand there is an increase in students entitled to free school meals but what are the other factors?

XXX does have a rising role but it does seem that in effect, we are being penalised for improving and growing.

**LCC Comment** – *Officers have put considerable effort into the refined model to minimise the turbulence across the county. This has produced greater stability in the transition from the existing formula, but clearly some schools would have received a greater level of funding under the June model.*