

Appendix 8 – Frequently Asked Questions

Special Schools Funding Formula Consultation – FAQ's

No.	Question	Response	Update comments
1.	Could you share the calculations sitting behind how the banding rates were reached?	Please see attached powerpoint presentation and explanation. Please note this is only for schools and should not be shared outside with other parties.	
2.	Could you also share with me the names and numbers in each band for Millgate and Keyham Lodge used as when we initially sent information to Jane, without allocated finance there were a proportion that we identified as 6+.	Shared directly 02/10/20 with Chris, Sarah and Victoria	
3.	Millgate School's Residence has not been considered in this funding model. How are the LA suggesting to fund this moving forward?	<p>We have received confirmation from SES none of the pupils within Millgate have reference to or requirement of a residential placement of a 38/52-week nature.</p> <p>If you would like to provide information regarding identified residential need for pupils please can you provide details such as frequency of use, demand, level of resource deployed in this provision etc. as part of your response to the consultation?</p> <p>This is something the Council would need to discuss with you further to what options may need to be considered in the future.</p> <p>The same question has been asked in question 74. Please provide this information as soon as possible so that we can consider.</p>	Work will commence with the school to do a full commissioning review to take place 2021/22 which will determine if this service is required. Full funding for this element (£400K/ 8%) will remain in place until that process is complete.
4.	I presume that the PowerPoint shared today can now be shared with staff,	This is only for school and your staff as its an aid to the consultation, it is not a formal consultation document.	

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	students and parents in order to inform the consultation.	<p>The main formal consultation documents are available online which is now live on the Council's website. We would ask you to direct parents, students and staff to the site to share their views and thoughts</p> <p>We would also like to request sight of communications you're planning to share with parents and pupils to ensure the consultation and information remains fair and equitable.</p>	
5.	At no point has there been any moderation of the banding model. When can we presume that this will take place?	<p>As discussed during the presentation on 02/10/20, the Council are proposing to undertake moderation of bandings once we have completed the consultation regarding the funding formula proposals.</p> <p>We would anticipate the moderation of bandings to take place during 2021/22.</p>	<p>The moderation process applied to the pupil cohort for 2019/20 was completed, however as the sample size was not adequate, we did not feel this could be fairly used and applied to moderate all schools banding. Additionally, it was felt by moderating at this time, it was add further complexity to this review.</p> <p>Once the banding rates have been agreed we want to ensure there is a robust and transparent process relying on a peer moderation model. It is important the we work collaboratively</p>

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			Special Schools to design and implement this process moving forward.
6.	Given the 25% of my cohort are new to roll since completing the banding exercise, when are you proposing that we band these students?	<p>As discussed during the presentation we would look to allocate these pupils according to your 2019/20 cohort banding figures.</p> <p>It is anticipated your new pupil cohort would also align to your cohort 2019/20, therefore in the case for Millgate these were within banding 5 – 6.</p> <p>If this is not the case, please can you submit details with the consultation information?</p>	
7.	Could you also identify and send me the final banding descriptors used in calculations as I seem to have different documents.	Included within the presentation noted above.	
8.	Can I also confirm that emailing you is a good method of raising questions as I have a few as you will have guessed, I presume you will then forward to the relevant person to respond and share wider as you build a bank of FAQs.	Yes, please send your queries directly to me and I will liaise with colleagues from within the Council.	
9.	Please can I clarify whether the meeting for Governors was for Heads to attend too (I got the feeling it was not but please can you just confirm this?)	Yes, the meeting is for Governors rather than Head Teachers	
10.	As you would like to see correspondence that goes out	Yes, it would be helpful if we could see any correspondence before it is sent out. I've not yet drafted any letter/ wording as appreciate you will know your parents better than	

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	<p>relating to the consultation, is there a standard letter that could go to parents ie you may have one already for parents at the Parent Carer Forum? or is there one on the LCC website? Otherwise, I am happy to prepare one for Oaklands parents, but if you had one ready with particular wording, I would be happy to use that</p>	<p>us, I'm more than happy to work with you if that's of help? I will be attending the PCF to present the consultation proposals next week.</p>	
11.	<p>Can I please gain some clarity on a slide that was part of the presentation in regards to consultation timeline. It says on the 14th October there is a presentation to the Parents Carer Forum, is this something already happens, or is this something that we can inform our parents carers about? If so do you have details more about this?</p>	<p>Parents with young people with EHCPs in special and mainstream schools participate in this forum. The agenda varies and covers a range of topics during the meeting It is a parent led forum with support from the council, you can gather further details from the link below. https://families.leicester.gov.uk/send-local-offer/your-voice/parent-carer-forum/</p>	
12.	<p>I recognise from the Special School Funding Consultation that there is £15 million from the £56,919 million HNB that is being distributed between the special schools. Can I ask how is it decided what that special school amount is from the HNB budget? Is there a specific percentage that it should be that is advised from Dfe/Gov or is that</p>	<p>The £15.6m that was mentioned in the pre consultation meeting with heads was the baseline funding level for teaching funding alone. This £15.6m was the total 2019/20 actual teaching expenditure for all special schools in the consultation. In other words this was the amount of money being spent on teaching for the numbers of pupils in 2019/20 with the level of need identified from the pupil bands. We have not reduced the total teaching funding available for all schools and have maintained it at the total expenditure seen in 2019/20. We have used the pupil banding information provided by schools to re-allocate that funding across schools based on the numbers of pupils in each band.</p>	

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	£15million total allocated to special schools decided locally?	No, there is no standard or recommended percentage allocation for special schools or indeed any other provision type from the HNB – these are local decisions.	
13.	<p>I just wanted to ask about Capital Maintenance Fund. Please could I ask how it is calculated? Is it based on sqm and does it take account of the age of the building??</p> <p>Also, this may be a question we need to put to Clare as part of the funding consultation, but will we receive CMF funding per pupil in addition to the proposed funding per pupil?</p>	<p>The funding associated with CMF was added to your per pupil funding in 2018/19 to reflect the fact that you were now responsible for those elements of the capital maintenance that had previously been the city council's responsibility. The funding was distributed on an area basis.</p> <p>The proposed new funding rates are to be used to cover all types of expenditure including general repairs and maintenance</p>	
14.	How will special schools funding be calculated in line with census dates, top up rates and commissioned places?	<p>The average weighted funding per pupil will be split into the £10k for commissioned places and the balance paid as a top-up. Payments for commissioned places are guaranteed regardless of actual occupancy over the commissioning period. If the school is not planning to grow in the financial year then the commissioning period will be for the financial year.</p> <p>If the school is growing and additional places are being commissioned from the start of the new academic year for example, then there will be more than one commissioning period – in this example one for April to July and another from August to March. Place funding of £10k per commissioned place will be guaranteed for the separate commissioning periods.</p> <p>Top up funding is paid by the LA in which the pupil lives, unless they are a looked after child in which case it is the LA who is the corporate parent that pays the top up. Top up funding payable by Leicester City Council will be paid based on the number of pupils in the census in each term that are the responsibility of LCC.</p> <p>Other LAs will need to be charged by the school for the top up relevant to their pupils for their period of occupancy.</p>	

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15.	<p>With this proposal and with financial responsibility as our local authority, LCC will be fully aware of the in-year £2,000,000 deficit for 2021.2022 across Millgate and Keyham Lodge, what plans have you already created as you knew this was going to happen 6 months ago when you kept the details confidential and away from our school leaders?</p>	<p>Special schools are responsible for their own delegated budgets. The LA commissions places and has to work to satisfy the demand for SEN in all of its forms within the resources available from the HNB alone. As part of that process the LA has to agree appropriate funding with individual providers within these financial constraints.</p> <p>Where there are significant changes in funding to specific providers then we will work with those providers to agree a transitional plan to move to the new funding level over a time period to be agreed.</p>	<p>We always look to provide additional financial advice and support with our schools where we know they are struggling. As described in 4.9(g) in the main report, we will work with schools to agree a transitions plan</p>
16.	<p>Considering the huge reduction expected for both Keyham Lodge and Millgate, do LCC propose a minimum funding guarantee, something along the lines that was proposed by DfE in line with a minimum funding guarantee.</p>	<p>We will work with the schools to implement a transitional plan to move to the new funding levels over a time period to be agreed.</p> <p>Reductions in unit funding to special schools require approval by the DfE. The standard MFG for special schools in 2021/22 is 0% per pupil, ie the per pupil funding should not reduce, unless agreed by exemption with the DfE.</p>	
17.	<p>How do you envisage our Millgate and Keyham Lodge Schools' managing this staggering reduction of £2 million for the next financial year, literally five months away?</p>	<p>As discussed, when presenting the consultation proposal, the Council will work with individual schools to agree any transition period regarding funding changes.</p>	<p>The LA remains committed to working with the school to agree a transition period.</p>
18.	<p>When considering calculations for the modelling of this redistribution of special school funding why was leadership factor heavily weighted, schools are</p>	<p>Schools are free to develop their own management arrangements using the overall funding available. The proposed funding formula identifies teaching and non-teaching components and proposes a level of funding for non-teaching which is independent of student need. The amount of funding for each non-teaching component is based on average levels of expenditure for the majority of schools.</p>	<p>Following the consultation, we requested additional information from several schools to</p>

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	<p>managed in extremely different way and considering mean pay is the same across all our special schools it seems targeted to focus on the leadership percentage of a schools delegated budget?</p>	<p>If schools, feel the level of funding is inappropriate then they must respond as part of consultation and <i>provide evidence</i> as to why the school needs to spend more than the majority of other schools on leadership for example. They should also be able to demonstrate what the impact is of the additional spend on the outcomes for the pupils.</p>	<p>understand/analyse budget requirements. We are proposing to work with each school to review and determine if further adjustments are required</p>
19.	<p>The methodology in calculating the revised funding rates are not representative of any student's individual need within any school, there has been no recognition of provision required as identified in EHCP's. Why was the work completed by Jane Friswell, an external advisor, commissioned for 18 months to carry out a funding review of high needs spend in relation to students needs and grade descriptors discarded for a simplified one designed by LCC officers.</p>	<p>The methodology in calculating the level of teaching funding uses the banding system which provides funding proportionate to the level of need as indicated in the banding descriptor. Pupils have been banded by special schools themselves.</p> <p>The work of completed by Jane Friswell has not been abandoned and will be used when moderation takes place in 2021/22.</p> <p>The banding descriptors were produced and updated by the Special School Head Teachers, following a review of those developed with Jane Friswell.</p>	
20.	<p>The rationale and modelling seem to be around shifting funds towards the lower bands of special educational needs, it seems that money is being moved away from the more complex, disadvantaged students with</p>	<p>The funding model distributes the teaching funding in proportion to the level of need of each pupil as described in the banding descriptors. Schools have placed their pupils in each of the bands and therefore the funding has been distributed based on the assessed level of need.</p>	

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	<p>mental health issues, can you share your rationale and explain why there is this purposeful shift in funding?</p>		
21.	<p>Why is there such a significant redistributing of funding, in excess of £1,000,000 from Millgate (band 5/6) to Ellesmere College (band 4), why is it not proportionate to complexity SEN and what is anticipated as a result with regard student outcomes, subsequent 4 years SEN place planning, OOA costs, NEET figures?</p>	<p>Please see question 20</p>	
22.	<p>This new modelling of special school funding is targeting the most vulnerable, disadvantaged and those from poverty-stricken families with complex mental health issues, can you reassure everyone that this reduction in funding and reduction in capacity and quality provision will not have a negative impact?</p>	<p>Please see question 20</p>	
23.	<p>While all other provisions remain within a 5%-7% difference from initial LA comparison funding our city MLD provision is over 20%</p>	<p>Within the comparator table we have tried to use schools which best fit into these categories, however, the Ellesmere example was difficult as the cohort is split significantly due to the breadth of the need the school meets. For example within their current cohort of children 34.8% is ASD (£23.2k – £23.5k) 8.62% is SEMH (£28.5k -</p>	

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	higher than the average considered LA comparatives?	<p>£29k), on that basis nearly 42% of the schools cohort sit in other categories and therefore the proposed average rate band for the school recognises this.</p> <p>It should also be recognised that the highest MLD rate is £20.34k, against a proposed rate of £21.34k, and therefore a 20% comparison is used based on the lower end of the centile medium. It should also be recognised that the highest rate for SEMH comparison is £28.1k, with centile average of £24.39k, however, the LA is proposed £29,014.</p> <p>Finally it should be recognised that the rate system is designed to go with the child, regardless of which school they attend, and the rating system is designed to ensure the needs of the child are recognised through the banding they are awarded and therefore the proposed average rate system is based on the cohort in the school, linked back to the funding that child is awarded under the banding rate system.</p>	
24.	Why is it that the only two schools facing a reduction are those who have submitted an academy order?	The proposed funding formula distributes funding on the basis of need regardless of the status of the institution.	
25.	What were DfE initial comments when you approached as you said they have been considered?	The ESFA indicated that they would consider the matter in detail at the point when the LA submits a formal request to reduce funding rates. Until such time they would not provide any opinion which would pre-judge the outcome of the consultation. They did acknowledge that other LAs have submitted similar requests.	
26.	Ultimately the DfE have to approve any changes in schools' revenue, can I ask you to outline what the criteria is for this and how any decision is made?	See question 25	
27.	Shouldn't the funding of residential settings be considered separately. A significant impact of this provision relates to improved	Please refer to question 3	Work will commence with the school to do a full commissioning review to take place

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	social outcomes for children, young people and their families and should therefore also be considered in the context of social care and not education alone.		2021/22 which will determine if this service is required. Full funding for this element (£400K/ 8%) will remain in place until that process is complete.
28.	Why won't the review of all strands of the HNB funding lead to an increase in the funds allocated to special schools? Currently the special school element is approx. £29 million from a total HNB of £56 million. Several years ago, all strands were under review but we are unaware of the outcomes of this piece of work.	All areas of the HNB are in the process of being reviewed. We cannot pre-judge the outcome of these reviews but we would look at re-distribution of any funds released as a result.	
29.	Ash Field Academy need to be part of the review alongside the other schools. If, as has been suggested, they are reviewed separately, what will happen to any funding that may be saved as part of that review?	<p>As we explained at the meeting, Ash field's funding will be reviewed following the completion of this consultation. Ash field is also funded from the HNB.</p> <p>It is important to stress that neither Ash Field or the other special schools will be disadvantaged as a result of the reviews being separate. There was a pressing need to begin the consultation for the majority of schools as soon as possible and including Ash Field at this stage would have introduced further delay. The delays related to the availability of comparative unit costs for 2019/20 as a result of the different financial year ends for academies and there are also issues of cost comparability as a result of the wider range of need at Ash Field including the medical support which needed further work as part of the review. We cannot pre-judge the outcome of this review.</p>	
30.	The proposed model is based on an average cost per pupil	The model has not moved away from assessing individual pupil needs. The weighted average funding per place is calculated directly from the banding assessment of all	

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	<p>place. From the outset, the intention was to produce a banding model where each child was funded according to their individual level of need. Not dissimilar to the system that has continued to operate successfully at Ash Field. Why has the proposed model moved away from this?</p>	<p>individual pupils at a point in time in the school year. This weighted average funding per place will be used to fund places in the following financial year.</p> <p>The weighted average funding rate will be re-calculated prior to the start of the following financial year and where there is a significant change in the banding mix of pupils in the school, the weighted average funding may change.</p> <p>We have indicated that where schools have a cohort of children at a separate site which have significantly different levels of need to the main site, then a different average funding rate will apply to each site.</p> <p>We have also indicated that there may be <i>exceptional</i> circumstances where a pupil's need is significantly beyond the needs of the banding descriptors and these instances will be looked at on a case by case basis.</p>	
31.	Teacher Pay queries	<p>Email sent to all CLASS Headteachers by Richard Sword 15/10/20</p> <p>All, As part of the rates review, a number of you have rightly raised the issue of teacher pay rises. I therefore felt it was right to write out to you on the specific point, however, in accordance with the consultation this response will be formally recorded within our Q&A responses.</p> <p>To give context, the special school funding rates proposed in the consultation were prepared so that a direct comparison could be made between unit costs in 2019/20 and current funding rates per pupil. Any technical changes to the HNB for 2021/22 were unknown at the time of preparing the proposed rates.</p> <p>Nevertheless, we do recognise that if there were any technical changes to the HNB then we would adjust the proposed funding rates for 2021/22 accordingly. The DfE have now confirmed that the previously separate grants for teachers' pay rises in 2018/19 and 2019/20 and the teachers' pension increase in 2019/20 will be incorporated as part of our HNB allocation. In other words, we will adjust the proposed funding rates to include what the DfE add to our HNB allocation which will need to reflect the grants previously received separately by schools.</p>	

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		<p>Therefore, whilst our LA funding rate from 2021/22 will increase because of this transfer, the impact will be neutral for schools because the external teachers' pay and pension grant income will reduce by the equivalent amount.</p> <p>We also have confirmation from DfE that they will not be providing any separate additional funding for the 2020/21 teachers' pay rise or any future years' increases. Therefore, we will fund the teachers' pay increase for the financial year 2021/22 by applying a 2.75% uplift to the teaching and leadership elements of the funding rates as shown in the table 1 below:</p>	
32.	<p>LCC have always funded our (Millgate) residence and it was LCC that decided to increase the average weighted allocation in 2014 to take account of previously additional allocated funds. At no time have you or those setting up this consultation and modelling explained this although it is the same finance offices involved that made these decisions. I would really appreciate some acceptance of this, the provision has not just been developed internally.</p>	<p>We have checked our records and can find no reference to changing the funding rates specifically for residential provision at Millgate.</p>	<p>Funding arrangements with the school in 2013 remain unclear. Work will commence with the school to do a full commissioning review to take place 2021/22 which will determine if this service is required. Full funding for this element (£400K/ 8%) will remain in place until that process is complete.</p>
33.	<p>In line with the consultation, this is linked to the parity of funding between all schools. In this regard I would like to know how the funding for Keyham and Millgate has been over the last 3-4 years and if there has been any</p>	<p>Email response sent by Richard Sword 19/10/20</p> <p>Keyham and Millgate have made the following transfers of revenue funding to capital as per their CFR (consistent financial reporting) returns. These transfers are coded by the schools themselves on the CFR code E30 "Direct Revenue Financing (Revenue contributions to capital).</p>	

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	<p>significant movements between revenue and capital. I feel it's important to understand the financial situation of the schools which will be affected most by the consultation as this information will help me to form that view.</p>	<table border="1" data-bbox="640 145 1854 376"> <thead> <tr> <th>Year</th> <th>Keyham (£)</th> <th>Millgate (£)</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>125,000</td> <td>0</td> </tr> <tr> <td>2016/17</td> <td>200,000</td> <td>75,000</td> </tr> <tr> <td>2017/18</td> <td>225,000</td> <td>150,000</td> </tr> <tr> <td>2018/19</td> <td>75,000</td> <td>75,000</td> </tr> <tr> <td>TOTAL</td> <td>625,000</td> <td>300,000</td> </tr> </tbody> </table> <p>Of these amounts transferred to capital in previous years, the balances at 1 April 2020 were as follows:</p> <ul style="list-style-type: none"> • Keyham £601,123 • Millgate £272,485 <p>These balances are held on the Council's balance sheet, and for clarity are quite separate from the revenue carry forwards of the two schools. I hope this answers the question posed, however, if it does not please do let the team know.</p>	Year	Keyham (£)	Millgate (£)	2015/16	125,000	0	2016/17	200,000	75,000	2017/18	225,000	150,000	2018/19	75,000	75,000	TOTAL	625,000	300,000	
Year	Keyham (£)	Millgate (£)																			
2015/16	125,000	0																			
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34.	<p>From the information that you have given me I have made the following calculations based on the numbers of pupils in your consultation documents and the current and proposed per pupil allocations. I attach the worksheet in case I have made an error in calculation. There seems to be a large difference between the amounts going to the Special Schools and the total from the breakdown of the High Needs Block. Can this all be Ashfield? If not where am I going wrong? See table 2</p>	<p>The difference for 2019/20 is the hospital school, Ash field and the placements in other LAs special schools. The £29.248m in the HNB is the forecast for this year's expenditure at current rates and includes growth in pupil numbers.</p>																			

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35.	How have you decided on the rate per pupil for Other Costs and Non-Teaching Staff. You are reducing Nether Hall by £1,085 per pupil which means a cut of at least £114,000. How have you factored in our extra costs of lunch time assistants because of the needs of our pupils particularly those who are tube fed?	The rate per pupil for non-teaching was based on actual costs from 2019/20, which would have included any additional lunch associated costs for additional support.	
36.	What is LCC's rationale for the proposal?	This is explained in the consultation document and in the presentation made to special schools	The rationale for the proposals remains to address the inequity in funding arrangements between the special schools and ensure it is redistributed in a fair and transparent manner.
37.	Leicester's HNB is increasing by 9.11% provisionally estimated at £62,667,897 for 2021.2022 (from approx. £55,450,227). Why not use this additional £7,000,000 to finance the historical underfunding of Westgate, Oakland's, Netherhall and Ellesmere special schools?	<p>The HNB provisional allocation for 2021/22 shows an increase prior to recoupment of £5,923,024 and £5,655,024 post recoupment.</p> <p>In 2020/21 we are forecasting a shortfall in the HNB allocation compared to expenditure of £5.65m. Even allowing for the increase in the 2021/22 allocation the increase in demand for places means that we are forecasting a further £2.7m deficit.</p>	

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38.	What is the potential impact of this proposal on LPS, Ashfield School and the Hospital School who also are funded predominantly from HNB?	As explained Ash Field's funding will be reviewed following the completion of this consultation. Hospital school funding whilst part of the HNB is separate and passported to the school. LPS funding will be subject to a review in due course, but it is also currently block funded.	
39.	Considering the varying array of LA and special school funding comparisons, which show different pictures of over or under funding, it is important to ask why LCC are proposing an in year reduction of £1,000,000 in revenue funding for Millgate School? LCC earlier this week shared an average annual total carry forward of £75,000 over the past 5 years, this is obviously NOT over funding of a school.	<p>The method of allocating funding has been explained in detail as part of the consultation and moreover in responses to additional questions which have been circulated.</p> <p>We are not proposing a £1m reduction in one year. As explained previously we will work with the schools to develop a transitional plan to move the schools the lower funding levels.</p> <p>To be clear, LCC shared information on the extent to which funding had been transferred from revenue to capital by Millgate and Keyham, not the revenue carry forwards of each school. Total funding transferred by both Keyham and Millgate is £925,000 in the four years 2015/16 to 2018/19, £873,608 remained unspent at 1 April 2020.</p>	
40.	Have LCC considered the impact on mainstream schools already finding meeting needs of SEMH students extremely challenging and in serious crisis around finding suitable provision?	We have systems in place for the provision of additional SEN top funding to support mainstream schools. We are increasing our SEMH provision significantly through DSPs and working with other special schools who already deliver this provision. The rates review will not restrict or reduce the availability of SEMH places	
41.	Have LCC considered the impact of these reductions in other services provided centrally and funded using the schools HNB?	We do not consider that there will any significant impact on centrally provided services is these proposals are implemented.	

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42.	What do LCC see the impact being on the schools receiving a reduction above MFG?	We will work with those schools that see a reduction in unit funding to develop a transitional plan to reduce expenditure over an agreed time period	
43.	Which schools' benefit from the proposal and what other possibilities where considered?	We are consulting on the proposals outlined in the consultation document. Changes to the proposals may arise following the completion of the consultation and discussion with the DfE.	As noted above in Q18, additional information was highlighted to the LA during the consultation and we are working with individual schools to review and address those points
44.	Have LCC fully informed schools, counsellors, unions and our local communities on the implications you acknowledged through developing this proposal and also that subsequently learned from those involved?	We are consulting with all interested parties and the groups identified are included.	
45.	Is LCC treating this change in funding for the six schools as a local reorganisation of SEN provision? If so can LCC share the wider plans for this reorganising of SEN provision, timelines and expectations on completion?	No, we do not consider this a local reorganisation of SEN provision. The local offer will not be changed as a result of these proposals	

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46.	<p>These changes to bandings have not been attributed to types of need and the proposed bandings do not reflect students on roll in 2019.2020. The present funding set by LCC in 2019 has been attributed to and at present meets students' special educational needs with regard SEMH, how do LCC propose needs can continue to be met at Keyham Lodge and Millgate School's with this reduction in over £1,000,000?</p>	<p>As explained previously the special schools have allocated the 2019/20 pupil cohort to one one of the six bands which in turn allocates funding according to the resource need identified in each band.</p> <p>Average teaching funding per pupil under the proposals for Keyham and Millgate are as follows:</p> <p>Keyham – current £20,318 proposed £21,565 Millgate – current t £23,201 proposed £22,091</p> <p>The reduction in funding proposed for Keyham and Millgate as a result of the new banding system is substantially related to non-teaching costs.</p> <p>Funding for teaching for both Keyham and Millgate remains substantially higher than most other special schools as a result of identifying need following the banding of pupils. Keyham would receive an increase in funding for teaching compared to the level of expenditure in 2019/20. Millgate's proposed teaching funding is lower than the total expenditure in 2019/20 but remains the highest level of funding in these proposals. Since the funding being made available for teaching under these proposals is either higher or similar to that spent by these two schools on the same cohort of pupils on which the banding is based, then there is sufficient funding available to address the pupil need identified in the EHC plan if these proposals are implemented.</p>	
47.	<p>LCC need to confident that the proposed "final allocation of funding must be sufficient to secure the agreed provision specified in any EHC plan" (section 80 HN operational guide) for students at Keyham Lodge and Millgate School, what evidence have you that this level of funding in sufficient?</p>	<p>The evidence that there is sufficient funding for Keyham and Millgate is provided in the answer to question 11 above. Moreover, it should be noted, the funding rates proposed for Keyham and Millgate is significantly above other regional comparators, which operate very good SEMH school and this clearly demonstrates that provision can be provided to meet the needs of children.</p> <p>Currently no child has respite provision named on their EHCP</p>	

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48.	LCC will be aware that the MFG is breached as the proposal will to fund both Keyham Lodge School and Millgate School below their guaranteed level of funding, do LCC anticipate applying for an exemption to the MFG using the disapplication request form?	As explained previously if the proposals in this consultation go forward we will be approaching the ESFA to obtain their permission to reduce unit funding levels, ie to obtain an exemption from the current 0% MFG protection.	
49.	Must be sufficient to meet EHCP "the final allocation of funding must be sufficient to secure the agreed provision specified in any EHC plan"	See response to question 11 and 12	
50.	Is LCC confident that this proposal complies with section 149 of the Equality Act 2010? Can LCC identify and assess the potential equality impact of this proposal and provide the analysis?	A full equality impact analysis is ongoing and will be completed and analysed following the closure of the consultation to ensure compliance with the Equalities Act 2010.	The EIA is a tool and is continuously developed during the course and following a consultation. Information has been gathered on the protected characteristics. We cannot fully understand the impact until a final decision is made on funding changes and we work with the schools to understand the impact.

No.	Question	Response	Update comments
51.	How does this proposal fit with the wider Authority Proposal Tool?	We assume you mean the Authority Proforma Tool or APT. The APT is used to calculate mainstream school funding and has no relevance to special school funding.	
52.	My question number 35 related to how the other staff and non-staffing cost per pupil had been calculated for the proposed funding rate. As it is the same for each school at £5,677, it cannot be based on the actual expenditure for each school. As you can see Nether Hall had a rate higher than this average in 2019/20 and my point is that averaging across the special schools isn't fair. You accept that the leadership costs for smaller schools is higher than the average so this should also apply to other costs that are fixed regardless of the size of school roll. The funding rate also needs to take account of the different requirements of the pupils as I said in my question how have you factored in the need to employ extra lunchtime staff for tube feeding, the number of PMLD pupils etc.?	<p>The rational for adjusting leadership costs is very clear in that there are economies of scale for larger schools.</p> <p>For other staffing costs and other costs, we have taken an average, because whilst there will be variations across schools, there is no reason why on average these costs should vary with need.</p> <p>You can provide further evidence as part of the consultation to justify why Nether Hall and no other school should have additional funding for this element</p>	As note above reflecting on the feedback we have requested additional information from several schools relating to their staff costs and will work with schools to understand the points raised during the consultation.
53.	You have ended up with a teaching rate for 2020/21 similar to the 2019/20 actual. As you know there has been substantial increases in	Please see above Q31	

No.	Question	Response	Update comments
	<p>teacher and teaching assistant pay and employer pension contributions between those two periods. These increase in costs have not been met by the Government contribution. How do you expect the school to meet these increased costs?</p>		
54.	<p>There has been an issue with Nether Hall funding not increasing to meet our increase in costs for several years and I wrote to you in July 2018 with my concerns, the review carried out by Jane Friswell and the data the school submitted on costs per pupil seems to have been ignored. Is this the case?</p>	<p>Bespoke funding has been provided to Nether Hall in 2018/19 and 2019/20 over and above the standard funding rate. These proposals and this consultation supersede previous work.</p>	
55.	<p>The reply to question 34 was "The difference for 2019/20 is the hospital school, Ash Field and the placements in other LAs special schools." Can you give the actual figures for those three?</p>	<p>The figures would not be helpful because they are a combination of top up funding only for Ash Field and other LA provision (the ESFA recoup the place funding for Ash Field from us and other LAs pay the place cost for our placements in their provision) and full cost provision for the Hospital school which covers ward based, school based and outreach.</p>	
56.	<p>The other part of the reply was "The £29.248m in the HNB is the forecast for this year's expenditure at current rates and includes growth in pupil numbers." What are the pupil numbers for each</p>	<p>Growth in numbers of commissioned places have been agreed with schools individually for 2020/21.</p>	

No.	Question	Response	Update comments
	<p>school that you are using to forecast the cost including the three areas (hospital school; Ashfield and placements with other Local Authorities). In other words, how is the forecast split between the schools and other placements?</p>		
57.	<p>Included in the High Needs Block indirect costs are Special Needs Teaching Service and overheads. What considerations have been given to ceasing the Service and letting the schools buy in expertise as required? How are the overheads allocated to this block determined?</p>	<p>There are significant benefits and economies of scale from having a centrally provided SEN teaching service and we are not looking to end that arrangement.</p> <p>Overheads are allocated using standard corporate rates. The extent of the overhead charges are also being reviewed along with other elements of the HNB.</p>	
58.	<p>Over the five years actuals Special School expenditure has increased from £20,054 to £26,830 an increase of £6,776 or 34%, Mainstream top ups have increase from £3,792 to £9,870 an increase of £6,078 or 160%. Doesn't this indicate that your problem is the mainstream top ups being out of control rather than special schools?</p>	<p>No, it does not indicate that costs are out of control. What it does indicate is that there is increasing demand for additional support for those pupils with high levels of SEN who remain within mainstream schools. We will be reviewing the mainstream top up funding methodology in the near future.</p>	
59.	<p>Clare</p> <p>In your reply to my question about the substantial cut in</p>	<p>In response to your question, yes can you please submit information via the consultation platform.</p>	

No.	Question	Response	Update comments
	<p>funding to Nether Hall in respect of other staffing and other costs your replied</p> <p>"The rational for adjusting leadership costs is very clear in that there are economies of scale for larger schools.</p> <p>For other staffing costs and other costs, we have taken an average, because whilst there will be variations across schools, there is no reason why on average these costs should vary with need.</p> <p>You can provide further evidence as part of the consultation to justify why Nether Hall and no other school should have additional funding for this element"</p> <p>Would you prefer a separate paper from the school on this or just part of the overall response via the website? I have no idea of the costs the other schools incur. If you want me to make a comparison with other schools then I will need a full breakdown of their costs. I can justify our costs but how else am I suppose to claim no</p>	<p>The total teaching and leadership costs for the schools were in the original tables we shared during presentation to the schools. Please let me know if you need a copy, although Sarah will have the details from the presentation.</p>	

No.	Question	Response	Update comments
	<p>other school should be funded at this level?</p> <p>I find it interesting from your reply that leadership has economies of scale whose rational is very clear but these economies of scale do not apply to roles such as premises staff and business managers.</p> <p>Thank you for your help as we develop a solution which addresses the City Council problems and is fair to the schools.</p>		
60.	<p>I am sorry to keep pestering you with questions but this is very important to the school as it will determine whether we can continue to provide the standard of teaching and care to the children of the City with the most complex needs. As you can see from my previous emails I am looking in detail at the other staffing and non staffing costs. In an earlier reply you said that the figure of £5,677 per child was calculated by adding together the spend by each school and dividing by the number of pupils. Yet</p>	<p>The rate for non-staffing and other staff has been calculated from the average 2019/20 expenditure of the schools, excluding the two schools whose unit costs in 2019/20 are significant outliers.</p> <p>We have used a standardised rate for income of £1500 per pupil. The mix of income will vary from school to school but includes:</p> <ul style="list-style-type: none"> • Pupil premium • Teachers pay grant • Teachers pension grant • PE and sports grant • Catering income <p>The gross costs for schools including pupil premium related cost have been accounted for when we derived the funding rates. All we have done is offset the pupil premium funding (and the other income) against the gross costs to leave a net funding requirement from the LA.</p>	



No.	Question	Response	Update comments
	<p>as far as I can see each school apart from Oakland is spending more than this per pupil. How does the maths work on this?</p> <p>You have also included an income per pupil of £1,500 what is this intended to be made up of? Is Nether Hall going to have to hold fund raising events or send each child home with a fund raising target? The various grants such as pupil premium income and PE support are ring fenced for specific expenditure and not available to disperse against general school running costs. Any funding raising activity such as pool hire has been curtailed due to the pandemic.</p>	<p>In 2021/22 the historic teachers' pay and pension grants will not be paid by the ESFA, they will be paid by the LA as the associated funding will be included in the High Needs Block.</p> <p>Effectively we will reduce the standard income level of £1500 and increase the amount paid by the LA by an equal amount. There will be no net impact for the school. We will provide details of the adjustment when we have the final figures from the ESFA.</p> <p>By standardising income the school can keep any additional funding over and above the standard amount.</p>	

No.	Question	Response	Update comments																																																																																																		
61.	<p>'considering Keyham Lodge and Millgate Schools' historical funding is being shared through consultation could I ask that for the period 2015.2016 – 2019.2020, to ensure there is parity of understanding of funding, all special schools revenue carry forward is shared alongside any revenue to capital (E30) as you have done so below. Many thanks Chris.'</p>	<p>Please see table below the details of the transfer to revenue.</p> <p>Ellesmere have confirmed the £180k remains in place to fund a replacement to a BSF CHP which does not work with 2 boilers for the school.</p> <table border="1" data-bbox="631 316 1787 596"> <thead> <tr> <th></th> <th>OAKLANDS</th> <th>ELLESMERE</th> <th>NETHER HALL</th> <th>WEST GATE</th> <th>KEYHAM</th> <th>MILLGATE</th> </tr> <tr> <th>E30 - Revenue to Capital Transfers</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>125,000</td> <td>0</td> </tr> <tr> <td>2016/17</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>200,000</td> <td>75,000</td> </tr> <tr> <td>2017/18</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>225,000</td> <td>150,000</td> </tr> <tr> <td>2018/19</td> <td>0</td> <td>180,000</td> <td>0</td> <td>0</td> <td>75,000</td> <td>75,000</td> </tr> <tr> <td>2019/20</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <table border="1" data-bbox="631 638 1850 868"> <thead> <tr> <th></th> <th>OAKLANDS</th> <th>ELLESMERE</th> <th>NETHER HALL</th> <th>WEST GATE</th> <th>KEYHAM</th> <th>MILLGATE</th> </tr> <tr> <th>Revenue CFWD Surplus/(deficit)</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> <th>£</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>247,123</td> <td>690,171</td> <td>456,651</td> <td>214,588</td> <td>232,024</td> <td>3,815</td> </tr> <tr> <td>2016/17</td> <td>206,948</td> <td>526,376</td> <td>415,795</td> <td>327</td> <td>304,352</td> <td>(47,825)</td> </tr> <tr> <td>2017/18</td> <td>7,993</td> <td>717,269</td> <td>428,820</td> <td>(148,952)</td> <td>571,964</td> <td>(126,346)</td> </tr> <tr> <td>2018/19</td> <td>135,853</td> <td>497,034</td> <td>352,584</td> <td>(514,589)</td> <td>359,670</td> <td>18,882</td> </tr> <tr> <td>2019/20</td> <td>160,763</td> <td>259,877</td> <td>379,427</td> <td>(1,369,348)</td> <td>64,102</td> <td>(18,622)</td> </tr> </tbody> </table>		OAKLANDS	ELLESMERE	NETHER HALL	WEST GATE	KEYHAM	MILLGATE	E30 - Revenue to Capital Transfers	£	£	£	£	£	£	2015/16	0	0	0	0	125,000	0	2016/17	0	0	0	0	200,000	75,000	2017/18	0	0	0	0	225,000	150,000	2018/19	0	180,000	0	0	75,000	75,000	2019/20	0	0	0	0	0	0		OAKLANDS	ELLESMERE	NETHER HALL	WEST GATE	KEYHAM	MILLGATE	Revenue CFWD Surplus/(deficit)	£	£	£	£	£	£	2015/16	247,123	690,171	456,651	214,588	232,024	3,815	2016/17	206,948	526,376	415,795	327	304,352	(47,825)	2017/18	7,993	717,269	428,820	(148,952)	571,964	(126,346)	2018/19	135,853	497,034	352,584	(514,589)	359,670	18,882	2019/20	160,763	259,877	379,427	(1,369,348)	64,102	(18,622)	
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62.	<p>The response to FAQ 14 indicates a change to our funding process, as part of this consultation can the agreed funding process for special schools be presented relating to this year and next, can historical amendments also be highlighted and how consultation was carried out each time.</p>	<p>The funding process has not changed.</p>																																																																																																			
63.	<p>Is this a re-distribution or cost cutting exercise and can more detailed understanding</p>	<p>The consultation document and subsequent presentations and governor meetings have explained the rationale. This is redistribution of funding within the HNB.</p>	<p>As noted above in Q36 The rationale for the proposals remains</p>																																																																																																		

No.	Question	Response	Update comments
	<p>be shared around the rationale identified in FAQ 36.</p>		<p>to address the inequity in funding arrangements between the special schools and ensure it is redistributed in a fair and transparent manner</p>
64.	<p>Throughout FAQs there is constant reference to working with individual schools in implementing a transitional plan; can you outline what this might look like, the process, timescales, and early thoughts considering the massive reduction in funding. Can a dedicated session, as a matter of urgency, be arranged with Millgate and Keyham Lodge School Governors to explore what this plan might look like?</p>	<p>The transition plan will be agreed between the school and the LA if the proposals in the consultation go ahead. It would be pre-emptive to arrange transitional plan meetings prior to the closing of the consultation period.</p>	<p>The LA continues to be committed to working with individual schools and agreeing a transition plan. Defining what this may look like would happen once a formal decision is taken and agreement is reached with the DfE.</p> <p>We have met with and asked for further detailed information following the consultation to review budgets.</p> <p>Also as noted above the funding will remain in place for the residential/respite until the LA have</p>

No.	Question	Response	Update comments
			completed a commissioning review, this therefore reduces some of the funding deficit.
65.	<p>FAQ Qu 18; What evidence do you need in addition the rationale already sent through via email with regard our schools' leadership; I have previously outlined how our leaders are instrumental in delivering an education program and are timetabled face with students, on the ground making the difference. In addition to details already passed on it is important that we highlight how the figures LCC presented for leadership costs are inflated by 25% to what they are today?</p>	<p>If leadership costs are lower now than recorded in 2019/20, (the reference year on which the proposals have been based) then this will contribute to the transition to the proposed funding levels.</p> <p>With reference to the claim that the assistant head teachers have 70% of their hours timetabled in front of a class teaching, can you provide the list of staff, grade, annual costs and actual front of class timetabled hours for the current and previous years as evidence.</p>	Following the consultation and feedback we have requested information from the school to review information regarding leadership costs.
66.	<p>It is extremely worrying that misleading information is being shared as accurate and true through this consultation process;</p> <p>a. "We have checked our records and can find no reference to changing the funding rates specifically for residential provision at Millgate" Attached is a copy of the section 251</p>	<p>The funding schedule from 2012/13 referred to in this question uses a funding formula which pre-dates the national funding formula changes of 2013/14 when place and top up funding was introduced. It also pre-dates the involvement with special school funding formulae of the current head of finance.</p> <p>If, as suggested, the difference in the current rates between Millgate and Keyham is due only to the respite provision then this suggests a current respite provision cost of £625k.</p>	As noted above in Q3, Q16, Q27, Q32. We have reflected on the information and agree funding was awarded, it was not formally commissioned/ defined. The LA will undertake a full commissioning review in 2021/22.

No.	Question	Response	Update comments
	<p>(2013) for Millgate School, this was used in preparation for the new weighted pupil funding rate in 2013, the difference in the rate across the only two SEMH schools is the amount Millgate was funded in 2013 for its residence and extended day provision. Martin Judson and I were present when LCC identified and subsequently approved these new rates at both schools. Why a lack of knowledge can this oversight be recognised immediately through consultation and the Millgate residential and extended day be considered separately to the proposed funding per pupil across special school as no other has residential provision and such is not comparable.</p> <p>b. LCC selected funding comparison data is being used in a misleading manner; “the funding rates proposed for Keyham and Millgate is significantly above other regional comparators, which</p>	<p>As indicated in earlier responses, the LA does not commission residential places with Millgate.</p> <p>As per question 3, can you please provide full details of the current costs of the respite provision (including which CFR code these costs are coded to), how many pupils use the provision and for how many days each in a year, the reasons why and the benefits. We will then be able to assess whether this is a provision which the LA wishes to commission.</p> <p>We have used benchmark data from local authorities in the information provided to date.</p> <p>The DfE’s schools financial benchmarking tool provides the following information on per pupil grant funding (which includes pupil premium) for the schools mentioned specifically in this question for 2018/19 (2019/20 data is not available):</p>	

No.	Question	Response	Update comments																																																						
	<p>operate very good SEMH school and this clearly demonstrates that provision can be provided to meet the needs of children.”</p> <p>Listed below is a alternative selection of schools that could have been selected, there are many other LA’s that fund on average over £37,000;</p> <ul style="list-style-type: none"> • Derby; Kingsmead School @ £50736 Holy House Special @ £37,818 • Milton Keynes; Romans Field School @ £37,118 Stephenson Academy @ £36,272 • Bedfordshire; Oak Bank School @ £33,354 • Cambridge; The Harbour School @ £34,817 • Northampton; The Gateway @ £32,772 <p>c. I do not agree with the statement in FAQ 18, I do not believe it reflects the true provision at both SEMH schools’; “The reduction in funding proposed for Keyham and Millgate as a result of the new banding system is substantially related to non-teaching costs”...“Keyham – current £20,318</p>	<p>Grant funding total  Save as image  Add to your charts ?</p> <table border="1"> <thead> <tr> <th>School name</th> <th>Hide details ▶</th> <th>Local authority</th> <th>School type</th> <th>Number of pupils</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>Stephenson Academy</td> <td></td> <td>Milton Keynes</td> <td>Academy special sponsor led</td> <td>81</td> <td>£39,000</td> </tr> <tr> <td>Millgate School</td> <td></td> <td>Leicester</td> <td>Community special school</td> <td>100</td> <td>£38,422</td> </tr> <tr> <td>Keyham Lodge School</td> <td></td> <td>Leicester</td> <td>Community special school</td> <td>112</td> <td>£34,300</td> </tr> <tr> <td>The Gateway School</td> <td></td> <td>Northamptonshire</td> <td>Community special school</td> <td>62</td> <td>£30,063</td> </tr> <tr> <td>Oak Bank School</td> <td></td> <td>Central Bedfordshire</td> <td>Academy special converter</td> <td>104</td> <td>£29,788</td> </tr> <tr> <td>Romans Field School</td> <td></td> <td>Milton Keynes</td> <td>Community special school</td> <td>55</td> <td>£27,651</td> </tr> <tr> <td>The Harbour School</td> <td></td> <td>Cambridgeshire</td> <td>Community special school</td> <td>75</td> <td>£27,402</td> </tr> <tr> <td>Kingsmead School</td> <td></td> <td>Derby</td> <td>Community special school</td> <td>89</td> <td>£25,162</td> </tr> </tbody> </table> <p>Clearly there is a variation in this list but the proposed revised rates for Keyham and Millgate are at still at the top end of the range, excluding the one outlier school, Stephenson Academy, however, it should be acknowledged that this school is an Academy.</p> <p>This proposal does vary funding for teaching according to need. In fact for Keyham and Millgate the funding proposed for teaching is within +6% and -5% respectively. The argument being put forward is that leadership teams required for SEMH provision should be substantially higher than for any other provision – in the case of Keyham 2.28 x the per pupil average of the other schools and in Millgate’s case 2.82 x. It has been suggested that all SEMH provision has this level of leadership scale staff – in the case of Keyham and Millgate this includes a total of 9 assistant headteachers all of which it is claimed spend the bulk of their time teaching in a classroom. We have asked for further information and evidence as part of question 65.</p> <p>It has also been claimed that the level of expenditure per pupil for non-staffing for Keyham and Millgate being twice the average of the other schools is justified. We understand some of this non-staffing costs relate to:</p> <ul style="list-style-type: none"> • Extended day and afterschool clubs 	School name	Hide details ▶	Local authority	School type	Number of pupils	Amount	Stephenson Academy		Milton Keynes	Academy special sponsor led	81	£39,000	Millgate School		Leicester	Community special school	100	£38,422	Keyham Lodge School		Leicester	Community special school	112	£34,300	The Gateway School		Northamptonshire	Community special school	62	£30,063	Oak Bank School		Central Bedfordshire	Academy special converter	104	£29,788	Romans Field School		Milton Keynes	Community special school	55	£27,651	The Harbour School		Cambridgeshire	Community special school	75	£27,402	Kingsmead School		Derby	Community special school	89	£25,162	
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	<p>proposed £21,565, Millgate - current £23,201 proposed £22,091”</p> <p>All of the funding reductions relate to teaching and learning, per place funding at Millgate reduces by £5,180 and at Keyham Lodge £1,864, it shows a complete lack of understanding to separate leadership costs as we are successful as we are one community that work to the same goal which is to change our students lives</p>	<ul style="list-style-type: none"> • In house mental health support • Family Support • Vocational placements and therapeutic placements. • Areas like food lessons funded by parents • School uniform being paid for by parents • Those that are not eligible for free school meals having to pay for their children’s food • Equipment and technology that extends the possibilities of learning • Food parcels and support • Hardship funding for clothing and footwear • Leavers vouchers for further education and support for leavers • Millgate school transport to collect and drop off your children when needed • Summer fete • Study camps • Residential visits/overseas trips • Prize cabinet and rewards system • Gold trips <p>We would ask that the two schools provide further quantified details of the additional non staffing expenditure which they feel is necessary to deal with the specific needs of SEMH pupils at their school.</p>	
67.	<p>Qu 33 FAQs; Millgate School and Keyham Lodge School were advised by LCC finance to secure capital of at least £75,000 each year as part of lifecycle and refresh. Can LCC share that this was the case, expecting this level of good practice from all maintained schools and that each year both Keyham Lodge and Millgate schools have submitted detail with for this capital funding in line with LCC procedures.</p>	<p>Firstly the historic transfers of revenue funding to capital far exceed the £75k a year mentioned in this question and these were not agreed with the LA prior to them being actioned.</p> <p>Moreover, as a general point the setting up of funds for future capital maintenance may have once been desirable, however given the shortfalls in the HNB revenue allocation this is no longer realistic.</p>	

No.	Question	Response	Update comments																												
68.	<p>This proposal of modelling around staffing ratios and not student's needs, alongside an inconsistent understanding of needs through having three different SEN descriptors for just 7 special schools and the complete lack of moderation are concerning and I would urge that the consultation re-start with clarity, consistency understanding implications for our students and long term effect of these proposals.</p> <p>Moderation is important and it is crucial that before we re-distribute funding at the levels proposed. In FAQ 23 where one school meets needs of such a wide population of students and their banding reflects this "34.8% is ASD (£23.2k – £23.5k) 8.62% is SEMH (£28.5k - £29k), on that basis nearly 42% of the schools cohort sit in other categories". Surely this highlights the necessity to ensure we moderate before any change in funding takes place so that this and other schools receive the finance that supports those children they have in their school.</p>	<p>As explained previously, staffing ratios have been used to weight the funding for each band.</p> <p>If the proposed banding system was not an accurate reflection of need then the proposed average teaching rates per pupil would be significantly different from the actual teaching costs incurred by schools in 2019/20.</p> <p>A comparison of the actual teaching cost per pupil in 2019/20 and the proposed average teaching cost per pupil for each school illustrates that whilst there are variations the banding is reasonably reflective of the actual resources deployed by schools:</p> <table border="1" data-bbox="649 582 1814 1013"> <thead> <tr> <th>School</th> <th>Total final effective proposed teaching funding per pupil</th> <th>Current teaching cost</th> <th>Variation</th> </tr> </thead> <tbody> <tr> <td>Oaklands</td> <td>£16, 237</td> <td>£16,198</td> <td>-4%</td> </tr> <tr> <td>Ellesmere</td> <td>£14,984</td> <td>£13,017</td> <td>15%</td> </tr> <tr> <td><u>Netherhall</u></td> <td>£16,337</td> <td>£16,443</td> <td>-1%</td> </tr> <tr> <td>Westgate</td> <td>£17,226</td> <td>£20,000</td> <td>14%</td> </tr> <tr> <td>Keyham</td> <td>£21,565</td> <td>£20,318</td> <td>6%</td> </tr> <tr> <td>Millgate</td> <td>£22,091</td> <td>£23,201</td> <td>-5%</td> </tr> </tbody> </table>	School	Total final effective proposed teaching funding per pupil	Current teaching cost	Variation	Oaklands	£16, 237	£16,198	-4%	Ellesmere	£14,984	£13,017	15%	<u>Netherhall</u>	£16,337	£16,443	-1%	Westgate	£17,226	£20,000	14%	Keyham	£21,565	£20,318	6%	Millgate	£22,091	£23,201	-5%	
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No.	Question	Response	Update comments
69.	<p>What is the process for agreeing exceptional circumstances and how will we ensure there is a level of independence and constancy. “We have also indicated that there may be <i>exceptional</i> circumstances where a pupil’s need is significantly beyond the needs of the banding descriptors and these instances will be looked at on a case by case basis”.</p>	<p>A formal process will be proposed and consulted upon separately.</p>	
70.	<p>Can LCC clarify whether there is additional revenue available to that what was identified when consultation was launched in October, both with regard allocated HNB revenue and also the delay in anticipated spend for EHCP provision on the ground? Can LCC share funding intentions for our HNB in relation to EHCP’s across the city and in OOA placements? It would also be useful sharing the last three years spend in OOA placements.</p>	<p>Details of the HNB expenditure has been provided covering the last 5 years of actual expenditure and the 2020/21 budget. Please refer to question 37 with regards to additional HNB funding. In summary, despite additional funding for the HNB we the LA will incur a deficit in 2020/21 and in 2021/22 based on current growth projections.</p>	
71.	<p>Considering we are not involving all special schools and PRUs who all have students with EHCP’s, 60 places planned in the new</p>	<p>We have already indicated that we will be reviewing other areas of expenditure funded from the HNB following the completion of this consultation. As stated before, the PRUs are funded on a different model, due to the way the funding works and roles.</p>	

No.	Question	Response	Update comments
	<p>year...we also have seen that there is real variance of comparative funding data, can we make the common sense decision and re-visit this funding proposal and involve all stakeholders in making this something that will truly make an impact across all provisions.</p>		
72.	<p>Can any impact analysis or equality reviews being developed be shared as mentioned in FAQ 50, can the implications of this funding both for the two schools facing financial challenges and the wider impact on mainstream sector be outlined.</p>	<p>The findings from the consultation should then be used to further inform the equality impact assessment and in identifying any mitigating actions that are required to lessen or remove any disproportionate negative impact.</p>	<p>As mentioned in Q50 above the EIA is a tool and is continuously developed during the course and following a consultation. Information has been gathered on the protected characteristics. We cannot fully understand the impact until a final decision is made on funding changes and we work with the schools to understand the impact.</p>
73.	<p>In 6 years, staff have taken Millgate from 'Requires Improvement' to 'Outstanding' (with no improvement points given) through their sheer</p>	<p>The context of the consultation has been explained already. We will work with schools to agree a plan to transition to the proposed funding rates.</p>	<p>Thank you and as part of our meetings with schools we recognised your</p>

No.	Question	Response	Update comments
	<p>hard work and dedication to the school and the students who attend it, often working evenings, weekends and holidays, giving everything to ensure the wellbeing and safety of our students. We consistently go above and beyond for our boys to give them the best outcomes we possibly can, both in terms of their education and their development as people. We have literally doubled our roll in 4 years (56 in Nov 2016 when I started to 113 now) taking on ever more complex students with a wider range of needs, and at the same time have gone from 1 or 2 students getting qualifications, to all of our 2020 leavers getting qualifications. We are currently in the midst of a pandemic with staff who are already on their knees having worked solidly throughout the first lockdown and the summer holidays, and who are now falling ill with Covid (or like me, terrified of getting Covid) and exposing their own families to that risk. I have 2 questions:</p>		<p>outstanding Ofsted judgement. Reflecting the discussion, we will be reviewing the residential/respite provision and undertake a full commissioning review during 2021/22.</p>

No.	Question	Response	Update comments
	<p>1. We would like to know about the timing of this review - why now?</p> <p>2. Can you understand that staff now feel a sense of betrayal at the proposal of a staggering 22% cut in funding that could put their jobs at risk?</p>		
74.	<p>Across the Federation, our students are some of the most complex and disadvantaged children in the city and we become a lifeline for them and their families. At Millgate a significant part of this lifeline is the Residence, where our students can stay to either get respite from difficult (sometimes unsafe) home environments, or to give families respite from difficult behaviours. Just last week we made a difference to a 15-year-old student who stayed in, when the alternative would have been that he was again homeless having been abandoned by his entire family (Social Care having been unable to place him). Students who stay in get to do age-appropriate activities that allow them to play and be children, and as they get older to develop independence skills. Staff</p>	<p>In question 3 we have asked for detailed information on the respite provision at Millgate in order that we can make an informed judgement on whether this should be commissioned and if so by whom. Please refer to question 3.</p>	<p>As note above we will complete a separate exercise to complete a fully commissioning review during 2021/22</p>

No.	Question	Response	Update comments
	<p>have the opportunity to be more nurturing and parental than during the school day, and the relationships built with staff in Residence can be the most important ones for our students - we see positive impacts on their attendance, their behaviour in school (and out of school with reductions in levels of criminality), their education and even their relationships at home. The Residence has also been rated as 'Outstanding' by Ofsted each year for the last 3 years (prior to that it was Good). Please can you explain why there has been no provision made in the proposal for the Residence, meaning that this valuable resource would inevitably have to close?</p> <p>❖ As a Federation, we take children from the PRU and Carisbrooke and see them through to leaving school at the age of 16.</p> <p>1. Please could you explain why their funding is protected under this review, and Millgate and Keyham's is being cut so hugely?</p>		

No.	Question	Response	Update comments
	<p>2. How do you expect both schools to continue to operate at the highest level without being willing to adequately fund it?</p>		
75.	<p>There was some confusion during the Keyham governors call held on the 9th November and this was linked to the banding criteria used at the time of the data collection from the Special School Heads. During the phone call it was made clear that Richard and Ellie thought that the Banding information was based on the whole 'needs based banding' document; however this was not the case. On the 18th November 2019 Clare Nagle asked the Special School Heads to band students, based on only the following criteria:</p> <p>As outlined in this document, the main focus is on staffing levels/ratios not on student needs. My questions relate to the following:</p> <p>If a student is in band 5 and requires a staffing ratio of 1:1 – how can this be achieved within the average weighting</p>	<p>The banding system re-distributes the total actual teaching resources deployed by schools in 2019/20 based on numbers of pupils in each band, with each band weighted according to the resources required. The mechanics of this have been explained in a power point slide provided separately.</p> <p>The resultant weighted average teaching funding per pupil for each school produces some re-distribution but the rates remain broadly in line at an individual school level with the actual teaching expenditure per pupil seen in 2019/20.</p> <p>Please see question 68.</p> <p>For example for Keyham, the level of funding per pupil for teaching under the banding system is £21,565 compared to the <i>actual</i> level of expenditure which was £20,318. So the banding system is, in this case, providing more than the current level of teaching expenditure.</p> <p>The cost of admin and catering for example are funded from the non-teaching funding component.</p> <p>The staffing ratios in each band are being used as a proxy factor for the need described in each band to fairly distribute the resources spent by schools on teaching in 2019/20. The bands are not intended to provide the full theoretical funding implied by each band on a pupil by pupil basis. We know this is an effective approach because the variation in the redistributed teaching funds and the actual expenditure by school is within the range +/-15%. The bands cannot provide the full funding implied by staffing ratios because this would mean an additional £5m of teaching expenditure would be</p>	

No.	Question	Response	Update comments
	<p>of £28,488 per pupil when the costs of staff are as follows:</p> <p>SEN TA LB - (32.5 hrs 39 weeks per year) - £29,462 SEN TA LC - (32.5 hrs 39 weeks per year) - £22,835 MPS 6 Teacher + SEN - £53,680 UPS 3 Teacher + SEN - £60,106</p> <p>Costs for staff members are with on-costs This means that at best a pupil can be costed to have access to a TAc if within Band 5 or part of a teacher. However at Keyham Lodge and Millgate school we do not have pupils in Band 4 or below and moreover, for Band 6 students, who require additional staffing beyond 1:1, how can this be achieved within this financial proposal? How can schools actually work with students in Band 5/6 within the Banding costs? Where is the money to pay admin/Kitchen/run the school building/pay for resources? Whilst it is costed within the proposal, how do these costs translate into the actual cost of staff within the Banding criteria used for data collection?</p>	<p>required over and above that which was spent in 2019/20, ie an increase of 33% which is clearly not realistic or necessary.</p>	

No.	Question	Response	Update comments
	If this was not LCC's intention to band in this way is the information that has been the basis for reducing money or increasing money allocated to schools based on accurate information?		
76.	Question 78 can the revenue be shared in response to this question? 'considering Keyham Lodge and Millgate Schools' historical funding is being shared through consultation could I ask that for the period 2015.2016 – 2019.2020, to ensure there is parity of understanding of funding, all special schools revenue carry forward is shared alongside any revenue to capital (E30) as you have done so below.	Added details to question 61 to which this relates as there is no question 78.	
77.	Question 75 not answered, and the example is misleading and inaccurate as have previously outlined	Additional text provided, see above.	
78.	Question 74 – not answered and residence continues to be left out in all questions	<p>Please reference to question 3 and question 66 – we have repeatedly asked for detailed information.</p> <p>We are not ignoring this issue but unless information is provided, we cannot consider it. The respite provision is not directly an issue for this consultation, in order to take account of it we need the information requested.</p>	Noted above we will review the commissioning requirements in 2021/22

No.	Question	Response	Update comments
		Please read the responses that are provided rather than repeatedly ask the same question.	
79.	Why do you 'think the level of funding proposed is a fair and equitable amount' what evidence have you around how this proposal will affect the provision and needs of young people?	We believe the re-distribution is fair and equitable based on the methodology outlined in the consultation.	
80.	During Schools forum Richard Sword mention that PRUs were funded differently through a 'passport system' could this be shared wider and also in Qu 74 when will our PRU's be subject to a review.	<p>PRUs will be subject to a review at a date to be determined following the completion of this review and Ash Field's review.</p> <p>It was explained at schools forum and in question 38 that the Pru is funded on a block basis (not a 'passport' basis).</p>	
81.	Qu 73 - what does 'we will work with' actually mean, this statement is being used a lot and yet after asking for clarity nothing is forthcoming. We have asked for a meeting and feel waiting until after consultation is a little late.	<p>We cannot meet with schools to discuss transitional arrangements as this would imply that the outcome of the consultation was pre-determined.</p> <p>We will meet with those schools who see a reduction in funding once a decision has been made regarding the outcome of the consultation. as we indicated there will be transitional funding made available to the affected schools over the transitional period.</p>	
82.	Question 72 – not answered, can you share understanding in preparing this proposal around possible impact to the wider system and quality of provision for SEND	The final EIA will be published once this has been completed.	The EIA is iterative and will continue to be updated as it has done so through and following the consultation and in light of more information being

No.	Question	Response	Update comments
			available following formal decisions are made.
83.	Question 71 – not answered	The responses to this consultation will be reviewed and the outcome shared in due course. Comparative data has been provided and responses made regarding the alternative comparatives provided by Chris Bruce (see question 66)	
84.	Question 69; schools already have exceptional cases why are these students needs being ignored, with no process yet designed, therefore in many cases leaving needs of pupils being unmet for up to 24 months	We are aware of no cases of pupils being left with unmet needs for up to 24 months – please provide examples of any such cases	
85.	Question 68 – “comparison of the actual teaching cost per pupil in 2019/20” this has been used frequently and is misleading all as ACTUAL TEACHING cost in 2019/2020 were reduced significantly in the two schools receiving a reduction in funding, the leadership factor being taken out when leaders deliver education and are instrumental in education of all students! The comparison is not accurate and is miss-leading, accurate figures have been shared and an overview of how leaders deployed sent at the beginning of the consultation as requested, with no	Similarly, to the issue regarding respite provision, we have asked for detailed information regarding claims that leadership grades have extensive timetabled teaching hours – please provide the detailed information requested in question 65 asap.	We have asked for additional information to review and understand leadership costs

No.	Question	Response	Update comments
	feedback or meetings arranged to discuss.		
86.	Question 67 – It is unfair and deviates from the real issue as LCC criticise the schools for doing something that LCC felt and supported was desirable because we are presently under financial challenges, LCC have always been aware and also are the funding body for our schools, the lack of consistency and clarity to what our year-end balance will be is the issue and LCC have changed their funding process without sharing over the past 4 years.	The funding process has not been changed over the past 4 years. The response to question 67 remains.	
87.	Question 66 – Our present LCC head of finance was the lead on funding reviews in 2013 when the funding of extended day and residential places was built into the average weighted pupil figure at Millgate. LCC would have been fully aware of why such a significant difference in average weighted pupil funding at Millgate and Ashfield to others due to residential provision and subsequent implications of these cuts. I would have hoped for more transparency	<p>Questioning the honesty, integrity and transparency of council officers is an unwelcome addition to this consultation process and completely without justification.</p> <p>As has been explained above we will deal with the respite provision issue separately but, once again, please actually respond to our requests for the detailed information outlined in question 66 and question 3.</p>	We will complete a formal commissioning review of residential/respite during 2021/22

No.	Question	Response	Update comments
	and honesty from the beginning of the consultation		
88.	Question 64 – we are being asked to agree this reduction and then trust that we will be supported in reducing budgets over a three-year period to achieve the targets outlined through this proposal. Will this gradual change be the case for those schools seeing an increase, will this be transitional as we are redistributing, or will funds be sought from elsewhere?	Increased rates will apply from 1 April 2021 if the proposals are approved. The HNB is the only source of funding.	
89.	Question 62 – the funding process has changed and this was last minute and is only this year different to what has been the case for previous years.	The funding process has not changed.	
90.	Can I also ask if OOA spends are to be shared wider?	The expenditure on this and all other HNB elements for the past 5 years have been shared previously.	

Table 1

Pay rise impacts	Oaklands	Ellesmere	Nether Hall	West Gate	Keyham	Millgate
Teaching funding	£16,237	£14,984	£16,337	£17,226	£21,564	£22,091
Leadership	£2,745	£2,215	£2,745	£2,134	£2,745	£2,745
Total	£18,982	£17,199	£19,082	£19,360	£24,310	£24,836
2.75%	£522	£473	£525	£532	£669	£683

Table 2

Description	Oaklands	Ellesmere	Nether Hall	West Gate	Keyham	Millgate	Total	High Needs Block	Unexplained difference
Pupils-Banding	111	288	105	179	112	104			
Pupils Cost	109	285	105	180	112	104			
Proposed	23,159	21,376	23,260	23,537	28,488	29,014			
Current	22,050	18,429	22,346	22,074	31,125	37,137			
Proposed	2,570,649	6,156,288	2,442,300	4,213,123	3,190,656	3,017,456	21,590,472	29,248,000.00	-7,657,528.00
Current	2,403,450	5,252,265	2,346,330	3,973,320	3,486,000	3,862,248	21,323,613	26,830,000.00	-5,506,387.00

Completed 8 December 2020

Updated 02 March 2021 – with additional commentary following review of consultation responses and information

Clare Nagle