

## **Appendix 2**

### **Consultation responses**

#### **Proposal 1:**

*70% of the funding distributed on pupil numbers and 30% on current funding for band D & E within the school. For the purposes of this consultation the pupil numbers are taken as the September 2020 count which is in line with the existing formula and the band funding is from the October 2021 forecasting model.  
(paragraph 4.2)*

**For**            8

**Against**       5

#### **Proposal 2:**

*80% of the funding distributed on pupil numbers and 20% on current funding for band D & E within the school. For the purposes of this consultation the pupil numbers are taken as the September 2020 count which is in line with the existing formula and the band funding is from the October 2021 forecasting model.  
(paragraph 4.5)*

**For**            5

**Against**       8

There were 4 responses made with no preference but made comments. All the comments are listed below.

## Comment 1

We agree the principle:

- The funding should follow the pupil
- The funding should allow for current and future needs
- The formula should create sustainability in funding so schools can plan
- The funding should be able to be used flexible to meet needs

Therefore, the preferred model that we believe is the fairest model and which reflects the ALN reform is 70% of the funding distributed on pupil numbers and 30%.

When considering the need for transition funding to reduce the effects for those schools that see large increases and large losses. We believe that the 12% increase and 8% decrease is not in line with the above principles and is too low.

The 3-year period of capping the gains and losses again is too long for some reasons.

## Comment 2

As a large school we have a considerable number of pupils who require additional adult support.

I welcome the decision to allow us as a school the autonomy to decide how this support can be most effectively used.

Due to the new funding formula we expect to incur a decrease in funding. Hopefully we will be supported to reduce the impact on learners whilst transferring to the new system.

I would also welcome support from the LA in communicating the new message to staff, parents and governors as some still see the term 1:1 as the only method of support available.

## Comment 3

The choice presented looks rather limited but of the two options the first proposal places more weight on band funding so we assume is slightly more linked to individual need. Schools will appreciate a new system that means less red tape but I wonder how parents will receive this. A move away from this thinking would be an improvement in our view.

#### Comment 4

I have responded this way as the school has historically and currently has a high population of ALN children and this (for selfish reasons) would be better funding for the school- to maintain teaching assistants who work within the school.

I agree with many parts of the proposal, a school having a set budget to be used flexibly throughout the school is good. We must move away from 1:1 provision as this is not healthy for the pupil and adult in the medium and long term. Considering this funding and the ceasing of band d and band e funding has to and must be communicated clearly and forthright to parents as they will still be expecting/wanting an adult 1:1 with their ALN child constantly throughout the day and this can't happen.

One point of note; if a child comes into school on a managed move or from another county then funding would be needed on the short term (possibly longer) to help with transition and budgeted into future formula for future needs if they require support (which will most probably be the case).

#### Comment 5

In my own opinion, I feel that the funding should be there for the children who require this.

#### Comment 6

Proposal 2 is the best fit financial model for the ALN statemented / pupil numbers on roll position.

#### Comment 7

We completely agree with all principles set out in the document (3.3). Understanding how funding follows a pupil is fair, as is holding a contingency for learners moving into county (we have experienced this in Sept this year).

Using pupil numbers does make it fairer and using January 22 numbers is sensible as a September count will often change due to movement of new intake pupils as they settle/ adjust.

The current funding model for ALN does not work and the costs of staffing far exceed the money received and 5% of the school budget. For a school such as ours where additional finances such as PDG are tiny, the continued costs are very challenging and have a direct impact on levels of support staff employed. Using FSM as an indicator of ALN does not always correlate, so there are winners and losers within this.

## Comment 8

- There seems to be little discrepancy between the two models as the numbers of students year on year can be so variable. The appendices including the modelled financial impact on schools are helpful, though in some cases, must be worrying for school communities where significant losses will be incurred. One assumes these schools are currently overfunded and will be supported through a transitional phase to cushion the sudden drop, where necessary.
- In addition, within the consultation document it is unclear what will happen with regard to pupil movement within the school year. Where a school receives an influx of new students will they be funded for these or will they receive a backdated payment the following year?
- Where schools receive new students on a managed move basis will they also receive any funded associated with these students? Has contingency been built in for this?
- Where students move into authority from other LAs, will their funding follow them?

## Comment 9

We understand the principle of equality and the need for all schools to provide universal provision, however it feels this formula is not reflective of equity. Our understanding is the schools with less severe ALN needs will benefit greatly and be able to provide an excellent 'Universal' provision with the additional funds that they receive. However, those schools with pupils with complex needs will be subsidising the funding required to provide 'good enough' care for their most vulnerable and have very little to support those with universal needs, even when taking the 5% of school budget into consideration.

Our fear is pupils with extreme needs that display poor behaviour due to frustration, circumstances, avoidance etc. will result in more exclusions and managed moves as schools will not have the funds to support them. This then resulting in more layers of hurt and rejection adding to their problems of accessing a relevant curriculum to meet their educational needs.

We appreciate there is no easy option however would recommend if the suggested formula is used that the percentage is higher for existing and future 'specific' pupils compared to number of pupils at setting. Band E allows for one LSA for around three quarters of the day. Most schools with a Band E child, particularly if the needs are EBSD, are already subsidising their care/education from their school budget and fear that both suggested models would again penalise schools with high percentages of ALN pupils.

The other point to consider is that secondary schools stand to benefit greatly from this formula with their high pupil numbers. Research, however, shows that if good interventions and support are provided sooner rather than later, i.e., in pupils early years, (Primary) then long-standing issues can be minimised and pupils will get their best chance of achieving long term goals.

Our view would therefore be that we either keep the current model or again look for a different solution where pupils with identified needs are supported as well as the schools being provided with funding for universal and universal plus provision.

#### Comment 10

The 70% / 30% allows for more of the delegated funding to be based on pupils who, identified by Statement / SAPRA and then IDP going forward, require access to additional adult support

I have concerns about the effect and impact on school budgets if more pupils join a school, who clearly need access to additional adult support, which is already 'stretched' around existing pupils requiring this support.

I fear that schools will be reluctant to take a child on a managed move without additional financial support that would have previously followed the child.

There needs to be a pick PR campaign by the LA to parents around the traditional 1:1 expectation and that this will no longer be the norm.

#### Comment 11

I would like to suggest a modification to the 70%/30% model. It has long been felt that early intervention is the best way forward so could all schools with a nursery be given a set fixed amount to provide this early intervention support. The rest of the funding to then be allocated via the 70%/30% model as per the reasoning below.

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There needs to be a pick PR campaign by the LA to parents around the traditional 1:1 expectation and that this will no longer be the norm.

## Comment 12

Our preference would be for the 70% / 30% model. Although as a school we receive a reduction in funding, we feel this would be a fairer allocation of resources following the children and young people with the greatest need. We appreciate that it is the children and young people with the most complex needs who would require the high levels of and more specialised ALP (linking directly to the ALN Act); this comes at an increased cost and resourcing level. A robust system of quality assurance to maintain thresholds across the LA is essential as we move through implementation of the ALN Act and Code, developing school based IDPs. A clear approach to decision making of complex cases is needed, where referrals are made to the LA (linked to panel approach). We do feel the Sixth Form ALN approach to funding should be equitable, fair and transparent and therefore in-line with the 3-16 funding model. Without a consistent approach, it is likely to be viewed as discriminatory. For a school on the border, with a high number of EHCPs, it is essential that funding recouped from neighbouring authorities is shared directly with schools. The EHCP statutory document is incredibly rigid in content and therefore direct funding is required to meet the 2 provision requirement, without having a detrimental impact on Monmouthshire students with ALN. Often there is specificity around the hours of 1:1 TA support and the qualifications needed. Without direct funding, we would need to state that we could not meet the needs and provision identified in EHCPs on nearly all consultations received

## Comment 13

I am a Foundation Governor at a CiW Primary school and I would like to comment on the above document.

I am unclear as to how the amount of money that will be distributed to schools is arrived at; is it a percentage of the authority's total budget? Is this amount decided by WG or locally?

I agree with the principles that the Working Party decided to use. I am delighted that the link between FSM and ALN is no longer being used. It is really important that schools are protected by transition funding while the new system is established. It is vital that schools have the confidence to be able to employ highly skilled staff to meet the needs of their pupils with ALN.

I feel unable to support one proposal over the other proposal without knowing how the actual figures would impact on the school.

I am concerned about how the contingency fund will be used, If, for example, a pupil with complex ALN moved from England midyear where they had been supported through an Education, Health and Care Plan, and joined a school in Monmouthshire how would that school be able to access additional funds to support that pupil? How would the school go about applying for additional funds? How long would the process of accessing the funds be?

When the new system is in place if a school feels they have been treated unfairly how can this be addressed?

## Comment 14

Challenge: Could there be a further explanation of the difference between the two models? Which will be the better option? The two models are very similar in what they propose. If we were to go for funding with a higher amount on pupil numbers, then schools with larger pupil numbers would gain more, whereas if we were to go for the 70% funding then they would have slightly less. The working group didn't have a preference with these models but felt that both should be put out for schools to consider, and are committed to the principles of pupil numbers and additional learning needs, rather than any other driver for the formula. Anonymity in the table of responses is understandable, but can anything be drawn from looking at the responses from schools – is there a link to the size of the schools and their responses, or a delineation between secondary and primary school responses? Looking at pupil numbers, some headteachers might be able to work out which school is theirs. Our comprehensive schools have larger pupil numbers so with these two models we will see that the secondary schools will gain funding, and smaller primary schools will lose funding. Where schools have high levels of statements, and school action plus statements in place, then moving away from higher funding for ALN and doing it on pupil numbers and additional learning needs, schools will lose. This is why they were very clear that they want that transitional funding in place, to allow schools to move from the old model to the new (this will be in place for up to 3 years), and to minimise the disruption in terms of funding, staffing and – most importantly – support for those pupils. Is it still the case that if a school has more pupils in special needs than others then they will get more funding, and if a child moves schools the funding goes with them? In terms of the new model, the proposal is that the funding will remain in place for the whole of the financial year, which will give the schools the flexibility to plan the funding and staffing for that financial year. If a pupil leaves, to go to another school, the funding will not move. Under the old system the funding would have moved, resulting in the member of staff supporting that child being made redundant, in most cases. However, if a family with a child with additional learning needs moves into the county, the council will be able to provide funding on a one-off basis, to provide support for the first financial year, but following that, the child would be on roll at the school properly and attract funding under this new system. Has there been any feedback on a 75% and 25% funding split? What effect would that have? This was discussed at the working group; they preferred the 70/30 or 80/20 versions, which is why we have gone out with those recommendations. In terms of feedback from schools, the consultation only went out on 10th January, so we have not yet had their responses. In relation to those schools that might come under two headings i.e., large numbers of ALN and large pupil numbers, what about the 3-19 school in Abergavenny? Is there enough flexibility for when it comes online? This was discussed in some detail in the working group. We are aware of the situation with the 3-19 school hopefully coming online in the near future. It is something that we would need to work through on the formula. With this formula, we were very keen to give flexibility to all schools: we know that for the first year, we need to consider all of these things as they come through and be open to all of the particulars. This is why we want a full review after 12 months, and goes back to the transition funding, which gives the stability for schools to continue as they are. As we move through, developing the formula, all of the formula will need to change for the new 3-19 school – it won't just be the additional learning aspect of it. When will the final decision be made as to the 70 or 80%? After the consultation

closes on 11th February, the recommendations will go back to the school budget forum for consideration. A Cabinet report will be drafted, and a final decision made by them in their meeting on 2nd March. So, it is a quick turnaround once the consultation closes. Chair's Summary: The Committee commends the work that has been done. We are reassured by the transition funding system. We have clarified some of the numbers, particularly regarding school sizes and primary vs secondary, and are reassured that different permutations have been discussed and the scenario of the new 3-19 school has been considered. This will be a fairer system and allow schools to plan effectively. The committee is happy for the consultation to proceed and go to the Cabinet report.

#### Comment 15

Happy to agree either of the above, however we would like it be considered that there is no PRU in Welsh medium education and that additional funding be allocated to support Welsh medium school with pupils requiring additional support.

#### Comment 16

Point 2.4 under Issues with the current system states:

The funding follows the pupil and if the pupil leaves the funding will be removed which could result in a member of staff who is supporting that pupil being put at risk of losing their job.

However in point 3.3.

3.3 The working group agreed the following principles in deciding a proposal:

The funding should follow the pupil

What is the difference?

Also:

There should be a contingency which will have strict criteria to support learners that move into Monmouthshire and are not previously known about

What is the criteria? What about schools receiving a pupil already known within MCC as part of a managed move. They should also be considered in this contingency.

#### Comment 17

We support the 70 / 30 proposal.

It makes no sense at all to allocate funding based on FSM because FSM is not a real indicator of ALN support required. There also needs to be a closer reflection of the costs incurred to provide the level of support an individual child requires.