Supplementary Papers for Schools Forum

Date: Wednesday, 13 December 2023 – 3.00pm

7.	**School Funding Consultation and Budget Proposals 2024-25** Responses to the consultation are set out in Appendix 2 attached (marked to follow in the main agenda)	3 - 18

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Appendix 2a

Summary of the School Funding Consultation Outcome 2024-25

1. Response to the consultation

Responses were received representing 65 schools (67%).

The analysis and comments made are included in Appendix 2b

The list of schools responding is included in Appendix 2c

2. Summary of Decisions and Recommendations

All Members:

1. Agree that as a minimum, surplus school block funding after the NFF has been applied can be transferred to support pupils with high needs.

   There was a majority support for this proposal (65%).

   See consultation question 1 in Appendix 2b.

2. Agree if further school block funding can be transferred to support pupils with high needs, with NFF allocations reduced, to provide a funding transfer of at least 0.5% in total.

3. Agree if a transfer above 0.5% can be considered with the DfE

   There was no support from schools to reduce NFF allocations to allow any higher contribution to the high needs budget than surplus schools block funding.

   See consultation question 2 in Appendix 2b.

   Schools Forum members are requested to also consider the deficit management plan information on the meeting agenda.

4. Agree that the funding for the central schools service block is allocated fully to support the central services supporting all schools.

   See consultation question 7 in Appendix 2b. There was little comment made regarding the central school services budgets.

School Members:

5. Recommend to Council how the NFF should be adjusted (if agreed) to provide funding to transfer to high needs.

   See consultation questions 3 (reducing NFF values) and 4 (capping overall increases) in appendix 2b.

   The majority of responses did not support all schools contributing, with either reductions to the MFG or MPPLs being unacceptable. There was, however, greater support this year for capping per pupil increases (58%).

   It is recommended that based on the responses from schools (accepting that a reduction in NFF allocations is unsupported overall) that if a transfer is to be made to high needs that a cap is to be applied to provide funding for the transfer.

6. Recommend to Council how the NFF should be adjusted if there is a shortfall in school block funding (without there being a transfer to high needs).

   See consultation question 5 in Appendix 2b.

   There was not a high level of agreement for the proposed method despite that being suggested by the DfE (64% disagreed), but other options were not suggested other than using any surplus from the current year.

   It is suggested that this is revisited with Schools Forum in January 2024 when the outcome of the December settlement is known and if a method to reduce NFF allocations for affordability becomes relevant.

7. Agree the growth fund policy for 2024-25.

   See consultation question 6 in Appendix 2b

   There was a high level of agreement (77%) with the growth fund policy set out (appendix 4 in the consultation paper) with it recommended that this is adopted for 2024-25. The outcome of the policy will be provided for the January 2024 meeting.

Appendix 2b

Outcome of School Funding Consultation 2024-25

Summary of Responses

Question 1

Do you agree that surplus schools block funding (lever a) should be transferred to support the high needs budget?

Responses:

Yes	42	65%
No	19	29%
Unsure	4	6%
Total	**65**	**100%**

Comments included:

- £1million will not make a sufficient difference to the deficit. Schools should keep the money to spend on their own approaches and increase the number of available adults for vulnerable children so that permanent exclusions can be kept to a minimum. Additional capital funding to create safer spaces is also needed.
- Lack of clarity over the surplus and formula affordability (question 5). The consultation has not made it clear that these amounts are separate.
- Lack of clarity in how the surplus originates and whether it could be greater than 0.5%.
- In previous years this has been transferred to early years providers. Recommend it either goes to early years settings or transferred to the high needs budget.
- The track record does not give any confidence.
- There is no agreed formula for usage of any surplus; the consultation has not made it clear whether surplus funding to HNB is distinct from the other proposed transfers.
- We don't feel that the consultation is making it clear that this would be in addition to any transfer to support the high needs deficit.
- Any level of surplus available should be utilised to top-up any unaffordability in applying the NFF before adjustments are made as per paragraph 7.2. Only following this should a transfer of surplus be applied to the high need block.
- As the second least funded school in Bournemouth we do not have the funds to support this and all the children who attend the school will suffer.
- An unconditional transfer across will just get lost in the deficit, once any surplus is identified Forum should then consider whether to transfer to the high needs block and if the decision is to transfer it, what specifically it should be used for to create most value. If they decide to transfer for the use of nursery SEND, then Forum, guided by those members from nursery/early years should be consulted on how it is used before it is allocated and spent.

Council Response

There was a majority of positive responses to agree surplus schools block funding can be transferred to support high needs.

The comments indicate more should be done in the consultation paper to explain why there could be a surplus and this will be considered for next year. Also, it needs to be considered further how the funding should be used in the high needs block.

It is proposed that any surplus schools block funding should be used to support the high needs budget (but not necessarily used to reduce the deficit – please refer to the DSG Management Plan paper on the meeting agenda).

Question 2

Do you agree that schools should contribute to the management of the high needs funding shortfall by contributing funding from their NFF allocations? (funding levers b-e).

Responses

Yes	0	0%
No	64	98%
Unsure	1	2%
Total	**65**	**100%**

Comments included:

- How do we meet the needs when we are given so many pupils who should be in specialist provision?
- Schools are already highly challenged to meet the rising level of complex need within schools with the current existing budget shortfalls. This is due to:

  a) the continual increasing number of children with complex SEND and the lack of effective, systematic support and ability for BCP SEND service to support schools effectively.

  b) holding on to children who are recognised in their EHCP to require specialist provision. Due to the lack of places within BCP, our schools end up supporting these children for an extra 2-3 years on average.

  c) the cost of placing those children who should be in specialist provision in our schools requires extra staffing (1:1) as they need a bespoke curriculum away from the classroom because often they are not able to regulate within the classroom or access the same provision and need alternative bespoke curriculum

  d) increase in children with SEMH needs who put others at safety and well-being at risk - staff and children alike - and therefore needing again a learning environment that is not a mainstream classroom and an adult with them at all times. This takes support for all children, as the costs are not reimbursed by the LA

  e) lack of adequate spaces/ rooms and resources to place and support the children safely and adequately - the risk assessments identify this but there are no solutions

  f) despite stating that our schools cannot meet need in the consultation process - children are still assigned, when EHCP states specialist

g) our schools have places available due our larger PAN and high levels of turbulence, so our schools receive disproportionate amount of children with very complex needs compared to those schools who are full.

h) an incredible increase in the number of children in receipt of Early Help/ CIN/CP within our schools which has reached a breaking point for us as those children need a lot of personalised support either to engage at all in school, due to the trauma they may be living in but also those that are unable to attend school and the level of support, challenge and cost to try and reintegrate them into the school =- which can be unsuccessful

i) both LA agencies - SEND and Social Care are unable to effectively fulfil their roles and duties which is impacting on both staff children's well-being and ability to manage due to the lack of expert support, placements and funding.

j) staff recruitment is becoming another breaking point because the demand on those staff and the compromise on their well-being is forcing staff out of the workforce as they get paid more money for less stress working for non-educational sector.

k) too many children not identified in Early Years (pre-school) and causing additional staffing pressures on entry to Reception as they are unknown to the school and requiring high adult support, when the intake of the very young is finely balanced to enable all the other children a successful start to their education

l) having to move class TAs out of mainstream infant classrooms to support more complex needs and this is diminishing the quality of support for the other children, and then adds extra work stress on the teacher - Health executive states we have a duty of care to look after support and prevent stress in the workplace.

- Many schools find it extremely difficult to manage and find high quality staff with SEND specialisms without taking away more money.
- We would question how we would meet the needs of all children if you take money from budgets. Primary concern is safeguarding in all contexts The reduced budget would look to reduce personnel and ratios would become challenging. In addition, if budget is not there how do we support positive academic progress.
- Schools on the MPPL should not contribute. Section 7.7 of the Schools Operational Guide 2024 to 2025 (published 11 October 2023) states that the DfE expects the commitment to MPPLs to be implemented in full, locally and both local authorities and schools should work on that basis.
- School budget increases are not able to meet increased costs from part funded pay rises for teachers and unfunded pay rises for support staff. To reduce the NFF allocations would have dire consequences.
- The proposed funding increase does not cover the increase in costs, and we should not be expected to work with less than the National Funding Formula.
- If more money is removed from schools when the roofs are literally falling in, the increase in students whose needs won't be met due to the diminution in onsite AP will exceed the potential benefit of pouring school money into the current deficit.
- Children cannot be supported in the manner their EHCP requests without funding. Consequently, the other children in the school are then deprived of a fair education,

as their funding is syphoned into SEND. Falling rolls is also impacting on our funding due to low birth rate so general funding is also already impacted.

- How am I supposed to meet the needs of all the children in our school, with even less funding? We are already overstretched, taking in children with high needs, they cannot be supported in the manner their EHCP requests without funding. Consequently, the other children in the school are then deprived of a fair education, as their funding is syphoned into SEND. There will be detrimental impact on the school because we do not have enough money to support the needs of the children that we currently have. There is a falling pupil population, due to low birth rate so general funding is also already impacted.
- Compromising school funds will raise the level of demand as AP in schools is already being paid for
- Funding for safe and efficient running of schools has been calculated by government on a formulaic basis working within already stretched government funding; this funding should not be diverted from one area to support another, especially without knowing what measures have already been taken or how this money will be spent to maximum benefit and impact. At a time when cost increases are exceptionally high, further cutting budgets risks both the quality of education of students and jobs within the local area.
- Whilst we understand the shortfall - how can it be right that you are taking from schools who are already struggling hugely with increased costs. Staffing will already have to be cut and this will have an even greater substantial impact.
- BCP have not provided assurance of how it's strategic plan would reduce the deficit in the high needs block whilst not increasing pressure further in mainstream settings. Applying reductions in funding would put additional pressures on schools who are already struggling to balance a 3 year budget based on MPPFL. We would be reluctant to see a reduction in funding to fill a deficit without a clear improvement in services and support available
- We have lost 5% pupil premium so no additional funds to use.
- The impact on schools is already huge and becoming detrimental to the effective running of a school. school funding already does not cover all costs, especially since staff pay increases which are not fully funded, so schools cannot afford to contribute any more to central pots. Not sure where the funding is being spent currently as so little is coming back to schools in terms of support.
- Funding doesn't cover costs as it is and the impact on schools would be considerable
- Cannot meet need within own setting to ensure safety of all pupils if more funding is taken.
- School budgets are already significantly challenged by staffing increases & inflation & significantly so more recently by the slowness/lack of funding for special needs pupils. It makes no sense to take funds away from the school budgets when we can't even access the funding due from the very pot we're the being asked to pay into.
- School funding already does not cover all costs, especially since staff pay increases which are not fully funded, so schools cannot afford to contribute any more to central pots. Besides which, the impact on the high needs deficit would be negligible and the

impact on schools would be enormous. The impact on schools would lead to a bigger drain on the HNB too so it is counter intuitive

- We believe that any adjustments to the NFF factors should be done only if the NFF is unaffordable after taking into account the October 2023 census information and not just to support a deficit in another block. Taking funding away from schools in a time when schools are facing the worst levels of inflation and cost increases that have occurred in a decade is irresponsible and putting children's education and jobs at risk.
- DFE guidance is for minimum per pupil funding levels should be implemented in full and the local authority should follow this expectation.
- Funding from DfE is based on the amount required to resource mainstream students as calculated by NFF. DfE recognise that schools should not be resourced below MPPFL (it is a compulsory factor in Section 7 of the school's Operational Guide). Additionally, under resourcing mainstream schools will only compound the current HN challenges as if schools need to cut budgets it will impact their ability to meet the needs of more students especially those that fall just below the EHCP threshold.
- Schools should not have to contribute. Divergence from NFF seems shortsighted, and not coupled to a plan to reduce the HNB deficit.
- No. All these do is remove funding from mainstream settings, themselves facing the same cost pressures and typically receiving proportionally lower funding increases than special schools. Moving away from the NFF factors when the direction of travel is for convergence does not appear to be a sustainable strategy.
- The government need to provide the funding needed to BCP to recover their high needs deficit, not schools. The contribution from schools will make such an insignificant difference to the deficit that it's just not worth doing. However, the return of those funds back to schools via their GAG will be invaluable to schools

Council Response:

All the difficulty in reducing NFF allocations is understood. However, the council has a duty to explore all options for financial sustainability in the high needs block, working in partnership with schools to manage the DSG budget overall.

Question 3

Do you agree that **if** a funding transfer is agreed by the DfE beyond the level of surplus schools block funding that <u>all</u> mainstream schools should contribute funding from their NFF allocations? (all funding levers b-d)

If no, which schools should be exempt from contributing (tick all that should apply).

☐ **(lever b) Those receiving formula allocations (local formula unit values =NFF)**
☐ **(lever c) Those receiving MFG allocations (MFG should be set at 0.5%)**
☐ **(lever d) Those receiving minimum per pupil funding levels (MPPFL = NFF).**

Responses:

Yes	24	37%
No	38	58%
Unsure	3	5%
Total	**65**	**100%**

Comments included

- It would be fair for all schools to contribute.
- Schools on the MPPL should not contribute.
- We don't believe there should be any further transfer beyond the surplus
- There is so much context behind why schools fall into NFF, MFG, MPPFL categories that is a contribution is made, then this should be proportional to each setting.
- These schools (b and c) are receiving below what they should be getting so should not have to sacrifice their funding further.
- The most equitable approach would be for all schools to have their budgets left intact
- We don't believe that any schools should be exempt. If this surplus was to happen - all schools should have to contribute equally. Including schools on the MPPFL.
- If a transfer has to be made, then all schools should contribute rather than penalising just a few.
- We do not believe that a funding transfer above the level of surplus schools block funding should be made at all. However, if a funding transfer above the level of surplus funds in the school block is made to the HNB then it should be shared fairly between all schools and no schools should be exempt. Schools on MPPFL actually have a higher level of funding increase than schools on formula (1.5% on your consultation appendices) and they generally do not have high levels of vulnerable students on roll that schools with high levels of deprivation/low prior attainment funding have (which require additional costs to be paid by these schools).
- We do not believe such a funding transfer should be made as all schools need full funding allocation: Funding from DFE is based on the amount required to resource mainstream students as calculated by NFF. DfE recognise that schools should not be resourced below MPPFL (it is a compulsory factor in Section 7 of the school's Operational Guide). Additionally, under resourcing mainstream schools will only compound the current HN challenges as if schools need to cut budgets it will impact their ability to meet the needs of more students especially those that fall just below the EHCP threshold.
- The safety valve pre-conditions need to be addressed at a political level e.g. putting pressure back on central government in the run up to a general election; selling off capital; other resource structures.
- Schools are facing increasing budgetary pressures. We are required to submit 3-year budgets to the EFSA. These budgets are based upon assumptions made about the level of funding that will be received. The only reasonable way to construct a budget with integrity is by knowing what income we will receive - ie under the NFF funding. Any proposal to undermine this assumption will inevitably result in reductions in staffing levels, resourcing and building maintenance, and an increase in class sizes.
- Every school should contribute a little to make it fair and equitable for all. (Use levers a-d)

Council Response:

If a transfer to high needs is agreed that includes reducing NFF allocations, it is fairer for all schools to contribute as managing the high needs deficit is a shared responsibility with all schools. If the schools receiving MPPFL allocations are excluded, then other schools will see their NFF allocation reduce by more. To enable schools with MPPFL top up allocations to contribute funding, a request to disapply the regulations is needed through the Safety Valve discussions with the DfE. Ultimately, if the DfE do not approve then it will not be possible. In any event, the Council will need to reflect on the recommendations of the Schools Forum at its meeting in February 2024.

Question 4

Do you agree that if a funding transfer is made beyond the level of surplus schools block funding that schools with funding increases beyond 0.5% (the level of the MFG) should see gains capped to be more in line with increases for other schools? (funding lever e).

Responses

Yes	38	58%
No	23	35%
Unsure	4	6%
Total	**65**	**100%**

Comments included

- Surely different schools have different contexts and different demographics so not able to determine.
- Prefer that every school contributes.
- Should not include schools on the MPPL .
- Cannot agree any level beyond the surplus.
- The solution should not be at the cost of schools who are already struggling to meet needs.
- It needs to be a fair approach.
- The cost should not be met by schools already struggling to meet needs
- Appendix 1a (funding as per NFF) shows that schools on MPPFL have the highest gains of 1.5%, however your appendix 3e (establish a cap on gains of 1.35% which is funding lever e) shows that schools on MPPFL haven't been impacted by this gains cap – their gain still sits at 1.5%. Therefore, it appears that schools with lower gains are being capped ahead of those with higher gains.
- This would help to ensure fairness across the system by bringing funding levels more in line
- But only if forced by the DfE.
- If those schools are seeing gains, it is due to the factors driving them - indicating the that the school's children need additional support and funding. Cutting this will not help the HNB deficit in the long term.

Council Response:

In previous years, schools have generally not supported capping school with the larger increases considering that the increase is greater because their needs have grown. This year more schools would support this (58%) if reducing NFF allocations is taken forward.

To clarify the position with the MPPFL, this option does not include reducing these from those in the NFF (for which a disapplication is required) as well as applying a cap. The appendix in the consultation shows the impact of capping the greatest increases in isolation of any other NFF adjustments. Hence, in illustrating the impact of a cap (the maximum single impact would be limited by the 0.5% MFG). The increases for MPPFL schools (those with MPPFL allocations in both years) would remain at the NFF increase so higher than the increase for capped schools.

Question 5

Do you agree that if the NFF is unaffordable and no transfer to high needs is agreed that adjustments are made in accordance with paragraph 7.2?

Responses:

Yes	16	30%
No	34	64%
Unsure	3	6%
Total	**53**	**100%**

Comments included:

- All schools should contribute a little.
- Any level of surplus from the prior year should be utilised to ensure there are sufficient funds to meet the NFF
- If the NFF is unaffordable and the adjustments are being made only to support the affordability of the NFF then adjustments will be required to be made, but possibly not in the order that you have suggested.
- This is in line with DfE policy
- It is difficult to make suggestions until the amount of any potential shortfall is known in terms of impact on schools.
- Not reducing MFG or MPPFLs

A number of responses made were general comments and these have been included with question 8 (other comments) if not already covered elsewhere.

There was confusion between this question (reducing NFF allocations due to affordability) and previous questions about reducing NFF allocations to enable a transfer to high needs. The response rate is lower than for other questions as it was initially omitted in error from the on-line questionnaire and some schools did not return after it had been added.

Council Response

There was not a high level of agreement for the proposal (64% disagreed).

It is suggested that this is revisited with Schools Forum in January 2024 when the outcome of the December settlement is known and if a method to reduce NFF allocations for affordability becomes relevant.

Question 6

Do you support that the growth fund policy described in appendix 4 for 2024-25?

Responses:

Yes	50	77%
No	6	9%
Unsure	9	14%
Total	**65**	**100%**

Comments received:

- Appendix 4 in the consultation (new policy) seems a prudent way forward.
- In principle the content is not disagreeable, but the omission of any recognition of the arbitrary DfE distribution of capital development funds and the added value this brings to schools where capital needs are minimal (compared with schools where potential costs are higher) appears unfair.
- This is what the DfE are saying, and consequently what schools are expecting and planning towards.
- There needs to be a review of place planning. BCP are funding intrinsic growth places whilst there are increasingly numbers of spaces in current provisions across the BCP area.
- Falling roll fund would seem more appropriate going forwards given the fall in pupil numbers across BCP (especially Christchurch) and over time.
- Generally agree, but the cut off of at least 30 extra students appears a high threshold

Question 7

Please provided any comments you would like to make concerning the budgets in the central school services block.

The only comment received for these budgets was that the cost of licenses increase seems high. Other comments made for this question are included in the next section.

Response:
The cost of licenses is a recharge from the DfE over which we have no control.

It is proposed that the funding for the central schools service block is allocated fully to support the central services supporting all schools. The specific budget allocations are to be agreed at the January 2024 Schools Forum to reflect the DSG Settlement to be received in late December.

Question 8

Are there any further comments you would like to make about any issues within the scope of this consultation?

Comments included:

- The absence of a three year DSG management plan is a significant short-coming for confidence in future planning.

- It's complex and it appears that whilst schools are being consulted, decisions have already been made to reduce the MFG by 0.5%, whether or not schools can tolerate/afford this. The help for high level need SEND support is very limited - children are on roll when schools are clearly stating they cannot meet need. Early intervention is lacking and short sighted - more needs to be spent earlier on to reduce cost later.
- We have concerns over safety, meeting the needs of the EHCP children and all other children. Ultimately, we would need to risk assess to see if we are operating in a safe environment
- It was a huge amount of complex information to digest with significant implications for schools. More support for the consultation is needed.
- Reproduced in full:
    - As part of the consultation were asked to agree that if the NFF is unaffordable in full and no transfer to high needs is agreed then adjustments to the NFF are made in accordance with paragraph 7.2 (Question 5). The allocations generated through NFF on the basis of the October 2023 census should be transferred to schools. We do not understand why there should be "insufficient" funding if NFF has been applied. Paragraph 7.2 is contradictory as it discusses there being insufficient funding and in the following paragraph a surplus. If there is such a surplus, then this should be used to address formula affordability before any transfer to the HNB is considered. The lack of affordability has not been demonstrated, and must be before disapplying the 2023-24 MPPL is considered (Section 7.7 of the Schools Operational Guide 2024 to 2025).
    - The LA has failed to recognise the pressures faced by schools. Schools are facing increasing budgetary pressures. We are required to submit 3-year budgets to the EFSA. These budgets are based upon assumptions made about the level of funding that will be received. It is not unreasonable for budgets to be set assuming the that under the NFF funding corresponding to the MPPL will be received. Any proposal to undermine this assumption will inevitably result in reductions in staffing levels, resourcing and building maintenance, and an increase in class sizes.
    - The operational guidance requires the LA to have a 3-year DSG management plan, but this has been absent since the inception of BCP. The consultation document, yet again, only considers the 2024-25 academic year, despite a request at the most recent meeting of the Schools Forum to provide a 3-year plan so that schools could align their budget planning for this period.
    - The increase in HNB funding is outstripping that of the SB Schools Block (SB) funding has increased by 1.6% (there was a 1.54% increase in 2023-24), compared to High Needs Block (HNB) funding increasing by 2.8% (there was a 4.8% increase in 2023-24).
    - The LA have failed to take timely and effective action to address the High Needs Block overspend over the last 4 years On page 6 of the School Funding Consultation 2020-21 (published in December 2019) it was stated that the High Needs Block funding was under pressure due to the:

• High level of permanent exclusions for younger children in recent years, with this trend continuing in the academic year 2019-20

• Increasing numbers of pupils with EHCPs

• Increasing complexity of needs inflating the average cost of an EHCP

• Local specialist provision becoming full with greater use of higher cost Independent and Non-maintained Special School (INMSS) and bespoke provision

- Similar statements have been made in every consultation document since 2019. The LA have failed to address any of the above issues over the last 4 years
- Much lauded at its inception, the Delivering Better Value (DBV) initiative seems to have had little, if any, effect. In the current consultation document, it states "the four DBV workstreams were projected to have relatively little impact on the deficit over the medium term".
- There is no confidence in the LA being able to develop and implement a DSG management plan over the short, medium or long term, whether or not the LA are part of the Safety Valve (SV) intervention programme.
- The LA have a track record of being unable to estimate future HNB expenditure or manage expenditure within the allocated budget The total HNB spend for 2023-24 in the consultation document published in Nov 2022 was £81,384,000. For the same period, the estimated spend in the 2024-25 consultation document is £86,756,000. This is an increase of 6.6% (and the actual outturn could be worse).
- The analysis of estimated and actual expenditure over time shows that the variance is becoming greater, rather than reducing. The forecast figure for the total HNB spend for 2024-25 is £97,630,000 – an increase in planned expenditure of 12.5%, compared to an increase in funding of 2.8%. We note that the increase planned expenditure on accommodating needs in independent schools is 31.4%. Further evidence of the mismanagement of the provision for High Needs students From pages 12/13 of the consultation "In January 2023, there were 3,226 EHCPs in BCP. However, at this time, the backlog stood at around 340" "Compared with the national picture, BCP continues to have a disproportionate number of plans supported in INMSS with 1.8 times that of the national data in 2022-23"
- The consultation is flawed The consultation process appears flawed. The local authority is either being disingenuous or are evidencing their incompetence. The consultation document itself is impenetrable to all but the most determined headteachers and governors.
- There appears to be no time for the authority to take account of responses to the consultation before proposals are presented to the Schools Forum on 13 December.
- The questions that are being asked relate only to a limited number of the potential options that could be pursued to address the deficit budget. The phraseology of each question assumes an acceptance of a transfer of the "surplus" block funding and 0.5% from the SB. It has not been made clear that the 0.5% transfer is in addition to the transfer of "surplus" block funding.

- Furthermore, there are significant differences in the flexibilities offered to local authorities depending upon whether or not they are participants in the Safety Valve (SV) intervention programme. Paragraph 1.2 of the consultation document states that the LA has been invited to participate in the SV intervention programme. The intention of the programme is to bring the DSG deficit under control with the LA agreeing with the DfE a deficit management plan spanning several years. Section 5.4 clarifies that the LA will submit a revised DSG management plan and accompanying narrative to the DfE by 15 December. In a subsequent paragraph a period of 7 years is stated. Should the management plan be accepted the current consultation becomes obsolete.
- There has been no consultation with schools about the potential content of any deficit management plan.
- The LA's commitment to addressing the DSG deficit by reducing the number of EHCPs issued has to be questioned. On page 16 of the consultation document, it states that under the SV intervention programme, the DfE believes that there is no evidential basis for the indefinite increase in the requirement for EHCPs, and yet on page 18, there is an acceptance by the LA that the demand for EHCPs will continue to grow.
- We are concerned that there appears to be no consultation process concerning the long-term DSG management plan, which if accepted, is likely to have a significant and lasting effect upon all schools within the local authority. The lifetime of such a plan has not been clearly stated, nor the effect upon school's budgets for that period. If we are to assume that the LA will not be part of the SV intervention programme, and the majority of the consultation document was prepared with this in mind.
- the LA have (yet again) missed the deadline for the submission of a block movement disapplication request, assuming that such a request is only made once agreed by the Schools Forum. This has been the case in every year since 2019. Section 30 of the Schools Operational Guide 2024 to 2025 (published 11 October 2023) states that the deadline for local authorities (other than those in the safety valve programme) to submit a block movement disapplication request is 17 November 2023. The deadline enables the DfE to communicate decisions in time for local authorities to submit the APT and provide maintained schools with their budget shares. If such a request has been made, or is being prepared, the LA has to provide: • details of previous block movements, including those that did not require a disapplication request, and the pressures those movements were designed to address • a DSG management plan that includes: • a forecast position for at least the next 3 years • details of predicted growth, sufficiency, and the actions the local authority are taking to mitigate the risk of overspending • quantified financial and SEND interventions, with detailed narrative explaining how the figures have been derived • a breakdown of specific budget pressures justifying a transfer, including changes in demand for special provision over the last 3 years and how the local authority has met that demand by commissioning places in all sectors • assessment of why the high needs costs are exceeding funding levels and plans to change the pattern of provision where necessary • assessment of the need to seek schools forum approval for further transfers and consideration of plans to avoid this if possible • partnership between the

local authority, those institutions offering special and AP (including mainstream schools) and parents; and between the local authority and neighbouring authorities • any contributions coming from the health and social care budgets towards the cost of specialist places • consideration of how additional high needs funding would be targeted to 'good' and 'outstanding' mainstream schools that provide an excellent education for a larger than average number of pupils with high needs, or to support the inclusion of children with SEND in mainstream schools • details of the effect that any transfer would have on individual schools' budgets funded from the schools block • information presented to the schools forum, and to all schools through consultation and details of responses to the transfer proposal The guidance further states that the above information should be as presented in published papers considered by the Schools Forum. The consultation paper fails to meet the criteria, particularly in respect of providing an acceptable DSG management plan. We have never had the privilege of seeing a 3-year DSG management plan since the inception of BCP.

- As in previous years, the forward strategy has not been shared. Planning on a year by year basis would appear to not be a sound methodology. It seems the safety valve could be a superb source of much needed additional funding, but with little detail on how this would be spent and no guarantee BCP proposal will be accepted (unless this has changed), more details on the plan (and backup plan) would give consultees more information to discern the correct way forward.
- BCP and it's schools should be collectively working together to meet the needs of our community. Open more specialist provision as opposed to having children in a huge number of very expensive, often ineffective alternative provisions. Forcing SEND children into schools that are not resourced to support them is detrimental to the child and the school community.

Appendix 2c

List of Schools Responding to the Consultation

Schools Responding to the Consultation

Hillbourne Primary School

Twin Sails Infant School & Nursery and Hamworthy Park Junior School

Springdale First School

Bishop Aldhelm's CE Primary School

Bournemouth School

Poole Grammar School

Ambitions Academy Trust - Bayside Academy, Manorside Academy, Elm Academy, Kinson Academy, Queens Park Academy, Kings Park Academy, SAA, Oak Academy, Leaf Studio, Longspee Academy and Tregonwell Academy

St Peter's

Parkstone Grammar School

Canford Heath Junior School

Canford Heath Infant School

Ad Astra Infant and Haymoor Junior School

Poole High School

Bearwood Primary & Nursery School

Stanley Green Infant Academy

Talbot Primary School

Poole High School

The Bishop of Winchester Academy

Pokesdown primary school

Twynham School. The Grange School, Twynham Primary School. Stourfield Junior School, Stourfield Infant School, Christchurch Junior School

The Epiphany School

Ocean Academy

Burton CE Primary School

Merley First School

Springdale First School

Baden Powell and St Peter's Junior School Bethany Junior School Courthill Infant School Heatherlands Primary School Heathlands Primary Academy Lilliput CofE Infant School Longfleet CofE Primary School Oakdale Junior School Old Town Infant School and Nursery Queen's Park Infant Academy St Clement's and St John's CofE Infant School St Luke's CofE Primary School

Somerford Primary School

Bournemouth School for Girls

St Edward's

Winton Primary, The Quay School

Secondary / Middle identifier assumed to be Broadstone Middle

4 Primary schools did not identify themselves