

B&NES Consultation on the School Funding Reform for 2013-14

Summary of Responses Including Comments

No. of Primary Schools responded out of 62 – 38

No. of Secondary Schools responded out of 13 – 7

No. of Other responses – Governors, officers, councillors, Finance Officers - 4

Basic per pupil entitlement

Question 1 - Do you agree that the weighting between Key stage 3 and 4 should be 1:1.271?

Question 1	Yes	No	Left Blank
Primary Response	21	1	16
Secondary Response	7		
Others			4

Question 1 - Additional Comments:

School	Comment
St Johns Bath	As a Primary Head, I am not in a position to give an informed response.
Bathwick	There is still a huge difference between Y6 / Y7 – though as roughly same as 'national figure', it probably won't change
Southdown Juns	Yes – this does not affect us
St Marys Bath	(Yes) as a Primary Head, I am not in a position to give an informed response.
Cameley	(blank) No specific views
St Nicholas Primary	(Yes) If no detrimental effect to Primary schools, suggest Secondary schools agree ratios themselves
Writhlington Secondary	Seems reasonable and less turbulence in budget to leave this as it is currently
St Keyna (COG)	Unable to comment as not familiar with secondary school budgets but it does seem sensible to have a higher weighting for KS4 compared with KS3
Peasedown	The current weighting between these Key Stages appears appropriate.
St Keyna (Head)	Unsure as not familiar with secondary school budgets
Southdown Inf	We cannot comment because we do not work in this sector however we do not agree that the Primary sector should be a single unit – this takes no account of the cost of adult :pupil ratios which are statutory for Reception children.
St Martins Garden	No View
St Gregs	As the relativity between the key stages is similar in B&NES schools to the national average this seems a fair weighting to use
Freshford	We are unable to give a response either way as we do not feel we are a position to answer this question
Newbridge	We agree that the current weighting between these Key Stages appears appropriate and should be continued.
St Johns, MSN	As long as this ratio maintains the overall ratio between Prim : Sec
Bathampton	Personally I think that the weighting should be more in favour of Primary

Question 2 - Following the steer from the Schools Forum, Do you agree that we should move from 5% of resources targeted at deprivation to 7%?

Question 2	Yes	No	Left Blank
Primary Response	28	8	2
Secondary Response	3	4	
Other	2	1	1

Question 2 - Additional Comments:

School	Comment
St Johns Bath	This moves towards a fairer distribution of resources.
Bathwick	We agree that if this is the national figure then in principle it should be a target to move towards. Our concern is that we are creating a lot of turbulence – and if everyone is trying to avoid excessive turbulence before the new national formula- do we need to move so quickly on this re-partitioning of the primary pot? Aren't national resources targeting this area as well with pupil premium funding? Will it be easier to achieve once hopefully the Authority may gain additional funding?
Widcombe Juns	We feel that it is sensible to move towards the Government proposed figure in line with the steer from Schools Forum
WASPS	(Left Blank) If we have to eventually move to 7% - Yes. If Not –No.
Chandag Juns	As this could result in a significant loss to our school – we still need to deal with and support deprived children that their postcode doesn't reflect this. Suggest a staggered move from 5 – 7% possible 5.5/6 next year to soften the blow.
St Marys Bath	brings us in line with planned Govt reforms
St Nicholas Primary	Those already in receipt of Deprivation payments will gain further, whereas those not receiving this funding will share a smaller amount in the 'pot' that is left, thus taking a double hit.
Julie Eden	Good idea!
Norton Hill and Somervale	The proposed way of measuring deprivation we consider to be crude
High Littleton Pry	A targeted resource towards those schools with pupils from more deprived backgrounds is a recommendation that I agree with.
Paulton Infants	No. 5% is bad enough given . Some surprising figures yielded through the IDACI index. Rural deprivation does not appear to be reflected sufficiently
Writhlington Secondary	Right to move towards what is likely to be in national funding model
St Keyna	I agree with the proposal to move to 7% targeted at deprivation.
East Harptree	As a small school we do not register highly on the IDACI but we do have an increasing number of families who are considered deprived but fall outside the boundary for FSM.
Peasedown	We do not agree and suggest this stay at 5% to reduce undue turbulence – a stated aim of the LA which we support. The schools with the biggest changes to their budgets will suffer significant instability. Keeping the percentage unchanged at 5% will go some way towards minimising this. If the LA has to make a move it should be introduced over a period for example, 5% to 6% then to 7%.
St Keyna (Head)	I agree with the proposal to move to 7% targeted at deprivation as long as the deprivation criteria are such that funding is allocated to schools based on the number of children from deprived households actually at the school.
Southdown Inf	We believe that all resources targeted at deprivation should be allocated to deprivation and cannot understand why this isn't already the case.
St Keyna (Parent Gov)	But only if it is allocated to schools by clear justifiable criteria, based predominantly on the number of children from deprived households at a school.

St Martins Garden	It is important that all resources are targeted to meet the needs of deprivation due to usually requiring additional support.
St Gregs	Governors agree with the fundamental premise that resources should be targeted towards deprivation and that we should move towards the DfE guidance level of 7%
Freshford	In principle we agree that those children who are most socially deprived should receive appropriate funding.
MSN Primary	To effect a smooth transition to the new formula, it would be helpful if this were to remain at 5%, with a timetabled gradual increase to 7%. This is particularly important for schools most immediately affected by the changes.
Wellsway	We believe that a move to 6% is more appropriate as the impact has noticeable anomalies. The re-distribution towards Bath and the losses affecting schools in both Keynsham and NR do not reflect the situation on the ground. This suggests problems with the methodology that needs some adjustment to be made to reflect sub-urban deprivation. This is 1 way in which this could be achieved.
Newbridge	Our preferred option is to stay at 5% to reduce undue turbulence – a stated aim of the LA which we support. We are concerned that schools with the biggest changes to their budgets, both negative and positive, will suffer the greatest instability, especially when changes are made again when the national funding formula is introduced. Keeping the percentage unchanged will help minimise such instability. If the LA has to make a move then we would propose a gradual shift ie 5% to 6% then to 7%.
St Johns, MSN	Adding additional resources to deprivation seems reasonable, however, if using the new criteria means that there is a shift in resources, then adding additional resources to this factor will only create a larger shift between “deprived and non-deprived schools” I would like to see more modelling on this so that you reduce the turbulence, adding in more resources at the lower end.
St Johns, MSN	Yes-as long as the resources are used to target the most relevant groups
Oldfield Park Inf	We support the suggestion that this should be staged over 2 years.
Bathampton	Any change should be done as slowly as possible

Question 3 - Following the steer from the formula review group, do you agree that the Deprivation indicators of IDACI and Free School Meals are used?

Question 3	Yes	No	Left Blank
Primary Response	26	10	2
Secondary Response	6		1
Others	3		1

Question 3 - Additional Comments:

School	Comment
Bathwick	These seem to be the appropriate factors to use.
Widcombe Jun	We are sure that the Formula review group have put in their best efforts to make this fair, so are happy to follow their lead.
Chandag Inf	Really not sure about this one, because there are definite inaccuracies in this data – it is too generalised.
Cameley	Yes but would agree that the IDACI data may not reflect the rural deprivation in the same way as it does for urban setting. Incidentally new (low cost) houses built in Temple Cloud with postcode BS39 5EE do not show on the DfE database
St Nicholas Primary	Needs to be weighted more towards FSM uptake, which would be based on numbers with greater need at present. (ie those currently claiming benefits). If families in deprived areas are on benefits they too may claim FSM and so will be included in the equation, but not double counted in both the IDACI index and FSM.
Julie Eden	(Yes) Weighing this up, once the IDACI indices are updated to match the more recent census this will be a good measure to balance with FSM, IDACI will not rely on the parent signing up to FSM which can negatively affect areas where many families are hard to engage. My main concern is that the current IDACI indices do not reflect the level of need in Radstock. The EYFS Profile data shows that outcomes in the Radstock Children's

Appendix C

	Centre reach area are consistently low and this year are lower than those in Twerton. I do not know if this pattern is reflected at other key stages. Anecdotally there has been some movement of families out of Twerton to Radstock.
Liz Weeks (2 schools)	(Yes) The assumption is that the forum have considered other indicators
Norton Hill and Somervale	However the IDACI we consider to be a rather crude measure as it fails to take in to account those families who are only slightly above benefit thresholds
High Littleton Pry	I am unaware of other deprivation indicators; therefore I am guided by Schools Forum.
Church Valley Schools Federation	Very difficult as parents do not apply for FSM and so we receive less funding even when we encourage them to take up the offer. However I am not sure what else could be used as an indicator. Again postcodes for the local areas to school are not necessarily and indicator of the deprivation experienced by some of the pupils.
Paulton Infants	Infant Schools at a disadvantage with one third of the school not staying for meals initially and takes time to establish entitlement and application for FSM
Writhlington Secondary	Provides a balance and addresses weaknesses of using either FSM or IDACI.
St Keyna	I have some concerns about the weighting of the deprivation indices. There are pockets of deprivation in Keynsham North and South Wards as shown by the IDACI SOA data which rate as some of the most deprived nationally but the wards as a whole do not rate so highly thus masking the true extent of the deprivation suffered by some families. Pupils from these wards attend all three primaries in west Keynsham however the profile of pupils at the individual schools as measured by the FSM data is very different.
Peasedown	The IDACI system is too 'broad brush' and thus flawed. Our understanding is that IDACI is based on an aggregation of approx. 1500 people in areas known as Lower Super Output Areas. These do not sufficiently reflect situations where higher income households (and high cost houses) sit alongside lower income households. Whilst FSM is also not a perfect system it is an indicator is based on household income of an individual family and thus likely to be a more accurate indication of deprivation.
St Keyna (Parent Governor)	The support and opportunities a school provides to its children will depend to a limited extent on the affluence of the areas in which the children live (less affluent areas are less likely to provide alternative sources of support, and less opportunities for sport and other activities) and to a major extent on whether they are living in deprived households (parents with less cash will not always be able to drive to support services and activities in other areas or purchase private services for their children).
St Keyna (Head)	I am very concerned about the weighting of the deprivation indices. There are pockets of deprivation in Keynsham North and South Wards as shown by the IDACI SOA data which rate as some of the most deprived nationally but the wards as a whole do not rate so highly. The data therefore masks the reality for a lot of families in our area. Pupils from these wards attend all three primaries in west Keynsham however the profile of pupils at the individual schools as measured by the FSM data is very different. Therefore the weighting between IDACI and FSM will need to be carefully thought through.
St Martins Garden	The school hasn't in the past been entitled to deprivation funding despite the level of need. The combination of both goes some way to redressing the balance.
St Gregs	It seems reasonable to target most of the resources at the most deprived pupils
Freshford	On reflection, we do not agree because we believe this will have an unreasonable effect on our school as it will further diminish our funding for vulnerable children, who due to our inclusivity, are on our SEN register with specific learning difficulties.
MSN Primary	Both are crude indicators of deprivation and often mask the true situation. On balance, we consider FSM a better indicator of deprivation, but it would be helpful if the LA could produce a document that makes it clear to parents who are eligible how beneficial it is for them to apply for FSM. NB There are faith schools which may reside in a high deprivation area, but because of their admissions policies draw most of their children from more affluent areas.
Welton Primary	The proposed indicators do not appear to reflect the community we serve in Midsomer Norton.
Newbridge	The IDACI system is fundamentally flawed. There are too many examples of IDACI

	bands that do not accurately reflect household income due to the 'broad brush' nature of the calculation. IDACI is based on an aggregation of approx. 1500 people in areas known as Lower Super Output Areas. We are happy to share examples with the LA of LSOAs in B&NES where higher income households (and high cost houses) sit alongside lower income households. FSM as in indicator is based on household income of an individual family and is, therefore, a fairer indication of deprivation.
Oldfield Park Inf	This gives a fair balance and recognises the relative needs of both groups, especially those children entitled to FSM but don't live in the Deprivation areas. However, the use of October FSM data penalises Infant Schools who often only have 2 out of 3 year groups eating meals regularly on the date of the census. Parents often apply for FSM late in the term despite us urging them to apply on entry. Is it possible to use January PLASC data or if using October Data include the current Y3 cohort so that three full years of data are used.
St Johns, MSN	As above, needs more modelling to create a better balance and stop the major shifting of resources.
St Johns, MSN	As long as the indicators used are accurate
Moorlands federation	As long as there are no big gains/losses which would have a severe immediate impact
St Andrews	Difficult to get Reception pupils FSM details before the beginning of October as they attend part-time for the first few weeks.

Question 4 - Following the steer from the formula review group, do you agree with the percentage split of resources between Free School Meals and the IDACI index methodology?

Question 4	Yes	No	Left Blank
Primary Response	16	18	4
Secondary Response	2	4	1
Others	1	2	1

Question 4 - Additional Comments:

School	Comment
St Johns Bath	There are families who are entitled to free school meals and do not take up the entitlement. Possibly even more weighting on the ADACI
Bathwick	Comments Two reservations: a) We share people's concerns over the use of 'October numbers' – particularly as new Reception children are not necessarily registered for FSM by then b) Would a greater FSM portion be more valid to cover families from all areas?
WASPS	(left blank) Not sure if 75/25 split is too great. Will some pupils entitled to FSM be missed if they live in an area not recognised by IDACI.
Chandag Infs	(No) Move to 50:50
Chandag Juns	We feel FSM is a more accurate indicator of 'current' deprivation and should be given a higher % e.g. 50/50
St Marys Bath	there are families who are entitled to free school meals and do not take up the entitlement for a variety of reason so the split overcomes this potential problem
Chew Stoke	(no) A better split would be in our opinion 50/50% to more accurately impact on children at Chew Stoke
Cameley	Unsure – would be interesting to see outcomes of different split e.g. 50% IDACI /50% FSM
St Nicholas Primary	See above. Greater weighting towards FSM. Suggest FSM 75:25 IDACI.
Julie Eden	(Yes) Would be happy with the proposal or 50:50 although this makes little difference to the Radstock area because of the funding cap.
Liz Weeks (2 schools)	(No) A 50:50 split would be preferred, using FSM Ever6
Norton Hill	A 50/50 split would be more equitable

and Somervale	
High Littleton Pry	If this methodology has been modelled and the impact on individual schools has been taken into account, then I believe that the most deprived pupils in BANES should be targeted and the resources available to schools who have those pupils on roll.
Church Valley Schools Federation	More inclined to move towards a 50/50 split
Paulton Infants	Infant Schools at a disadvantage with one third of the school not staying for meals initially and takes time to establish entitlement and application for FSM
Writhlington Secondary	This should be 50/50 to reflect what appears to be roughly equal weakness of either measure. The justification for the split suggested is not clear.
St Keyna	Whilst the weighting may work well in schools that serve a ward where the overall level of deprivation is high, eg south west Bath, it does not reflect the true level of deprivation in areas such as Keynsham and the Chew Valley or certain areas of Bath.
St Philips	We think this should be 50 / 50 split NOT 25 / 75
St Keyna (Parent Governor)	<p>When calculating the funding a school needs to support its pupils from deprived households, it makes no sense to give an individual assessment of family finances (FSM allocation) less weight than an average measure of deprivation in the areas in which the school's children are living.</p> <p>This is apparent in the predicted figures given in the appendices of the consultation document. Whilst three neighbouring schools serve the west side of Keynsham, households in the area are very heterogeneous with regards to socioeconomic resources, and the three schools have very different children on role: St John's 10 children with FSM, Castle 51 children with FSM, St Keyna 65 children with FSM. However the IDACI index averages out the variation across households splitting the west side of Keynsham into a Band 0 area and a Band 2 area. Children from these bands do not attract funding under the proposal, and so Castle and St Keyna with their high numbers of children eligible for FSM receive very little money from this larger area-based component of deprivation-linked funding.</p> <p>From the appendices, Castle and St Keyna are predicted to receive around £36K and £49K respectively in deprivation linked funding. However, the proposals as a whole are predicted to reduce funding to both schools (about £50K and £40K depending on assumptions from Castle and St Keyna respectively). This is a huge contrast to schools in Bath with similar numbers of children with FSM on role. For example St Martin's with 54 children receiving FSM on role has a predicted allocation of £224K in deprivation funding, and St Michael's with 73 children receiving FSM on role has a predicted allocation of £229K. This significantly higher funding is likely due to both schools serving areas with widespread deprivation which are banded as 3+, and so attract more funding from the larger component in this proposal.</p> <p>So I object to the 75% IDACI, 25% FSM weighting as it does not allow schools adequate funding to support children who are living in deprived households in socially mixed areas. In line with my answer to Question 3, I would support 85% weighting to FSM and 15% to the IDACI index.</p>
Batheaston	Our Governors believe the percentages in the split should be more equal. In our context, where we have more FSM than other neighbouring schools, we are concerned that our funding will be affected if IDACI index is the prime methodology.
East Harptree	Due to low population, our families do not score highly on the IDACI index; we would prefer a 50/50 split.
Peasedown	As indicated above we have significant concerns for the use of the IDACI system and are not convinced that it should be used. We therefore would also have concerns for the proposed percentage split between IDACI and FSM.
St Keyna (Head)	Whilst the weighting may work well in schools that serve a ward where the overall level of deprivation is high, eg south west Bath, it does not reflect the true level of deprivation in areas such as Keynsham and the Chew Valley or certain areas of Bath.

	To address this issue it makes more sense to use the most accurate individual measure of deprivation that we have-% of Free School Meals. This would allow for the many socially mixed areas which do not score highly on the IDACI but do score highly on FSM to be funded appropriately. You only need to look at the figures for St Keyna, Castle and St Johns in your appendices to see the truth of this. I would suggest therefore that the suggested weighting is reversed and is agreed as 75% FSM, 25% IDACI.
St Martins Garden	50:50 FSM data would be more up to date then IDACI. The level of mobility means we are always behind with the funding at least FSM reacts quicker than information from IDACI would.
St Gregs	As the FSM Ever 6 basis is used to allocate the pupil premium additional funding it seems reasonable to include a different measure within the formula to split such resources in addition to the basic FSM measure
Freshford	Morally we agree wholeheartedly that these children rightfully have this money allocated to them. However, as a school situated in a middle class area, with no IDACI/FSM children, it begs the question as to what remains for us.
MSN Primary	Would prefer a much higher FSM weighting, in order to produce funding more reflective of deprivation as it is in the school. NB Can we clarify whether we are talking about FSM <u>now</u> or children who have been in receipt of FSM <u>ever</u> in their school career to date? Or an average over any 3 year period?
Welton Primary	At the least a 50/50 split. We believe the FSM indicator is a fairer measure.
Wellsway	We believe that there is a greater correlation between FSM as an indicator and this is based on the numbers of FSM compared to the IDACI index, which is based on National Statistics that are more out of date. We believe the split should be the other way round.
Newbridge	We believe the IDACI system should not be used, or the percentage split between IDACI and FSM should be weighted heavily in favour of FSM. We feel that in the modelling supplied by the LA, schools such as St Michael's and Twerton are not adequately supported by the proposed IDACI weighting. FSM gives a more accurate indication of household income and is, therefore, a more ethical approach to funding in cases of deprivation.
St Johns, MSN	As long as the indicators used are accurate
Moorlands federation	As long as there are no big gains/losses which would have a severe immediate impact

Question 5 - Following the steer from the formula review group, do you agree with the weighting applied to the IDACI bandings?

Question 5	Yes	No	Left Blank
Primary Response	13	16	9
Secondary Response	2	4	1
Others	3		1

Question 5 - Additional Comments:

School	Comment
St Johns Bath	This appears to be backed up by the evidence gathered by modelling the impact on individual school.
Bathwick	There seem to be similar percentages of children in Band 3 and 4. Should the weightings in these bands be more 'similar'?
Chandag Infs	(Yes) But do not necessarily agree with Idaci banding!!!
Chandag	Don't feel we have enough information to be able to answer this question – some

Juns	clarification needed?
St Marys Bath	(Yes) this appears to be backed up by the evidence gathered by modelling the impact on individual school.
St Nicholas Primary	(No) Difficult to understand FSM uptake more accurate.
Julie Eden	(Yes) This is interesting for Keynsham where a significant number of band 2 children at one school are not supported
Norton Hill and Somervale	More weighting should be allocated to the lower bands
High Littleton Pry	I believe that the weighting will allow the authority to focus on those most in need and provide enough funding where it is most needed.
Church Valley Schools Federation	More inclined to even these up a little so the lower bands receive a little more but the higher bands still receive highest levels
Paulton Infants	Although gains will be capped initially, some figures for some schools as a result of this weighting look to me to be excessive
Writhlington Secondary	The weighting needs to be phased, the jump between Bands 3 and 4 being too great. Eg 1.5, 2.5, 3.5 4.5
St Philips	Sorry we don't understand this?
Batheaston	As other heads, we need it explained why there is such a difference between band 3 and 4
East Harptree	N/A (as the weighting only kicks in at Band 3)
Peasedown	If used e support the proposal to give the greatest weighting to the highest IDACI bands but do not follow the logic of the proposed weighting.
Combe Down	I agree with the 25%/75% weighting. FSM is too much of a blunt tool to be a truly effective measure of deprivation. From our school's standpoint we are pleased that the deprivation of a considerable number of children who attend our school has at last been recognised although I understand that some schools may feel a 50/50 split would be better.
St Martins Garden	It make sense that the higher the band the greater the need.
Freshford	We do not feel we can answer this question as this area is too hard to fully understand.
Welton Primary	See above
MSN Primary	Surely the whole rationale behind banding is to reflect increasing levels of need, and therefore the bands should attract increasing weight ... whilst acknowledging where the numerically highest proportion of need is (i.e. Bands 3 and 4).
Wellsway	This should be staggered not a leap from Band 3 to 4
Newbridge	Not only do schools with real deprivation needs such as St Michael's, Twerton and St Keyna miss out with the proposed IDACI / FSM split, they also lose out on the proposed IDACI banding weightings as they seem to have the greatest number of pupils in band 3 and these children fall in the lowest 10% in BANES. We consider this to be a moral issue and absolutely reject a weighting that defies all logic. We support the proposal to give the greatest weighting to the highest bands but suggest the weighting is distributed as follows: Band 3=2; Band 4=3; Band 5=4; Band 6=5
Oldfield Park Inf	Yes it targets resources at the most deprived children in the local authority. We understand other weightings don't work as well.
St Johns, MSN	A definite no, far too high towards the higher end without providing a reasonable resource for the lower, this will create a big change compared to previous deprivation factors.
St Johns, MSN	Weighting of the 3 upper bands seems high compared to the lower band – could produce issues for the lower end of the scale
Moorlands federation	We have concerns that those just above the lowest deprivation factor ALWAYS seem to miss out but still need support as not always eligible for benefits
St Andrews	Inequality gaps cause huge stress and are very difficult to manage.

Looked after Children

Question 6 - Do you agree that £1,000 should be allocated to schools for each looked after child

Question 6	Yes	No	Left Blank
Primary Response	37	1	
Secondary Response	6		1
Others	2		2

Question 6 - Additional Comments:

School	Comment
High Littleton Pry	We have had very little experience of Looked After Children attending High Littleton; therefore we are unsure of what support these pupils might require and the costs to a school. Therefore, I am guided by the review group's recommendations.
St Keyna	I am unclear whether this will be provided immediately the pupil enters the school or is dependent on whether or not the pupil is on roll in October. Given that some LAC can move schools at very short notice it is possible that a pupil could be on roll from November to the following July and therefore not attract the lump sum.
St Keyna (Head)	A needs assessment should be made before funding is allocated. LAC children do not always need additional support that is more expensive than other children on roll. If it is agreed to allocate £1k per LAC then it would be good to find a mechanism to release the funding in instalments as these children can often be quite mobile and it would not be right to issue £1K to the first school they attend during the year and nothing to the next. Nor would it be cost effective to be giving £1K to more than one school during an academic year.
St Martins Garden	As a minimum What happens when LAC/SEN/deprivation all overlaps- can a child be supported by all 3 funds?
Freshford	Yes we do agree, although we would welcome further guidance on how schools should be responding to the new OFSTED requirements for reporting online use of the Pupil Premium to support individual children and the measurable impact.
MSN Primary	On balance, probably yes.
Newbridge	Yes we feel this is an accurate estimation of the additional needs looked after children usually incur in various support services.
Oldfield Park Inf	Is it possible for the funding to be received at the point of entry of a LAC to the school rather than in retrospect via the following year's budget. When LAC children enter school they often need immediate support. Some LAC children stay in our schools for less than one year. How does that affect funding?
St Andrews	The payment should be made when, or each time a looked after child joins a new school. (Looked after children can change school placement)

English as an Additional Language

Question 7 - Do you agree that the resources should be targeted at pupils first year of British education?

Question 7	Yes	No	Left Blank
Primary Response	25	11	2
Secondary Response	5	2	
Others	2		2

Question 7 - Additional Comments:

School	Comment
St Johns	As a Headteacher with a number of EAL pupils (13.6%), it is evident that the first

Bath	year is the crucial year. It is, however, important to continue support in the second and third year. As a school we have seven pupils in their first year. We have seven in their second or third year – these pupils will miss out on support funding. Many other areas in this consultation have included pupils across a number of years and those already in the school now. We should do the same with SEN.
WASPS	On the whole more resources are used during the first year in British education.
Chandag Infs	What happens if the child moves after a term, goes to another school and the first school has the money?
St Marys Bath	(Yes) as a Headteacher with a number of EAL pupils (13.6%), it is clear that the first year is the crucial year
Chew Stoke	(No) Better split between first two to three years
Cameley	No, I believe it should be weighted over three years with the heaviest weighting to the first year
St Nicholas Primary	Needs to be evenly allocated over 3 years. Under new proposal no funding will be given to the school if receiving child in their 2nd or 3rd year of British education. Total amount should not be given to 1st school, as so often, the child moves on soon after arrival in UK.
Julie Eden	(Yes) The challenge here is where children newly arriving in the city are mobile due to rehousing but unlike Bristol I do not think this is a significant issue in this LA and the schools receiving the most EAL children will probably benefit. It may be useful to monitor the ethnicity of children moving in or out of schools between Reception and Y6.
High Littleton Pry	This would depend on when the child arrived at school. I believe that the DfE will base their funding on the October census. However, if a child was to arrive at our school (and in our experience they arrive halfway through a school year) we would not receive any funding until the following year, presuming that the child is still with us! Their first year of school is the most important, and therefore I would agree that a lump sum of £1000 should be allocated to EAL pupils.
Church Valley Schools Federation	What happens if they come and then go again....? Returning to a different school
Paulton Infants	my experience is that these children often move from school to school
Writhlington Secondary	The need will continue for three years or more so makes more sense to phase it. If the child moves during that time there is nothing for the next school.
St Keyna	£1000 may be a significant amount at primary to provide support for a pupil at EAL, but as discussed at the briefing, school may have a pupil join part way through the year who leaves before the following October count. Depending on the language skills of the pupil when first entering school, a significant amount of money may have been spent which will not be reimbursed because the pupil has moved school. It also poses problems for secondary schools as they would receive no support for a child with limited English who is in their second year of British schooling. I would prefer to see the money split over two years but retain the weighting between primary and secondary due to the complexities of the secondary curriculum.
St Philips	On the condition that the £1000 is released as soon as the children join the school – not after the PLASC as this may be too late.
Peasedown	We agree that EAL children need the greatest additional support in their first year.
Southdown Inf	In our experience, EAL families tend to arrive mid year and often leave mid term – they do not fit their visit to UK around school years and providing support for children must be available each year for the first three years – if you allocated as suggested above many schools would be supporting children without the funding and some schools would be allocated the funding and then the children would move and the next school would not be able to access funding at all – that seems highly unfair on the children and the receiving school.
St Martins Garden	We have had to employ a member of staff to target EAL and be responsive to their needs on arrival, so to be able to support this specifically is worthwhile. We do however question the data regarding number of EAL pupils with their first year?
Freshford	It is difficult to form an opinion on this, as we are not a school which regularly encounters this problem. We would anticipate that those schools who do have many

	children with EAL will have a firm opinion on this.
MSN Primary	...With the rider that there should be clear evidence of impact of this support, as a child could move on to another school having benefited very little from targeted input in that first year; i.e. those resources must really make a difference.
Welton Primary	We feel that this will penalise some pupils/schools who need to support such pupils later in their school life i.e the second year of a pupil's schooling. Also, a pupil might also join a school later in a school year and will not receive funding until the next academic year which might delay support.
Wellsway	This allocation should be monitored closely to ensure that the funding identified is used for the benefit of this student
Chew Valley	Schools with EAL pupils face particular challenges which extend beyond the first 12 months. There is a danger that interventions for EAL pupils are scheduled for the first year and then the pupil is left to sink or swim. In our opinion we should extend the additional resource to the 3 years permitted by the DFE.
Newbridge	Yes. EAL children need the greatest additional support in their first year. This approach is sensible.
Oldfield Park Inf	Is there a mechanism for the funding to be triggered when the child enters the school for the first time rather than in retrospect the following year in the next budget?
St Johns MSN	Resources generally required for at least 2 probably 3 years. Front loading this will not help the school plan as budgets will be blurred across years.
St Johns MSN	Resources may be needed for longer than the first year – to concentrate all of the provision in the first year could have implications for progress and monitoring of budgets
Moorlands federation	New arrivals often spend the first 6 months immersing themselves before action and costs are required so may need money for the 2 nd and 3 rd year. EAL mobility can be high in the first year and if children move within this period the new school would not be in receipt of the payment
St Andrews	However it is worth noting that 6 of our pupils with EAL came to us from another British UK school. Also children that arrive from overseas after the Jan Plasc and leave before the October count – is there a way of these children qualifying for EAL funding?

Question 8 - Following the steer from the formula review group, do you agree with a differential funding rate for EAL with secondary schools receiving £2,000 per pupil and Primary schools £1,000?

Question 8	Yes	No	Left Blank
Primary Response	22	13	3
Secondary Response	7		
Others	1		3

Question 8 - Additional Comments:

School	Comment
St Johns Bath	I believe the difficulties involved in developing a child new to the country do not depend on age. A fairer allocation would be £1,500 per pupil in both sectors. Secondary Schools already have significantly more provision and funding for need.
Chandag Juns	We feel a more even split would be appropriate as a child regardless of key stage requires the same amount of intensive support on arrival.
St Marys Bath	EAL pupils in Secondary school have a lot more catching up to do and, to achieve this, need a greater level of support.
Chew Stoke	(No) The challenges in terms of EAL are similar and an equal weighting between both sectors would be better
Paulton Juns	I feel that this figure should be equal for both secondary and primary i.e. £1500 because the level support needed for EAL children is similar no matter what age they are.
St Nicholas Primary	(No) Primary Schools to receive the same funding as Secondary Schools.
High Littleton Pry	I agree with the review group's recommendation that an allocation of £1000 for EAL primary school pupils is reflected in the fact that primary aged pupils integrate and

	grasp new languages far quicker than secondary pupils.
St Philips	Due to the logistics of moving classes every 5 minutes in secondary school and the added difficulties this affords
Peasedown	We are not clear as to the need for this level of differential funding as we do not have sufficient information to compare the costs of EAL support in secondary versus primary.
Southdown Inf	We disagree with this proposal because, in our experience, the younger children are not only learning English as an additional language but they are at a developmental stage where they are also learning their own language – we have children arrive with us who not only have language difficulties – often no English at all but also have never been to school before – they often require a great deal of adult support and time – as do the families – who look to us for help in all sorts of ways – we do not think that the differential funding rate is fair.
St Martins Garden	However there can be an EAL/SEN overlap. It will take some time to establish SEN in an EAL child, often this will take more than the year - will this be a problem?
Freshford	We are not convinced of this and do not feel we know enough about the subject to comment, although research shows that impact in early years is crucial.
MSN Primary	This recognises the research that shows that younger children are better placed to pick up a new language than older, and acknowledges that the gap for secondary EAL learners is likely to be larger than the gap for primary.
Newbridge	We do not have sufficient data to accurately compare the costs of EAL support in secondary versus primary and so cannot object to the Formula Review Group steer.
St Johns MSN	Generally agree, although a total of £1000 for 3 years seems very low
St Johns MSN	Seems reasonable but £1,000 does not go very far in funding resources
Moorlands federation	Infant and Junior Schools are under the same pressures to show progress and could need the same intensive support. Good early intervention is better or of equal value
St Andrews	Presently this school has 21 different languages spoken and a very small staff with one dedicated HLTA. Secondaries are in a position to have more staff to manage and support EAL children. Here buying in interpreter services for initial parent consultation meetings and providing bilingual resources is very costly.

Lump Sums

Question 9 - Following the steer from the Schools Forum, do you feel a lump sum equivalent to the current average primary lump sum is appropriate?

Question 9	Yes	No	Left Blank
Primary Response	35	2	1
Secondary Response	3	2	2
Others	2		2

Question 9 - Additional Comments:

School	Comment
WASPS	This is fairer than if all schools receive the same lump sum.
St Marys Bath	would love to have a £200,000 lump sum but realise that this would not be entirely fair!
St Nicholas Primary	(No) Would appreciate further explanation of £101K. As DFE suggest up to £200K.
Norton Hill and Somervale	I don't agree with the principle that the lump sum should be the same for primary & secondary schools, however I appreciate this has been specified by the DFE.
High Littleton Pry	I agree with Schools Forum that all schools should receive the same lump sum allocation which would be a level of support equal to all schools, irrespective of size.
Church Valley	Could this be increased slightly?

Schools Federation	
St Keyna	It would not be fair to give so high a lump sum that it would significantly benefit smaller schools.
Peasedown	The LA argument for the £100,000 lump sum is reasonable. This should however be a maximum as a higher figure could risk deterring schools from amalgamating or seeking similar efficiency drives.
Combe Down	This would appear to be within DfE limits and directives
St Gregs	Unsure – there was some discussion about the lump sum being increased but Governors recognised that this may have an adverse effect in terms of overfunding very small Primary schools and moving resources away from other areas of need.
Freshford	Yes we agree
MSN Primary	As this seems to support a major re-distribution of funds between losers and winners, we are not in principle in favour, but we recognise that there is no scope to change this. The amount seems reasonable
Newbridge	We felt the LA argument for the £100,000 lump sum was reasonable but would suggest this is a maximum as a higher figure could risk deterring schools from amalgamating or seeking similar efficiency drives.
Oldfield Park Inf	The methodology seems fair but we would question the position of Federated Schools who are receiving the lump sum twice and are possibly making savings on many of the items the lump sum is meant to cover. (Such as Head Teacher salary)

Spit Sites

Question 10 - Do you agree with the new split site definition?

Question 10	Yes	No	Left Blank
Primary Response	27	2	9
Secondary Response	6		1
Others			4

Question 10 - Additional Comments:

School	Comment
Liz Weeks (2 schls)	Couldn't see a definition, assume it includes playing fields away from schools
High Littleton Pry	A lump sum of £40,000 to cover resources of an additional site as well as travel costs of £15 per pupil seems fair. However, I'm sure that you would get a better steer from those schools that have to deal with these issues.
Church Valley Schools Federation	Federations are an interesting aspect which are going to become more frequent!
Writhlington Secondary	Seems reasonable
Batheaston	Not enough experience of split sites to comment
St Martins Garden	As federations grow will this definition have to accommodate schools over multiple sites? What is defined as a 'no safe walking route'?
Freshford	We do not feel able to comment on this as we have no experience of operating on a split site
MSN Primary	Practical considerations suggest this is ok.
Newbridge	We are not clear about the former split site definition, but the current proposal seems fair.
Moorlands federation	No. Should factor in any split site buildings between schools not just playing fields. E.g. federation, amalgamation not in same building.

Question 11 - Do you agree with the funding values attributable to this factor?

Question 11	Yes	No	Left Blank
Primary Response	20	2	16
Secondary Response	6		1
Others	1		3

Question 11 - Additional Comments:

School	Comment
Norton Hill and Somervale	Federations should be able to claim the travel allocation where pupils in the age range R to 16 travel between schools > 0.5 miles apart for parts of the curriculum.
High Littleton Pry	A lump sum of £40,000 to cover resources of an additional site as well as travel costs of £15 per pupil seems fair. However, I'm sure that you would get a better steer from those schools that have to deal with these issues.
Church Valley Schools Federation	Seems quite high but would need to know which schools this is referring to to know how necessary this is (no response)
Writhlington Secondary	Have to trust the formula review group on this
St Philips	I think so.... I'm unsure of the implications of this – not having worked in a split site school.
East Harptree	N/A (as we would not be aware of the actual costs of having a split site)
St Martins Garden	No View
Freshford	No specific view on this due to lack of experience mentioned in Q. 10 above.
MSN Primary	No informed comment to make on this!
Newbridge	Again this seems fair, although we feel we don't have enough information to formulate a reasoned argument in either direction. In principle, we are not opposed to the definition or funding values.
St Johns MSN	Each split school will have different costs associated with it
Moorlands federation	Lump sum of £50,000 allocated to cover the cost of duplicated equipment/resources expenditure per additional site if the buildings are split .It makes no difference of how it is split!

Exceptions

Question 12 – Is there an exception that you think should be applied for?

Question 12	Yes	No	Left Blank
Primary Response	9	15	14
Secondary Response		3	4
Others			4

Question 12 - Additional Comments:

School	Comment
Bathwick	The Governors are still concerned that providing meals for other schools needs to be recognised – if not via the formula, advice to address this point would be greatly appreciated. What if you have trees in your grounds in a Conservation area? How can the

	ludicrous amount delegated cover tree inspections and works?
Chew Stoke	Cost of transport for KS2 children requirement for swimming for rural schools.
Chew Stoke Governor response	Consideration should be given to schools who have a requirement to provide swimming lessons but which are far from swimming facilities and thus have considerable extra expense.
Liz Weeks Chew Stoke & Paulton Juns	(blank) Schools having to pay for transport to swimming pools – probably doesn't meet the criteria though
High Littleton Pry	We are a small village school with no hall of our own. We therefore rent the adjacent Church Hall (£8236) and the local Recreation Ground (£752) to meet our curriculum needs. I believe that this affects less than 5% of schools across the authority, but impacts on us by more than 1% of our budget.
East Harptree	We think we should be entitled to an exception due to the rental costs of our hall and playing field, but as it equates to less than 1% of our budget we realise that we would not qualify. However £1500 is a considerable sum for us to find as a small school.
St Martins Garden	Schools with special units. We understand the funding of special units is not covered by this consultation, but mainstream allocation has for a number of years supported Margaret Coates Centre. Any new funding formula must reflect the need for the unit to be self-sufficient and not reliant on the mainstream funding to support it.
MSN Primary	There is a range of factors that do have an impact on schools' budgets, such as the fall-out from new buildings (as in our case), where the footprint of the school has increased, the sophistication of the systems has increased (e.g. maintenance of boilers, new H&S requirements (e.g. man-safe on the roof), ventilation, etc.). Some schools are 'high maintenance' whilst others are less so. Is this measurable and can it feature in the formula?
Welton Primary	We would like the cost of swimming tuition and transport to and from the local pool to be considered.
Newbridge	An issue affecting less than 5% of the schools in B&NES that should have an exception applied is that of the size of the school site relative to the number of pupils. Large sites have higher maintenance costs. In less than 5% of schools this amounts to more than 1% of the budget and should be accounted for in the exceptions.
Moorlands federation	Split buildings same site - A) Lump sum of £50,000 allocated to cover the cost of duplicated equipment/resources expenditure per additional site if the buildings are split Large playing fields Size of buildings per m per child

Cap on Gains

Question 13 - Do think a cap on gains should be applied?

Question 13	Yes	No	Left Blank
Primary Response	35	3	
Secondary Response	6		1
Others	2		2

Question 13 - Additional Comments:

School	Comment
St Johns Bath	there needs to be as much financial stability for schools while changes are introduced particularly for those schools for whom the losses will involve possible redundancies. Is there a possibility of further phasing of these changes. The losses for some schools are significant. The principle is correct but the actuality quite stark for some.
Bathwick	(yes)- To support change for losing schools
Widcombe Juns	Even though this will affect us detrimentally we agree that it is the fairest way to deal with this and will help those who might otherwise struggle.
St Marys Bath	(Yes) there needs to be as much financial stability for schools while changes are introduced particularly for those schools whose the losses may lead to redundancies.

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High Littleton Pry	I agree that we need as much stability as possible to the funding system. A cap on gains should be applied to fund those schools in receipt of MFG. If a fluctuating cap alleviates swings in gains and losses, then I agree with that option.
Church Valley Schools Federation	Could the % be set lower so the gains are not so high? As a result the losses are not so high?
St Keyna	Given the fact that some schools will benefit, whilst others like St Keyna will lose, I agree there should be a cap on gains so that no one school will benefit disproportionately.
Peasedown	A cap on gains will help minimise turbulence by helping to balance the Minimum Funding Guarantee. In addition, the MFG should be applied to total losses incurred by a school, not per child, as some schools are set to lose more than 2% of their total income which will have far reaching ramifications
Southdown Inf	The majority of schools that gain using the DfE formula reflect the actual need within those communities – we want the money to go to those schools directly – it is long overdue.
St Martins Garden	The modelling data for 2013-2014 (appendix B) shows a cap of -£27, 344; however appendix E & F show 'gains' over 5 years. So we are confused as to the impact of 'cap on gains' to SMGP!?
St Gregs	It seems reasonable to put a cap on gains, given that the proposed formula will only be operational for two years in the agreed form; a loss of MFG and other changes in two years could mean a reduction in funding for those who have initially gained funds leading to greater financial instability for such schools
MSN Primary	It seems equitable to attempt to balance excessive gains against excessive losses and to even these up to some degree.
Newbridge	A cap on gains will help minimise turbulence by helping to balance the Minimum Funding Guarantee. In addition, the MFG should be applied to total losses incurred by a school, not per child, as some schools are set to lose more than 2% of their total income which will have far reaching ramifications.
Oldfield Park Inf	To be fair to all schools we can see that a cap is appropriate. However, as a school that is likely to gain we want to be sure that our children are receiving the finding to which they are entitled. We are always in the position of setting a deficit budget and endeavouring to carry forward sufficient funds to balance our budget. This has become increasingly difficult to achieve in recent years. To be able to maintain the high standards we have achieved with the demographic we serve at this school it is important we have the money we are entitled to especially as a significant number of our children enter with below average attainment.
St Johns MSN	Has to smooth out the transition and pay for MFG
St Johns MSN	The cap will help to ease the transition short fall of the 'losing' schools
Moorlands federation	Until NFF is known it will avoid turbulence and prevent possible unnecessary redundancies
St Andrews	Cap on gains should not prevent the school receiving the full pupil premium per identified pupil. Given the high number of pupils with EAL and our urgent need to provide adequate resources this element of the funding should not be included in the capped sum.

Question 14 - At what level should a cap on gains be set?

Question 14	responded		Left Blank
Primary Response	32		6
Secondary Response	6		1
Others	2		2

1.74%	1.5%	Fluctuating	Other
2	14	19	3

Question 14 - Additional Comments:

School	Comment
St Johns Bath	in principle with the philosophy in Q13
Bathwick	The fluctuating cap seems best option and most 'flexible' depending on the situation at the time.
Widcombe Juns	We are sure that you have tried to put in place the best arrangement for the schools as a whole and are happy to follow your lead.
WASPS	1.5 – 2%
Chandag Juns	1.5% because this is the option which equates to us losing the least amount of funding. E.g. £35,000 at 1.5% not £50,000 at 5%
Southdown Juns	as proposed
St Marys Bath	1.74%
Chew Stoke	1 ½ %
Cameley	1.74%
Paulton Juns	The cap level should 1.5% as this seems to have the best result for the majority of schools over 5 years.
St Nicholas Primary	Lowest suggested rate ie 1.5%
Chew Stoke Governor response	Same level as MFG
Liz Weeks Chew Stoke & Paulton J	The same rate as the minimum funding guarantee
Norton Hill and Somervale	It seems sensible for the Cap on Gains to pay for the MFG
High Littleton Pry	1.5% - however I would be guided by Schools Forum as to the many models they would have used.
Paulton Infants	1.5%
Writhlington Secondary	Fluctuating cap = to cost of MFG
St Keyna	It would seem fair to set the cap at a similar level to the MFG
St Philips	1.5% I think!! This is a little confusing
Batheaston	1.5%
East Harptree	At the outset it would seem fair to set both CAP and MFG as the same percentage but we know that would not work, as lowering the cap would affect the MFG and tip the balance the other way. Is there a way of reducing the distance between the winners and losers?
Peasedown	The cap should be set at 1.5%. This will allow the budget to fund the MFG so that individual schools are not faced with rapid and large reductions with dangers for drastic measures and redundancies
St Keyna (Head)	Unsure
Combe Down	A 'fluctuating cap' of between 1.75% and 2.00% to allow for unforeseen changes and conditions eg pupil numbers, new housing developments
Southdown Inf	From the figures given to us we could not work out how the 1.5%, 3%, or 5% cap would affect the schools for each year over the 5 year period.
St Martins Garden	1.5%
St Gregs	Governors felt that the cap should pay for the protection offered to schools under the MFG.
Freshford	We are not in any position to comment, but do not disagree with your model.
MSN Primary	Although it makes no difference to our school, whichever rate is applied, we would favour whichever rate provides the greatest stability across the system over a five-

	year period.
Welton Primary	As suggested 1.74% → 2.03% seems agreeable
Wellsway	We believe it needs to reflect the protection required for the losers, ie no more and no less as per the old Safety Net Calculation.
Chew Valley	We like the sophistication of a fluctuating cap which is directly related to the cost of the Minimum Funding Guarantee.
Newbridge	A cap on gains of 1.5% or less will go some way to providing a degree of balance in the budget in order to help fund the MFG.
Oldfield Park Inf	3%
St Johns MSN	1.5% - 2% would be fair
St Johns MSN	1.5% - 2% would be fair
Moorlands federation	As described
St Andrews	Pupil premium and EAL funding to be allocated separately i.e. not included in the capped amount.

High Needs pupils funding

Question 15 - Do you agree with the proposed methodology of allocating resources to schools for pupils with high needs?

Question 15	Yes	No	Left Blank
Primary Response	13	22	3
Secondary Response	1	5	1
Others	1		3

Question 15 - Additional Comments:

School	Comment
Bathwick	How much of the High Needs funding change is 'mandatory' or is it all a choice we can choose to make or not? It really does seem in principle a devastating blow against 'mainstream inclusion' and one that we really hope the Government doesn't eventually make. We would therefore urge that NO CHANGE is made in current SEN funding – if that was possible.
Bathwick	If schools receive no other additional funding via IDACI / FSM they will lose out considerably with just a 'top-up' system. From next April we will lose £6000 for our child with a Statement and have just £4000 left for all other support provision across the entire 225 pupil school. Is there an opportunity to allocate some funding through pupil numbers in addition to the lump sum for school SEN support?
Widcombe Juns	We believe that the government proposals are not in the interests of the child with high need, and that an allocation following the child would be better. However within the constraints put on us, we are happy that you have put forward the next best thing.
Chandag Infs	Feel that pupils may not get the support they need due to financial constraints – the bills need to be paid
Chandag Juns	(No) Because a child with a High Level of Need has such an impact on other children in the class and their ability to learn. This actively goes against Inclusion. We have a number of High Level Needs pupils at school we would have to say could no longer meet their needs without the funding. By sharing a lot of the SEN funding to schools regardless of whether they have the statemented children means the money isn't where the need is, therefore as we have 3 statements we lose 3 x £6000 per year and as some of the SEN funding uses a deprivation element we get less. As the IDACI bands use post codes this is actually irrelevant for most of our statements which focus on medical diagnosis which has

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	nothing to do with where you live. However a school could get increased SEN funding but not have the stated pupils on roll. This seems unfair; we consider that the funding should still directly follow the children.
Southdown Juns	(No) This goes against the ethos of inclusion and schools will have to decide whether to take stated pupils
St Marys Bath	(No) it has the potential to destroy an inclusive culture in schools
Chew Stoke	(No) I have concerns for schools that will fall just under the average, but have a number of high needs pupils
St Nicholas Primary	(No) £10k lump sum per school is inadequate. Would prefer per pupil funding for all SEN pupils (those on School Action, School Action + and Stated). Unsure that information in briefing is not reflected in Appendices.
Chew Stoke Governor response	Generally agree. However, do feel this policy, over time, could be divisive and lead to high needs children being shipped around depending on a school's overall finances
High Littleton Pry	My feeling is that schools who have low numbers of pupils with high needs will benefit financially, whilst other school with larger than average numbers of pupils with high needs will be penalised. This does not sit well within what I believe to be an inclusive authority.
Church Valley Schools Federation	This will cause huge staffing issues for many schools
St Philips	This depends on the complexity of the need. Schools will stop pursuing statements knowing that they will have to fund the requirements of the statement using their school budget and in some cases this may be significant. What happens to a child with complex needs who arrives mid-year – how is a school expected to support that child. Schools will have to provide support according to budget as opposed to need. It will also undermine the ethos of inclusion.
Batheaston	IT IS AN INCORRECT PREMISE THAT SEN NEEDS CORRELATE TO DEPRIVATION. Only one of our stated children has FSM and some of other stated children live in the very privileged parts of Batheaston. Disabilities like ASD and Down's (and many other examples) are not linked to deprivation. We are extremely concerned that this premise will negatively impact on our school funding. In a recent Headteachers' meeting, the concern from all is that this suggested funding for children with high cost SEN pupils will make inclusion difficult and will most likely result in HTs trying to turn away families. Even with a further fund received for having more children than average still would result in a large decrease in funding which will not be suffered by schools who have no/1 stated pupil.
Southdown Inf	The proposed methodology will mean that children with high needs will not get the level of funding and thereby support that they need because there will not be enough money in the school budget put aside for their specific needs due to the reduction in overall budget funding. The school will have to make very difficult decisions about providing appropriate level of support for those with high level need and managing and providing for those with medium level need. Currently, we provide effectively for all those with low level and medium level SEN within our budget and we only apply for additional funding for those with high level need (through statement funding or transition funding or CHIF) which we cannot afford to do – the 2013-14 budget is not going to provide us with the level of funding we received for the stated children and those supported by Transition and CHIF, which we had in our school last year.
Peasedown	WE do not support creating an SEN funding methodology that does not follow the child. The proposed methodology will fail too many children in B&NES. Every school that misses out on deprivation indices will lose out on money needed for Special Needs children. The inevitable result would be money being taken away from the main school budget to fund SEN to the detriment of non SEN pupils. Numbers of SEN children can be known as opposed to deprivation indices which are broad brush strokes subject to annual fluctuations. Assigning budgets to actual pupils with known needs should not be any more complex than calculating deprivation percentages. Most Statements will not fluctuate year on year in the way that IDACI scores will.
Combe	There is a financial disincentive to be inclusive

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Down	
St Gregs	Unsure – Governors were concerned that the current basis of allocation for pupils with Statements of over 100 units could not be maintained as the system currently works well in terms of schools being able to support these particular high needs students.
Freshford	We enclose a copy of Pete Mountstephen's correspondence to Michael Gove. In essence, we do not agree morally with the new methodology, the principle of which we believe to be seriously flawed. However, we do recognise the need for your compliance with government instructions.
MSN Primary	The proposed methodology penalises schools who do badly out of the IDACI index, who would have to take 'more' from their core funding to support SEN high needs children. Far better to try to match a higher level of funding more directly to the children with identified needs, which in turn makes it easier to employ (and release) support staff. Some schools might cynically persuade parents that they cannot really meet the needs of SEN children, so that they then become subject to 'placement' decisions that may penalise other schools.
Welton Primary	It is very difficult to make an informed decision with such a complex proposal....
Wellsway	This methodology penalises schools that are inclusive whilst, to a degree, rewarding those that are not. To allocate so much of the high needs funding through the deprivation indices is not appropriate because high needs students are a factor throughout society not just deprived areas.
Chew Valley	Our concern is that the 'notional' £6k per SEN pupil to be found from the school budget is a fiction and the more pupils you have on your SEN register the more uncomfortable the fiction becomes.
Newbridge	Creating an SEN funding methodology that does not follow the child is fundamentally flawed. The proposed methodology will fail too many children in B&NES. Every school that misses out on deprivation indices will lose out on money needed for Special Needs children. This will result in money being taken away from the main school budget to fund SEN, ie money taken away from non SEN children to fund the SEN needs. This may have the undesired effect of schools discouraging parents of SEN children to attend their school as they risk being a drain on resources. Numbers of SEN children are known in concrete figures, as opposed to deprivation indices which are broad brush strokes subject to annual fluctuations. Assigning budgets to real cases with real needs is not hard and need not be any more bureaucratically onerous than calculating deprivation percentages, as most Statements will not fluctuate year on year in the way that IDACI scores will.
Oldfield Park Inf	We are seriously concerned about the rationale behind expecting schools to fund the first £6,000 annually of every School Statements. We feel this is open to mismanagement and a variety of interpretations - How will schools demonstrate that they have spent the £6,000 from their own budgets? Schools will be financially dissuaded from being inclusive. This is a huge disincentive for schools to take children who will potentially need a statement. The £10,000 that goes to every school may go to some schools with no statemented pupils. This system has potential for the children with less articulate parents to miss out on their full entitlement. The majority of schools will already have spent at least £6,000 on a child who requires a statement before applying for Statutory Assessment. To then be required to find the first £6000 of any statement above 80 units means that some schools could have to earmark £12,000 for a child within the same academic year / 12 month period. To have to continue to fund at this level will be impossible for many schools. We cannot see the £10,000 (£4K + £6k) itemised on any of the appendices. Is this truly going to be an additional £10,000 or another sum of £10,000 which we have to find from our existing budget?
St Johns MSN	As much as a choice as we have
Moorlands federation	the premise that SEN needs correlate to deprivation is incorrect
St Andrews	Number of children with statements can fluctuate. In addition we think children with medical funding should count separately.

Question 15A – In particular the use of a Lump sum per school?

Question 15A	Yes	No	Left Blank
Primary Response	15	17	6
Secondary Response	3	4	
Others	3		1

Question 15A - Additional Comments:

School	Comment
Bathwick	This is currently the ONLY means that all schools have to secure SEN funding. As above – can there also be some pupil number addition? All schools need to ensure that children make two-levels of progress and apply additional interventions at any point as needed.
Chandag Juns	(No) As doesn't take into account number of children with High Level of Need you would take. Schools that get a reputation for supporting such pupils well could be overwhelmed with parents choosing their school for their child and not have the appropriate or sufficient funding to support them.
Southdown Juns	(No) Not flexible and does not meet the needs of the pupils
Norton Hill and Somervale	This funding should be allocated specifically to SEN pupils
High Littleton Pry	A lump sum of £10,000 as part of the school's delegated budget means that a school such as ours who have two statemented pupils (both 180 units) would have previously received £27,262 This combined with medical funding for a child with Type 1 diabetes of 90 units (£6815) would allow us to employ two full time Teaching Assistants and another TA for 15 hours a week. However, under the new formula, the school would only receive 210 units (£15,903). This would mean a shortfall to the school of approximately £9,000.
Writhlington Secondary	Probably not important to secondary schools given scale and way budgets are constructed but probably very important to primary schools
St Philips	Funding must be allocated according to the needs of the child and a lump sum is not necessarily the enable schools to address issues effectively.
Peasedown	Schools and pupils should be allocated SEN funding at the time of need. This cannot be efficiently "evened out" over years via a lump sum. In addition, a school of less than 100 students cannot possibly have the same SEN budgetary requirements of a school of more than 1000. The lump sum is too crude.
Combe Down	This does not address the needs of those schools with a large number of statemented children
Southdown Inf	This is only just enough to support one statemented child – what happens to the rest of them?
St Martins Garden	However the planned £10K will NOT meet the multiple needs of £6K per child
St Gregs	Governors agreed with the proposal of having a lump sum allocation per school but were unsure as to whether £10,000 was enough
Freshford	We are well recognised as an inclusive school, but due to our geographical location we trigger no IDACI funding, despite the fact that we have children with specific learning needs. Many of these children have come to us on Appeal and carry no funding. We do not feel the methodology takes account of schools such as ours, who are definite losers.
MSN Primary	Unclear how beneficial this is: would be better to try to allocate the combined 'lump sums' according to need, as schools do have very different SEN support requirements.
Welton Primary	Do we have a choice?
Wellsway	To give a £10k lump sum per school does not help any school large or small when they are losing such a large amount of the special needs allocation per pupil. It would be fairer to allocate the £10k per school through the Deprivation indices and reduce the amount of the threshold per school. This would benefit more schools, particularly

	small ones who take a proportionately high number of these students in relation to the whole school. We believe that the £10k lump sum per school should be scrapped and the threshold for the point at which the top up is triggered should be lowered.
Newbridge	SEN funding cannot be calculated so indiscriminately. One school may have high SEN needs for a few years and then drop back again to low needs. But it needs the funding at the time of need; this cannot be evened out over years. In addition, a school of less than 100 students cannot possibly have the same SEN budgetary requirements of a school of more than 1000. The lump sum is too crude.
Oldfield Park Inf	We feel that the total funding should be awarded to children who meet the criteria for a Statement of 100 units and above as currently.

Question 15B – In particular targeting 7% of resources using deprivation indices?

Question 15B	Yes	No	Left Blank
Primary Response	16	15	7
Secondary Response	4	3	
Others	2	1	1

Question 15B - Additional Comments:

School	Comment
Bathwick	If the main DSG is targeting this area, is this 'double accounting' for these schools?
Chandag Juns	(No) As Deprivation doesn't depend on postcode or Free School Meals but rather on the child's specific needs – especially those with High Level of Need – we have several children with H L N who are from well off families living in good area's but due to problems at birth or genetic disorders have HLN
Chew Stoke	(No) 5% as currently
Chew Stoke Governor response	No – in our particular case.
Julie Eden	(Yes) An improvement on 5%!
Norton Hill and Somervale	Too high a level of funding directed at deprivation being measured on a crude basis
St Keyna	But also see comments regarding weighting of IDACI/FSM indices
St Philips	Unsure
Batheaston	Needs to be based on the children we have in our schools, as above
East Harptree	For reasons already stated
Peasedown	We see no evidence that 7% as opposed to 5% will make any difference. The 2% is money should be put back into the main pot and distributed according to the size of the school – as larger schools are likely to have a greater number of SEN needs
St Keyna (Head)	But also see comments regarding weighting of IDACI/FSM indices
Freshford	See above
MSN Primary	See above reservations about deprivation indices in any case.
Welton Primary	Not all higher needs pupils are from a deprived background
Wellsway	Yes but not at the expense of high needs students in inclusive schools, drop the threshold to around £3K and put all of that funding into the deprivation pot.
Newbridge	We have seen no evidence that 7% as opposed to 5% will make any difference. The 2% is money that could be put back into the main pot and distributed according to the size of the school – as larger schools are likely to have a greater number of SEN needs.
Oldfield Park Inf	We would suggest a stepped move to 7% over 2 years.
St Johns MSN	But need to change the weightings

Question 15C – In particular using the prior attainment methodology described in the consultation?

Question 15C	Yes	No	Left Blank
Primary Response	14	14	10
Secondary Response	3	2	2
Others	2	1	1

Question 15C - Additional Comments:

School	Comment
Bathwick	We understand that an element would be prior attainment.
Chandag Infs	No this is entirely dependent on the individuals carrying out the assessment and in my experience this is very subjective and in no way an exact science. Plus this is not going to be a method of assessment in the future.
Chandag Juns	(No) As EYFS has been shown to not be a credible measure and is likely to change in future also this measure is quite a distant measure from the children we receive in KS2 it would be better to use KS1 results.
Southdown Juns	(No) System open to abuse and will need very careful monitoring
St Marys Bath	(No for Primaries – but Yes for Secondaries) Key Stage 2 results are objectively marked exams and, as such, are a reliable method of allocating resources. The EYFS is far less objective or reliable. The deprivation indicators that often reflect attainment would be a better means of allocating this resource.
Chew Stoke	(Blank) What will replace this proposal now the previous FS Profile scoring is being replaced??
St Nicholas Primary	Would request breakdown of EYFS scores per year at both levels ie 73 and 78 points. (W Jefferies is contacting DFE to seek clarification on our figure).
Chew Stoke Governor response	No – understand this is a redundant parameter.
Julie Eden	(Yes) As this is supporting SEN 73 would be more appropriate than 78 points
Liz Weeks Chew Stoke & Paulton J	(Yes) But I understand that the EYFSP is now banded rather than scored – how will this impact?
Norton Hill and Somervale	There should be a sliding scale that takes in to account children who enter the school at 4C English & maths
Church Valley Schools Federation	Not sure how some of the figures from DfE have been achieved....are they accurate?Have they been inflated by some schools?
St Keyna	Using the EYFS methodology would seem to be sensible. However in schools with significant pupil mobility, how certain can the LA be that the data used to ascertain attainment at the end of reception is accurate? How will prior attainment of home schoolers who enter the school system be ascertained?
St Philips	Unsure
Batheaston	We don't understand how points will be used now that they are not part of EYFS profile. Will the future methodology work on the percentage of children recorded as having 'emerging' skills? The EYFS doesn't correlate to KS1 curriculum.
East Harpree	Unsure, as prior attainment methodology not described in the document as far as we can see
Peasedown	Using the prior attainment methodology is fundamentally flawed. It penalises good Early Years practice. It perversely encourages schools to 'fail' or the risk of schools 'under-scoring' Early Years children in order to secure greater funding for the whole school. This approach also risks failing SEN children, many of whom will not start to 'fall back' until Y1 or Y2. Many tests of specific need cannot be administered before the child is older. The proposed prior attainment methodology would fail to fund the resources these children need
Southdown Inf	How can this be proposed when the EYFSP is no longer going to be used as an assessment tool within the Foundation Stage?

St Martins Garden	For 2013-2014 only. What attainment can then be used as EYFSP data will not be No comparable and we currently don't know what that will even look like
Freshford	Neither Yes or No. This is complex and we are uncertain as to whether this allows for mobility across county boundaries. We are right on the edge of B&NES and Wiltshire.
MSN Primary	Even with good cross-authority moderation, there are significant differences in Early Years assessment practices, such that the % of children in different schools below the threshold set could vary greatly, although the actual attainment may be very similar. Equally, where schools achieve very well in Early Years, they are penalised for their success. Some children with needs do not manifest those needs until later on.
Welton primary	Some children might not have had a full year of schooling to base a measured judgement. Learning needs might not match the EYFS scores. Behavioural difficulties might not appear at EYFS.
Newbridge	Using the prior attainment methodology is fundamentally flawed. It penalises good Early Years practice and risks encouraging schools to fail, or at least 'under-score', their Early Years children in order to secure greater funding for the whole school. This approach also risks failing SEN children, many of whom will not start to 'fall back' until Y1 or Y2. Children with dyslexia, for example, cannot be screened until they are aged 7 (ie in Y2) at the earliest. The proposed prior attainment methodology will fail to adequately fund the resources these children need.
Oldfield Park Inf	Although we understand there is little choice in the available methodologies ie. 73 / 78 points we feel that attainment on entry is fairer, attainment at the end of the Foundation Stage penalises those schools who have successfully enabled children to make better than expected progress and therefore exceeded 73 points. Therefore we don't agree with the overall methodology. This may be a methodology that needs discussion beyond the LA.
St Johns MSN	As long as the prior attainment can be deemed to be accurate – some schools may submit 'lower' scores in order to increase their allocation
St Andrews	The FSP is set to be reviewed. This will presumably mean that the criteria for prior attainment will need to be reviewed very soon.

Question 16 – Do you agree that resources should be retained to target at those schools where there are higher proportions of pupils with high needs?

Question 16	Yes	No	Left Blank
Primary Response	33	3	2
Secondary Response	2	3	2
Other	2	1	1

Question 16 - Additional Comments:

School	Comment
Bathwick	Schools need to cover current 'Statement costs' – or children's needs will only be met by special school provision!?
WASPS	As long as its pupil specific and not general.
Chandag Infs	Put the money where the need is!
Chew Stoke	(No) All pupils with high needs should receive proportionate funding.
St Nicholas Primary	Some schools take a higher percentage of SEN. Children with SEN require greater support, costing more. Some schools/academies may be more affective at discouraging SEN pupils to join them.
Chew Stoke Governor response	No – all fund should be on a per-pupil basis so those in need get it.
Norton Hill and Somervale	All funds should be delegated on agreed methodology
High Littleton Pry	Some resources should be retained to target schools which have a greater than average proportion of pupils with high needs.
St Philips	SOME resources to buffer the unknown and also to address mid year issues as they

	arise – or schools will have to hold back a % of their budget ... just in case... which is not the best way to budget.
Batheaston	Should be on a sliding scale, like suggested for deprivation index. So if a school has 12 statemented children, more than £5000 should be given for each one past a level, eg 5 statemented children.
Peasedown	Yes. If resources are retained to target schools with a higher proportion of special needs, those schools will be better placed to allocate the resources to where they are needed. There should be a retained budget which is able to move with the child and meet their individual needs.
St Keyna (Head)	We spend a very large proportion of our budget on pupils with special needs and I am very concerned about the impact of any budget reduction on our most vulnerable pupils.
St Martins Garden	High mobility of children will mean some resources must be available on change of demand, to be able to respond to the new arrival immediately.
St Gregs	Governors were concerned as to how this additional 'top up' would be agreed between the commissioner and the provider; there would need to be clear guidelines to ensure a fair distribution of these 'retained' resources.
Freshford	Yes, we definitely agree with this.
MSN Primary	...provided this doesn't give 'other' schools an excuse to pass on all their potential SEN entrants, creating unofficial special schools! Important that schools take their fair share of children with both SEN and behavioural needs.
Welton Primary	Why can the money not be provided to schools in the first instance? There does not seem to be any explanation for funding of dual registered pupils. As mentioned above, some pupils might not appear on the census until after October and this might delay funding for them.
Wellsway	As per the answer to 15/16 above we believe that targeting these schools in this way does not benefit any school that is inclusive. It is better to leave as much funding per high needs students in school as possible.
Newbridge	Yes. If resources are retained to target schools with a higher proportion of special needs, those schools will be better placed to allocate the resources to where they are needed. There should be a retained budget which is able to move with the child and meet their individual needs. Every child matters, and we are responsible for all the children in B&NES. We should be able to operate a system where individual children with high or complex needs do not fall through the net or are failed because our system was too crude to cope with them.
Oldfield Park Inf	Although we don't agree with the overall methodology. See question 15.
St Johns MSN	The whole point of this exercise is to increase the 'equality' of the funding
St Andrews	Also some funding needs to be retained for when children with high level of needs arrive into the school mid year from out of county/country.

Additional Delegations

For the following items indicate whether you agree with the method of delegation and if you would prefer the resource to be de-delegated and the service to be continued in its current format.

HCSS

HCSS – delegation methodology	Yes	No	Left Blank
Primary Response	26	2	9
Secondary Response	5		2
Other			4
HCSS – De-delegation	Yes	No	Left Blank
Primary Response	30	3	5
Secondary Response	2	2	3
Other		1	3

School	Comment
Bathwick	If that's how software is 'costed'
St Marys Bath	Yes- for the reason given
Chew Stoke Governor response	No – we do not use this service
High Littleton Pry	Yes as this scheme can be obtained efficiently through bulk purchasing
St Keyna	Schools which have a higher proportion of sen should have access to additional support. Schools such as St Keyna spend a significant proportion of their budget on pupils with additional needs. Unless there is support available via the LA then pupils with low level needs are likely to be disadvantaged as schools struggle to balance their budgets.
St Philips	Yes – LA to sort out
St Gregs	De-delegated – if economies of scale can be achieved by doing so
Oldfield Park Inf	As long as the delegated amount covers the cost

Pupil Retention Grant – Primary Only

Pupil Retention Grant Primary Only - delegation methodology	Yes	No	Left Blank
Primary Response	26	2	10
Secondary Response	3		4
Other			4
Pupil Retention Grant Primary Only – De-delegation	Yes	No	Left Blank
Primary Response	30	3	5
Secondary Response	1	2	4
Other		1	3
School	Comment		
High Littleton Pry	This can be de-delegated to pass onto the behaviour panels		
MSN	Yes – ie to Norton Radstock schools		

Broadband Charges

Broadband charges – delegation methodology	Yes	No	Left Blank
Primary Response	26	2	10
Secondary Response	5		2
Other			4
Broadband charges – De-delegation	Yes	No	Left Blank
Primary Response	31	1	6
Secondary Response	2	2	3
Other			4
School	Comment		

St Marys Bath	Yes- for reasons given
High Littleton Pry	Yes - To ensure continued pooling arrangements
Paulton Infants	Blank - Not sure. This seems very expensive but have always been very happy with any B&NES IT related services
St Gregs	De-delegated – if economies of scale can be achieved by doing so
Oldfield Park Inf	As long as the delegated amount covers the cost
St Andrews	Yes for a trial period only

Behaviour Support Services

Behaviour Support Services – delegation methodology	Yes	No	Left Blank
Primary Response	25	3	10
Secondary Response	5		2
Other			4
Behaviour Support Services – De-delegation	Yes	No	Left Blank
Primary Response	27	5	6
Secondary Response	2	2	3
Other			4
School	Comment		
St Johns Bath	Yes - funding needs to be targeted to those schools who, at a particular time, face behaviour issues with considerable costs		
Bathwick	YES – as currently done		
St Marys Bath	Yes- funding needs to be targeted to those schools who, at a particular time, face Behaviour issues with considerable costs		
High Littleton Pry	This can be de-delegated to pass onto the behaviour panels		
St Gregs	De-delegated and resources allocated to area panels		
MSN Primary	Would prefer to shop around!		
Oldfield Park Inf	Targets the resources at those pupils who need it		

Support for ethnic minority groups

Support for ethnic minority groups – delegation methodology	Yes	No	Left Blank
Primary Response	19	8	11
Secondary Response	5		2
Other			4
Support for ethnic minority groups - De-delegation	Yes	No	Left Blank

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Primary Response	21	11	6
Secondary Response	2	2	3
Other			4
School			
Comment			
St Johns Bath	Methodology Yes. De-delegation No- this service is not effective. St John's has much experience of working with the service and would be concerned to continue the arrangement		
Bathwick	YES – needs to be targeted where need is		
St Marys Bath	No- this has historically not been a good service. 25% of our pupils are from Ethnic minorities.		
High Littleton Pry	This can be de-delegated to collectively continue the support from Kick Start		
East Harptree	Yes, although we have yet to access the service		
Peasedown	No, we would prefer to retain this money and buy in the support we need from where we need it		
St Keyna (Head)	No. I am not aware of receiving any beneficial support from EMAS in recent years.		
St Gregs	De-delegated – if economies of scale can be achieved by doing so		
Newbridge	No, we would prefer to retain this money and buy in the support we need from where we need it		
Oldfield Park Inf	Can it be targeted at those schools who have the need?		

FSM Checking Service

FSM checking service – delegation methodology	Yes	No	Left Blank
Primary Response	25	2	11
Secondary Response	4	1	2
Other			4
FSM checking service- De-delegation			
FSM checking service- De-delegation	Yes	No	Left Blank
Primary Response	32	1	5
Secondary Response	2	2	3
Other			4
School			
Comment			
Bathwick	YES – sensible not to take on additional time consuming admin / economies of scale		
High Littleton Pry	De-delegation to continue availability of service		
St Gregs	De-delegated – if economies of scale can be achieved by doing so		
Wellsway	No, this should be done through the deprivation indices on FSM		

Maternity Cover

Maternity Cover – delegation methodology	Yes	No	Left Blank
Primary Response	25	2	11
Secondary Response	5		2
Other			4
Maternity Cover-De-delegation			
Maternity Cover-De-delegation	Yes	No	Left Blank
Primary Response	31	2	5
Secondary Response	2	2	3
Other			4
School	Comment		
Bathwick	YES – crazy not to! (Do we understand correctly that Academies CAN'T buy back into this one??)		
St Marys Bath	Yes – absolutely!		
High Littleton Pry	De-delegation to continue pooling arrangements		
St Martins Garden	YES: Incredibly important as cannot cover the impact of this cost every year.		
St Gregs	De-delegated – but question of how all costs will be met if they exceed pooled allocations		

Jury, magistrates and Councillor

Jury, magistrates and Councillor– delegation methodology	Yes	No	Left Blank
Primary Response	25	2	11
Secondary Response	5		2
Other			4
Jury, magistrates and Councillor-De-delegation			
Jury, magistrates and Councillor-De-delegation	Yes	No	Left Blank
Primary Response	30	3	5
Secondary Response	2	2	3
Other			4
School	Comment		
Bathwick	YES – targeted where needed		
High Littleton Pry	De-delegation to continue pooling arrangements		
St Gregs	De-delegated – but question of how all costs will be met if they exceed pooled allocations		

Union Duties

Union Duties – delegation methodology	Yes	No	Left Blank
Primary Response	22	5	11
Secondary Response	5		2
Other			4
Union Duties - De-delegation			
Primary Response	29	4	5
Secondary Response	2	2	3
Other			4
School	Comment		
Bathwick	YES – need to spread the cost to enable all to receive a benefit		
High Littleton Pry	De-delegation to continue pooling arrangements		
East Harptree	No, we think it should be a Per Pupil basis		
St Gregs	De-delegated – but question of how all costs will be met if they exceed pooled allocations		
St Andrews	Yes with an opportunity to review after a year		

Termination of employment costs

Termination of employment costs – delegation methodology	Yes	No	Left Blank
Primary Response	23	2	13
Secondary Response	5		2
Other			4
Termination of employment costs- De-delegation			
Primary Response	31	2	5
Secondary Response	2	2	3
Other			4
School	Comment		
Bathwick	YES – again able to give to where needed		
High Littleton Pry	De-delegation to continue pooling arrangements		
St Gregs	De-delegated – but question of how all costs will be met if they exceed pooled allocations		

For the following items, indicate whether you agree with the method of delegation.

Rent

Rent – delegation methodology	Yes	No	Left Blank
Primary Response	25	3	10
Secondary Response	5		2
Other			4

School	Comment
Bathwick	Just a bonus for us
Southdown Juns	YES TO APPLICABLE SCHOOLS
St Nicholas Primary	YES Would be interested in Buy Back /SLA type scheme
East Harptree	No, as the small amount the school will receive is nowhere near the cost of the rent
Peasedown	In most of the issues/subjects included in this table, we do not have access to enough comparable information to make informed decisions. In these instances, we have agreed with the delegation methodology – where we have disagreed, it is because we know enough to raise questions. To complete this section more accurately we would need to see the current methodology to compare against the proposed methodology.
Freshford	Disagree strongly. There is nothing the school can do about conjuring up enough space to provide children's entitlement to PE, the opportunity to participate/watch concerts, plays etc. Currently, we have to hire the local community hall. Based on information to date, we will have to pay £735pa rather than £168pa. This constitutes a high proportional increase in rent for a small school, together with the likely impact of proposed changes to the funding of High Intervention pupils, reliance on IDACI/FSM to trigger funding etc.
Welton Primary	No. Rent should cover actual costs.
Newbridge	In most of the issues/subjects included in this table, we do not have access to enough comparable information to make informed decisions. In these instances, we have agreed with the delegation methodology – where we have disagreed, it is because we know enough to raise questions. To complete this section more accurately we need to see the current methodology to compare against the proposed methodology.
Oldfield Park Inf	Yes for all – we can only assume this is done fairly within boundaries of what you are allowed to use

Schools causing concern

Schools causing concern – delegation methodology	Yes	No	Left Blank
Primary Response	26	2	10
Secondary Response	5		2
Other			4

School	Comment
Bathwick	Will need to be set up somehow with new 'lead' group / organisation e.g. Teaching School
Chandag Juns	(Blank) More information/clarification needed on how this will impact on us?
Southdown Juns	YES TO TARGETED SCHOOLS
Cameley	No specific view but concerned where support would come from
St Nicholas Primary	YES Would be interested in Buy Back /SLA type scheme
Welton Primary	No. Issue doesn't necessarily relate to the size of the school
Oldfield Park Inf	Yes for all – we can only assume this is done fairly within boundaries of what you are allowed to use
Moorlands federation	Teaching Schools? Do they not get the money to take responsibility for the results of these schools?

Mainstream contingencies

Mainstream contingencies – delegation methodology	Yes	No	Left Blank
Primary Response	26	3	9
Secondary Response	5		2
Other			4
School	Comment		
Bathwick	Don't know how LA will manage if something goes awry / something changes during the year? (Though maybe with nothing left to be responsible for, there isn't any changes needed during the year???)		
Chandag Juns	(Blank) More information/clarification needed on how this will impact on us?		
St Nicholas Primary	YES Would be interested in Buy Back /SLA type scheme		
St Martins Garden	NO: If errors have been made this should be covered by LA not schools		
Freshford	Don't understand – we've never had any errors		
Welton Primary	No. There shouldn't be any errors and the LA should pick up the tab if there is - not the school budget!		
Oldfield Park Inf	Yes for all – we can only assume this is done fairly within boundaries of what you are allowed to use		

Tree management

Tree management – delegation methodology	Yes	No	Left Blank
Primary Response	20	10	8
Secondary Response	5		2
Other			4
School	Comment		
Bathwick	Really do hope that the Parks Dept. want to offer a service for this amount. Just like Jury service et al – this penalises particular schools with particular grounds!! What if the Local Authority has conservation orders on trees?		
Southdown Juns	NO – SUGGEST FUNDING TARGETED AT NO OF TREES NOT PUPILS		
St Nicholas Primary	YES Would be interested in Buy Back /SLA type scheme		
Church Valley Schools Federation	No – we have many trees including many old trees		
Combe Down	Shouldn't this be per tree not per pupil!		
St Martins Garden	NO: This is irrespective of number of trees on site. As a school which has had every tree mapped and we have many! (in excess of 45 mature specimens!)		
Freshford	We have ongoing concerns about trees on our small site and £87 would not cover the cost of checking and maintaining them in a safe manner.		
MSN Primary	NO – should be on a 'likelihood' basis, based on a tree survey of each school site.		
Welton Primary	Per tree not per pupil!		
Newbridge	No. It makes more sense to fund this per tree, not per pupil. Some schools have no trees at all, why would they receive funding for this unused service?!		
Oldfield Park Inf	Yes for all – we can only assume this is done fairly within boundaries of what you are allowed to use		
Moorlands	This should continue		

federation	
St Andrews	Tree management could that be allocated per tree rather than per pupil? The trees are already mapped out.

Devolved admissions

Devolved admissions – delegation methodology	Yes	No	Left Blank
Primary Response	23	4	11
Secondary Response	5		2
Other			4
School	Comment		
Bathwick	What do we have to do with the £27?		
Chandag Juns	Not Applicable		
St Nicholas Primary	YES Would be interested in Buy Back /SLA type scheme		
Church Valley Schools Federation	NO For a small primary this will be a huge loss		
St Martins Garden	No View		
Oldfield Park Inf	Yes – but we are concerned it doesn't target the schools who have that responsibility.		

School Meals

School Meals – delegation methodology	Yes	No	Left Blank
Primary Response	20	1	17
Secondary Response	4		3
Other			4
School	Comment		
Bathwick	We understand that there will be discussions with Primary Council about School Meals as a whole?		
Chandag Juns	Free school meal need to cover actual cost e.g. £390 if £2 per meal or more if costs more e.g. £2.50		
Southdown Juns	TIMESCALE TOO SHORT TO IMPLEMENT		
St Nicholas Primary	(Blank) The School feels it needs to review its current arrangements and will be investigating alternatives. Concerned that the current catering service may not be viable if other schools opt out.		
East Harptree	Yes, as long as the amount is reviewed in retrospect at the end of the year to take account of increase or decrease in numbers of FSM.		
Combe Down	No-Needs much more discussion		
St Martins Garden	Initially the school would wish to retain catering services to maintain these aspects. However the long term view may be to take on school meals and provide a more varied range of meals than currently offered, which would be more specific to our pupils		
Freshford	We would generally like more time for this to be debated amongst HTs in order that we can make an informed choice about the future of Catering Services		
Moorlands federation	Insufficient information		
Oldfield	We need far more guidance on the implications of this to provide clarity to all schools.		

Park Inf	We can't risk the provision of school meals costing more than the amount we are delegated.
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School lunch grant

School lunch grant – delegation methodology	Yes	No	Left Blank
Primary Response	22	1	15
Secondary Response	3		4
Other			4
School	Comment		
Bathwick	(as above)		
Chandag Juns	More information/clarification needed on how this will impact on us?		
St Nicholas Primary	(Blank) The School feels it needs to review its current arrangements and will be investigating alternatives. Concerned that the current catering service may not be viable if other schools opt out..		
East Harptree	No, the school would no longer be able to subsidise school meals on this basis. We would like to explore the possibility of asking Catering Services to provide a healthier meal option for less cost per meal.		
Freshford	As Above		
Welton Primary	Yes keep this		
Moorlands federation	Insufficient information		

Individually assigned resources for pupils with SEN

Individually assigned resources for pupils with SEN – delegation methodology	Yes	No	Left Blank
Primary Response	19	6	13
Secondary Response	3	2	2
Other			4
School	Comment		
Bathwick	Not all children meet the prior attainment criteria but still need support to enable progress – or should we be allowing more children to 'fall behind'?		
Chandag Infs	No - ? accuracy of assessment		
Chandag Juns	Is this currently MAF? EYFS not credible it would be more accurate to use KS1 results.		
St Nicholas Primary	(Blank) Further clarification needed. We could not identify this sum of money in the appendices		
Marksbury	Yes. However we are not sure if we will be able to maintain sufficient contingency to cater for a high needs SEN child moving into the school mid year.		
East Harptree	Yes, but unsure of actual impact.		
Peasedown	Prior attainment methodology is not a rigorous or a fair approach. It is too subjective and too open to abuse. SEN support should be assigned according to needs. Many SEN needs cannot be assessed in Early Years (for example ASD or dyslexia)		
St Martins Garden	No modelling provided. Prior attainment for SEN pupils by is sheer nature will be lower than their peers.		
St Gregs	No-please see earlier comments re Q15		
Freshford	Can't comment due to complexity of systemic changes to funding special needs and		

Appendix C

	stated children in the authority
MSN Primary	NO – see above comments about unreliability of prior attainment methodology
Welton Primary	See comments on Q16
Wellsway	No the threshold should be lowered to something more manageable for all schools.
Newbridge	No the prior attainment methodology is not a rigorous or a fair approach. It is too subjective and too open to abuse. Children who need SEN support should be assigned this according to their needs, many of which may not be picked up in Early Years (including ASD and dyslexia as common examples).
Oldfield Park Inf	Yes – depending on the prior attainment measure used – again should be as Question 15 C which is the childrens’ level on entry to the FS not their exit.
St Johns MSN	Yes – as long as the prior attainment element can be seen as accurate
Moorlands federation	Insufficient information

Additional Information

Chris Metcalfe St Keyna (Parent Gov) adds the following

Past the deadline I realise - but when discussing the consultation in our Finance meeting today, my colleagues encouraged me to send the attached collation of figures from the appendices in the consultation document.

Makes it very clear how the proposals greatly disadvantage schools on the West side of Keynsham in comparison with similar schools in Bath.

	Oct 11 pupils	Pupils on FSM	Pupils living in deprived areas (3+)	Deprivation funding	Pupils <73 EYFSP	Prior attainment funding	Basic per pupil element	Predicted change under proposals
St Keyna	190	65	5	£49,198	67	£54,977	£455,237	-£39K
St John's	213	10	1	£9,155	5	£4,103	£518,872	-£28K
Castle	202	51	2	£36,229	23	£18,873	£499,292	-£50K
Whitchurch	193	23	31	£62,801	16	£13,129	£472,369	+£61K
Coombe Down	391	23	67	£236,822	46	£37,746	£944,739	+£140K
St Martin's	171	54	58	£224,361	56	£45,951	£442,999	+£43K
St Michael's	172	73	137	£228,968	56	£45,951	£425,867	+£79K
Twerton infants	153	66	120	£206,920	48	£39,387	£367,127	+£77K
Newbridge	441	30	33	£49,970	28	£22,976	£1,072,009	-£113K
Widcombe infants	179	9	9	£35,581	2	£1,641	£440,552	+£5K