

CYNGOR SIR POWYS COUNTY COUNCIL.

**CABINET EXECUTIVE
15th December 2020**

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REPORT TITLE: Amendments to the School Funding Formula

REPORT FOR: Decision

1. Purpose

- 1.1 To seek Cabinet's approval for amendments to the School Funding Formula (SFF).

2. Background

- 2.1 Prior to the pandemic, the intention had been to review the whole fair funding formula that distributes funding to Powys schools to ensure that the distribution formula meets the needs of the schools in the future, during and following the Transforming Education programme. However, reluctantly, it was agreed (through the Head of Finance, the interim Chief Education Officer, Schools' Budget Forum and the Formula Review Group (FRG)) that this review would need to be postponed during the pandemic period (where the Council was operating on a Business Critical basis) and would not take place during 2020. Work on this will begin in the new year.
- 2.2 The methodology for delegating funding for Special Educational Needs (SEN) / Additional Learning Needs (ALN) in mainstream schools was highlighted as an area that needed urgent review, particularly for primary schools. This is due to the current methodology not providing sufficient funding for schools attended by mainstream pupils with significant SEN/ALN. In addition, the current methodology is based partly on the numbers of pupils with statements of SEN and one of the implications of the Additional Learning Needs and Educational Tribunal (Wales) Act (the ALN Act) is that in the future statements of SEN will no longer exist. As a result of this, the current methodology will no longer be fit for purpose.
- 2.3 An ALN formula sub-group of the FRG was established to work through the current issues and options for improvement.

- 2.4 Any changes to the School Funding Formula must undergo a consultation process with all schools and be agreed with the Schools' Budget Forum prior to implementation.
- 2.5 It should be noted that the development of a funding formula for the future schools' estate to support the Education Transformation programme will encompass all areas of the formula, but this will be subject to further consultation and a phased implementation over a number of years.

3. The Need for Change

3.1 The key principles driving these proposals are:

- In line with the ALN Act and the Powys ALN Strategy, the needs of most pupils with SEN/ALN should be met by schools within mainstream classes.
- Pupils with SEN/ALN should only attend special schools when their needs cannot be met in specialist centres or mainstream classes.
- Pupils with SEN/ALN should only attend specialist centres when their needs cannot be met in mainstream classes
- Delegated funding should target those pupils who need it most but also enable schools to provide an inclusive education for pupils with a wide range of needs.
- Schools should receive funding to give them flexibility to provide a fully inclusive education for all pupils.
- Where pupils in mainstream classes have a high level of need, additional funding should be delegated to schools and should be used to support these pupils.
- The funding methodology should allow for additional funding to be allocated to schools for those pupils whose needs are identified in-year or those who move into a Powys school during the year.
- Any change in distribution methodology must be managed within the same overall budget

Current Challenges

3.2 Currently each primary school receives an element of SEN/ALN funding which is based on a range of proxy indicators e.g. the number of primary pupils not achieving the core subject indicator (CSI) at KS2 at that particular school. The purpose of this funding is to provide support and resources for a wide range of pupils with SEN/ALN. Some pupils with a high level of need have a statement of SEN which sets out the support

they will require. Under the current methodology, schools are required to use all of their general SEN/ALN allocation described above before they can receive any additional funding to provide the support needed for these stated pupils. This means that these schools then have very little funding to develop support for learners with less complex needs and inhibits early identification and intervention.

- 3.3 This can be seen as a disincentive for schools to accept pupils with more complex needs, which runs counter to the aim of the new Powys ALN Strategy of a fully inclusive education system supporting participation fully in mainstream education wherever feasible.
- 3.4 A further area that needed to be reviewed urgently was the funding of mainstream schools which have local authority funded specialist centres. Currently, general school budgets are based on the number of classes provided, and do not take into consideration all of the pupils who attend the specialist centres. Headteachers feel that this is unfair. Many have expressed the view that all specialist centre pupils should be included in the numbers considered in relation to the general school budgets. The local authority must be mindful of the requirements of section 13 paragraph 2 (b) of the School Funding (Wales) Regulations 2020 (see below).

4. Consultation Proposals

- 4.1 The full consultation paper detailing the proposed changes can be found at Appendix A and is summarised below.
- 4.2 For the distribution of ALN funding to primary schools, the proposed changes should target learners with the greatest needs, while also providing schools with a base level of funding to support all learners with SEN/ALN.
- 4.3 Every year schools are required to enter information onto the Pupil Level Annual School Census (PLASC) in relation to pupils with Special Educational Needs. This information indicates the type of support and provision that is required by individual pupils. The consultation proposed that this categorisation be used to target funding at those learners identified on PLASC as having more complex needs.
- 4.4 The base level of funding for all schools be based on a combination of the number of learners on the SEN register and the number of learners entitled to Free School Meals (eFSM), which is widely used as a proxy measure for deprivation.
- 4.5 A budget should be retained as a contingency for any new pupils identified as having significant needs.

- 4.6 In order to ensure consistency between schools, a system of moderation should be introduced, involving ALNCos and scrutiny of provision maps by LA officers.
- 4.7 For mainstream schools with specialist centres, their formula funding should be based on the number of pupils on roll who only attend the mainstream setting e.g. if the school has 100 pupils on roll, 4 of whom attend its 12-place specialist centre, the school receives its mainstream funding on the basis of 96 pupils. This will bring the formula in line with the School Funding (Wales) Regulations 2010.
- 4.8 Local authority officers should meet with the headteacher and specialist centre teachers on an annual basis to agree on any additional requirements.

5. Consultation Findings and Responses

- 5.1 Overall, the number and quality of responses were disappointing. 22 responses were received to the consultation (10 from primaries and 11 from secondaries, with one nil return) representing 9 primary schools and 5 secondary schools.
- 5.2 Appendix B provides more detail of the responses along with officer commentary. In summary:
 - 22.7% of respondents were supportive of simplifying the proxy indicators used to provide a base level of funding for ALN provision (63.6% were neither supportive nor unsupportive and 13.6% were not supportive);
 - 36.4% of respondents were supportive or very supportive of using PLASC categories to provide targeted funding for ALN provision (59.1% were neither supportive nor unsupportive and 4.6% were not supportive);
 - 31.8% of respondents were supportive or very supportive of providing top up funding if required for statements or banding (59.1% were neither supportive nor unsupportive and 9.1% were not supportive);
 - 27.3% of respondents were supportive or very supportive of a system of moderation (63.6% were neither supportive nor unsupportive and 9.1% were either not supportive or not at all supportive);
 - 63.6% of respondents were not at all supportive and 13.6% were not supportive of the proposal to fund the mainstream schools with specialist centres based on pupils on roll that do not attend the specialist centre (13.6% were supportive or very supportive

and 4.6% were neither supportive nor unsupportive, with one nil response;

- 63.6% of respondents were supportive or very supportive of annual meetings between local authority officers and the headteacher and specialist centre teachers to agree any additional requirements (31.82% were neither supportive nor unsupportive, with 1 nil response);

6. Proposed Way Forward

Primary Schools

- 6.1 It is proposed that elements 1 and 3 should be adopted in April 2021 as described in the consultation paper. However, it is proposed that element 2 should not be adopted until a later date, giving the local authority and schools time to come to consensus as part of wider budget discussions:

Element 1: Simplified Proxy Indicators – providing a base level of funding for all schools

Indicator	Weighting
Number of pupils on the SEN Register (from PLASC)	80%
Free School Meals (FSM) entitlement ¹	20%

- 6.2 SEN and FSM data would be averaged over the most recent 3 years available to smooth the impact of changes from one year to another.

Element 2: Allocation based on the number of pupils in certain PLASC categories

- 6.3 Further analysis has taken place since the proposals were put out to consultation and it is clear that there are significant inconsistencies between schools in terms of the pupils that are allocated to the PLASC categories that the proposals for element 2 relate to. Officers are of the view that this part of the proposals should be delayed in order that guidance can be provided to schools and a moderation process implemented so that the data is more consistent across all schools.
- 6.4 There is a risk to the implementation of this element related to the capacity within the central ALN teams which need to be in place in order

¹ FSM is used as a proxy for deprivation and is widely used by Welsh Government for resource distribution. The group discussed using the Welsh Index of Multiple Deprivation (WIMD) but this was discounted as it is not considered suitable by WG's Distribution Sub Group and the data is not readily available in Powys.

to secure this consistency across Powys. Current restrictions on recruitment due to Covid may make this impossible.

- 6.5 As an interim measure, officers propose that the funding targeted at pupils with significant needs be based on the requirements of their statement of SEN or banding, reduced by the individual pupil amount delegated to the school through the simplified proxy indicators, as part of their SEN/ALN allocation.

Element 3: Top Up Funding

- 6.6 A sum of money will be retained centrally to be distributed to schools to support pupils whose needs are identified during the year, or who arrive at a Powys school during the year.

Specialist Centre funding

- 6.7 In line with the School Funding (Wales) regulations (see below), pupils in the specialist centres should not be included in the pupil numbers used when calculating overall school budgets. Officers should work with schools on an annual basis to determine the amount of funding required to support the integration of specialist centre pupils into mainstream classes

13.—(1) In determining budget shares for maintained nursery, primary and secondary schools, a local authority must take into account in their formula the number of registered pupils at those schools on such dates as may be determined by them weighted if the authority consider it appropriate in accordance with paragraph (7).

(2) For the purpose of paragraph (1), the number of registered pupils does not include—

(a) pupils in respect of whom grant is payable to the authority by the Welsh Ministers under section 36 of the 2000 Act;

(b) pupils in places which the authority recognise as reserved for children with special educational needs or (except where the local authority chooses not to exercise their discretion under regulation 15 in respect of children in nursery classes) for children in nursery classes.

7. Resource Implications

- 7.1 Finance – All of the proposals are expected to be managed within the existing overall budget for ALN funding distributed to schools. The Schools' Finance Manager supports the proposals and will amend the funding formula to reflect the changes once agreed. The Schools' Finance team will continue to support schools to manage the changes that arise from the formula review.
- 7.2 HR – The Schools' HR team will continue to work with Headteachers, Staff, Governors, Trades Unions and other officers of Powys County Council to ensure that any changes that are required will be made in line with the School's adopted policies and procedures
- 7.3 The Head of Finance (s151 Officer) comments as follows: "I note the comments of the Schools' Finance Manager. The proposals recognise a number of funding issues identified by schools and the inclusion of these elements within the funding formula will enable schools affected to manage cost pressures that arise"

8. Legal implications

- 8.1 Professional lead notes the recommendations and the issues identified by finance and how these will be addressed following the formula review. Legal services will assist where necessary to ensure compliance with the relevant legislative provisions.
- 8.2 The Head of Legal and Democratic Services (Monitoring Officer) comments as follows: "I note the legal comment and have nothing to add to the report".

9. Data Protection

- 9.1 The proposal does not involve a change in the processing of personal data.

10. Comment from local member(s)

- 10.1 All schools across the council may be impacted by changes to the school funding formula therefore all local members have an interest.

11. Integrated Impact Assessment

- 11.1 The proposals support the principles of the ALN Act and meet the requirements of the new Powys ALN strategy.

- 11.2 The proposal will ensure that funding for SEN/ALN will be targeted at those with the greatest need while also supporting schools to provide high-quality education for pupils with a wide range of needs.
- 11.3 They will underpin closer working between the authority and its schools and secure greater consistency.
- 11.4 A financial impact assessment has been undertaken to assess the level of change in funding levels to individual schools. Where the changes in funding to individual schools are considered to be unmanageable, a self-funding damping mechanism will be put in place to support schools through the transition.

12. Recommendation

12.1 It is recommended that:

From April 2021

- Funding for learners in mainstream primary schools will be delegated through
 - a) an interim arrangement of targeting funding at those learners with the highest need based on the statement of SEN or banding, taking into account the individual pupil amount delegated for SEN/ALN
 - b) provision of a base level of funding based on a combination of the number of learners on the SEN register (80%) and the number of learners entitled to Free School Meals (eFSM) (20%) to support pupils with a wide range of needs
 - c) top up funding where new pupils are identified as having significant needs
- A system of moderation be introduced in order to ensure consistency between schools, involving ALNCOs and scrutiny of provision maps by LA officers.
- The formula funding for the mainstream schools with specialist centres is based on pupils on roll that do not attend the specialist centre, to ensure that the formula complies with the School Funding (Wales) Regulations 2010;
- Where schools host a local authority funded specialist centre, officers will meet with headteachers and specialist centre teachers on an annual basis to agree resource requirements; and that

- If any changes in funding to individual schools are considered to be unmanageable, a self-funding damping mechanism be put in place to support schools through the transition.

Beyond 2021/22:

- Instead of receiving funding linked to the statement or banding, schools will receive funding based on the number of pupils identified through the PLASC data (as explained in the report).

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The Funding Formula (2021-22)

Consultation Paper

Overview

Prior to the pandemic, the intention had been to review the whole fair funding formula that distributes funding to Powys schools to ensure that the distribution formula meets the needs of the schools in the future, during and following the Transforming Education programme. However, reluctantly, it was agreed (through the Head of Finance, the interim Chief Education Officer, Schools Forum and the Formula Review Group) that this review would need to be postponed during the pandemic period (where the Council was operating on a Business Critical basis) and would not take place during 2020. Work on this will begin in the new year.

The methodology for delegating funding for Special Educational Needs (SEN) / Additional Learning Needs (ALN) in mainstream schools was highlighted as an area that needed urgent review, particularly for primary schools. The implementation of the Additional Learning Needs and Educational Tribunal (Wales) Act (the ALN Act) will also see statements of SEN being gradually replaced by Individual Development Plans (IDPs).

An ALN formula sub-group was established to work through the current issues and a range of options for improvement. The council considered all of the views given by the group and has put forward the following consultation document which sets out the proposed changes and seeks your views on these.

An impact assessment will be undertaken and if the changes in funding to individual schools are considered to be unmanageable, a self-funding damping mechanism will be put in place to support schools through the transition.

All proposed changes and any transitional arrangements will have to be managed within the same overall budget amount.

It should be noted that the development of a funding formula for the future schools estate after the Education Transformation programme will encompass all areas of the formula, but this will be subject to further consultation and a phased implementation over a number of years.

Why we are consulting

We have a statutory duty to consult on the funding formula for schools. In addition, we feel it is good practice to do so and are interested in your views.

Background

The total funding for SEN / ALN provision distributed to schools in 2020-21 is £5,906,833. The distribution methodology differs between the primary and secondary sectors as shown in Table 1 below. Please note these figures will change as a result of pay awards and pupil number changes in future years.

Schools are expected to use some of their general funding to support pupils with SEN / ALN.

Table 1: 2020-21 delegated funding for SEN / ALN provision

	Primary	Secondary	TOTAL
Formula led:	£	£	£
Additional Learning Needs Coordinator (ALNCo)	732,740	394,488	1,127,228
Proxy Indicators	2,154,118	-	2,154,118
Pastoral Support	-	311,629	311,629
Small Class Size	-	1,870,342	1,870,342
Total Delegated via formula	2,886,858	2,576,459	5,463,317
Exceptional Needs / "Top Up" Funding:			
Current Banding Top Up Commitment	91,428	352,088	443,516
Current Spend Sub-Total	2,978,286	2,928,547	5,906,833
Remaining Exceptional Needs Budget for panel			306,484
TOTAL			6,213,317

For both sectors there is a top up based on the banding system used by Powys County Council. All pupils with a statement of Special Educational Needs (SEN) are banded from 1 to 10 according to need. There is an expectation that, where possible, schools will cover the cost of the banding from their delegated funding. However, where this is not possible, additional Band led top-up funding is provided.

The authority holds a central budget of £0.75m for pupils with exceptional needs with allocations being agreed through a panel. This includes funding for pupils

who arrive at a school during the school year and current banding top up where the delegated funding is not sufficient. This amount and how it is accessed will be reviewed for both primary and secondary following the outcome of this consultation by officers in collaboration with school representatives.

Delegation of funding to support SEN / ALN provision in Secondary Schools

Current System

For **secondary** schools, SEN / ALN funding distribution is based on three main elements. The first element related to funding the Additional Learning Needs Coordinator (ALNCo), based on funding equivalent to 0.1 FTE teacher per 100 pupils (on average this equates to £5,800).

The second element relates to funding for pastoral support equivalent to 1 Grade 7 (mid point, term-time only) which is not based on pupil numbers.

The remaining funding is used to fund small classes of 15 pupils in each year group in each language stream.

In addition, there is the “top up” funding for banding referred to above.

Proposals for change

Following discussion with the ALN formula sub-group, the Council has decided that, with the exception of specialist centres, it will not change the ALN funding distribution method to secondary schools at this point. This will be reviewed as part of the wider review beginning in 2021.

1. Delegation of funding to support SEN / ALN provision in Primary Schools

Current system

For primary schools, there are two main elements to the formula led distribution. There is an initial amount to fund the ALN Coordinator (ALNCo) with the remainder being distributed via a formula based on proxy indicators.

The amounts provided for ALNCo costs depend purely on pupil numbers. Schools with 100 or fewer pupils will receive funding equivalent to 0.1 Full Time Equivalent (FTE) teacher (on average this equates to £5,800). For schools with more than 100 pupils, they receive an additional 0.1 FTE per 100 pupils or part thereof. In the current financial year this allocates £732,740 to primary schools.

£2,154,118 of the SEN / ALN funding for primary schools is then distributed via a formula based on proxy indicators (see Appendix A).

In addition, there is the “top up” funding for banding referred to above. Schools are expected to use the whole of their delegated funding before they receive a top up amount for a single pupil.

Proposals for change

Following discussion with the ALN formula sub-group, it was agreed not to change the ALNCo funding element.

It is proposed that the remainder be distributed on a combination of simplified proxy indicators (Element 1) and PLASC SEN / ALN category data (Element 2 - see Appendix B for details of PLASC categories), supplemented by top up funding for banding / statements (Element 3) where required during the transition period, as described below.

The amount allocated through each element will vary depending on the number of pupils within the PLASC categories used and any additional top up required, in order to ensure that the total funding amount remains the same. Priority will be given to Elements 2 and 3, with the remainder being allocated to Element 1.

Schools will have flexibility to target this funding to support pupils with SEN / ALN where it is most needed but must ensure that provision meets the requirements of pupils’ statements of SEN.

Element 1: Simplified Proxy Indicators – providing a base level of funding for all schools

It is proposed that this element would account for around 35% - 40% of delegated SEN / ALN funding (excluding the ALNCo element) and distribution would be based on the following simplified proxy indicators:

Indicator	Weighting
Number of pupils on the SEN Register (from PLASC)	80%
Free School Meals (FSM) entitlement ²	20%

These data would be averaged over the most recent 3 years available to smooth the impact of changes from one year to another.

This funding will not be deducted from the “top up” funding as is currently the case.

² FSM is used as a proxy for deprivation and is widely used by Welsh Government for resource distribution. The group discussed using the Welsh Index of Multiple Deprivation (WIMD) but this was discounted as it is not considered suitable by WG’s Distribution Sub Group and the data is not readily available in Powys.

Element 2: Allocation based on the number of pupils in certain PLASC categories

It is proposed that an amount, equivalent to around 40% – 45% of delegated SEN / ALN funding (excluding ALNCo element) is delegated to schools based on the number of pupils recorded as a 3 or a 4 in either the Curriculum and Teaching or the Grouping and Support categories on PLASC (see Appendix B). This would ensure that funding is targeted at those pupils with the greatest need.

The Specialised Resources category will not be used, as the local authority already funds specialist equipment. The Advice and Assessment category will not be used, as there is not normally an associated cost.

Element 3: “Top up” funding

It is proposed that a relatively small amount of the funding be available (around 10% - 15% of delegated SEN / ALN funding excluding the ALNCo element) be available to top up the funding provided through Element 1 and Element 2 above where this funding is below what is needed to support schools in providing what is currently required by the statement, banding or IDPs in the future.

Question 1: Element 1: It is proposed that a base level of funding is distributed to each primary school based on simplified proxy indicators, 80% pupils on the SEN register / 20% FSM entitlement. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 2: Please explain the reasons for your response / add any comments so that we can consider this further

Question 3: Element 2: It is proposed that an amount is delegated to schools based on the number of pupils recorded as a 3 or a 4 in either the Curriculum and Teaching or the Grouping and Support categories on PLASC and that this

is the first call on the funding available. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 4: Please explain the reasons for your response / add any comments so that we can consider this further

Question 5: Element 3: It is proposed that a relatively small amount of the funding available (around 10% - 15% of delegated SEN / ALN funding excluding the ALNCo element) be available to top up the funding provided through Element 2 above where this funding is below what is needed to provide what is currently required by the statement or banding. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 6: Please explain the reasons for your response / add any comments so that we can consider this further

In order to ensure consistency between schools, it is proposed that a system of moderation will be introduced, involving ALNCoS and scrutiny of provision maps by LA officers.

Question 7: It is proposed that a system of moderation will be introduced, involving ALNCOs and scrutiny of provision maps by LA officers. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 8: Please explain the reasons for your response. Is there an alternative moderation process that you can suggest?

Funding for Specialist Centres and their Mainstream Schools

Current system

Specialist centres (excluding the pre-school assessment centres) are normally staffed by one teacher and one higher level teaching assistant fully funded by the local authority.

Where learners in a school that has a specialist centre have a higher level of need identified within a statement, additional funding is delegated to the school based on the banding “top up” system, regardless of whether those learners spend all or part of their time in the specialist centre.

The pupil numbers used in the funding formula for the mainstream school is reduced by the number of places available within the specialist centre. This can cause issues for some of these schools, e.g. if a school with a 12-place specialist centre has 100 pupils on roll in total, it receives its mainstream funding on the basis of 88 pupils, regardless of how many pupils actually attend the specialist centre.

Proposals for change

It is proposed that the mainstream school funding will be based on the number of pupils on roll who only attend the mainstream setting e.g. if the school has 100 pupils on roll, 4 of whom attend its 12-place specialist centre, the school receives its mainstream funding on the basis of 96 pupils.

It is also proposed that, going forward, local authority officers should meet with the headteacher and specialist centre teachers on an annual basis to agree on any additional requirements for the centre as a whole, for example to support integration into mainstream classes or where a learner or a cohort of learners have extremely complex needs. This will enable specialist centre teachers to use funding more flexibly to support all their learners.

Question 9: It is also proposed that the funding formula for the mainstream schools with specialist centres is based on pupils on roll that do not attend the specialist centre. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 10: Please explain the reasons for your response / add any comments so that we can consider this further

Question 11: It is proposed that, going forward, local authority officers should meet with the headteacher and specialist centre teachers on an annual basis to agree on any additional requirements. How supportive are you of this proposal?

Please select only one item:

- Very supportive
- Supportive
- Neither supportive nor unsupportive
- Not supportive
- Not at all supportive

Question 12: Please explain the reasons for your response / add any comments so that we can consider this further

A bit about your school

Question 13: Please could you state whether you are responding as a

- Primary school
- Secondary school
- Special school

Question 14: Name of school? (this is voluntary and you do not have to provide this information if you'd prefer not to).

Appendix A to Consultation Paper

Current Proxy indicators and weightings

Indicator	Weighting
Number of pupils across all primary schools	10%
Number of primary pupils not achieving the core subject indicator (CSI) at KS2	20%
Free School Meal (FSM) entitlement	20%
Number of primary pupils scoring under 75 on the Cognitive Abilities Tests (CATs) in year 4	5%
ALN weighted units relating to number of pupils on School Action Plus (SA+)	35%
WG reading test results in year 2 and year 4	10%

PLASC Categories

Every year, schools are required to enter information onto PLASC in relation to pupils with Special Educational Needs. This information indicates the type of support and provision that is required by individual pupils in terms of:

- Curriculum and teaching methods
- Grouping and Support
- Specialised resources
- Advice and Assessment

Criteria for the different types of provision are as follows:

Curriculum and teaching methods

To identify the provision of support for the pupil in curriculum and teaching methods.

- CT1 some targeted differentiation
- CT2 significant and targeted differentiation
- CT3 some curriculum modifications
- CT4 significant curriculum modifications

Grouping and support

To identify the provision of support for the pupil in grouping and support.

- GS1 occasional additional support in class
- GS2 targeted and sustained additional support
- GS3 small group class provision
- GS4 mostly small group provision

Specialised resources

To identify the provision of support for the pupil in specialised resources.

- SR1 periodic access to standard equipment
- SR2 individual access to normally available equipment
- SR3 individual access to specialised equipment
- SR4 dedicated access to highly specialised equipment

Advice and assessment

To identify the provision of support for the pupil in advice and assessment.

- AA1 school-based assessment
- AA2 external advice/assessment
- AA3 specialised assessments
- AA4 multi-agency assessments

Appendix B

Consultation Responses

There were 22 responses to the consultation in total, representing 9 primary schools and 5 secondary schools

A It is proposed that a base level of funding is distributed to each primary school based on **simplified proxy indicators**, 80% pupils on the SEN register / 20% FSM entitlement.

1. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	0	0.00%
Supportive	5	22.73%
Neither supportive nor unsupportive	14	63.64%
Not supportive	3	13.64%
Not at all supportive	0	0.00%
Not Answered	0	0.00%

2. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
Supportive - with clear guidance of placement on SEN register and with fair and consistent monitoring.	<p>The LA agrees that there is a need for guidance on the placing of pupils on the SEN/ALN register as well as fair and consistent moderation. Closer working between schools and the LA will ensure greater consistency across Powys. This will be particularly important as the ALN Act is implemented.</p> <p>We recognise the issues raised in relation to FSM. FSM figures would be taken as an average of the previous 3 years to help address this.</p>
Neither - We have evidence that there is a strong link between deprivation and SEN, but many of our pupils who were FSM a few years ago- and are still living in poverty- are no longer on the FSM register- often because parent/s will struggle and do anything other than apply and have to find transport to the job centre or divulge personal information.	
Not supportive - Pupils designated as eFSM is decided outside school control and the same guidelines are applies to all families. Pupils on the school's SEN register is open to variance across schools and could inflate the base level of funding.	

<p>4 x Neither - On the one hand, there is a proven link between ALN and deprivation (best measured through FSM). Also, by including pupils on the SEN register, we would hopefully ensure schools with greatest ALN needs receive more funding. However, by linking funding to the SEN register, we introduce a perverse incentive to increase the number of pupils on the SEN register.</p>	<p>Issues relating to delegated ALN funding for secondary schools will be addressed next year as part of a full review of secondary ALN funding.</p> <p>Issues raised in relation to the assessment and statementing process will be considered by Inclusion officers. Prompt assessment of need and early intervention are a key part of the ALN strategy.</p>
<p>Not supportive - eFSM is funded through PDG. Monies made available to schools through the finding formula for ALN must be for ALN.</p> <p>eFSM can vary significantly from year to year.</p>	
<p>Supportive - I wonder whether the levels of SEN would be considered and how this would work with the new IDPs. For example, a child on a statement or in many situations on School Action Plus (SAP) requires more funding than a School Action (SA) pupil, especially pupils with behavioural challenges. Would it also take into consideration new pupils entering the school?</p>	
<p>Neither - What about funding to High Schools. We currently do not have the support needed for the high number of pupils who have ALN needs and who receive no support at High School. High Schools should receive the equivalent funding to ensure these pupils receive the support they need at High School. Also why are pupils who quite evidently need a statement, not being assessed and given a statement? Why when pupils are statemented are they not then given the support they should have to ensure their needs are met? Why does assessment by county take so long? Why is it only the pupils of parents who 'shout the loudest' that are listened to?</p>	

B It is proposed that an amount is delegated to schools based on the number of pupils recorded as a 3 or a 4 in either the Curriculum and Teaching or the Grouping and Support categories on **PLASC** and that this is the first call on the funding available.

3. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	1	4.55%
Supportive	7	31.82%
Neither supportive nor unsupportive	13	59.09%
Not supportive	1	4.55%
Not at all supportive	0	0.00%
Not Answered	0	0.00%

4. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
<p>This depends on who gets to decide what grouping and support category they should be in. Experience tells me that some county officers do not accept what schools tell them about the high level of support some pupils need.</p>	<p>One of the responses suggests a lack of trust between the school and the LA. This is something that officers are working hard to address. It is crucial that schools and LA officers have a shared understanding of the needs of pupils and the different types of support that should be provided.</p> <p>Guidance on the PLASC categories is crucial. Currently there is a lack of consistency in relation to the PLASC information entered by schools. For this reason, it is now recommended that the PLASC element of this proposal should be implemented in 2022, giving officers time to work with schools to ensure consistency.</p>
<p>Funding for higher needs, including children with statements/EHCPs must come first. Presently, schools with higher needs are in fact penalised; their delegated budget for ALN, including allocations for an ALNCO, can be used up entirely on one:one support. This does not allow schools to meet the needs of all children with ALN equally, which POWYS' current formula apparently aims to do- it doesn't. How can schools with higher levels of need be worse off? These are the schools that cannot use the ALNCO element to fund an ALNCO! The current way ALN is funded is fundamentally flawed and needs changing.</p>	

<p>This would answer my questions above as long as schools are consistently using the PLASC codes above. We many need some clear criteria on each of the codes to ensure fairness and consistency.</p>	<p>We fully agree that schools who have pupils with higher needs should not be penalised. The suggested model aims to address this.</p>
<p>Schools should be able to operate on an individual basis, their judgement be trusted and schools should be able to say what funding they need and county respond accordingly. Education should be devolved form county so that schools can operate their own budget without money being taken by county for a tier of operators that are not needed.</p>	
<p>Schools need money for students though in rural areas this is tough.</p>	

- C** It is proposed that a relatively small amount of the funding available (around 10% - 15% of delegated SEN / ALN funding excluding the ALNCo element) be available to **top up** the funding provided through Element 2 above where this funding is below what is needed to provide what is currently required by the statement or banding.

5. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	1	4.55%
Supportive	6	27.27%
Neither supportive nor unsupportive	13	59.09%
Not supportive	2	9.09%
Not at all supportive	0	0.00%
Not Answered	0	0.00%

6. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
<p>This would allow some top up where provision needed is specialised or new to a setting.</p>	<p>We agree that schools who have pupils with statements should be provided with sufficient funding to</p>

<p>Powys' funding formula must not penalise schools that provide the support outlined in a statement. Funding must be available to schools for the required support outlined in statements. Currently, the formula is not fair to schools with higher levels of need.</p>	<p>address the needs identified in the statement.</p> <p>There will be an expectation that, where possible, support will be shared in order to avoid over-dependence on adult support and to make efficient use of the whole pot of funding across Powys.</p>
<p>I agree schools often need top up funding and this needs to be easily accessible if they are unable to meet a child's needs.</p>	
<p>Schools should be able to be in charge of their own budget and allocate funding appropriately.</p>	
<p>I have concerns over how it will be determined if current requirements are not being met. Will this be fair? Will the process be the same for all schools?</p>	

D It is proposed that a system of **moderation** will be introduced, involving ALNCos and scrutiny of provision maps by LA officers.

7. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	4	18.18%
Supportive	2	9.09%
Neither supportive not unsupportive	14	63.64%
Not supportive	1	4.55%
Not at all supportive	1	4.55%
Not Answered	0	0.00%

8. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
<p>This would help my concerns with question one but I think clear guidance on provision mapping is needed from County but that is also flexible and considerate to different approaches. My experience has been a list of interventions with monitoring progress on these, where as due to being a small school we work our interventions in different ways but this was not seen as acceptable even though progress was evident.</p>	<p>It is encouraging that there is general support for increased moderation in order to ensure consistency. Inclusion officers will be working with schools this year on provision mapping.</p>
<p>This depends on how positive the moderation process turns out to be. If meetings simply become an argument about the support a child needs- and county officers, who hardly ever step foot in a setting to see actual children, have the final say, then no- I don't agree.</p>	<p>It is acknowledged that there have been weaknesses in support in ALN over recent years. The new ALN strategy requires a highly trained workforce in schools and a small number of very specialist staff working for the LA.</p>
<p>This would ensure more consistency across schools.</p>	<p>It is recognised that, over recent years, officers have not spent enough time in schools. This is largely due to the fact that the central team is currently very small.</p>
<p>Previously, there was a system of moderation involving ALNCOs and scrutiny of provision maps by LA officers. This was very supportive and helped the ALNCOs to solve problems and identify ways forward. I look forward to this being reintroduced.</p>	<p>Additional officers are currently being appointed, following a restructure of the service. A key priority will be for officers to spend more time in schools, working with headteachers and ALNCOs.</p>
<p>Until Powys funds qualified ALNCOs, this must not be the case. Often, due to poor funding, headteachers have to take on this role. This is unacceptable- most heads are not qualified and already have huge workloads.</p> <p>The county has got rid of the best support mechanism (LIST) where we worked together and felt supported. This is not the case now. I would not welcome 'moderation' of provision maps in this school. I would, however, welcome support!</p> <p>Such a move would have a negative impact on the mental health and well being of those heads who have to cover this role.</p> <p>Facilitate the employment of qualified ALNCOs before introducing such scrutiny.</p>	<p>Schools receive a small amount of funding to support the work of the ALNCO. However, it is expected that the salary of the ALNCO is met within the overall school budget. Schools may wish to consider the appointment of cluster ALNCOs. ALNCO training will be a priority over the coming years.</p>

I feel this needs doing to ensure all children are having their needs met as long as this is done in a supportive way and not a judgemental way. Schools would also need to ensure ALNCOs are given enough time to complete this effectively.	
We don't need LA officers, we need more teachers and support in school to ensure that pupils receive the education and support they need. The salary of an LA officer will pay for teaching staff and LSA's that are needed in the classroom instead of schools operating on ridiculously small budgets to provide ALN support.	
Training of ALNCOs in putting together provision maps will be necessary to make sure there is parity in the method across all schools.	

9. If you have any further comments that you'd like to make about the funding formula please use this space to give them.

Responses from Consultees	Officer comments
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- E** It is also proposed that the funding formula for the **mainstream schools with specialist centres** is based on pupils on roll that do not attend the specialist centre. How supportive are you of this proposal?

10. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	1	4.55%
Supportive	2	9.09%
Neither supportive nor unsupportive	1	4.55%
Not supportive	3	13.64%
Not at all supportive	14	63.64%
Not applicable	0	0.00%
Not Answered	1	4.55%

11. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
<p>I would presume monitoring of the units would take place as if a low number of places are being accessed then is the unit viable especially with high level of staffing. I think a mid way point would have been better. Actual students - 50% of unit if higher than this then the formula above would work. I do realise the valuable work these units do but they are not consistent across the county and give additional resources to a select group of schools.</p>	<p>LA officers want to work with schools where there are specialist centres to ensure that the staffing of these centres is appropriate. Where relevant, this may include additional funding to support pupils with a very high level of need as well as pupils who are integrating into mainstream classes.</p> <p>The School Funding (Wales) regulations require the authority to reduce the pupil numbers by the number of pupils in places which the authority recognise as reserved for children with special educational needs.</p> <p>Basing the reduction on the actual numbers of pupils attending the specialist centres is the most transparent methodology.</p> <p>This will also support the implementation of the ALN strategy of ensuring that learners are placed in the most appropriate setting for their needs</p>
<p>Pupils in Specialist Centres are also members of their mainstream school. In order to integrate them effectively, and to avoid non-centre pupils from losing out on their provision, other school staff must be involved and staff ratios- in the mainstream classrooms, at play and lunchtime- have to be higher.</p>	
<p>This proposal recognises a previously unchallenged discrepancy.</p>	
<p>I strongly disagree with the proposal that funding of pupils in schools with a specialist centre will be based on the number of pupils on roll who only attend the mainstream setting e.g. if the school has 100 pupils on roll, 4 of whom attend its 12-place specialist centre, the school receives its mainstream funding on the basis of 96 pupils.</p> <p>This proposal will systematically penalise mainstream schools for housing their specialist centre and fails to take into account how specialist centres function.</p> <p>For example, in Llanidloes Primary School, all pupils who attend the KS2 specialist centre are supported in order to reintegrate them as much as possible back into mainstream classes. This is an important part of their progression towards independence. When they are reintegrated into mainstream lessons, they add to the total number of pupils in that mainstream class. This can incur significant additional</p>	

costs including teaching and non-teaching staff. For this reason, all pupils in schools like Llanidloes, including those who attend the specialist centre, need to be included in the total pupil calculation in block 1 of the funding formula. There is simply no sound, fair rationale for failing to do so.

By deducting pupils from the class size calculations, the LA fails to take into account how specialist centre provision works in practice (with pupils moving in and out of the centre according to each child's progress towards resilience). This would financially penalise schools that have specialist centres on site. It leads to a reduction of funding for these schools despite the fact that they have to increase support staff costs (without any additional funding at all in the current formula) to support specialist centre pupils' access to mainstream classes. Neither does it take into account the extra midday supervision often needed for pupils with additional needs.

The proposal to continue this practice of pupil deductions is patently about reducing overall ALN expenditure and is grossly unfair

As previously.
This proposal will systematically penalise mainstream schools for housing a specialist centre and fails to take into account how specialist centres function.

Less money for rest of school, despite having to meet the needs of children in specialist centre, is not right. These children require greater support when they are integrated back into class. Very few children are full time in the specialist centre.

Current formula can also affect a head's pay.

I feel I cannot comment on this as I do not have experience of a setting like this and am unsure of the best approach.

5 x I strongly disagree with this proposal which is grossly unfair.

This proposal will systematically penalise mainstream schools for housing a specialist centre and fails to take into account how specialist centres function.

For example, in Llanidloes High School, all ASD pupils who attend the specialist centre are supported in order to reintegrate them as much as possible back into mainstream classes. This is an important part of their progression towards independence. When they are reintegrated into mainstream lessons, they add to the total number of pupils in that mainstream class. This can incur significant additional costs for an extra class teacher. For this reason, all pupils in schools like Llanidloes, including those who attend the ASD Centre, need to be included in the total pupil calculation in block 1 of the funding formula. There is simply no sound, fair rationale for failing to do so.

By deducting pupils from the class size calculations, the LA fails to take into account how specialist centre provision works in practice (with pupils moving in and out of the centre according to each child's progress towards resilience). This would financially penalise schools that have specialist centres on site. It leads to a reduction of funding for these schools despite the fact that they have to increase support staff costs (without any additional funding at all in the current formula) to support ASD Centre pupils' access to mainstream classes to as great an extent as they can manage.

The proposal to continue this practice of pupil deductions is patently about reducing overall ALN expenditure as it is grossly unfair.

Why not count all pupils instead of penny pinching. No wonder you're in special measures.

Because this is deeply unfair.	
Specialist units need to be supported to deliver the education along with the school. Many specialist units try to support pupils who county are delaying in statementing or who have misdiagnosed but clearly need support. The support units are not a separate entity to the school they are integral to it and the mainstream school and special units work together to support one another. Often pupils who are not statemented but who clearly need a statement have no support form Powys CC and need to be supported by the mainstream school with no additional resources.	
These units cover a large area so may not be correlated to pupils on rule.	
Most pupils in specialist centres attend normal lessons	

F It is proposed that, going forward, local authority officers should **meet with the headteacher and specialist centre** teachers on an annual basis to agree on any additional requirements.

12. How supportive are you of this proposal?

Option	Total	Percent
Very supportive	9	40.91%
Supportive	5	22.73%
Neither supportive nor unsupportive	7	31.82%
Not supportive	0	0.00%
Not at all supportive	0	0.00%
Not Answered	1	4.55%

13. Please explain the reasons for your response / add any comments so that we can consider this further.

Responses from Consultees	Officer comments
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<p>The units need to be supported by the county even though this does sound like an option for more resources whereas I think it should work both ways ie reduction of resources.</p>	<p>The aim of this proposal is to develop closer working between local authority specialists and each of the specialist centres.</p>
<p>How can county possibly understand the requirements of specialist centres without having regular meetings?</p>	<p>Once the new Inclusion structure is in place, regular meetings will be held with specialist school</p>
<p>While it is clearly desirable to establish strong communication between the LA and schools with specialist centres, if this is a half-hearted attempt at trying to address the patently unfair practice of reducing specialist centre pupil numbers from block 1 funding, then I am against the idea. Rather, the LA needs to end the unfair practice of deducting pupils from school rolls.</p> <p>To repeat, this practice is unfair because it systematically penalises mainstream schools for housing a specialist centre and fails to take into account how specialist centres function.</p>	<p>headteachers and teachers at the school. Every specialist centre is different, and the staffing needs vary according to pupil need, number of pupils, age range and language.</p> <p>If a pupil is spending considerable time in mainstream, consideration needs to be made as to whether placement at the specialist centre is still needed.</p>
<p>ALN team need to be supporting specialist centres at all times - they need to know settings and challenges. This can only be accomplished if they go into the centres.</p> <p>Needs to be clear 'line management' and staff need to feel that they have the support from line managers.</p>	<p>Issues raised in relation to pupil numbers has been addressed above.</p>
<p>Meetings with the LA are always beneficial to raise strengths and issues.</p>	
<p>Headteachers know the needs of the school.</p>	
<p>While it is clearly desirable to establish strong communication between the LA and schools with specialist centres, if this is a half-hearted attempt at trying to address the patently unfair practice of reducing specialist centre pupil numbers from block 1 funding, then I am against the idea. Rather, the LA needs to end the unfair practice of deducting pupils from school rolls.</p>	

2 x While it is clearly desirable to establish strong communication between the LA and schools with specialist centres, if this is a half-hearted attempt at trying to address the patent unfairness inherent in reducing specialist centre pupil numbers from block 1 funding, then I am against the idea. Rather, the LA needs to end the unfair practice of deducting pupils from school rolls.

To repeat, this practice is unfair because it systematically penalises mainstream schools for housing a specialist centre and fails to take into account how specialist centres function.

For example, in Llanidloes High School, all ASD pupils who attend the specialist centre are supported in order to reintegrate them as much as possible back into mainstream classes. This is an important part of their progression towards independence. When they are reintegrated into mainstream lessons, they add to the total number of pupils in that mainstream class. This can incur significant additional costs for an extra class teacher. For this reason, all pupils in schools like Llanidloes, including those who attend the ASD Centre, need to be included in the total pupil calculation in block 1 of the funding formula. There is simply no sound, fair rationale for failing to do so.

By deducting pupils from the class size calculations, the LA fails to take into account how specialist centre provision works in practice (with pupils moving in and out of the centre according to each child's progress towards resilience). This would financially penalise schools that have specialist centres on site. It leads to a reduction of funding for these schools despite the fact that they have to increase support staff costs (without any additional funding at all in the current formula) to support ASD Centre pupils' access to mainstream classes to as great an extent as they can manage.

The proposal to continue this practice of pupil deductions is patently about reducing

overall ALN expenditure as it is grossly unfair.	
To ensure the needs of schools are met.	
I have concerns over ensuring the parity of this between schools given the diverse range of ALN learners that there can be.	