

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

16 January 2024

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Cabinet Member for a Learning Powys**

**County Councillor David Thomas
Cabinet Member for Finance and Corporate
Transformation**

REPORT TITLE: School Delegated Budget Funding Formula Review

REPORT FOR: Decision

1. Purpose

- 1.1. To inform members of the responses received to the consultation and to recommend changes to the School Funding Formula for mainstream Primary, Secondary and All-age Schools.

2. Background

- 2.1. It is good practice to maintain a rolling programme of review of the school funding formula. The priority areas for formula review in 2023 were:
- Review the distribution of ALN funding to all Mainstream schools;
 - Review how the formulae take account of factors related to deprivation and disadvantage; and
 - Review of distribution of funding for premises, including utilities.
- 2.2. The School Funding (Wales) Regulations 2010 require that the authority consults with the governing bodies of all its schools and with the Schools' Forum on any changes to the school funding formula.
- 2.3. A Formula Review Group was established in 2023 with a range of stakeholders, including headteachers and chairs of governors from each school sector, along with Council officers. The group has met on two occasions, in July and September 2023 to review the existing formulae, before developing a set of proposals for Primary, Secondary and All age schools.
- 2.4. Between meetings, officers undertook detailed work on the areas for review and proposals to be considered, bringing that work back to the FRG for discussion. Comparisons with funding formulae from other Welsh authorities were also undertaken.

- 2.5. Schools were consulted on the proposed changes over four weeks between 7 November to 1 December 2023.
- 2.6. The aim of the proposed changes are to support transparent and equitable funding arrangements for Primary, Secondary and All age schools, which will:
- Create a **more equitable provision for all learners** across Powys
 - **Support the aspirations of the transformation programme**
 - **Support all learners** including helping **offset the effects of disadvantage**
 - **Support a collaborative schools' community** which offers effective professional learning to facilitate the self improving system.
 - **Support inclusion and bilingualism, and promote access to excellence for all learners.**
- 2.7. The proposals are intended to support the distribution of funding to every Primary, Secondary and All age school in Powys. The allocation of funding within the school remains a matter for the headteacher and the Governing Body within the quantum delegated to them and the regulations that apply to the local management of schools.

3. Consultation Proposals

Amending the Notional ALN funding: Primary, Secondary Phase Mainstream Schools

- 3.1. The current mainstream primary phase formula allocates the notional ALN funding (totalling £1 million) to mainstream primary schools and the primary phases of all age schools based on the following proxy indicators using three-year averages of the current academic year and the previous 2 years.
- Learners on the Special Educational Needs (SEN) / ALN Register (80% / £800,000)
 - Learners entitled to Free School Meals (eFSM) (20% / £200,000)
- 3.2. The current secondary phase formula allocates notional ALN on the following bases:
- ALN Lump sum – 1 full time equivalent (FTE) Additional Learning Needs Coordinator (ALNCo) and 1 FTE pastoral teaching assistant (TA) support, totalling £1.2m . There are no proposals to change this element of the secondary phase formula.
 - “First class of 15” funding includes £1.536 million of notional ALN funding – each year group in each stream and on each site that has 16 or more learners is funded for an initial teacher-learner ratio of 1 FTE teacher to 15 learners. It does not take account of the number of learners with ALN or eligible for FSM and does not differentiate between them. The total funding distributed through this element of the formula amounts to £3.007 million, of which £1.536 million was the notional ALN funding used to fund the “First class of 15” and £1.471 million was general schools delegated funding, including disadvantaged learners.

- 3.3. Some learners with ALN also draw in band-led funding, provided to the school to supplement formula funding. This is drawn from the “ALN Retained” budget which totals £1.670 million.
- 3.4. In addition to the Notional ALN funding for primary schools with specialist centres, the learners in those centres are included within their overall learner numbers at a rate of 50% to allow for re-integration. This is not the case for secondary phase schools with specialist centres.
- 3.5. By changing the methodology for distributing notional ALN funding to schools and delegating the majority of funds, there are benefits for all stakeholders and the potential to reduce the long term societal and financial costs associated with learners who may struggle without early intervention and consequent proper support.
- 3.6. The distribution mechanism for notional ALN in the primary and secondary formulae need to be aligned and based on the same proxy indicators to ensure equity for all and a continuum of support across their educational career. Aligning primary and secondary funding formulae and basing them on the same proxy indicators can offer several advantages:
 - Equity: It will promote a more equitable distribution of resources, ensuring that both primary and secondary schools receive funding based on similar criteria, which can be used to target the specific needs of learners, reducing disparity in quality and level of support. Schools that have high levels of learners with ALN will receive higher levels of funding, irrespective of which phase of education the learners are in to enable them to provide the necessary interventions and support
 - Consistency: Using the same proxy indicators for both phases of education creates a consistent and transparent funding system, making it easier for headteachers to understand and manage resources.
 - Targeted Support: Common proxy indicators can help identify specific needs across a learners’/cohort's entire educational journey, allowing for more targeted support and interventions throughout a learners’ schooling.
 - Efficiency: Aligning funding formulas simplifies administrative processes leading to more efficient resource allocation.
 - Accountability: A consistent approach to funding can enhance accountability as it becomes easier to evaluate the effectiveness and impact of investments in ALN resources based on common indicators.
 - Learner Transitions: When funding is aligned, the transition from primary to secondary education can be smoother for ALN learners, as the same criteria are used to allocate resources and enabling resources to ‘transfer’ with a learner, wherever they go.
 - Local Autonomy: It allows schools to have more control over their budget, enabling them to tailor support and resources specific to the needs of their ALN learners.

- Empowerment: It enables school leaders and staff to make decisions that benefit their ALN learners in their school to ensure learners receive the right support to reach their full potential.
 - Staff retention could be improved as longer-term contracts could be offered to staff instead of short, fixed term contracts giving stability within the workforce.
- 3.7. The authority is keen to move to using the new categories of ALN as the basis for distributing the notional funding for ALN in the mainstream school funding formulae. It is also keen to increase the amount delegated through the mainstream formulae at the start of the financial year and to minimise the ALN retained budget. It is anticipated that this will reduce the administrative burden on schools' staff and on authority officers of the current PIP or ERP processes. It will also give headteachers greater flexibility in how they utilise resources to meet the specific needs of their learner demographic.
- 3.8. **It is proposed** that the ALN retained budget be reduced to £300,000 per annum, which would only be available to provide funding to new complex presentations of ALN, whether through a learner being new to a Powys school or a learner suffering a life-changing event / illness. This budget would also be expected to provide funding to Special Schools for any learner number adjustments required at the start of each academic year.
- 3.9. **It is proposed** that of the following funding streams:
- The remaining £1.370 million of the ALN retained budget (which also currently provide band-led funding to schools); plus
 - The £0.800 million delegated through the notional ALN element of the current mainstream primary phase formula; (this equates to the total £1.000 million less the £0.200 million currently distributed on the basis of free school meal eligibility); plus
 - the £1.536 million ALN funding currently delegated through the “First class of 15” element of the mainstream secondary phase formula be pooled to provide a total of £3.706 million to be distributed as notional ALN funding to all mainstream schools.
- 3.10. **It is proposed** that the total of £3.706 million notional ALN funding for mainstream schools is distributed to schools based on the number of learners each mainstream school has in each of the new categories of ALN, namely ULP, School IDP and LA IDP. **It is further proposed** that this would no longer be supplemented by additional band-led funding.
- 3.11. **It is proposed that** this data would be extracted from the TYFU system on the same date as the locally agreed date for the learner count date, i.e. the first Friday following the Autumn half-term (also known as the “November count date”).

- 3.12. In order to ensure that the funding distributed in this way does not exceed the £3.706 million available, it is necessary to be able to measure each category in relation to one another to establish a relationship between each category, which should equate to the differing levels of additional support needed for each category. **It is proposed** that each category is expressed as a “ULP equivalent”. The ratios to be applied to the model are set out in the Consultation document.
- 3.13. **It is also proposed** that where there are existing one-off arrangements for specific funding agreements with individual schools, these continue. In these circumstances a learner will have had a statement of special educational need for a significant time, and as a result may have had resources attached to a specific element of the statement. It would be unreasonable to immediately remove this. However, when the learner's statement of special educational need is converted to an IDP, it will be reviewed to determine whether it is still required. If the new proposal is accepted and implemented it is anticipated that the delegated funds will adequately replace previous funding agreements.
- 3.14. **It is proposed** that there is an adjustment to the learner numbers for secondary schools for 50% of the learners registered in the secondary phase specialist centres.
- 3.15. In order to minimise the risk of inconsistency between schools / clusters across Powys, **it is proposed** that ALN officers will undertake a thorough, systematic and careful quality assurance process as set out in Section 4.5.4 of the consultation document.

Revising the teaching and learning top ups: mainstream secondary phase schools

- 3.16. The current methodology for teaching and learning top ups in the secondary phase formula includes the “First class of 15” funding which would be removed if the proposed amendments to distributing notional ALN funding are agreed. This means that the teaching and learning top ups in the mainstream secondary phase formula need to be recalculated, to remove this element of funding or this will unfairly disadvantage those schools that do not receive teaching and learning top ups.
- 3.17. **It is proposed** that the top ups for individual schools, language streams or campuses with fewer than 600 learners will now be calculated as set out in the tables in the consultation document for years 7-9 (table 3) and for years 10 and 11 (table 4).

Disadvantaged Learners – Primary and Secondary Phase schools

- 3.18. The School Funding (Wales) Regulations 2010 stipulate that “A local authority must, in determining budget shares for both primary and secondary schools which they maintain, take into account in their formula a factor or factors based

on the incidence of social deprivation among pupils registered at all such schools”.

- 3.19. For the purposes of funding distribution, it is considered that this funding is provided to support all disadvantaged learners regardless of their socio-economic background.
- 3.20. This is addressed in the current mainstream primary phase formula by distributing £200,000 across all mainstream primary settings based on the three-year average number of eFSM at each school.
- 3.21. The current methodology through the mainstream primary phase formula provides the same amount per learner eligible for eFSM, regardless of the overall proportion of the school’s population that is eligible for eFSM.
- 3.22. It is noted that currently there is no equivalent allocation for mainstream secondary settings. Instead, in the secondary phase formula, each school receives an amount to cover the cost of the free school meals provided, which could not be used to support disadvantaged learners (the funding for this was included within the 1:15 funding). In 2022-23, £298,573 was allocated to secondary phase schools in relation to this. Secondary schools will continue to receive an amount to cover the cost of the free school meals provided.
- 3.23. Powys County Council is ‘work[ing] to tackle poverty’ in order ‘to deliver better outcomes for those who experience inequality and socio-economic disadvantage’.
- 3.24. When considering school spend and empirical evidence, the “Review of School Spending in Wales” in 2020 noted that ‘a 10% increase in spending has been found to improve education and later life earning by about 7-10%’. These effects are larger for disadvantaged learners.
- 3.25. The Review also recognised that ‘[t]here is a strong empirical evidence base showing that higher school spending has a larger, positive effect on learners from deprived backgrounds and can play a major role in reducing the attainment gap. As a result, the Review stated that ‘local authorities should therefore prioritise extra funding for deprivation’.
- 3.26. The impact of the covid pandemic and the cost-of-living crisis on learners and their families is recognised nationally, regionally and locally. To enable our schools to support disadvantaged learners we are proposing that funding is redistributed equitably across all phases based on the eFSM eligibility indicator.
- 3.27. **It is proposed** that a multiplier is used to increase the weighting of the eFSM indicator as the proportion of the school population that is eligible for eFSM increases, as set out in the table 5 of the consultation document.

Premises element of funding formulae – Primary and Secondary Phase schools

- 3.28. The current formula methodology for premises funding is based on a standard rate per square metre (SQM) for all mainstream and special schools, as shown in the extracts from the current formula descriptions and in section 7.1.1 of the consultation document. The current formula do not take account of whether the school hosts a school kitchen.
- 3.29. Energy costs have experienced significant inflationary increases, but these have not been uniform, either in terms of scale or timing, across the different fuel types currently used by schools for heating fuel. This has resulted in the standard amount per square metre not reflecting the differences in schools' relative need to spend, depending on their main fuel type used for heating.
- 3.30. Schools have also raised concerns about the impact that hosting working kitchens is having on their budget positions.
- 3.31. **It is proposed** that the funding rate per square metre for grounds and premises is revised to exclude utility costs and any additional costs associated with hosting a working kitchen. This new rate would be the standard premises funding that applies to all schools.
- $\text{Sqm of school} \times \text{base rate per sqm (excluding utilities)} = \text{standard premises funding}$.
- 3.32. **It is further proposed** that a utility specific rate per square metre is used to provide funding for schools based on the main fuel used for heating.
- $\text{Sqm of school} \times \text{utility specific rate per sqm} = \text{utilities related funding}$
- 3.33. In addition to this, **it is proposed** that a utility top-up is applied to schools with working kitchens based on a rate per SQM of the kitchen areas.
- $\text{Sqm of kitchen area} \times \text{applicable top up rate per sqm} = \text{Kitchen top up}$

Proposed Implementation

- 3.34. Changes to a distribution method will cause changes to individual schools' total funding, and there can be a risk of significant re-distribution if the proposed changes are significantly different from the existing distribution methodology. How this is managed is key to a school being able to ensure continuity and smooth transitioning for the staff and learners. Should a school need to make staffing reductions as a result of the redistribution, then sufficient time needs to be allowed to the appropriate processes to take place.
- 3.35. **It is proposed** that the implementation of the proposed formula is staggered over 2 years to mitigate any risk and minimise disruption. This will also give the opportunity to review the impact of the new distribution methodology during the first year. It is proposed that the proposed changes for the distribution of funding is phased as follows:
- Year 1 = 50% new formula, 50% current formula

- Year 2 = 100% new formula

Please note the timing and pace of proposed implementation may change depending on the outcome of wider budget discussions.

4. Responses to the Consultation

4.1. 15 responses to the consultation (13 of which were schools)¹, which is just under 15% of the 86 maintained schools in Powys (analysed by sector below, alongside the number of schools actively engaged in the formula review process during 2023). Each response is set out in detail in Appendix B along with officers' comments to any narrative responses.

School Sector	Number of schools	Consultation responses*	Represented on Formula Review Group (FRG)*	Represented on Schools Forum*	Total
Primary	72	11	3	5	19
Secondary	8	1	3	2	6
All-Age	3	1			1
Special	3	0	2		2
Unknown		1			1
Schools Forum		1			1
Total	86	15	8	7	30

* Each school is only included once in the table above – If schools represented on the FRG or on Schools Forum responded to the consultation, they are not included in the FRG or SBF numbers. If any schools are on both FRG and Schools' Forum, and did not respond then they are only included within the FRG numbers.

In addition, all Chairs of Governors and headteachers were invited to a meeting with the Head of Education on the 29 November 2023, in which the proposals were presented in full. The Head of Finance (Section 151 Officer) was also in attendance at the meeting.

Amending the Notional ALN funding: Primary, Secondary Phase Mainstream Schools (Questions 4 – 12)

¹ 13 schools responded to the previous consultation in Autumn 2022, equating to 15% of schools.

- 4.2. 13 responses were received in respect of Q4 and whether the secondary phase “First Class of 15” adequately reflects the variance in characteristics of learner cohorts, and therefore the relative level of ALN support required in secondary phase schools. Of the 13 that responded 8 were Neutral and 5 Agreed/Strongly agreed. There were 4 responses to the narrative question in relation to the “First Class of 15” which are set out in Appendix B.
- 4.3. Questions 6 and 7 related to maximising the delegation of ALN funding. There were 13 responses, 10 agreed / strongly agreed, with 2 neutral and 1 disagree. There were 9 responses to the narrative question.
- 4.4. Questions 8, 9 and 10 related to basing the distribution of notional ALN funding on the number of learners in ULP, School IDP and LA IDP categories, when the data should be extracted and the relative weightings of each category. Overall, the responses to questions 8 – 10 were a mixture of supportive (in the main) and neutral responses, with 3 disagreeing / strongly disagreeing with using the new categories (Q8), 1 disagreeing with extracting the data on November Count Date, in line with the pupil number data extraction (Q9) and 3 disagreeing with the ratios for the 3 categories (Q10). The narrative responses to question 12 (set out in Appendix B provide further context for the unsupportive responses in particular. The main element of concern related to whether the funding provided would support full time 1:1 support for a learner with ALN.
- 4.5. Question 11 related to extending the adjustment made to pupil numbers in the mainstream secondary phase of a school for 50% of the learners attending a specialist centre attached to a school, as is currently the case for primary schools with specialist centres. This allows for reintegration into mainstream classes.
- 4.6. The view of officers is that the formula proposals should be implemented as proposed.

Revising the teaching and learning top ups: mainstream secondary phase schools

- 4.7. Of the 12 responses received for question 13 **all** were either neutral (8) or agreed (4) with the revised teaching and learning top ups.
- 4.8. The view of officers is that the amendment should proceed as proposed.

Disadvantaged Learners – Primary and Secondary Phase schools

- 4.9. Respondents were largely supportive of the proposals in relation to amending the formula to place a greater weighting for disadvantaged learners.
- 4.10. Question 15 asked whether to use eFSM eligibility as an indicator within the formula to support disadvantaged learners received 14 responses. 11 agreed/strongly agreed, and 3 disagreed. Those that disagreed were concerned about the robustness of the eFSM indicator in light of Free school

meal roll out. Concerns were also raised about families that experience deprivation but are not eligible for Free School Meals. These are addressed in Appendix B

- 4.11. Question 16 and 17 were over 90% supported/neutral, 13 of 14 agreed that the relative need to spend increases as the proportion of disadvantaged learners in a school increases (Q16). 10 of 14 agreed with multiplier factors set out in the consultation document, 3 were neutral and 2 disagreed.
- 4.12. With the support of respondents, the view of officers is that the proposals should be implemented.

Premises element of funding formulae – Primary and Secondary Phase schools

- 4.13. 13 respondents agreed or strongly agreed with the proposals in relation to the premises element of funding formulae, with 1-2 neutral responses to each question and no disagreement.

Implementation of the proposed formula changes

- 4.14. 12 of 14 responses were in support of the proposed implementation over 2 years of the changes consulted upon. There was a request within some of the responses that modelling is provided as soon as possible.

5. Feedback from Schools Forum

- 5.1. The Schools Forum has been involved from the outset in identifying issues in the formula that needed to be addressed and in working through the options for change. The Forum has now seen the results of the consultation and is pleased to support the recommendations for changes to the formula. The proposed changes will help to ensure that funding will go to where it is needed most and, at the same time, will increase delegation of funding to schools to help address Additional Learning Needs.
- 5.2. However, the Forum is of the view that the Cabinet should be informed, before making a decision, about the impacts these changes will have on different types of school. The Forum did not have this information so does not know which types of school will benefit financially and which will not, e.g. will these changes result in primary schools receiving a greater share of the available funding than is currently the case or dual stream schools doing less well than single stream schools?
- 5.3. In considering this matter the Forum recognised that these proposals do not recommend any real terms increase in the delegated budget for schools. The Forum understands that the Council is facing extreme financial pressures and is endeavouring to protect the level of funding to schools and, in these circumstances, understands why it is necessary for schools to continue to find ways to make existing resources go further. They have, of course, been doing this for many years and will continue to do so.

- 5.4. However, it is important for the Cabinet to note that the funding in the formula to enable schools to meet (i) the additional learning needs of pupils, (ii) the costs of maintaining their buildings/grounds and (iii) their energy costs, has not seen a real-terms increase in recent times. This against a background of well documented increases in the costs of energy and property maintenance and the information provided by schools about the increasing number of pupils with additional learning needs.
- 5.5. The transformation agenda aims to help deal with this by making more effective use of funding in future when there are fewer schools but that will take many years to be fully realised. In the meantime, it is important to recognise that, with the current level of funding, schools will find it increasingly difficult to meet the needs of all their pupils.

6. Resource Implications

- 6.1. Current modelling of the proposed changes to the Mainstream schools' formulae indicates that the changes can be implemented within the current budget envelope. This modelling has been shared with Cabinet prior to decisions being made.
- 6.2. As with any change to a distribution formula, there will be some redistribution between schools as a result of the changes. Phasing in implementation will allow time for schools to plan for these changes in a managed way. The table below summarises the estimated change per sector, the net additional funding is found from the existing ALN budget the authority holds centrally, as set out in the formula consultation.

	Indicative Funding 24-25 as @ Sept 23	Revised Indicative Funding 24-25 after formula changes	Total change in funding	Total Change as % of original indicative funding for 24-25
	£	£	£	%
Primary	38,364,700	38,845,800	481,100	1.25%
Secondary	33,798,900	33,956,600	157,700	0.47%
All-Age	10,785,300	10,561,600	-223,700	-2.07%
	82,948,900	83,364,000	415,100	0.50%

- 6.3 Of the £3.7m highlighted in Section 3.9, £2.3m is already within the formula with a further £0.9m already distributed to schools as band-led funding or previously agreed for unique circumstances, leaving £0.4m of the £1.3m ALN retained currently to be added in.

- 6.4 The Head of Finance (Section 151 Officer) notes the content of the report and can support the recommendation.

7. Legal implications

- 7.1. Legal : The School Funding (Wales) Regulations 2010 set out the requirements of the School Funding Formula. The proposed school funding formula meets the requirements set out in the Regulations.
- 7.2. The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: " I note the legal comment and support the recommendations

8. Climate change & Nature Implications

- 8.1. The proposals do not have any climate change or nature implications.

9. Data protection

- 9.1. The proposals use pre-existing data that is already processed and managed in line with the Council's data protection procedures.

10. Comment from local member(s)

- 10.1. Not applicable

11. Impact Assessment

- 11.1. The proposed formula and scheme changes will lead to a stable, transparent and fair funding arrangement for Powys learners and schools. The proposed formula changes will create more equitable funding provision for all primary and secondary mainstream schools across Powys, supporting inclusion and all learners regardless of their additional learning needs or disadvantage. Risks to schools with a reduced level of funding will be mitigated by phasing in of the proposals, providing support for schools to reduce their costs and access to the wider "Team around the School" to support them with the transition.

12. Recommendation

- 12.1. It is recommended that:

- 12.1.1. the proposals for the distribution of Notional ALN funding as set out in paragraphs 3.8 to 3.15 are agreed;
- 12.1.2. the amendments to the Teaching and Learning Top ups for Secondary Phase as set out in paragraph 3.17 is agreed;

- 12.1.3. the proposals for distribution of funding for disadvantaged Learners – Primary and Secondary Phase schools as set out in paragraph 3.27 are agreed;
- 12.1.4. the proposals for distribution of the premises elements of the formula as set out in paragraph 3.31 to 3.33 are agreed;
- 12.1.5. the implementation of these changes are phased to mitigate the impact of redistribution between schools as set out in paragraph 3.35;
- 12.1.6. the implementation of these changes be reviewed as part of the Formula Review Group’s ongoing work programme.

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PRIMARY SCHOOLS

Question Ref	Q1 (Name of School:)	Buttington Trewern CP School	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Agree	
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Agree	
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Strongly agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the	Strongly agree	

	first Friday following the Autumn half-term, as agreed locally?)		
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Agree	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Agree	
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Agree	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Agree	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Strongly agree	

	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	From our perspective our whole building operates on a one zone heating system which is not a cost effective mechanism which is therefore not directly comparable to other buildings that can better control their heating use.	Comment noted
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Strongly agree	
	Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)	Two year phasing is manageable.	Comment noted

Question Ref	Q1 (Name of School:)	Ysgol Golwg Y Cwm	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q3 (If no, please provide further information:)		

	<p>Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)</p>	<p>Agree</p>	
	<p>Q5 (Please provide any additional comments you have in relation to the existing “First class of 15” distribution mechanism.)</p>	<p>This is not a fair and equitable system. ALN learners should be funded specifically according to their needs and not by a notional number of pupils within the school.</p>	<p>Comment noted</p>
	<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	<p>Strongly agree</p>	
	<p>Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)</p>	<p>Delegating the maximum amount of funding whilst retaining the minimum amount of funding for emergencies allows schools to have autonomy over their spending. It allows schools to plan for the provision needed for their pupils and to be flexible in responding to changing needs within their school at any time. Schools can directly address the specific needs of their individual pupils and ensure bespoke packages of provision which will allow best outcomes both educationally and socially and emotionally for these pupils.</p>	<p>Comment noted</p>

	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	<p>Strongly agree</p>	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)</p>	<p>Strongly agree</p>	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	<p>Strongly agree</p>	
	<p>Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)</p>	<p>Strongly agree</p>	
	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>We feel that this proposal is a far more equitable system which directly meets the needs of individual learners and allows schools to manage provision appropriately in a timely manner. It will allow for schools to be more proactive and less reactive in their planning for all learners with ALN. This system if adopted appears to have benefits with regard to workload for ALNCO's.</p> <p>We feel that taking numbers from the TYFU system will be the most accurate way of collecting data.</p>	<p>Comment noted</p>

	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Neutral	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Strongly agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Strongly agree	
	Q18 (Please provide any additional comments you have in relation to the proposed distribution of funding to support disadvantaged learners.)	We strongly believe that disadvantage learners require additional provision, to ensure equitable outcomes that schools should be duty bound to provide.	Comment noted
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Strongly agree	

	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Strongly agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	Consideration needs to be made for schools with community based provisions which host additional spaces and which are open for the public and multi agency use for 50 week per year.	Each school should have a Lettings Policy which outlines how third parties and community groups are charged for the use of the building. The expectation is that charges are made on a full cost recovery basis.
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

Question Ref	Q1 (Name of School:)	Crossgates CP School	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	

	<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	Strongly agree	
	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	Agree	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally)?)</p>	Agree	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	Neutral	
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	Agree	
	<p>Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)</p>	Agree	
	<p>Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)</p>	Agree	

	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Strongly agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

Question Ref	Q1 (Name of School:)	Llanfaes	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	

	<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	Disagree	
	<p>Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)</p>	<p>Fraught with issues regarding headteacher level of accountability for support of ALN pupils, issues with movement of pupils between schools in mainstream during a year, level of funding suggested will be insufficient for the needs and will put schools in the insidious position of choosing between children for support. Level of need is higher in schools than ever yet the funding will not be. Fluctuations of need in year need to be catered for - taking data on one day will not facilitate this.</p>	<p>Governing bodies of schools have a responsibility to ensure that provision for learners is adequate to meet the needs of all their learners. With this model, the level of funding for the most complex learners (those with an LA IDP) will be higher than has ever been delegated to schools previously. The model ensures that the funding is provided to the learners, and therefore schools, that have the highest level of need.</p>
	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	Disagree	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the</p>	Disagree	

	first Friday following the Autumn half-term, as agreed locally?)		
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Disagree	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Agree	
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Neutral	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Neutral	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	

	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	
	Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)	Schools need to have the proposed changes modelled for their own budgets asap - had this been available perhaps responses would be different?? Fundamentally, we need to remember this is not about figures but about children and people.	All options have been fully modelled, scrutinised and tested by officers on an individual school basis. It is the underlying principle of the changes that is for consultation and schools will be fully supported through the implementation of these should they be approved.

Question Ref	Q1 (Name of School:)	Builth Wells Primary School	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	No	
	Q3 (If no, please provide further information:)	Headteacher only	

<p>Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)</p>	<p>Neutral</p>	
<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	<p>Agree</p>	
<p>Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)</p>	<p>I agree that it would simplify things to delegate this funding directly to schools but it does depend upon effective systems to monitor and challenge schools on numbers with IDPs. This could prove to be even more involved and time-consuming. ALNCo's don't have time to do all the moderation of other schools that is required and there appears to be no proposal to pay them any additional money for a management responsibility which goes beyond the ALNCo's own school.</p> <p>What happens with children with IDPs who join the school after the funding count or who move onto an IDP during the year?</p> <p>Will schools with specialist centres get the full amount for each pupil with an IDP registered at the centre?</p> <p>Will we be able to access funding for resources other than staffing, especially expensive items such as hoists?</p>	<p>This model proposes delegating the majority of funding to schools, with the council retaining a small amount for those moving into the county that have significant needs or for when a learner suffers a life changing injury or medical condition. There will be no other retained funds and schools will not be able to ‘apply for additional funds’. Any changes to school premises will be considered through the relevant corporate channel. Specialist equipment, such as hoists, will continue to be funded by the appropriate body.</p> <p>A School IDP is a legal document and therefore what is written in this document must be provided. If a learner is stated as having needs that require ALP at a School IDP level, then this must be provided, else this contravenes the ALN Act. The council will provide robust challenge and quality assurance for ensuring that ALN registers are accurate.</p>

		<p>It is important to keep a retained budget but will it be enough and how will schools access this?</p>	<p>The options will be phased in over a two year period. The current model uses a 3 year average of the data and it is proposed that this continues with the new model. As the new model uses a new set of data that has not previously been recorded, a 3 year average will not be available in years one and two but these years will be subject to the phased implementation. A 3 year average will be available from the third year following implementation.</p> <p>A review of the ALN strategy will commence in January; Specialist Centres will be part of that review, and this will include reviewing the funding arrangements.</p>
	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	<p>Agree</p>	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)</p>	<p>Neutral</p>	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	<p>Disagree</p>	

	<p>Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)</p>	Neutral	
	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>Concern that the proportion afforded to LA IDPs is not sufficient. This category includes a wide range of ALN some of which can be very expensive to meet need if additional staffing and specialist resources are required. What would be the process for accessing some of the £300,000 retained funding and would we have to reapply each year?</p>	<p>Schools will not be able to access any of the retained emergency funding. At the end of the financial year whatever remains will be fully delegated across all schools through the formula.</p> <p>Currently, when a learner with a statement is 'banded' a mainstream school would usually only have access to funds for a lower level, e.g. between Band 1 to Band 4 (£3k - £8k). This model proposes that all LA IDP learners, whatever, the complexity of need will all receive the higher amount (indicatively modelled at £10k - this may change dependent on future numbers), therefore, schools will receive more funding than previous years.</p>
	<p>Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)</p>	Neutral	
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	Agree	
	<p>Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)</p>	Agree	
	<p>Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of</p>	Agree	

	social deprivation among learners within a school's population?)		
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	I agree in principle but it is hard to say with any certainty without seeing how we would be impacted by this change. Similarly, I agree in principle with the kitchen top up. Our meals are going to be cooked at County Hall. Who will get the kitchen utility top up then? As the take up for free school meals continues to increase with the roll-out, we are needing more kitchen staff to manage this. Has this been factored in as a growing cost?	<p>Comment noted.</p> <p>The kitchen utility top will be payable to the school building in which the meals are prepared and cooked if they are not prepared in a school building then this formula does not apply as this only applies to schools delegated.</p> <p>Kitchen staff are employed by the Catering Team who will ensure there are appropriate staffing levels for the number of meals being provided.</p>
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

	<p>Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)</p>	<p>Please can we see some modelling of the new formula in different contexts?</p>	<p>All options have been fully modelled, scrutinised and tested by officers on an individual school basis. It is the underlying principle of the changes that is for consultation and schools will be fully supported through the implementation of these should they be approved. The consultation document provided detail of the ALN and deprivation changes which would enable schools to calculate estimated funding for these areas. The premises element has been modelled but due to the unique circumstances of each school, working examples would not be beneficial due to the complexity of the data behind the calculations.</p>
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Question Ref	Q1 (Name of School:)	Guilsfield	Response
	<p>Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)</p>	<p>No</p>	
	<p>Q3 (If no, please provide further information:)</p>	<p>This is the response from the headteacher following the Budget meeting held on 29.11.23 where the elements were explained.</p>	<p>Comment noted</p>

	<p>Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)</p>	Neutral	
	<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	Agree	
	<p>Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)</p>	It will give schools more flexibility and enable them to plan support more effectively.	Comment noted
	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	Strongly disagree	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally)?)</p>	Neutral	
	<p>Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)</p>	Neutral	

	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>The funding attached to LA IDP's may see learners having support drastically cut, £10,000 per learner would not cover half the amount needed for a one to one support. Using more of the ALN funding allocated to the school would impact on the other ALN learners and also relies on there being enough pupils in other criteria to fill the funding gap.</p>	<p>Currently, when a learner with a statement is 'banded' a mainstream school would usually only have access to funds for a lower level, e.g. between Band 1 to Band 4 (£3k - £8k). This model proposes that all LA IDP learners, whatever, the complexity of need will all receive the higher amount (indicatively modelled at £10k - this may change dependent on future numbers), therefore, schools will receive more funding than previous years</p>
	<p>Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)</p>	<p>Neutral</p>	
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	<p>Disagree</p>	
	<p>Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)</p>	<p>Disagree</p>	
	<p>Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)</p>	<p>Neutral</p>	
	<p>Q18 (Please provide any additional comments you have in relation to the proposed distribution of funding to support disadvantaged learners.)</p>	<p>I think there needs to be a base level of funding to provide support and often training for staff, such as RADY and then an element of funding per learner.</p>	<p>Comment noted.</p> <p>If there was a base level of funding, the per learner amount would be reduced.</p> <p>RADY is fully funded by the local authority as part of a three-year programme.</p>

	<p>Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)</p>	<p>Strongly agree</p>	
	<p>Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)</p>	<p>Strongly agree</p>	
	<p>Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)</p>	<p>Funding should also look at how we make the buildings more efficient, with a clear timescale of when and how issues would be addressed, such as replacing metal window frames.</p>	<p>Capital works are funded via major improvement funding, which is separate to delegated funding.</p>
	<p>Q22 (Do you agree that there should be separate top up for schools with working kitchens?)</p>	<p>Strongly agree</p>	
	<p>Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)</p>	<p>Agree</p>	
	<p>Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)</p>	<p>I think the explanation of the elements should have been at the beginning of the consultation so that everyone was clear on what they were being consulted on. To have that meeting a day before the consultation closed is unfair. It would also be beneficial to have our budget plan modelled to show how these changes actually look, considering I sat through a budget surgery two weeks ago and now the budget will look very different.</p>	<p>As with all formula changes, these proposals are subject to Cabinet approval, and it will not possible to include these changes in individual school budgets in advance of this. When full budget packs are released to schools in the spring term, surgery sessions are held again with all schools to review the positions and provide support to schools to manage any changes to the estimated positions for future years. The consultation document provided detail to enable schools to estimate the funding they would receive for ALN and Deprivation based on their knowledge of their learner population.</p>

Question Ref	Q1 (Name of School:)	Ysgol Bro Tawe	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Agree	
	Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)	Even though we agree with this proposal we are concerned that there will be a lack of funding for in year new arrivals who have significant ALN needs.	The council will retain a small amount of funding for new arrivals moving into the County with significant ALN needs.
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Disagree	

	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally)?)</p>	Neutral	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	Disagree	
	<p>Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)</p>	Neutral	
	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>- Concerns over LA IDP funding - huge discrepancy in level of need for pupils with LA IDP, e.g: ASD pupil that requires 1:1 funding throughout school day compared to a child that needs academic support in class. -50 x ULP - what does this mean? Will it provide sufficient support for a child with significant needs? - Difference of opinion between schools on what the criteria for ULP / IDP are will determine which schools get the greater funding. -</p>	<p>Currently, when a learner with a statement is 'banded' a mainstream school would usually only have access to funds for a lower level, e.g. between Band 1 to Band 4 (£3k - £8k). This model proposes that all LA IDP learners, whatever, the complexity of need will all receive the higher amount (indicatively modelled at £10k - this may change dependent on future numbers), therefore, schools will receive more funding than previous years</p>
	<p>Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)</p>	Neutral	
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	Strongly agree	

	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Agree	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

Question Ref	Q1 (Name of School:)	Ysgol Trefonnen	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	

	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	<p>Agree</p>	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally)?)</p>	<p>Strongly agree</p>	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	<p>Agree</p>	
	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>Provided the information comes off Tyfu and not Teacher Centre which does not currently record ULP, we have no issue with the data being used from the pupil count date.</p> <p>That said we agree with the ratio's in contained within table 1 but we think that where a fulltime or considerably substantial 1:1 is identified this should come with additional figure and the figure quoted of 50x£200 would not be sufficient to cover the costs of a 1:1, meaning other pupils will be left disadvantaged as the school has to cover the cost for pupil safety.</p>	<p>Comment noted.</p> <p>Currently, when a learner with a statement is 'banded' a mainstream school would usually only have access to funds for a lower level, e.g. between Band 1 to Band 4 (£3k - £8k). This model proposes that all LA IDP learners, whatever, the complexity of need will all receive the higher amount (indicatively modelled at £10k - this may change dependent on future numbers), therefore, schools will receive more funding than previous years</p>
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	<p>Strongly agree</p>	

	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Strongly agree	
	Q18 (Please provide any additional comments you have in relation to the proposed distribution of funding to support disadvantaged learners.)	<p>Currently this money can be used to support the most vulnerable and disadvantaged pupils, and ideally using the economies of scale by combining ALN and eFSM pupil money to buy-in schemes that support both.</p> <p>Our breakfast club currently is 50% attended by eFSM pupils who are having a better day by having a relaxing morning in breakfast club and not rocking up to the gate at 9, or more likely 9:30, hungry, distressed or stressed.</p> <p>These schemes have substantial impact on pupil wellbeing, that promotes the best possible learning.</p>	This element of the proposal would continue to support schools to target the funding to support vulnerable and disadvantaged learners as they feel appropriate.
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Neutral	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Neutral	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	We are not sure if this affects our school or not, but if it means fairing and more funding for our school, to support our pupils are in agreement.	Comment noted.

	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Neutral	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Strongly disagree	
	Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)	We feel that we would rather see this implemented in April 2025, following a count date in November 2024. This will reduce the amount of confusion and disruption and leaves school knowing exactly where they are in October 2024 based on predicted pupil numbers. We feel a 2-year lead in just doesn't make sense.	Comment noted.

Question Ref	Q1 (Name of School:)	Ysgol Cefnlllys	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led	Strongly agree	

	funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)		
	Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)	Schools need more funding and central services can feel too heavy at times.	Comment noted.
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Strongly agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally)?)	Neutral	
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Neutral	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Neutral	
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Agree	

	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Agree	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Strongly agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Strongly disagree	

Question Ref	Q1 (Name of School:)	Arddleen County Primary	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Agree	
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)	Agree	
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Agree	

	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Neutral	
	Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)	The risk mentioned in para 4.5.1 is significant	Comment noted.
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Neutral	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Disagree	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	

	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	we are not clear how this new formula will be applied [in particular the square meterage] when the school rents a village hall -which forms part of the same building as the school-as theri assembly hall and other purposes during the school day	Funding of rented halls has a separate element within the formula and there are no proposals to amend this principle.
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

Question Ref	Q1 (Name of School:)	Ysgol Gymraeg Dyffryn y Glowyr	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support	Agree	

	required in secondary phase schools in Powys?)		
	Q5 (Please provide any additional comments you have in relation to the existing “First class of 15” distribution mechanism.)	The first class of 15” formula does not take a social model approach to removing barriers for every child who need additional support or accommodations be they at primary or secondary education phase and will make receiving adequate support a post code lottery where support will depend on how long NHS waiting lists are and for example on how much teaching staff understand and account for neurodiversity.	Comment noted.
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Neutral	
	Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)	Children with ALN can have many varied and ongoing issues, each needing different adjustments and their conditions and support needs can vary dramatically throughout their schooling. This formula does not account for the difficulties many parents and schools have in accessing diagnoses to support their evidence for medical need and will restrict undiagnosed pupils from support making the system unequitable. We are concerned that not enough research has	The ALN Act focusses on a need led system rather than a diagnosis led one. There is no stipulation that a learner must have a diagnosis to gain support to meet their needs. Schools should be able to evidence the support they are putting in place to meet the individual needs of their learners and what the impact of the support is.

		been conducted to establish an accurate picture of potential need.	
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)	Agree	
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Agree	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Agree	
	Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)	In theory we support number 8, but we have some concerns that the funding formula should instead be based on how many learners have ULP/IDP/LA IDP as this method does not take into account the years of battle it can take for many parents and schools to have their children's needs recognised. We already know that between 12% and 20% of all children will have some level of neurodivergence with 10% of the	The ALN Act focusses on a need led system rather than a diagnosis led one. There is no stipulation that a learner must have a diagnosis to gain support to meet their needs. Schools should be able to evidence the support they are putting in place to meet the individual needs of their learners and what the impact of the support is.

		<p>population being dyslexic alone yet many of them are not supported till adulthood and this formula will perpetuate this issue. A better formula would be to ensure basic funding to cover 20% of total student numbers were being accounted for whilst a separate budget is kept aside for children who need more 'specialist' support.</p> <p>We think the number should be renewable every time there are changes to pupil numbers to ensure we are not discriminating against any pupils who need support or making schools pay over and above for taking on ALN children at other points in the year. However we do not believe it is fair for any pupil to be denied access to more than 50% time in specialist centres if they are not ready/able to learn in mainstream settings.</p> <p>Regarding number 9: Forcing children to do this can increase behavioural problems which can then affect the learning of many more children in the mainstream setting as well as affecting the wellbeing of the ALN child.</p>	<p>This proposal does not relate to admission to specialist centres.</p>
	<p>Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)</p>	<p>Neutral</p>	
	<p>Q14 (Please provide any additional comments you have in relation to the</p>	<p>We believe both primary and secondary schools should have the same formula and continuity of practice where possible.</p>	<p>Comment noted.</p>

	<p>teaching and learning top ups in the mainstream secondary phase formula.)</p>	<p>However we do not believe it is fair for any pupil to be denied access to more than 50% time in specialist centres if they are not ready/able to learn in mainstream settings. Forcing children to do this can increase behavioural problems which can then affect the learning of many more children in the mainstream setting as well as affecting the wellbeing of the ALN child.</p> <p>We need more clarity on this issue in order to make an informed decision.</p> <p>We believe that the current formula for additional support is not equitable, but would need more clarity in order to make informed decisions.</p>	<p>This proposal does not relate to admission to specialist centres.</p>
	<p>Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)</p>	<p>Disagree</p>	
	<p>Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)</p>	<p>Agree</p>	
	<p>Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)</p>	<p>Agree</p>	
	<p>Q18 (Please provide any additional comments you have in relation to the</p>	<p>The funding formula neglects to consider many families who do not qualify for Free School Meals who are experiencing</p>	<p>It is fully recognised that there are families who are not eligible for e-FSM who experience poverty and deprivation.</p>

	<p>proposed distribution of funding to support disadvantaged learners.)</p>	<p>poverty and deprivation due to the cost of living crisis. Many people forced to use food banks do not qualify for FSMs and their deprivation should also be taken into account in any formula used. More work needs to be done to ensure more parents complete the forms for free school meals or at least feedback on why they cannot access free school meals. We believe all disadvantaged learners should qualify for the specific support they need, so their individual needs are met so the above formulas being capped does not make sense as that would leave some children disadvantaged. With the FSM indicator not being inclusive of families who are very much struggling this means we are missing entire groups. Difficulties with accessing diagnoses and assessments means some children need more support and adaptations but their needs are not assessed in time so they are missing out and falling behind. Earlier identification of need and/or diagnosis is essential in order to ensure children are able to access the support they need and for schools to access the funding required to support them.</p> <p>We feel the current funding system will disadvantage some learners. The amount provided should not be capped with less being given once you reach over 40% and all schools should qualify with the same increased increments.</p>	<p>Whilst e-FSM is the proposed indicator to calculate this element of the formula, it is considered that this funding is provided to support all disadvantaged learners regardless of their socio-disadvantaged background.</p> <p>Families are able to access support from the Income and Awards Team should they require assistance with the completion and submission of applications. In addition, all social media communications regarding the rollout of Universal Primary Free School Meals highlights the benefits of e-FSM application, including access to the Schools Essentials Grant for school clothing.</p> <p>Support for learners with additional learning needs (ALN) will be met through the proposed ALN element of the formula.</p>
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		We do not agree that the funding should be capped at 40%.	<p>The proposed multipliers are not capped at 40%, any school that has an e-FSM percentage for 40% or above will have the multiplier of 3 applied.</p> <p>Only one mainstream school has e-FSM numbering above 40% and that is due to the exceedingly small learner numbers.</p>
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Strongly agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	We do agree that there should be a separate rate for each utility type and it needs to include funding for external utility usage (car park lighting and cameras) and not just interior utilities.	Commented noted
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

	<p>Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)</p>	<p>We believe in order to make schools fully accessible and for them to have warm spaces where the children can learn the size of the school needs to be taken into account.</p> <p>Yes, we believe the new funding formula should be phased in and not be a sudden change. As we do not have specifics on financial implications and some schools may need to adjust to the new formula it is essential they be given the time to do this.</p>	<p>The size of school is taken into account in the current and the proposed premises element of the formula.</p> <p>Comment about phased implementation noted.</p>
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Question Ref	Q1 (Name of School:)	Ysgol Llanfyllin	Response
	<p>Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)</p>	<p>No</p>	<p></p>
	<p>Q3 (If no, please provide further information:)</p>	<p>Rwyf yn gadeirydd Gweithlu y Gymraeg ysgol Llanfyllin ac yn gynghorydd sir dros Penybontfawr, Llangynog, Llanwddyn, Llanfihangel, Dolanog, Llwydiarth, Llangadfan a'r Foel.</p> <p><i>Translation: I am the chair of the Welsh language workforce(?) at Ysgol Llanfyllin and a county Councillor for Penybontfawr, Llangynog, Llanwddyn, Llanfihangel, Dolanog, Llwydiarth, Llangadfan and Foel.</i></p>	<p>Comment noted.</p>

	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Neutral	
	Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)	Mae angen llif arian arall ar gyfer cynllun trochi os yw Powys o ddifri am datblygu y Gymraeg. <i>Translation: Another funding stream is needed for the immersion scheme if Powys is serious about developing the Welsh language.</i>	Comment noted.

Secondary School

Question Ref	Q1 (Name of School:)	Ysgol Maesydderwen	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not	Strongly agree	

	adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)		
	Q5 (Please provide any additional comments you have in relation to the existing “First class of 15” distribution mechanism.)	All schools are currently funded the same for ALN regardless of need. These means that schools with high ALN numbers are underfunded for need and hence there are significant numbers of learners who are not receiving the appropriate support that they require due to a lack of funding. This is not fair and equitable.	Comment noted.
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Strongly agree	
	Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)	Schools should be given the responsibility and accountability of ensuring the funding for ALN learners is provided directly to these learners.	Comment noted.
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Strongly agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers	Strongly agree	

	are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)		
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Strongly agree	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Strongly agree	
	Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)	Currently nearly all of the learners who are registered at the Specialist Centre access mainstream school and we the school does not receive any funding for these learners. A 50% ratio would be a fairer system.	Comment noted.
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Agree	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Strongly agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Strongly agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent	Strongly agree	

	upon the proportion of the incidence of social deprivation among learners within a school's population?)		
	Q18 (Please provide any additional comments you have in relation to the proposed distribution of funding to support disadvantaged learners.)	As the number of disadvantaged learners increase the number of complex issues also significantly increases. In order to support disadvantaged learners effectively the funding needs to recognise that an increase in support is needed as the number of disadvantaged learners increases.	Comment noted.
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Strongly agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Strongly agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	
	Q24 (Please provide any additional comments you have in relation to the implementation of the proposed formula changes.)	From our perspective the sooner these changes are implemented the better but we do recognise that if we want a fairer system then we need to support schools whose funding may decrease time to prepare for these changes. However, if	Comment noted.

		modelling shows that any losses for any school are minimal or can be supported from the LA for April 24 then a sooner change would be better.	
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Question Ref	Q1 (Name of School:)	Schools forum	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	No	
	Q3 (If no, please provide further information:)	This seems the best way to record my views as Chair of the Schools Forum which have been informed by discussions at the last 2 Forum meetings. Unfortunately the draft notes of the last meeting are not available yet so my efforts to take into account their views will have to rely on my memory of what was said.	Comment noted.
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Neutral	
	Q5 (Please provide any additional comments you have in relation to the	The information presented in the bar chart in par 4.3.8 does not demonstrate 'that the existing first class of 15	The intention of the chart was to demonstrate that the existing funding

	<p>existing “First class of 15” distribution mechanism.)</p>	<p>distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts'. The bar chart adds together the number of students receiving free school meals and the number of children with ALN. it does not take account of the fact that some children receiving free school meals also have ALN. That means there is double counting. It also fails to take account of the fact that some children receiving free school meals do not have ALN and should not therefore be taken into account when looking for a measure of the relative level of need for ALN support.</p> <p>Para 4.3.8 also says that 'it should be noted that the incidence of ALN used in the chart does not reflect the complexity of ALN needs within each school'. That means the bar chart does not capture the different levels of the three types of ALN recorded in this document. Appendix A does provide this detail.</p> <p>A better way of demonstrating the need for ALN support would be a bar chart using the weighting in paragraph 4.4.7, i.e. score of 1 for ULP, 15 for School IDP and 40 for LA IDP. I'm not sure it helps using free school meals data at all.</p> <p>Can revised information along the lines referred to above be provided please?</p>	<p>mechanism did not adequately reflect the needs of the learners, whether those were needs in relation to ALN or disadvantage.</p> <p>Further analysis can be shared at the next Schools Budget Forum meeting.</p>
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		<p>In addition the Welsh Government Regulations relating to Schools Forums say explicitly that local authorities MUST set out the likely financial effect of any such changes to the funding formula. The Council has not done this despite requests from the Forum to do so. This information is key so that decision makers can see what effects the proposed changes will have on different types of school, .e.g. which types of schools will get more money and which less.</p>	
	<p>Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)</p>	<p>Neutral</p>	

	<p>Q7 (Please provide any additional comments you have in relation to the ALN retained budget and the level of delegation.)</p>	<p>Increasing the delegation of more resources to schools is to be welcomed. At present the Council has one of the lowest delegation rates for education spending of all local authorities in Wales and this change will improve the Council's position.</p> <p>The Forum wished to highlight though that whilst there has been a demonstrable increase of ALN in recent years the overall funding available has not increased. Keeping the amount the same means that notwithstanding the increased delegation it will become more and more difficult for schools to fully address ALN.</p>	<p>Comment noted.</p>
	<p>Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)</p>	<p>Neutral</p>	
	<p>Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the first Friday following the Autumn half-term, as agreed locally?)</p>	<p>Agree</p>	
	<p>Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)</p>	<p>Neutral</p>	
	<p>Q11 (Do you agree that an adjustment is made to secondary phase school learner</p>	<p>Disagree</p>	

	<p>numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)</p>		
	<p>Q12 (Please provide any additional comments you have in relation to the proposed distribution of notional ALN funding.)</p>	<p>Q8 - cannot come to a view on this until it can be demonstrated that the 'First class of 15" distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys'. See comment in response to Q5. If this is proven then distribution by weighted numbers of ALN students makes sense.</p> <p>Q9 - in agreeing to this, provision does need to be made for any large in year changes, e.g. a school gaining or losing a couple of students with LA IDPs.</p> <p>Q10 - para.4.4.7 makes it clear that these proportions have been calculated to make sure that the overall sum available does not exceed £3.706M. This does not then equate to the actual costs of making provision for students with the different categories of ALN. The Forum need to be assured that, especially with LA IDP students, the funds will be sufficient to meet identified needs.</p> <p>Q11 - The Forum is of the view that the pending review of specialist centres is completed before any changes are made to the funding formula for these centres</p>	<p>Q8: Further analysis can be shared at the next Schools Budget Forum meeting.</p> <p>Q9: The contingency budget of the Schools delegated funding would need to accommodate provision for any large in-year changes relating to ALN, which would need to be considered alongside any other large scale changes.</p> <p>Q10: The total ALN retained budget has not been fully utilised in the last 2 financial years resulting in the balance being distributed across all schools at the end of the financial year. The proposals will make sure that the funding is delegated in line with learners' needs from the start of the financial year, allowing schools to plan for the funding.</p> <p>Q11: The proposals will being secondary schools with specialist centres in line with primary schools with specialist centres and would not impact on the review of specialist centres.</p>

	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Agree	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Disagree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Neutral	
	Q18 (Please provide any additional comments you have in relation to the proposed distribution of funding to support disadvantaged learners.)	Q15 - the Council has not made a compelling case for using free school meals rather than the official Welsh Government Index of Multiple Deprivation. It is acknowledged that there are many other children experiencing deprivation for a variety of reasons who are not in receipt of free school meals. It is also the case that the roll out of free school meals is skewing the number of	As set out on p. 22 of the Consultation document, the Welsh Government Index of Multiple Deprivation (WIMD) was considered, however, it is from 2019, which is prior to the COVID pandemic and the cost-of-living crisis and therefore is not representative of the impact of these.

		<p>parents applying as increasing numbers no longer need to. Although the Welsh Government Index needs updating (next year I understand) it is a better measure of deprivation than eligibility than free school meals claimants. It is widely used by Government Departments when allocating resources to tackle deprivation.</p> <p>Q17 - The principle here makes sense but no information has been provided on the financial implications for different types of school. As stated in response to Q4 - Welsh Government Regulations relating to Schools Forums say explicitly that local authorities MUST set out the likely financial effect of any such changes to the funding formula. This information is key so that decision makers can see what effects the proposed changes will have on different types of school, .e.g. which types of schools will get more money and which less.</p>	<p>Universal Primary Free School Meal (UPFSM) data is being closely monitored at a local and national level, and there has been no nationally issued data which confirms that UPFSM data is 'skewing' e-FSM data.</p> <p>e-FSM is often used in Welsh Government grant formula.</p> <p>e-FSM eligibility can alter on a daily basis, however, knows many e-FSM learners they have on roll at any one time.</p> <p>Currently there is no e-FSM element within the secondary formula that is based on learner eligibility. The proposal seeks to continue the current level of funding in the primary phase formula and provide a similar amount in the secondary phase formula.</p>
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	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential utilities inflation experienced in recent years?)	Agree	
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q21 (Please provide any additional comments you have in relation to the proposed changes to the premises funding.)	<p>The current level of funding available to meet existing energy and maintenance costs is insufficient as evidenced by schools having to draw from their reserves to meet these costs and the huge backlog of maintenance work.</p> <p>Further top ups should be considered for schools with particular features that require extra expenditure, e.g. schools with large numbers of trees to look after. Must express an interest here as my local school has lots of trees to maintain.</p>	<p>Comments noted.</p> <p>The proposed changes to the premises element of the formula will redistribute the quantum of funding but will not lead to changes in the overall level of funding.</p>
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	

Question Ref	Q1 (Name of School:)	Anonymous	Response
	Q2 (Is this the official response on behalf of the School, agreed by the Chair of Governors and the Headteacher?)	Yes	
	Q4 (Do you agree that the existing “First class of 15” distribution mechanism in the secondary phase formula does not adequately reflect the variance in characteristics of the learner cohorts, and therefore the relative level of ALN support required in secondary phase schools in Powys?)	Agree	
	Q6 (Do you agree with maximising the delegation of the existing ALN retained budget, including all existing band-led funding, with the exception of a small budget to allow for learner changes in special schools and new learners with ALN?)	Agree	
	Q8 (Do you agree that notional ALN funding should be distributed to all mainstream schools based on the number of learners in each of the new categories (ULP, School IDP, LA IDP) in their learner population?)	Agree	
	Q9 (Do you agree that the school level data on ULP, School IDP and LA IDP numbers are extracted on the same day as the learner number data is extracted (i.e. the	Agree	

	first Friday following the Autumn half-term, as agreed locally?)		
	Q10 (Do you agree with the ratios of ULP equivalents set out in Table 1?)	Agree	
	Q11 (Do you agree that an adjustment is made to secondary phase school learner numbers for 50% of the learners registered at the secondary phase specialist centres, to align with how primary schools are funded for reintegration?)	Neutral	
	Q13 (Do you agree that the teaching and learning top ups in the mainstream secondary phase formula be revised?)	Neutral	
	Q15 (Do you agree that funding should be distributed to all mainstream schools on the basis of the eFSM eligibility indicator to support disadvantaged learners?)	Agree	
	Q16 (Do you agree that the relative need to spend increases as the proportion of disadvantaged learners in a school increases?)	Agree	
	Q17 (Do you agree with the multiplier factors set out in Table 5 above which will increase the funding per learner dependent upon the proportion of the incidence of social deprivation among learners within a school's population?)	Agree	
	Q19 (Do you agree that the methodology for distributing funding for premises needs to be updated to reflect the differential	Agree	

	utilities inflation experienced in recent years?)		
	Q20 (Do you agree that there should be separate rates per square metre for base premises funding and for each of the utility types?)	Agree	
	Q22 (Do you agree that there should be separate top up for schools with working kitchens?)	Agree	
	Q23 (Do you agree that the implementation of the proposed formula changes should be phased?)	Agree	