

Norfolk Schools Forum

Meeting Details

Date: Tuesday 19 November 2024

Time: 9am

Venue: Cranworth Room, County Hall, Martineau Lane, Norwich, NR1 2UA

Membership	Organisation	Representing
Martin White (Chair)	Nebula Federation	Maintained Primary Governors
Adrian Ball	Diocese of Ely Multi Academy Trust	Academies
Helen Bates	Roman Catholic Church Diocese	Church Representative
Stephen Beeson	Norwich Diocesan Board of Education	Church Representative
Martin Colbourne	City College Norwich	16-19 Representative
Steven Dewing	Sapientia Education Trust	Academies
Lacey Douglass	Freelance Early Years Advisor	Early Years Representative
Mike Grimble	Avenue Junior School	Maintained Primary Governors
Bob Groome	National Education Union	Joint Consultative Committee
Glyn Hambling	Unity Education Trust	Alternative Provision Representative
Carole Jacques	Earlham Nursery School	Nursery Schools Representative
Joanne Philpott	Ormiston Academy Trust	Academies
Sarah Porter	Unity Academy Trust	Academies
Rachel Quick	The Wherry School	Special School Academy
Sarah Shirras	The Hive Federation	Maintained Primary Schools
Matthew Smith	Sheringham Woodfields School	Maintained Special Schools
Daniel Thrower	Wensum Academy Trust	Academies
Joanna Tuttle	Aylsham High School	Maintained Secondary Schools
Vicky Warnes	National Education Union	Joint Consultative Committee
Vacancy	N/A	Academies
Vacancy	N/A	Academies
Officers	Job Title	
Michael Bateman	Assistant Director – SEND, Strategic Improvement and Early Effectiveness	
Martin Brock	Accountant (Schools, Special Educational Needs and Early Years)	
John Crowley	Assistant Director of Learning and Achievement	
Dawn Filtness	Dedicated Schools Grant Strategic Lead (Children's Services)	
Samantha Fletcher	Assistant Director – Education, Infrastructure and Partnerships	
Jane Hayman	Assistant Director – Sufficiency, Planning and Education Strategy	
Sarah Jones	Director of Commissioning, Partnerships and Resources	
Nicki Rider	Assistant Director – SEN and Alternative Provision Strategy and Sufficiency	
Sara Tough	Executive Director of Children's Services	
James Wilson	Director of Sufficiency Planning and Education Strategy	

**For further details and general enquiries about this Agenda
please contact the Committee Officer:**

Laine Tisdall on 01603 222 053
or email committees@norfolk.gov.uk

Agenda

1. **Apologies for absence**
2. **Welcome from the Chair and Matters Arising**
0900 to 0910
 - Appointments to vacancies
3. **Minutes** **Page 4**
To approve the minutes of the meeting held on Friday 20 September 2024
0910 to 0915
4. **Strategic Planning (including Local First Inclusion)** **Page 14**
(Information and Discussion)
0915 to 0930
5. **NFF/DSG Allocations for 2025/26 and Autumn DSG Consultation Responses**
0930 to 1110
 - **NFF/DSG 2025-26 update** *(Information)* **Page 20**
 - **Summary of Responses** *(Information and Discussion)* **Page 24**
 - **Broader Engagement and Specialist Outreach** *(Information)* **Page 33**
 - **Affordability of Formula** *(Recommendations)* **Page 62**
 - **Schools Block to High Needs Block Transfer** **Page 68**
(Discussion and Decision)
 - **Notional SEN** *(Recommendations)* **Page 90**
 - **Element 3** *(Information and Discussion)* **Page 107**
- Break during item 5 at an appropriate time decided by the Chair**
6. **Early Years Budget Grant Update** *(Information)* **Page 124**
1110 to 1120
7. **(NFF) Disapplication Requests**
1120 to 1130
 - **Iceni Baseline** *(Decision)* **Page 126**
 - **Brisley Second Year amalgamation protection** *(Decision)* **Page 128**
 - **Exceptional Premises Factor** *(Decision)* **Page 130**
8. **Growth Fund** *(Decision)* **Page 132**
1130 to 1145
9. **Falling Rolls** *(Decision)* **Page 138**
1145 to 1155
10. **Central School Services Block** *(Decision)* **Page 142**
1155 to 1210

- 11. Forward Work Plan** (*Information and Discussion*) **Page 150**
1210 to 1215
- 12. Any Other Business**
1215 to 1220
- 13. Date of Next Meeting**
- Break for non-maintained school reps to be able to leave*
- 14. DSG Consultation – Maintained Responses** (*Discussion and Decision*) **Page 151**
- 15. De-delegation Block (Maintained Reps Only)** (*Decision*) **Page 180**
1230 to 1300

Martin White
Chair, Norfolk Schools Forum

Date Agenda Published: 13 November 2024



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Norfolk Schools Forum

Minutes of the Meeting held on Friday 20 September 2024 at 9am, Cranworth Room, County Hall,

Present

Martin White (Chair)
Stephen Beeson
Martin Colbourne
Steven Dewing
Lacey Douglass
Mike Grimble
Bob Groome
Glyn Hambling
Carole Jacques
Sarah Porter
Rachel Quick
Sarah Shirras
Matthew Smith
Daniel Thrower
Joanna Tuttle

Organisation

Nebula Federation
Norwich Diocesan Board of Education
City College Norwich
Sapientia Education Trust
Freelance Early Years Advisor
Avenue Junior School
National Education Union
Unity Education Trust
Earlham Nursery School
Unity Schools Partnership
The Wherry School
St. Williams Primary School
Sheringham Woodfields School
Wensum Academy Trust
Aylsham High School

Representing

Maintained Primary Governors
Church Representative
16-19 Representative
Academies
Early Years Representative
Maintained Primary Governors
Joint Consultative Committee
Alternative Provision
Nursery Schools
Academies
Special School Academy
Maintained Primary Schools
Maintained Special Schools
Academies
Maintained Secondary Schools

Also Present:

Michael Bateman	Assistant Director – SEND Strategic Improvement and Partnerships
Dawn Filtness	Finance Business Partner
Samantha Fletcher	Assistant Director – Education Infrastructure and Partnerships
Jane Hayman	Assistant Director – Sufficiency, Planning and Education Strategy
Sarah Jones	Director of Commissioning, Partnerships and Resources
Jonathan Nice	Senior Adviser – Teaching and Learning
Kate Philpin	HR Business Partner (Schools)
Adrian Thompson	Assistant Director of Finance (Audit)
Laine Tisdall	Committee Officer, Democratic Services
Sara Tough OBE	Executive Director of Children's Services
Joshua Warnes	Internal Audit Manager
James Wilson	Director for Sufficiency Planning and Education Strategy

1. Apologies and substitutions

- 1.1 Apologies were received from Adrian Ball, Joanne Philpott, John Crowley, and Martin Brock

2. Minutes

- 2.1 The minutes of the meeting held on Wednesday 10 July 2024 were approved as an accurate record of proceedings.

3. Matters Arising

- 3.1 A summary of Schools Forum actions for the 2023/24 academic year was due to be uploaded to the website forthwith.

4. Strategic Planning (including Local First Inclusion)

- 4.1 Forum Members received the annexed report (4).

4.2 Officers introduced the report, which provided an update on the revised shape and governance of the Local First Inclusion (LFI) programme, along with information regarding the comprehensive report considered by Norfolk County Council's Cabinet earlier in September. A brief update in relation to the ongoing discussions with the Department for Education (DfE) was also included.

4.3 The following key elements were highlighted to the Schools Forum:

- There were encouraging signs from the new government relating to Special Educational Needs and Disabilities (SEND) issues. There was a possibility of increased admission powers being devolved to local authorities, which would improve the local picture.
- It was noted that Norfolk County Council was still within the DfE's safety valve plan. An update was expected from the 1 October 2024 onwards. Officers expressed optimism that the new government would introduce reforms to the system, which would change the workings of the safety valve plan.
- A new independent chair of the LFI Executive Board, Mark Vickers, had been appointed from the beginning of the 2024/25 academic year.
- The Element 3 working group had proven useful during its term of operation. This had now changed its remit to become the LFI Reference Group. Officers planned to engage with this body in more detail over the coming months, as its findings would prove useful in the upcoming Dedicated Schools Grant (DSG) consultation in Autumn 2024. The membership of the reference group had not yet been finalised.
- Confirmation had been received from Norfolk County Council's Cabinet at their September 2024 meeting of a £35m uplift in Element 3 'top-up' funding for mainstream schools, to cover the 2024/25 financial year.
- While the report contained the latest SEND data from the DfE, it was acknowledged that the publishing of national statistics was now occurring later in the year.
- A deep dive into capital sufficiency and Specialist Resource Bases (SRBs) was due to be undertaken next week at the first meeting of the LFI Reference Group.
- The different types of SRBs were highlighted to the Schools Forum, covering different specialities. Speech Language & Communication Needs was currently at 100% occupancy, with Autism Primary at 98% and Secondary at 93%, respectively. It was noted that 80% occupancy was an optimum figure, as this provided enough space to allow children to be placed close to their home without excessive travel costs.
- The Learning & Cognition SRB was currently over-subscribed at 108% occupancy, which was part of the reason why further SRBs were being constructed.
- The Social, Emotional & Mental Health SRB was only at 79% occupancy, which required monitoring to see the underlying trends as to why this was under-occupancy. One of the SRBs in this category currently had a pause on new admissions, which had a resulting effect on the dynamics.

4.4 The following points were raised and discussed:

- The Chair stated that while the formation of the LFI Reference Group was a positive step forward, there were concerns that the membership could be dominated by a small number of people, potentially skewing the debate. The Element 3 working group saw its numbers increase during its operations, with the same scenario potentially occurring with the LFI Reference Group. Officers stated that the membership was under review to ensure it was representative and proportionate to all sectors. It was agreed that although the new group was originally focussed on mainstream provision, it should also reflect the needs of the 0-25 SEND cohort. Over 50% of the initial membership had confirmed their attendance for its first meeting in October 2024.

- The Chair queried the choice of the 80% optimum figure for SRB occupancy, given the higher occupancy rates in some SRB categories at present. Officers stated there was a delicate balance between strategic planning and ensuring the correct level of provision across Norfolk. There were also instances where some children moved on roll to an SRB, which then became their school, which meant more flux in the system. It was suggested that the LFI Reference Group could look at the data on a termly arrears basis, to ensure reconciliation term by term and to see turnaround figures.
- The Vice-Chair noted that the establishment of SRBs followed a process rather than magically appearing fully operational. An update on SRB phases was requested. Officers stated that the LFI Reference Group would be able to take a deep dive into this on a termly basis.
- A Forum Member requested a deep dive on where SRBs had rejected a placement due to them not being able to meet the needs, as this appeared to be an issue. Officers stated this could be investigated in detail once zone working was fully operational. It was suggested that workshop sessions on the SRB process could be organised for the future, given the level of feedback on this issue.
- The Vice-Chair noted that further SRB construction did not satisfy all needs geographically, as there had to be a fundamental understanding of children's needs.

4.5 The Norfolk Schools Forum **RESOLVED** the following:

- To **CONSIDER** the updated information on the LFI programme, in terms of the revised shape and governance.
- To **PROVIDE** comments and feedback that the local authority could utilise to support the advancement and success of LFI.

5. Provisional DSG Allocations for 2025/26 and Autumn DSG Consultation

5.1 Forum Members received the annexed report (5).

5.2 Officers introduced the report, which covered the range of issues that the local authority intended to include within the Dedicated Schools Grant (DSG) consultation in Autumn 2024. The consultation was anticipated to be the most extensive undertaken for a significant period of time, seeking to significantly increase the level of engagement with the sector achieved in recent years. The consultation was planned to be a combination of technical questions, along with engagement regarding the system transformation needed, with open-ended questions to enable schools to be actively involved.

5.3 The following key elements were highlighted to the Schools Forum:

- The DfE had not currently provided information regarding allocations, with no indication of a forthcoming announcement. This presented challenges for both officers and schools, potentially affecting the technical papers for the consultation.
- Officers stated it was sensible to consult on the SEND system in Norfolk and LFI in general, with it being proposed that at engagement sessions, broader questions were posed regarding the system.
- The Secretary of State for Education had not given any indication of the deadline for disapplication requests. In past years, this deadline had been the end of November, but currently there was no provisional information available for local authorities across the country to consult schools with. Officers were working on the basis that the deadline would remain the same as before. It was agreed that conversations with schools would not be delayed despite the DfE still needing to confirm provisional allocations.

- Consideration was given to potentially extending the consultation depending on updates from the DfE and responses. The deadline for agreeing an extension would be the October half-term. However, this would have a knock-on effect on the November 2024 meeting of the Schools Forum, with there being a potential need for additional meetings of the Schools Forum to consider the outcomes.
- The Executive Director for Children's Services was prepared to write directly to the Secretary of State regarding the disapplication request if there was still no update from the DfE. Ministers in the DfE had requested conversations regarding local authorities within the safety valve programme at the beginning of November 2024, which could potentially be in relation to disapplication requests.
- There were proposals to continue Notional SEN funding in line with the 2024/25 agreement, which had increased the percentage from 6.6% to 7.6%. This increase had brought Notional SEN closer towards the national average. A further increase of 1.5% was proposed for 2025/36, bringing the percentage to 9.1% as opposed to the national average of 11.5%. There was another option within the consultation to match Notional SEN funding in Norfolk with the national average, as there were expectations that the DfE could compel the local authority to move into line.
- Special Schools Outreach formed part of the consultation, with a question posed as to how this function could be expanded to mainstream schools without a monetary element involved. It was intended for outreach to move from a per pupil approach to referrals to a more strategic approach over a longer timescale. The consultation aimed to ask schools whether they wanted more provision built into the system.
- Element 3 funding principles were highlighted to the Schools Forum. It was stressed that as the current funding model could not be retained, the aim of the consultation was to help provide detail for a new model, designed in collaboration between the local authority and the education sector. It had been noted that there had been a number of different responses from the Element 3 working group to this proposal.
- Shared Parental Leave and Maternity Leave was in the consultation for maintained schools only. Shared Parental Leave was not currently reimbursed from the de-delegated maternity budget, with issues causing financial impacts on the budgets of some schools. Three options were up for consultation, which were to either de-delegate Shared Parental Leave costs for 2025-26 for statutory costs only, to do this and include associated salary costs covering periods of school holidays, or to keep the current system in place.
- It was noted that Maternity Leave was currently reimbursed from the de-delegated Maternity budget, with this being estimated at a cost of £101,000. An £80,000 overspend was currently forecast for the de-delegated fund. The consultation aimed to consider whether this should continue to be paid in the current manner.
- Proposed changes to internal audits for maintained schools were highlighted. It was intended to consult on whether schools agreed that the principle of the local authority maintaining funding for minimum risk-based assurance. There was a requirement for the Section 151 Officer at Norfolk County Council to provide assurance regarding Council finances and funding to the government. The proposal was that rather than auditing all schools every five years, a rolling cycle of audits would be conducted under the minimum risk-based assurance principle. The new approach was risk-based, which would enable best auditing practices to be applied to schools. It would also use less resources than the current auditing approach. The Section 151 Officer had indicated his approval of the risk-based approach, as this would provide assurance to him.

5.4 The following points were raised and discussed:

- The Chair requested confirmation that the consultation events had been finalised and schools contacted. Officers stated that letters were sent to schools at the end of summer 2024. Six events were planned, three of which would be held virtually on Teams, the other three being in-person across different areas of Norfolk. Of the in-person venues, these would be held at Great Yarmouth Library, King's Lynn Academy, and County Hall in Norwich. A hybrid approach was not intended. There was a drive within the team to increase engagement compared to past consultations. Feedback from the consultation would be filtered back to the Schools Forum for discussion and consideration.
- Forum Members commented that discussions relating to fair funding formulas had spanned several years. Consideration had to be given to how the local authority would engage schools, as was important to emphasise that this was an actual consultation which would shape the future direction of DSG rather than a tickbox exercise.
- Forum Members expressed concern that the consultation events were not in people's diaries and that there would be a lack of notice. Officers agreed to send urgent invitations once the meeting had concluded.
- A Forum Member noted that the Education and Skills Funding Agency (ESFA) was due to be merged into the DfE and queried how the system would function both nationally and locally once the merger had occurred. Officers stated that current indications suggested the ESFA would cease to exist in March 2025. Schools would not see any differences over the next six months. It was expected that schools' budgets would be calculated by the end of January 2025. Final DSG allocations were usually not confirmed until the week before Christmas.
- A Forum Member commented that it would be unwise to publish data and figures based on the 2023/24 academic year, as this would give schools a degree of certainty that was not based on reality at present.
- Forum Members stated that expectations management was key to a successful consultation. There was a need to emphasise the Element 3 pot but place less emphasis on the allocation mechanism.
- Forum Members highlighted that the provision of context within the consultation materials would produce beneficial results. This would help explain concepts such as notional SEN and special school outreach. Officers agreed to provide plain English context during consultation events where possible, to ensure that nuances were clear. There was the possibility to produce a technical paper laying out options and percentages relating to Notional SEN.
- The Chair queried as to what the consultation would include regarding special school outreach. Officers confirmed the consultation would provide schools an opportunity to request increased funding for this function, which would form part of the High Needs Block. Norfolk County Council would continue to support early needs in the county.
- The Vice-Chair commented there was a nervousness within the sector as to where the staffing for special school outreach was being sourced from. Officers stated that conversations were being held with the heads of special schools regarding indicators and capacity. The aim was to provide sufficient outreach capacity across the whole of Norfolk. The Vice-Chair stated there was a need for transparency to build confidence in the sector, while also illustrating the overlap between school teams and community teams. It was confirmed that officers would seek feedback regarding the principles of special school outreach.
- A Forum Member stated it needed to be made clear that special school outreach was funded through contributions from schools and the High Needs Block. This arrangement explained why the system was limited in size at present. Officers acknowledged the need to clarify the arrangements within the reports and consultation documents.

- The Chair queried the construction of the Element 3 part of the consultation, as to whether questions would be posed regarding proxy indicators or if moving to a formula approach was preferable. Concern was expressed that opinions on a formula approach could delay decisions on Element 3, as schools would be unaware where they stood. Officers stated they would provide context and data towards the proposal in the consultation documents. At present, the proposal was that there would be a formula implemented to allocation a portion of the Element 3 money, with the specific question being where to set the limits, whether this would be done by percentages or on a child-by-child basis. There were concerns that Norfolk did not have an even spread of children across districts which would fit the national funding formula and SEND requirements set by the government. A debate was required to find the best way forward.
- A Forum Member asked if the consultation was considering either a March 2025 or September 2025 change to Element 3. Officers stated that at present, a final decision was unknown. However, a summary of the model as it currently stood could be provided, which would show the breakdown of funding for the next couple of years plus the rationale behind it.
- A Forum Member commented that the 1.5% transfer from the Schools Block to the High Needs Block would have a noticeable impact on the consultation results. Officers clarified that transfers between blocks were an element of the safety valve plan. The LFI programme was operated on the basis that block transfers would continue in the usual way. However, if it was decided to cease these, this would require plans and modelling to be amended. If block transfers were not approved, this would result in a significant reduction in funding for mainstream schools, as the local authority could not effectively fund the programme twice.
- A Forum Member noted that the 1.5% block transfer was an assumption and queried how the decision would be made. Officers stated that any block transfer decisions above the 0.5% threshold had to be signed off by the Secretary of State. Bridget Phillipson had indicated that the DfE was seeking evidence that schools supported the transfer before the decision was signed off. If support was not forthcoming, there was a risk that the transfer would not be approved, potentially jeopardising the safety valve programme. It was unknown whether the new government wished to continue the safety valve programme under the current parameters. There was also a need to emphasise the consequences if the block transfer was not approved.
- The Chair queried as to how many local authorities across England had a block transfer mechanism, as the statistics could highlight areas for future consideration. Officers stated that historical data on block transfers could be provided in a report for the November 2024 meeting of the Schools Forum, although it was acknowledged this would be a time-consuming package of work.
- A Forum Member queried if it would be worth contacting local Members of Parliament to lobby the Secretary of State. Officers confirmed that letters had been sent to Bridget Phillipson during the summer, and that local MPs would be convened for an update in early October. Given the turnover of MPs due to the General Election, it was important that they were kept fully informed regarding the issues around DSG allocations.
- Forum Members expressed concern regarding the difference between the £101,000 figure for reimbursement and the proposed £6,000 delegation cost for statutory Shared Parental Leave. Officers stated that the £6,000 cost was a statutory payment in line with government legislation.
- Forum Members expressed concerns regarding assumptions for maintained funding for Shared Parental Leave within the reports, as there was the possibility that those in the consultation would choose option three to maintain the current system. as the other two options were unclear. Officers agreed to produce context relating to the three options, to be looked at in detail by The Chair and Maintained School Reps.
- A Forum Member noted that school contracts tended not to split up holiday pay, expressing slight concern that the split within the consultation appeared to be arbitrary.

- The Chair asked if officers were intending to create separate blocks for Shared Parental Leave and Maternity Leave within the accounting, or whether this would be a shared sum of money. Officers stated that the intention was for to share the same block, as this would be an easier approach to take.
- The Chair queried if the minimum risk-based approach involved conversations with Children's Services regarding which schools would be targeted for audits, as some schools might be audited more frequently given circumstances. Officers confirmed this was the case.
- The Chair pressed upon the timeline cycle for audits. Officers stated that the key principle regarding governance and risk was the responsibility of school governors and headteachers. Questions had to be raised whether the current system of auditing every school every five years was adding value to the system or a best use of resources. The current audit system did not pick up many issues which needed remedial work. It was acknowledged that a number of schools which were considered low risk would not be visited by the auditors, with this being the responsibility of governors and headteachers.
- A Forum Member asked if there was a way for governors of low-risk schools to be made aware of feedback and to be given reassurance as to why their school was not being audited. Officers stated that the report set out an option for governors to use their budgets to request more frequent assurance from Audit Services.
- A Forum Member queried if the audit offer covered all elements of the school estate, such as infrastructure and utilities. Officers clarified that the audits only covered financial matters rather being an all-purpose audit.
- A Forum Member expressed concern that the current five-year audit system did not take payroll into consideration, given that this represented a large portion of expenditure for some schools. Clarification was requested as to whether the minimum risk-based assurance model would still see the half-day assessments that were undertaken at red and amber rated schools using the existing framework or if a new approach would be taken. An officer suggested holding engagement sessions on the new model to provide details and to illustrate its effectiveness.
- The Chair stated it would be ideal if a Forum Member could be present at all of the consultation events if possible, although it was acknowledged that representation at the face-to-face events would be challenging to achieve due to prior commitments.

5.5 The Norfolk Schools Forum **RESOLVED** the following:

1. To **CONSIDER** and **COMMENT** on the proposed content of the Local Authority's consultation with schools.
2. To **PROVIDE** suggestions regarding how the funding formula part of the consultation could be carried out if the DfE did not provide the provisional DSG allocations in a timely way.
3. To **CONSIDER** and **COMMENT** on the proposed content of the Local Authority's consultation with maintained schools

6. Norfolk Audit Services – School Audits Update

6.1 Forum Members received the annexed report (6).

6.2 Officers introduced the report, which provided an update on the traded school audits and thematic audits that had recently been conducted by Norfolk Audit Services.

6.3 The following points were raised and discussed:

- The Chair requested clarity regarding not checking the employment status for tax purposes on individuals engaged by the school to carry out work. It was queried whether this was a case where such individuals had to declare that they were currently self-employed and covered their own taxes, or if they needed to complete an online proforma. Officers confirmed there was a HM Revenue & Customs (HMRC) toolkit available for assistance, with it being noted that declaring self-employment was not necessarily enough to satisfy requirements. It was important that a strong relationship was forged between schools and the HMRC, as this would help resolve issues highlighted from audits and inspections.
- Issues relating to payroll could be picked up with stakeholders as part of the work of the Audit Service. The payroll system and how schools currently interacted with it could form part of the DSG consultation, with officers happy to investigate further.

6.4 The Norfolk Schools Forum **RESOLVED** to **CONSIDER** and **COMMENT** on the key messages arising from the work of Norfolk Audit Services

7. Falling Rolls Funding

7.1 Forum Members received the annexed report (7).

7.2 Officers introduced the report, which was produced in response to DfE guidance for Growth and Falling Roll funds, which was updated in October 2023. The guidance stated that allocations would be based on both Growth and Falling Rolls for the first time, starting from the 2024-25 academic year. It was the intention of the local authority to form a time-limited Falling Rolls working group ahead of the November 2024 meeting of the Schools Forum, to discuss and make recommendations for the 2025-26 academic year.

7.3 The following point was highlighted to the Schools Forum:

- There was a need to determine criteria for the fund, based on the current environment for schools in Norfolk.
- A quantity of Forum Members were required to join the Falling Rolls working group.

7.4 The following points were raised and discussed:

- A Forum Member stated that four primary schools in the Caister area had applied for redundancies in the past week due to falling rolls and queried if they should be directed towards the fund. Officers noted that the criteria for the fund was not yet known, but that the schools could be directed there afterwards to see if they qualified for assistance. However, it was acknowledged that this may be too late for the affected schools. Demographic decline was an issue which schools across the UK had to adapt to.
- A Forum Member noted that the redundancy payment criteria was not clear to schools. Officers agreed to clarify and emphasise the criteria going forward.
- Stephen Beeson, Stephen Dewing, Sarah Shirras and Martin While all **AGREED** to join the Falling Rolls working group.

7.5 The Norfolk Schools Forum **RESOLVED** the following:

1. To **AGREE** to the establishment a time-limited working group of Forum Members and Officers, to consider whether a Falling Rolls fund should be established for Norfolk and, if so, to develop proposed criteria and methodology for allocation of the funds in line with government guidance.
2. To **AGREE** that the outcomes of the working group's work would be reported back at the November 2024 meeting of the Norfolk Schools Forum.
3. To **IDENTIFY** Members to represent the Schools Forum in the working group.

8. Early Years Funding 2025-26

8.1 Forum Members received the annexed report (8).

8.2 Officers introduced the report, which provided an update on Early Years Funding. At present, the DfE had not indicated that there would be any changes to Early Years funding nationally for the 2025-26 academic year. With this context, the local authority was proposing to make no changes to the early years DSG funding formula for 2025-26 and, therefore, was not required to consult with early years providers this year

8.3 Officers highlighted the following key elements from the report:

- Due to the significant consultation held in 2023, it was proposed that a consultation would not be held this year. Officers were anticipating that the same formula would be kept, enabling stability. A review was planned before the 2026/27 academic year.
- There was no indication at present from the new government that there would be any changes to early years funding.

8.4 The Norfolk Schools Forum **RESOLVED** to **SUPPORT** the local authority's preferred approach.

9. Norfolk Schools Forum Forward Work Plan

9.1 Officers introduced the current forward work plan to the Forum.

9.2 The following items were scheduled for the November 2024 meeting of the Schools Forum:

- Strategic Planning (inc. Local First Inclusion)
- Early Years Block 2025/26 Funding Formula Update (inc. consultation outcomes)
- Schools Block (inc. consultation outcomes and Schools Block transfer)
- De-delegation/Central Schools Services Block

9.3 The Norfolk Schools Forum **RESOLVED** to **NOTE** the forward work plan.

10. Any Other Business

- 10.1 Forum Members raised concerns that the in-person DSG consultation event in King's Lynn on Thursday 17 October clashed with the Norfolk School Leaders' Conference 2024, which was being held in Norwich. It was agreed that a new date for the consultation event be found.
- 10.2 It was noted that the November 2024 meeting of the Schools Forum would have a particularly lengthy agenda due to the DSG consultation outcome being considered at this meeting. Officers suggested either holding an extended, all-day meeting on Tuesday 19 November to ensure all agenda items received a fair hearing, or potentially booking a reserve meeting in early December to cover the remainder of the agenda.

There being no other business, the meeting closed at 12:11

**Martin White, Chair
Norfolk Schools Forum**



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Schools Forum

Item No: 4

Report title:	Local First Inclusion
Date of meeting:	19 November 2024

Executive summary

In our two previous reports to Schools Forum on the Local First Inclusion (LFI) programme, July and September, we were able to provide an update on the outcome of our stock-take of the programme and to confirm the new projects that were being planned / implemented alongside original projects and initiatives. However, due to a pause in discussions with the DfE we were not in a position to be able to provide any other updates, in particular regarding the revised finance modelling.

In mid-September the DfE did make contact with us asking for a revised model to be submitted and, in part, this was due to their scheduled briefing of Ministers regarding the 'Safety Valve' plan nationally.

In this report, therefore, we are able to provide a summary of that submission. This report to Schools Forum is taking place in parallel with reporting to the NCC Scrutiny Committee (a link to that report is provided below).

Other reports on this agenda provide the outcomes of the DSG Consultation undertaken this autumn, including Element 3 funding, Notional SEN funding and the proposed Block Transfer for 2025-26, and so these items will not be covered in this paper.

Schools Forum are asked to:

- Provide comment, support and challenge regarding the summary information we have provided from our submission to the DfE on our revised LFI plan, including taking into account the anticipated timeline of activity following this submission.
- Provide comment, support and challenge regarding our recommendations to Government regarding our LFI plan and seeking partnership working with the DfE for a Norfolk and national solution to the ongoing challenges to the SEND system.

1. Timeline of activity with DfE

On 17 September the DfE contacted the LA setting out their plans to brief Ministers on the safety-valve plan nationally. They requested an updated LFI plan for that purpose and we have information which suggests that they were doing similar with other LA's who are in the safety-valve programme.

We submitted our revised plan on 4 October and, due to our submission including a number of recommendations and a clear commitment to work with the DfE on the challenges for SEND & AP within both a local and national context, we asked to arrange a meeting to discuss our plan in advance of DfE officials briefing Ministers.

To date we have not yet had this meeting confirmed. However, in the meantime we have met with all Norfolk MP's, at Westminster, to ensure they are fully briefed on our submission to the DfE and seeking their help in our continued lobbying for fundamental change.

We will update Schools Forum members during the November meeting if we have had contact with the DfE in the period between publication of this paper and the forum meeting.

In parallel to our regular reporting to Schools Forum on LFI we are also providing a report to the NCC Scrutiny Committee on progress to date for the LFI programme and our next steps. A copy of that report can be accessed via this link [Scrutiny Committee Agenda 20 November 2024](#) once it is available, noting that the meeting of the Scrutiny Committee takes place the day after the November Schools Forum meeting.

2. Summary of submission to the DfE

Following our stock-take of the first year of LFI implementation, and running alongside our discussions with the DfE as part of their enhanced, monitoring and support (EMS) process, we have set out a revised Local First Inclusion programme; submitted to the DfE on 4 October. The following section of this report is based on key extracts from that submission to the DfE, setting out our ambition and the revised projects and initiatives we will now deliver.

Our revised plan requires a longer timeframe to achieve an in-year balanced budget. It also requires changes to guidance and ultimately regulations / legislation and a revised direction from government to all parts of the system in support of mainstream inclusion. We have provided a realistic view of what is possible over a longer timeframe, but we would also want to be clear that we cannot 'guarantee' this plan will be delivered as we do not currently have all the powers and controls needed to achieve that certainty. If the system is not reformed, no LA could guarantee delivering against any projected modelling. The model is probably, therefore, a best-case scenario under the current rules.

Our revised plan to the DfE sets out,

- a multi-year plan over 8-10 years to sustain the in-year balanced budget
- a commitment to continue our investment in promoting and enabling mainstream inclusion
- a commitment to continue developing 'sufficient' specialist provision
- a commitment to significantly reduce our reliance on the independent sector
- a request to consider a pragmatic and learning approach between government and NCC with levers to manage the system more effectively and strategically, i.e. place planning

And, in addition, a request to increase the quantum of HNB funding to reflect the level of high SEND both in Norfolk and across the country, alongside the identification of changes to the SEND system to prevent further deficits from being created together with a request to consider a new approach to resolve the cumulative deficit that supports NCC to remain financially viable and mitigates the risks of NCC issuing a S114 notice.

The updated plan is based on a programme over an extended time-period, building on the successes evidenced in the first 18 months of our Local First Inclusion programme, with the initial in-year balanced budget being achieved in the financial year 2030/31. However, Norfolk's system alone does not currently have a resolution to the cumulative deficit, and the LA has indicated to the DfE the desire to explore options for this with them, alongside an offer to innovate and assist with the national debate on SEND.

The revised LFI programme now includes additional projects and task and finish pieces of work but with the same aim. The LA have added new initiatives to this change programme and the LA has been far more explicit with partners regarding the need for us all to collectively 'live within our means'. Our revised submission is focussed on a multi-year plan – 8years+ to sustain/embed an in-year balanced budget – and continues our original focus on:

- an investment in mainstream inclusion
- continuing to develop 'sufficient' specialist provision
- significantly reducing reliance on independent sector provision
- a change in culture and behaviours across the SEND 'system' in Norfolk

The latest submission to the DfE, setting out our revised projects etc, also included a revised high level financial plan. This is set out below and illustrates how the LA believes an in-year balanced budget can be achieved within the financial year 2030/31, but also clearly shows the extent of the cumulative deficit at that stage:

	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031-32	2032-33
High Needs Block DSG Income	-142.2	-146.6	-151.0	-154.1	-158.4	-162.7	-167.7	-173.1	-178.4
1.5% Schools Block transfer	-9.5	-9.7	-9.9	-10.1	-10.3	-10.5	-10.7	-10.9	-11.2
Total income	-151.7	-156.3	-160.9	-164.2	-168.7	-173.2	-178.4	-184.0	-189.6
Maintained / Academy / Free Special Schools	60.2	63.6	68.8	76.5	81.0	82.8	79.5	75.5	77.1
Specialist Resource Bases & Deaf Resource Bases	9.8	11.6	14.0	15.9	17.2	17.9	18.2	18.6	19.0
Independent Special Schools	53.0	48.3	46.0	27.9	17.2	9.6	9.8	10.0	10.2
Alternative Provision	10.8	11.9	12.6	10.3	9.5	9.8	10.0	10.3	10.5
Post-16 (Further Education)	11.0	10.4	9.4	9.7	9.7	9.4	9.1	9.1	9.3
Other Provisions	11.8	11.6	10.0	9.7	8.7	7.8	6.7	6.3	6.1
Inclusion fund (including mainstream SEN / EHCP support)	35.0	35.0	34.0	33.0	32.0	31.0	30.0	30.6	31.2
Speech & Language, Sensory, Youth Offending and Child & Adolescent Mental Health support & contributions	4.4	4.5	4.6	4.7	4.8	5.0	5.1	5.2	5.3
High Needs Inclusion Infrastructure, cluster teams including parent link workers	8.2	8.1	8.1	7.0	6.0	6.2	6.4	6.5	6.7
Other, including TPG/TPECG, H&SC levy and new school start-up costs	2.9	2.9	3.0	3.1	3.2	3.3	3.3	3.4	3.5
Contingency	1.5	1.5	1.0	0.5	0.0	0.0	0.0	0.0	0.0
Total Expenditure	208.5	209.4	211.5	198.3	189.4	182.7	178.1	175.5	178.9
In-year +deficit/-surplus	56.9	53.1	50.6	34.1	20.7	9.5	-0.3	-8.5	-10.7
Cumulative Balance without contribution	174.4	227.6	278.2	312.3	333.0	342.5	342.2	333.7	323.0

Due to the scale of the financial challenge that continues, the LA have been clear in the submission to the DfE that the offer to work with them in partnership on both Norfolk and national solutions is genuine and, in doing so, the LA have set out six recommendations:

1. We recommend a trial period where Tribunal decisions must take account of Local Inclusion Plans and Safety-valve agreements
2. We recommend a trial period using 'reasonable endeavours' to secure EP specialism within advice and information for EHCP assessments and reviews
3. We recommended a pilot to explore applying bandings and tariffs for independent schools linked to local area state-funded special schools, with a direct link between average costs and Good/Outstanding Ofsted ratings for all new placements.
4. A request to consider a pragmatic and learning approach between government and NCC with levers to manage the system more effectively and strategically i.e. place planning
5. A request to increase the quantum of HNB funding to reflect the level of high SEND both in Norfolk and across the country, alongside the identification of changes to the SEND system to prevent further deficits from being created.
6. A request to consider a new pragmatic partnership approach between the DfE and LAs to resolve the cumulative deficit that supports LAs to remain financially viable and mitigates the risks issuing S114 notices impacting other critical services

These recommendations are specific to our situation in Norfolk; however, they do complement the recommendations that have been set out in two national reports on SEND & AP. The first of these reports, published in July this year by the ISOS Partnership, was commissioned by the Local Government Association (LGA) and the County Councils Network. The second report, published very recently, was from the National Audit Office.

Taken together these reports set out the challenges in a sobering way. These reports do not merely highlight the concerns of families regarding their frustrations with the SEND system, as many reports and commentaries on SEND over the past decade have done, but instead provide a forensic assessment of the root causes of the challenges, the need for fundamental reform and the assertion that whilst funding has increased exponentially in recent years the solutions do not lie in funding alone. Links to both reports are provided below.

Link to the ISOS Partnership report on SEND & AP, commissioned by the Local Government Association and County Councils Network: [Towards an effective and financially sustainable approach to SEND in England | Local Government Association](#)

Link to the National Audit Office report on SEND & AP: [Support for children and young people with special educational needs - NAO report](#)

3. Schools Forum are asked to:

- Provide comment, support and challenge regarding the summary information we have provided from our submission to the DfE on our revised LFI plan, including taking into account the anticipated timeline of activity following this submission.
- Provide comment, support and challenge regarding our recommendations to Government regarding our LFI plan and seeking partnership working with the DfE for a Norfolk and national solution to the ongoing challenges to the SEND system.

Officer Contact

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Schools Forum

Item No: 5(1)

Report title:	NFF and DSG Update for 2025-26
Date of meeting:	19 November 2024

Executive summary

This report sets out the information received to date from the DfE in relation to 2025-26 National Funding Formula (NFF) and Dedicated Schools Grant (DSG) funding allocations.

The DfE have stated that school and local authority level NFF and DSG allocations are expected to be published in late November, after the 18 November disapplication request deadline, and Norfolk's planned Schools Forum.

The DfE have advised that local authorities will continue to set their local formula in line with the parameters of the National Funding Formula, with only minor changes to the operation of the NFF in 2025-26.

Teachers' Pay Additional Grant, Teachers' Pension Employer Contribution Grant, and the recently announced Core Schools Budget Grant will all be rolled into the NFF from 2025-26.

Schools Forum are asked to:

- **Consider the information received to date from the DfE in relation to 2025-26 National Funding Formula and DSG allocations, to inform decision making and recommendations required elsewhere on this agenda.**

1. National Funding Formula 2025-26

The DfE has stated that school and local authority level NFF allocations will be published as soon as possible following the autumn budget, but to allow sufficient time to quality assure the accuracy of the allocations, they expect that the allocations will be published in late November. This will be after the disapplications deadline of 18 November 2024.

Operational guidance for local authorities will be published for 2025-26 alongside NFF allocations. The DfE have stated that this will confirm that local authorities will continue to have flexibilities to manage any affordability pressures that arise in their local formulae, including applying capping and scaling in their local formulae, as well as setting the Minimum Funding Guarantee (MFG) within a range.

The DfE have published early information on the structure of the schools NFF for 2025-26 at <https://www.gov.uk/government/publications/pre-16-schools-funding-local-authority-guidance-for-2025-to-2026> and the announcements made have been included within this paper.

Overall, there will be no substantial changes to the NFF for 2025-26. The same factors will be used in the funding formula that will operate in the same way, except for some changes to the Private Finance Initiative (PFI) factor.

The Dedicated Schools Grant (DSG) allocations for 2025-26 will be published in December 2024.

2. Exceptional Circumstances

A key change to note from 2025-26 is that all exceptional circumstances disapplication requests must be made annually.

Requests that have been sent to the DfE for approval in previous years will no longer be automatically rolled over, and local authorities wishing to continue using this factor must submit new disapplication requests, even if the criteria are still being met.

3. PFI Factor

Changes to the PFI factor for 2025-26 are:

- providing pro-rata funding when a PFI contract is coming to an end in the financial year (such that funding is only provided for the part of the year when the contract is still in place)
- setting conditions that local authorities need to meet to receive above-inflation increases in PFI funding (with the expectation that these would be the exception). The default expectation will be that previous years' PFI funding through the NFF will be increased by the Retail Prices Index excluding mortgage interest payments (RPIX) measure of inflation. If local authorities want to request that the funding is increased by a higher amount, then they will need to submit an affordability model to DfE

4. Funding Protections

The National Funding Formula in 2025-26 will continue to provide funding protections:

- Minimum Per Pupil Levels (MPPLs) - the MPPLs guarantee a minimum amount of funding for every pupil - the funding received through the MPPL varies from school to school depending on the year groups they have. In 2025-26, MPPL values will remain compulsory in local authority funding formulae.

- The funding floor - the funding floor ensures that a school's funding is protected from excessive losses year-on-year, and that all schools attract a minimum uplift to their pupil-led per pupil funding. For 2025-26, split sites funding will sit outside the calculation of the funding floor. This means that split sites funding will properly reflect any changes in the organisation of schools' sites.

5. Rolling In Other Grants

The Teachers' Pay Additional Grant (TPAG) and the Teachers' Pension Employer Contribution Grant (TPECG) 2024 will be rolled into the NFF for 2025-26.

The recently announced Core Schools Budget Grant (CSBG) will also be rolled into the schools NFF for 2025-26.

In each case, the funding will be rolled in following a very similar approach to previous grants that were added into the DSG. That is:

- Adding cash amounts to the primary, key stage 3 and key stage 4 per pupil funding factors in the schools NFF, to represent the equivalent amounts in the grants.
- Adding cash amounts to the primary and secondary FSM6 factors, and the lump sum, in the schools NFF, to represent the equivalent amounts in the grants.
- Adding cash amounts to the Minimum Per Pupil Levels (MPPLs) for primary, KS3 and KS4 respectively, to reflect the average per pupil amount of funding that schools attracted through the preceding grants.
- Adding an amount representing the total funding each school received through the preceding grants on to its baseline, which is used to calculate funding protection for the schools through the funding floor.

For TPAG and TPECG, the funding rolled in to the NFF will use the published funding rates directly. For example, the cash amount added to the primary basic per pupil NFF factor to roll-in TPAG will simply be the cash value of the primary basic per pupil rate in TPAG for 2024-25 (£62).

For CSBG, however, the DfE will take a slightly different approach to rolling-in the funding to the NFF. This is because the total funding in the CSBG in 2024-25 is calculated to match, at a national level, the funding needed to meet the full-year cost of the support staff pay award, as well as the part-year cost of the 2024 teachers' pay award (from September 2024). Therefore, to roll in this funding, they will calculate the full year equivalent of the whole of the CSBG, and then calculate new (higher) full-year equivalent funding rates from this new total. The cash values rolled into the NFF in 2025-26 will then reflect these full-year equivalent funding rates

6. Local vs National Formula

As in previous years, local authorities will be responsible for deciding local funding formulae for mainstream schools in their area. The funding levels that schools receive will be determined by the respective local formulae.

From 2025-26 the local authority flexibility to increase the pupil number count for schools with higher reception pupil numbers in the January 2024 census, rather than the October 2023 census, will be removed. Norfolk does not use this flexibility within its formula (only 8 LA's currently do).

The DfE have stated that they will be tightening the allowable circumstances in the exceptional circumstances factor, and that the local authorities that this is likely to affect will have been advised last year to make alternative arrangements. Norfolk has not been contacted in respect of this issue, and the LA has submitted disapplication requests to the DfE for the continuation of existing exceptional circumstances factors.

The DfE state that minor technical adjustments will be made to the operation of the Minimum Funding Guarantee (MFG), whereby both split sites and PFI funding will be excluded from the MFG calculation. This brings the MFG treatment of these factors in line with the NFF and ensures that increases or decreases in a school's split site and/or PFI funding does not impact other aspects of their funding.

Schools Forum are asked to:

- **Consider the information received to date from the DfE in relation to 2025-26 National Funding Formula and DSG allocations, to inform decision making and recommendations required elsewhere on this agenda.**

Officer Contact

If you have any questions about matters contained or want to see copies of any assessments, e.g., equality impact assessment, please get in touch with:

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Schools Forum

Item No. 5(2)

Report title:	DSG Consultation – Summary of Responses
Date of meeting:	19 November 2024

Executive summary

This report summarises the number of responses to the consultation survey received to the autumn 2024 consultation with Norfolk schools.

After removal of empty files and duplicates, the LA received 24 submitted responses to the survey and 7 unsubmitted responses.

Combined, overall responses represented 184 schools and 62,717 pupils.

Additionally, the report provides a summary of consultation briefing sessions that the LA undertook during the course of the consultation period.

Schools Forum are asked to:

- **Consider and comment on the level of representation of schools, pupils and types of provision represented by the consultation responses and engagement events received, including considering any groups that may be under-represented and whether this will affect the interpretation of the responses.**
- **Provide any feedback and proposed solutions regarding the conduct of the consultation for consideration by the LA**

1. Summary of Consultation Survey Responses

1.1. Submitted responses

The Local Authority received a total of 26 submitted responses to the online survey.

After removal of 2 individual schools' responses, duplicated where the trust had already provided a response for all of its schools, there were **24** submitted responses remaining.

Of the 24 submitted responses remaining:

- 3 were from individual maintained schools within the primary sector
- 5 were from federations or partnerships of maintained primary schools
- 1 was from an individual primary academy not represented by any other response
- 1 was a combined response for two primary academies within the same trust not represented by any other response
- 9 were from academy trusts representing multiple academies (including primary, secondary, all-through and special academies)
- 5 were from maintained special schools

A total of **177** schools, and **61,290** pupils were represented by the **24** submitted responses, broken down below:

	Primary Maintained	Secondary Maintained	Federations/ Partnerships	Academy/ MATs	Special Schools	Total
Number of Responses	3	0	5	11	5	24
Representing:						
Primary	3		16	109		128
Secondary				36		36
All-Through				1		1
Special School				3	5	8
Alt. Provision				3		3
16-19 School				1		1
Total Schools	3	0	16	153	5	177

	Primary Maintained	Secondary Maintained	Federations/ Partnerships	Academy/ MATs	Special Schools	Total
Number of Responses	3	0	5	11	5	24
Total Pupils	1,147	0	3,497	55,898	748	61,290

1.2. Unsubmitted Responses

The LA received a further 65 unsubmitted responses to the survey, the majority of which were empty or duplicates.

After removal of 43 empty files, another 13 that were duplicates where a submitted response had also been received, and 2 files where duplicate unsubmitted files were received (with only the latest responses being kept), there were then only **7** unsubmitted responses remaining.

Of the 7 unsubmitted responses remaining:

- 7 were from individual maintained primary schools

A total of **7** schools, and **1,427** pupils were represented by the **7** unsubmitted responses, broken down below:

	Primary Maintained	Secondary Maintained	Federations/ Partnerships	Academy/ MATs	Special Schools	Total
Number of Responses	7					7
Representing:						
Primary	7					7
Secondary						
All-Through						
Special School						
Alt. Provision						
Total Schools	7					7

	Primary Maintained	Secondary Maintained	Federations/ Partnerships	Academy/ MATs	Special Schools	Total
Number of Responses	7					7
Total Pupils	1,427					1,427

Where duplicate responses relate to engagement questions, rather than votes on specific options, those duplicate responses have not been counted in the tables but have been included in the feedback received. There are 8 responses where additional feedback has been picked up for engagement questions.

The Chair of Schools Forum has agreed that unsubmitted responses should be provided as part of the papers relating to the consultation to enable Forum Members to be aware of all the engagement and to decide whether or not that information is used to inform considerations and recommendations / decisions.

2. Summary of Consultation Briefing Events

The primary intention of the briefing events was to support and encourage engagement in the consultation, and to encourage attendees to give consideration to the matters at hand, to hear others' thoughts and to develop thinking within the system.

The majority of the contributions relate to the broader engagement part of the consultation survey and so a summary of views expressed through the 'conversation' section of these events will be included in that paper elsewhere on this agenda. Forum Members should be aware that it is possible that some voices will have been 'heard' through both formal responses to the survey as well as through contributions and conversations as part of the briefing events.

3. Additional Comments

There was the opportunity for respondents to provide additional comments at the end of the survey. 9 responders took the opportunity to provide comments where responses were submitted. 2 more respondents provided comments where there was more than one response per school received. These are provided in Appendix A to this paper.

Comments covered a number of areas that Forum Members may wish to take into consideration throughout the rest of this Forum's agenda. The themes of the comments reflect those received elsewhere in the consultation responses including:

- Reversing the Funding Flow
- Support for AP and Complex Needs in all secondary schools
- Zonal approach vs federation / MATs approach
- Equity in funding
- Focus on early intervention
- Notional SEN allocations
- Need for clarity and consistency to support better financial planning and stability
- Benchmarking and learning from other LA areas

4. Learning for future consultations

4.1. Face to face events vs online events

Alongside the consultation, the LA undertook six consultation briefings events in relation to the elements of the consultation relating to all schools, along with an additional briefing session each in relation to proposed changes for mainstream schools ((i) Shared Parental Leave & Maternity Leave, and (ii) internal audit offer).

Considering the main briefing sessions initially:

- 3 sessions were face-to-face and 3 sessions were online, with very different types of engagement depending upon the format
- Face-to-face sessions were much more conversational, allowing for exploration of the key engagement questions in relation to the LFI programme and SEND system in Norfolk, and more solution focussed
- Online sessions were more like a briefing, primarily with attendees having cameras off with some questions and responses to engagement questions, with less conversation between attendees and less focused upon solutions for the system as a whole
- Face-to-face sessions had much lower attendance (16 people with 13 schools / academies / trusts) compared with online sessions (64 people with, at least, 56 schools / academies / trusts represented)
- Appreciation was expressed for LA officers travelling to the east and west to undertake face-to-face sessions
- Both types of sessions offered opportunities to discuss the LFI work being undertaken and volunteers to join the work of the LFI Reference Group

Looking ahead to further engagement sessions, the LA would suggest that more traditional briefing type sessions are undertaken online, but that for sessions are undertaken face-to face that are seeking to engender more engagement, conversation and feedback, such as those designed to support the development of system thinking and identification of solution. Whilst it is acknowledged that face-to-face requires more time commitment from all involved, the LA is of the view that this is outweighed by the potential benefits of the more conversational style possible when meeting face-to-face.

The specific sessions relating to changes for mainstream schools was primarily attended by SF Members only. Whilst they did not result in engagement of other mainstream schools, they did allow time to properly explore the proposal with those Members so that they are better informed for the decision making that will be required. There were undertaken online, which seemed to be appropriate approach for these elements.

The views of Forum Members about future approaches, in particular from those who attended sessions, is welcomed by the LA.

4.2. Academy trust vs maintained mainstream survey return rates

11/28 multi academy trusts have submitted responses to the survey representing 146/254 (57%) mainstream schools, whereas only 19/147 (13%) maintained mainstream schools represented (or 26/147 (18%) if including unsubmitted responses).

This data would suggest that the voice of maintained mainstream schools is under-represented in the survey responses and the LA hypothesises that this may be due to a combination of the time commitment required to engage fully with the process along with the complexity of understanding the funding formula and the potential impact of proposed changes. Additionally, if a maintained headteacher has committed time to attend a consultation briefing event, then they may not also have the time available to complete a comprehensive survey.

This is, perhaps, different for multi academy trusts where they will have senior, strategic staff who can consider and respond on behalf of the whole trust, as they may spend a greater proportion of their working day considering these issues than a maintained headteacher. This is a challenge that is inherent in the mixed system that exists across the country as well as in Norfolk.

Overall, the funding formula should impact all schools in the same way regardless of whether they are a maintained school or part of an academy trust. Therefore, presuming the academy trust responses is representative of the views of all the schools within their trust, it should not matter whether a response is from an academy or maintained school in terms of providing an overall view of the approach that should be taken in Norfolk.

That said, historically, responses to DSG consultations (previously Fair Funding Consultations) would have been completed by headteachers with support from finance leads within their school. Conversely, it may well be that academy responses are undertaken by senior finance leads for academy trusts who will, no doubt, take into consideration the views of headteachers, but may have a different viewpoint in relation to preference for their trust than an individual headteacher within a trust may have for their school.

Therefore, there is a risk that (i) we do not hear the voice of those headteachers through these consultations and (ii) we do not hear the perspective of maintained schools where who may face different challenges and have different perspectives.

The LA suggest that consideration is given by Schools Forum and the LA as to how may wish to consider how future engagements ensure that both the voice of headteachers, financial professionals and CEOs are heard in a balanced manner. For example, would a briefing event be valuable that is designed specifically for maintained headteachers that fully captures contributions and treats them as formal consultation responses?

5. Next steps

Subsequent papers on this agenda go through each element of the consultation in turn. They are presented as separate papers to ease navigation by Forum Members, but the issues are not necessarily stand-alone, and Forum Members may wish to consider the impact of feedback from a different part of the consultation when making recommendations or taking decisions.

6. Recommendation

Schools Forum are asked to:

- Consider and comment on the level of representation of schools, pupils and types of provision represented by the consultation responses and engagement events received, including considering any groups that may be under-represented and whether this will affect the interpretation of the responses.
- Provide any feedback and proposed solutions regarding the conduct of the consultation for consideration by the LA

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Appendix A – Additional/Other Comments

The DSG consultation asked for any additional/other comments. Responses are provided below, verbatim.

Question: If you have any additional comments you would like to be considered about any of the proposed changes to the funding formula for 2025-26 or other proposals in this paper, not already included, please provide them in the box below (submitted responses):

"As noted we think the challenge needs to be looked at differently. Rather than taking money off schools to then return to them in the high needs block, which has led to increased spend and not all schools supporting inclusivity try reversing this. Give more of the high needs money to schools but make the schools manage the need for the majority of pupils. This is the model in place in Cambridge.

This means you pass the cost from the element 3/high needs block to element 2/notional.

Instead of geographical zones NCC should take the existing federation/MATs as clusters. The non-MAT/federated schools can then either be brought together to form a cluster, or align into a MAT/federation cluster if there is geographic alignment. "

"In relation to Sen funding and provision, I think all secondary schools should be supported to run AP/complex needs support to avoid funding so many independent provisions which are not always the right place and involve a huge amount of travel. The ships for primary may be heading in the right direction, but all larger schools should be supported to have these. However, it is of concern that some schools are filling these with their own children, which gives them an unfair advantage in terms of funding and provision for their pupils."

"School funding is a tight at the LA's. There is not enough money to do all the things schools/LA's need to do. We need to ensure fairness and equity in our allocation of funding at both levels, and continue to lobby DfE to increase DSG to LA."

"To support schools throughout the county in keeping children with EHCP's or on the path, funding needs to become ring fenced for schools facilitating bespoke provision, rather than PExing. Allowing them to run a financially sustainable success provision year on year."

"I understand that despite the consultation, that the block transfer of 1.5% is very likely to happen again this year. However, in the future, impact and value of money of LFI needs to be considered for schools. This should not be assumed and real quality assurance should be sought by talking with schools and groups of schools. This will be particularly relevant if the safety programme is discontinued by this government."

“XXXs preferred approach is for a smaller, gradual increase (1.5% year-on-year option for notional funding) with a lower transfer percentage (0.5%) from the Schools Block to the HNB, to minimise the impact on mainstream schools' budgets.”

“Need to ensure that the agreed approach is not then changed again after a short period of time. The sector needs consistency to be able to plan and provide the best possible provision for students.”

“As detailed in my answers, there are many considerations to take on board from this consultation, and a number of questions provided for schools and Trusts to respond to appear to be quite close minded in their approach. It would be interesting to know if Norfolk have taken views and thoughts from other neighbouring and wider local authorities in how they distribute funding and how they are tackling their SEND provisions, rather than re-creating the wheel to know what seems to be working effectively in other areas of the country. As we are all supposed to be moving towards an integrated system and a hard NFF, it would make sense to have consulted on a wider basis, and provided Norfolk schools and Trusts with this feedback, prior to any decisions being made for the County.”

“It is difficult to respond meaningful to so much potential change all at once. In some instances you are consulting on options, the impact of which is impossible to assess based on the information provided. Timescales are far too short for the volumes of change being proposed or to meaningfully involved Trustees/Governors.”

Question: If you have any additional comments you would like to be considered about any of the proposed changes to the funding formula for 2025-26 or other proposals in this paper, not already included, please provide them in the box below (additional responses to be included for engagement, where more than one response had been received for a school):

“School's need clarity. There needs to be a clear approach that

- a) Allows schools to budget effectively with minimised paper heavy application processes*
- b) Specialist provision needs to match the EHCPs that are written so schools and children are not left in vulnerable provisions*
- c) The use of AP needs to be removed from the burden of schools”*

“HNB should not move to High Schools and the removal of support for children in UKS2 Y4-6 is a huge concern. We should be upstreaming- looking at supporting the youngest to improve access to learning and schooling at the very youngest ages vs being reactive at the latter stages when children have not had the full and correct early support.”

Schools Forum

Item No. 5(3)

Report title:	DSG Consultation – Broader engagement and Specialist Outreach
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools specifically in relation to the broader engagement and specialist outreach questions.

Schools Forum are asked to:

- **Consider the information provided within this report to inform decision making and recommendations required elsewhere on this agenda**
- **Provide any comments or feedback for consideration in relation to the ongoing development of the Local First Inclusion programme.**

1. Introduction

The DSG consultation with schools was an opportunity to undertake broader engagement with Norfolk's school leaders with a focus on how, as a system, we can enable higher levels of inclusion within mainstream schools. Additionally, some specific questions were asked in relation to expanding and amending the outreach model from special schools to mainstream schools to support decision making by the LA.

See section 7 (page 10) of the [DSG consultation paper 2024](#) for more information about broader engagement questions.

This report focuses on the themes of the responses to support the decision making elsewhere on the agenda for this Schools Forum, rather than an in-depth review of the responses at this stage.

The themes presented are those that have come through the responses to each question asked even where there is apparent misunderstanding from the responder(s).

There will be opportunities for further, detailed, work on these in the future; initially with the LFI Reference Group prior to a future item for Schools Forum to support the work of Local First Inclusion and the transformation needed within the Norfolk system.

Additionally, the LA is aware that many themes highlighted reflect indications of reform needed for the SEND system nationally through the recent reports by the ISOS Partnership (commissioned by the Local Government Association and the County Councils Network) in July this year and then followed very recently by the National Audit Office report into the SEND & AP system. The new Government have indicated that they will be making further announcements in Spring 25 regarding reform and funding.

Given that the purpose of this report for this agenda of Schools Forum is to support decision making elsewhere on the agenda, the verbatim comments submitted have not been added to an appendix (as the LA has done with other areas of the consultation). However, these will be shared alongside a future agenda item to consider this engagement response more substantially.

2. Question: What makes the biggest difference to the ability of schools and settings to be inclusive of children with significant needs – what should we do or provide more of?

The responses highlight several key themes:

1. Funding and Resources

- **Increased Funding** is the most frequently mentioned requirement. A significant concern is the mismatch between **funding levels** and the **increasing need** for support, particularly in **high-needs areas**. Many responses indicate that current funding structures, including **pupil-led models** and **element 3 funding**, are inadequate to meet the growing demands.
- **Predictability and Sustainability of Funding** is also emphasised. Schools require more **stable and consistent funding** to plan and develop long-term provisions, especially for **specialist roles** and **bespoke interventions**. There's a call for funding mechanisms that are less reactive and more proactive, allowing schools to adapt and scale resources to meet evolving needs.

2. Training and Specialist Support

- **Training for staff** is a major focus, with many respondents stressing the need for **high-quality, targeted professional development** to equip all staff—teachers, support staff, and SEN coordinators—with the skills to support pupils with significant needs.
- There is also a strong demand for access to **specialist services**, such as **speech and language therapy**, **educational psychology**, and other **specialist interventions** that are often unavailable or under-resourced.

- Responses highlight the value of **Specialist Partner roles** and **dedicated SEN advisors**, as these can provide targeted guidance and help schools manage challenges effectively.

3. Staffing

- **Adequate and well-trained staff** is crucial for inclusion. Schools need more support staff, such as teaching assistants, as well as **specialist staff** who can work with children with **SEMH, physical disabilities, and complex needs**.
- There is also a focus on **recruitment and retention** of staff, with a need for **long-term contracts** and **on-the-job training** to build capacity in schools. Ensuring that staff are well-supported and trained is key to maintaining high-quality provision.

4. Space and Environment

- **Physical space** within schools is a significant barrier to inclusion. Some schools do not have the necessary space to provide **safe, appropriate environments** for students with high needs, such as **safe spaces** or specialist areas.
- There's a call for **capital investment** in school infrastructure to provide suitable learning environments, including for **nurture provisions** and **specialist classrooms**.

5. Clarity and Coordination of Provision

- The **lack of clarity** about what constitutes effective inclusion is highlighted as a barrier. Some respondents mentioned the need for better **collaboration** between **EHCP coordinators, SENCo** (Special Educational Needs Coordinators), **parents, schools, and local authorities** to ensure there is shared understanding and consistency in the provision and expectations for students with significant needs.
- There is also a concern over **inconsistencies in EHCPs**—particularly when provisions listed are not achievable within the context of mainstream schools, leading to **frustration and conflict** between schools and parents.

6. Collaboration and Local Provision

- Schools need more **information** and **support** to make informed decisions about how to include students with significant needs. This includes a need for better **transition support** between different educational settings and for **clear, neutral advice** from **EHCP coordinators** regarding available local provisions.

- The idea of a **mainstream specialist model**—where some schools specialise in specific types of needs (e.g., SEMH, physical disabilities, communication) while still being part of the mainstream system—is seen as a potentially **cost-effective** and **sustainable** approach to inclusion. Schools should be able to build their capacity over time.

7. Impact on the Wider School Community

- Some responses noted the importance of ensuring that inclusive practices do not negatively impact the learning and well-being of other children. There's recognition that maintaining **inclusion** in mainstream schools requires balancing the needs of **all students**, and some respondents cautioned against **overloading** staff or disrupting the educational experience of other pupils.

8. Flexibility and Autonomy for Schools

- Schools need the **freedom** to use resources in ways that best meet the needs of their students, including flexible **staffing arrangements** and access to targeted **interventions**. The ability to make **autonomous decisions** about how to support pupils with significant needs is considered critical to the success of inclusive education.

Conclusion:

To improve the inclusivity of schools for children with significant needs, there is a clear consensus that **funding**—particularly stable, predictable funding—should be increased. There is also a strong emphasis on ensuring schools have the **resources**, **space**, and **specialist training** required to meet diverse needs effectively. Finally, the importance of **clarity** and **coordination** between all stakeholders—schools, local authorities, parents, and external services—is essential to create a more cohesive and effective system for inclusion.

3. Question: What are the biggest barriers to inclusion within the current system?

The responses point to several persistent and interconnected issues, linked with the key themes highlighted in response to the previous question:

1. Funding Shortages

- **Insufficient Funding** is the most commonly identified barrier. Many respondents highlight that there is **inadequate funding for SEND**, especially in relation to staffing, building adaptations, and the **high costs of supporting pupils** with significant needs. This includes challenges around **EHCP (Education, Health, and Care Plan) requirements** that schools often cannot fully meet due to funding constraints.

- There is also a concern about the **unpredictability** and **lack of flexibility** in SEND funding, making it difficult for schools to plan effectively and secure the necessary resources when they are needed.

2. Staffing Challenges

- **Recruitment and Retention** of skilled staff, particularly for **specialist roles**, is a major challenge. Many schools struggle to find **appropriately trained staff** or face issues with **high turnover** due to the challenging nature of the work and insufficient job security. Schools often cannot **recruit** or **retain** enough **teaching assistants** or **specialist teachers**, which significantly hampers their ability to meet the needs of pupils with SEND.
- **Staff Training** is another key barrier, with many schools facing difficulties in providing **adequate professional development** for staff to support children with complex needs, particularly in mainstream settings.

3. Bureaucracy and Administrative Burden

- **Excessive Bureaucracy** is cited as a significant barrier, particularly the complex and time-consuming processes surrounding **EHCP assessments**, **funding applications**, and **paperwork**. SENDCOs (Special Educational Needs Coordinators) are often overwhelmed by the administrative workload, which takes them away from their primary role of supporting students and staff.
- The **lengthy assessment processes** and **unrealistic EHCP provisions** (e.g., Section F) that do not align with available resources or the child's actual needs are also mentioned as significant barriers.

4. Lack of Specialist Provision and Access

- **Insufficient Specialist Provision** within mainstream schools and the **lack of specialist placements** is a recurrent theme. Many schools face difficulty in meeting the needs of pupils with complex SEND due to a lack of **specialist resources**, **spaces**, and **external placements**. The **lack of affordable external provision** or access to high-quality specialist interventions, such as **speech and language therapy**, **educational psychology**, or **nurture provisions**, is a significant constraint.
- **Space limitations** within schools, especially with increasing pupil numbers, further restrict the ability to create suitable environments for pupils with significant needs.

5. Inequities in Provision

- The **disconnect between services** (e.g., between education and health services) is highlighted, with challenges in **coordination** between **schools**, **health professionals**, and **local authorities**. This disconnect results in inconsistent or delayed support for children, particularly in early years, which can lead to **complex needs** emerging later.
- The issue of **parental expectations** and the **parental voice overriding professional advice** is noted. In some cases, this leads to children receiving **alternative provision** or **EHCPs** that do not align with their actual needs, or placements that are not sustainable for schools.

6. Curriculum and Pedagogical Barriers

- The **one-size-fits-all curriculum** and overemphasis on **standardised testing** are seen as barriers, as they do not always accommodate the needs of students with SEND, particularly those with **complex learning needs**. Respondents argue for a more **flexible** and **adaptable curriculum** that can better support the diverse needs of students.
- Schools are also facing difficulties in adjusting their **classroom environments** to meet the needs of children with complex needs, as many classrooms are designed for the **majority** and not for students with specific SEND. This is exacerbated by a **lack of training** for mainstream staff in **specialist strategies** (e.g., using PECs or sensory support).

7. Inadequate Support for Early Intervention

- **Delayed or inadequate early intervention** is another significant barrier. The absence of timely **early assessments**, particularly for **young children**, means that issues are often not addressed until they become more complex and harder to manage.
- **Early years provision** is identified as a gap, with some children entering mainstream settings without necessary **diagnosis**, **EHCPs**, or funding.

8. Systemic and Structural Issues

- **Complex and fragmented systems** within **local authorities** make it difficult for schools to navigate and receive the support they need. Some respondents feel that the **local authority system** is too slow, fragmented, and disconnected from the realities faced by schools.
- The **inflexibility of the SEND system** also poses a barrier, with the need for more **adaptive** and **responsive** support that can cater to the evolving needs of students and schools.

9. Parental and Community Support

- **Parental confidence and understanding** of the system is a barrier, with some parents having unrealistic expectations of what can be provided through an EHCP or diagnosis, while others may lack understanding of the **realities** of what support is feasible within the current system.
- The **lack of parental support or involvement** in supporting their child's needs can also exacerbate challenges for schools, particularly when there is a mismatch between what schools are able to provide and parental expectations.

10. External Pressures

- The **pressure of external regulations** (e.g., the tribunal system) and the **emphasis on standardised outcomes** (such as attendance rules) can interfere with the ability to provide flexible, responsive support for children with SEND.
- The **impact of new national attendance rules** is mentioned, which may undermine the ability to accommodate children who might benefit from **part-time mainstream placements**.

Conclusion:

The biggest barriers to inclusion in the current system are **funding constraints**, particularly regarding staffing, resources, and specialist provisions; **recruitment and retention** of skilled staff; **bureaucratic processes** that slow down access to resources; and a **lack of specialist support** and **space** to meet the needs of children with SEND. There are also concerns about **early intervention**, **parental expectations**, and the **disconnect** between health and education services. Addressing these barriers requires a more **flexible, responsive**, and **coordinated system** with sufficient resources to support both students and schools effectively.

4. Question: What specific gaps in services or provision would you highlight for the programme to address?

The responses to the question reflect both systemic and resource-based challenges.

1. Specialist Provision and Capacity

- **Insufficient Specialist Places:** There is a clear need for **more specialist resource bases (SRBs)** and specialist school placements, particularly for children with complex or high-level needs. Schools are often unable to meet the demand for placements, leading to children being in **inappropriate settings** or without suitable provision.

- **Lack of Bespoke Provision:** Some students need **flexible, bespoke provision** within mainstream schools rather than full-time specialist placements. This includes students who can access the curriculum but struggle with the mainstream environment and may need **part-time or individualised support**.
- **Increased Capacity for Alternative Provision (AP):** There is a demand for expanding **Alternative Provision** and **Complex Needs Schools** to address growing needs. There is also a call for **alternative provision** to be linked more closely with **special schools**, creating a continuum of support that offers flexibility in placements.

2. Speech and Language Therapy and Specialist Services

- **Access to Therapy Services:** A significant gap exists in the **availability and accessibility of speech and language therapy (SALT)**, along with other therapeutic services like **occupational therapy** and **mental health counselling**. Long waiting times and limited access are hindering early intervention, which is critical for children with **communication needs**.
- **Specialist Advice:** Schools often face **delays in accessing specialist advice**, including from **Educational Psychologists** and other experts, which delays support and increases the risk of children falling through the cracks.

3. Funding and Resource Gaps

- **Predictable and Sustainable Funding:** There is a need for more **predictable and consistent SEND funding** to allow schools to plan and maintain high-quality provisions over the long term. This includes ensuring funding is **adequate for children with high needs**, especially those coming from outside their catchment areas.
- **Additional Funding for Schools:** Schools need more **funding to hire additional staff**, such as **specialist teachers** or **teaching assistants**, and to access adaptive technologies that enable students to participate fully in school life.
- **Capital Investment in Specialist Spaces:** Schools require **funding for creating or improving specialist classroom spaces** that are better suited for children with SEND, ensuring that they can be included in mainstream education with the necessary support.

4. Teacher and Staff Training

- **Specialist Staff Training:** There is a need for more targeted **training and CPD (Continuous Professional Development)** for school staff, especially in areas like **non-verbal communication, autism strategies (e.g., PECs, TEACCH, Attention Autism)**, and **social-emotional learning**. This includes training on how to meet the needs of **non-verbal pupils**, students with **emotional-based school non-attendance**, and those with **behavioural challenges**.
- **SENDCo Support and Training:** There is a gap in the **training for SEND Coordinators (SENDCos)**, with a need for more **direct support** from specialists and the ability for SENDCos to work more closely with experienced SEN advisors. More **hands-on support** in schools is needed rather than relying solely on external consultants.

5. Improved Coordination and Collaboration

- **Better Collaboration Between Education and Health Services:** Many responses pointed to the need for stronger **linkages between education and health services**, particularly in the **early years**, to address **developmental issues** at the earliest stage.
- **Support for Families:** There is a gap in **family support services**, particularly for families with children who have complex needs in mainstream settings. Better **parental engagement** and **trust-building** are necessary, along with ensuring **consistent and accessible support** for parents navigating the system.

6. Administrative Burden and Process Improvements

- **Streamlining the EHCP Process:** Several responses pointed to the need for improvements in the **EHCP process**, including making it more **efficient** and **less bureaucratic**. SENDCos are overwhelmed by administrative tasks, such as **costed provision maps** and **paperwork**, which detracts from their ability to focus on direct support for students.
- **Faster Access to Support:** Respondents also emphasised the need for quicker access to services and support, particularly for **students in crisis**, to prevent situations where children end up in inappropriate settings or face long delays in receiving the necessary interventions.

7. Support for Students with Complex Behavioural and Emotional Needs

- **Behavioural Support:** There is a significant gap in **dynamic, in-school support** for students with **high behavioural needs**. This includes support for both the **school staff** and **parents**, to address behavioural challenges while maintaining the well-being of the entire school community. Support services that help **manage challenging behaviour** in a way that prevents exclusion (e.g., PEX) are urgently needed.
- **Support for Emotional-Based Non-Attendance:** Growing numbers of students are experiencing **emotionally-based school non-attendance**. There is a need for more **specialist support** to address this issue and provide tailored solutions for affected children.

8. Expansion of Specialist Knowledge and Services

- **Expertise in Local Authorities:** A desire for more **up-to-date expertise** within the local authority, with some schools expressing that they are experiencing delays in receiving actionable advice from SEN advisors or educational psychologists. **Timely, high-quality, and specific guidance** from these specialists is critical to meeting individual student needs.
- **Multi-Disciplinary Collaboration:** Respondents advocated for more **multi-disciplinary meetings** involving a variety of agencies (e.g., social care, youth services, health services) to coordinate **wraparound services** for students. In particular, the suggestion to have **school-based community hubs** involving professionals from various sectors was noted as a potential solution.

9. Alternative Provision and Flexibility

- **Flexible Provision Models:** Respondents emphasised the need for **more flexible, part-time placements** in mainstream schools for children who don't need full-time specialist provision but struggle with the mainstream environment. These placements should provide tailored support to help students access the curriculum without the pressures of full-time attendance.

10. Additional Recommendations

- **Parenting Support:** The importance of **early parenting advice** and **pre-school readiness** was highlighted, with some respondents noting that interventions are too late once children reach school age. Better **parental support systems** from an earlier age are needed to ensure children are **ready for school** and **ready to learn**.

Conclusion:

The responses highlight several key gaps in services and provision, including **insufficient specialist placements**, **lack of timely access to therapeutic services**, **underfunded school resources**, and **inadequate staff training**. To address these gaps, there is a call for **better coordination** between education, health, and social services, **increased funding**, more **specialist training for staff**, and **improved access to specialist advice** and support. Ensuring **flexible, bespoke provision** and more **inclusive, tailored interventions** in mainstream schools is also seen as essential to improving SEND provision.

5. Question: What specific changes to ways of working or pathways would you suggest?

The responses emphasise the need for more streamlined, efficient, and collaborative systems, across schools, health and the LA, that reduce bureaucratic barriers and improve support for schools and students.

1. Improved Communication and Collaboration

- **Increased School-to-School Collaboration:** Strengthening **collaboration between mainstream and specialist settings** is a key priority. More **peer networking opportunities for SENCOs** are recommended to share best practices and improve understanding of different support models. There should also be more **cross-school work**, such as **pupils with complex needs spending time in mainstream schools** and vice versa.
- **Closer Collaboration Between Support Teams:** There is a call for **closer integration between school-based teams (e.g., SENCOs)** and local authority teams (e.g., the placement team and SEN/Inclusion team) to ensure a more **holistic approach** to placements and support for students with EHCPs. Regular reviews with SEN advisors could help provide a more comprehensive perspective on the needs of the school.
- **Co-location of Services:** Services like **Mental Health Teams**, **School Nurse Teams**, **Speech and Language Therapists**, and **Educational Psychologists** should be **based in schools** or easily accessible to ensure that support is timely and easily integrated into school life.

2. Streamlined Processes and Systems

- **Streamlined Support Services:** There is a desire to **simplify and clarify the support process** for schools, especially regarding the various types of support available. This includes **eliminating overlapping support** and ensuring that services offered are **practical and effective** rather than theoretical or generic. A **clearer structure of support** with designated points of contact is also needed.
- **Simplified Paperwork and Documentation:** The current **paperwork burden** on SENDCos and schools is considered excessive and inefficient. The documentation required for accessing services and funding, particularly **Element 3 funding**, needs to be reviewed and streamlined so that it does not place undue strain on already overworked staff. There's a suggestion to **standardise the process** and reduce the emphasis on financial tracking over educational outcomes.

3. Timely and Relevant Intervention

- **More Timely Intervention:** There is a need for more **timely and continuous intervention** for students, particularly in cases where current systems are slow or restrictive. The current system often leads to delays, such as waiting for **speech and language therapy** or **EHCP decisions**, which hinders the timely provision of support.
- **Early Support and Identification:** There is a call for **earlier intervention**, particularly in **Early Years**, where early **health checks** and **early identification of SEND needs** can ensure that issues are addressed before they become more entrenched. This includes having **early years advisors** regularly visit nurseries and schools to help with identification and support.
- **Early Intervention for Neurodevelopmental Concerns:** The **NDS pathway** (Neurodevelopmental Services) needs to be **faster and more transparent**, with clear communication with schools and families about waiting lists and progress. This would ensure that schools and parents are better informed about the steps being taken to address neurodevelopmental concerns.

4. Clear and Consistent Funding

- **Set and Consistent Funding:** There's a strong call for **more predictable and standardised funding** for SEND, especially for children with complex needs. This includes setting **consistent funding levels** that allow schools to plan and budget more effectively. The **Element 3 funding** system should be **fairer** and **more transparent**, addressing the issue of unequal funding allocation for students with similar needs, with the suggestion of **flexible, pre-approved funding** for urgent SEND-related support to enable quicker responses to emerging needs and prevent delays to support.
- **Funding Clarity:** The process for allocating **funding for SEND** should be clearer, and schools should have the ability to make budget predictions for **bespoke provisions** that are sustainable over the long term.

5. Support for Schools and School Leadership

- **More Support for SENDCos:** There is a need for more **specific opportunities for SENDCos to meet** and share knowledge, learn about different models of support, and gain a better understanding of the **SEND landscape** in the region. These networking opportunities should also include **collaboration with local authority teams**.
- **Reducing Headteacher Workload:** The increasing workload on **Headteachers and SENDCos** is highlighted, particularly in the context of new initiatives like working in **zones** or moderating processes. It's suggested that workload considerations be factored into any new systems or strategies.

6. Flexible and Inclusive Pathways

- **Pathways for Complex Needs Students:** There is a need for **more flexible pathways** for students with complex needs, such as the ability to **disapply children from national curriculum requirements** or **statutory assessment** without penalising the school's performance data. This would allow schools to better support these students without the pressure of standardised testing and national expectations.
- **More Support to Keep Students in School:** There's a suggestion to improve the support system to **prevent exclusions** (PEX) and reduce suspensions by having **inclusion advisors** work directly in schools with pupils and staff to address issues early and provide preventative support.

7. Clarity and Transparency in Decision Making

- **Clarity on Decision Making:** The process by which decisions are made regarding **placement and funding** for students with EHCPs should be more transparent. There is also a call for better communication between **EHCP coordinators and schools** to ensure that **placement decisions** are informed by an accurate understanding of the school's context and the specific needs of the child.

8. Collaboration with Parents

- **Realistic Expectations for Parents:** Schools and support services should work to **set realistic expectations for parents**, helping them understand that a **1:1 teaching assistant** support may not always be necessary. This also includes helping parents better understand the types of support that are available and how they can access them.
- **Better Parent Communication:** It's crucial that parents are given **clear and consistent information** about the services their children are receiving, the progress being made, and how to navigate the SEND system.

9. Sharing Best Practices

- **Sharing Best Practices Across Schools:** There is a call for more **sharing of best practices**, particularly between mainstream and specialist schools. By learning from experts in specialist provision, mainstream schools can adapt and improve their approaches to inclusion.

Conclusion:

The suggested changes focus on creating a more **streamlined, collaborative**, and **efficient SEND system** that empowers schools, provides timely and flexible support, and ensures that funding and resources are distributed equitably. Key themes include improving communication, simplifying processes, ensuring more timely interventions, and providing schools with the flexibility and resources they need to support their students effectively. The goal is to create an environment where SEND support is **holistic, accessible**, and **sustainable** for all students.

6. Question: Do you have any views on the proposed model for spending of the High Needs Block over the coming period and the prioritisation of investment?

The responses reflect a mix of support, concern, and suggestions for improving the allocation of resources to ensure more effective provision for pupils with Special Educational Needs and Disabilities (SEND):

1. Concerns about Sustainability and Accountability

- **Sustainability of Specialist Provision:** There is significant concern about the **financial sustainability** of specialist provision, particularly in the context of **complex needs schools** and **Special Resource Bases (SRBs)**. Some respondents highlighted that **complex needs schools** are under immense pressure due to increasing demand from the **tribunal process**, but without adequate funding to support the expansion of infrastructure and resources to meet these needs.
- **Accountability for Spending:** Several responses stressed the importance of **accountability** for how the funding is spent, especially when it comes to creating new spaces and ensuring that resources are directed effectively into the system. There was also concern about the growing funding allocation for transport and independent specialist placements, which are seen as **cost-inefficient** compared to developing local, state-funded provision.

2. Balancing Investment Between Specialist and Mainstream Provision

- **Focus on Specialist Provision:** Some respondents agreed with prioritising investment in **specialist provisions** such as **SRBs** and **complex needs schools**, but emphasised the need for a balanced approach. **Top-up funding** (e.g., **Element 3** funding) should be specifically targeted for high-needs students, particularly in mainstream schools, rather than spreading it too thin across lower-band needs.
- **Investment in Mainstream Schools:** There was a clear call to ensure that **mainstream schools** are not neglected in the funding model. **Mainstream inclusion** should be prioritised, with an emphasis on **Enhanced Specialist Provisions (ESPs)** within mainstream schools, which would help upskill staff and increase overall capacity to meet SEND needs. Investing in mainstream schools was seen as a key element in **building inclusion** and preventing the need for more costly specialist placements.
- **Capital Investment:** Respondents also suggested that more funding should go toward **capital investment** in mainstream schools to create **specialist classrooms** that can better accommodate pupils with complex needs, making inclusion more feasible.

3. Prevention and Early Intervention

- **Shifting Left (Prevention):** There was broad support for the idea of **shifting left**—i.e., providing support earlier in the education system to prevent the escalation of needs. This would include improving the identification of needs **earlier** in the education process to prevent more costly interventions later on. Investing in **early years** services like **speech and language therapy** and **health checks** was seen as crucial in identifying and addressing needs at the earliest possible stage.
- **Parental Confidence:** Building **parental confidence** in the mainstream system's ability to meet needs was also highlighted, alongside the importance of **upstreaming** support to prevent pupils from becoming "stuck" without the necessary provision.

4. Autonomy and Flexibility for Schools

- **Giving Schools Autonomy:** Some respondents supported **giving schools more autonomy** over their funding decisions, allowing them to **allocate resources** in a way that best meets the needs of their students. This would enable schools to address specific needs in a more flexible and responsive manner.
- **Investment in Practical Strategies:** There was a call for more **in-school support**, including practical strategies to keep students in **mainstream settings** and to prevent them from moving to alternative provision. While **more funding** is important, there was an emphasis that it's not just about more money—it's about using existing resources more effectively.

5. Focus on Specialist Support and Infrastructure

- **Expansion of Specialist Provision:** A key priority for some respondents was the need to **expand local specialist provision** to avoid sending children to **out-of-county placements**, which are not only more expensive but also less ideal for fostering local inclusion. Developing and expanding **special school spaces** and **SRB places** within local areas was seen as essential to providing children with the right support close to home.
- **Support for Complex Needs:** There was an understanding that more **funding** is needed to support **complex needs pupils**, particularly those who are "**stuck**" without sufficient specialist provision. Respondents pointed to the **increasing pressure** on mainstream schools due to the growing number of high-needs pupils, which can exacerbate **exclusions (PEX)** and create a vicious cycle.

6. Concerns Over Current Spending Priorities

- **Inefficient Spending:** Some respondents raised concerns about the **inefficient allocation of funding**, particularly the prioritisation of transport and **independent specialist placements (AP)**, which they felt drained resources from the school system. There was criticism of the current focus on transport costs and the excessive use of independent provision, which often proves to be **more expensive and less effective** compared to developing local, inclusive support.
- **Lack of Flexibility in Decision-Making:** Some feedback pointed to the need for **more clarity** in how decisions are made about where and how the **High Needs Block** is spent, as well as ensuring that spending is **well-coordinated** and **aligned** with the actual needs of schools and pupils.

7. Calls for More Support Services and Coordination

- **Increased Support Services:** Respondents also called for more **speech and language therapists, health visitors**, and other support services to be embedded in schools to **address early identification** of needs. This would support the move towards **earlier intervention** and prevent students from reaching a crisis point.
- **More Integrated Support Teams:** There were suggestions for a more **coordinated approach** to support services, including **Education and Family Workers** who could provide **home-based support** for families, and a stronger focus on **mental health** support for both students and their families.

8. Need for Clarity and Certainty

- **Urgency for Clarity:** Some respondents felt that decisions regarding funding and the proposed model for the High Needs Block are **coming too late**, and that more clarity on future funding is necessary to **plan effectively**. There were concerns about the impact on staff and students if resources are not allocated sooner, with some fearing that **staff layoffs** and reduced support could be inevitable if the current funding model doesn't improve.

9. Long-Term Vision and Sustainability

- **Sustainability of Investments:** Finally, there was a focus on ensuring that any investments made are **sustainable** over the long term. Schools need to be able to count on consistent, reliable funding that supports the **long-term growth** of their SEND provision and doesn't lead to **short-term fixes** that might not address underlying needs.

Conclusion:

The responses suggest a consensus that the **High Needs Block** funding model needs to strike a **balance** between supporting **specialist provisions**, **mainstream inclusion**, and **early intervention**. Key priorities include ensuring that funds are **targeted effectively**, that schools are given **autonomy** to allocate resources, and that investment is directed towards areas like **capital investment**, **speech and language therapy**, and the **expansion of local specialist provisions**. There is also significant concern about the **inefficiency** of current spending practices, particularly with regard to **independent placements**, and a call for **greater clarity** and **accountability** in how the funding is distributed and spent.

7. Key Themes from Consultation Briefing Events

The briefing events provided an additional opportunity for engagement and feedback from school leaders, as well as the formal consultation survey responses.

Key issues highlighted included the reluctance of some mainstream schools to accept children and young people with moderate learning needs, the time and resources consumed by tribunals, geographical barriers and fragmented school system.

There were significant barriers identified such as financial constraints, recruitment challenges, and the mental health impact on staff.

The discussions highlighted the importance of early intervention, dynamic staffing, and strong parent-school relationships, and the need for a more holistic curriculum that focuses on life skills.

The discussions also emphasised the need for better collaboration among schools and local authorities, secure long-term funding, and addressing geographical barriers to support.

8. Specialist Outreach

The LA has been undertaking a review of the current 'S2S' model. The review has highlighted the desire to have a wider 'reach', with the opportunity to work with teachers and school leaders rather than individual children, to support them to enable children who's needs can be met in mainstream schools to remain in mainstream schools. The DSG consultation with schools included questions about a proposed new model for specialist outreach.

See section 7.1 (pages 11-13 of the [DSG consultation paper 2024](#) for more information about specialist outreach questions and options.

Question: Would expanding the scope and reach of specialist outreach support from special schools be an effective prioritisation of investment from the High Needs Block?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	18	75%
No	4	17%
Question not answered	2	8%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools¹
Yes	115	65%	27%
No	10	6%	2%
Question not answered	52	29%	12%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils²
Yes	45,981	75%	38%
No	2,159	4%	2%
Question not answered	13,150	21%	11%
Total	61,290	100%	51%

Unsubmitted responses (duplicates removed):

Option	Number of Responses	% of Responses
Yes	4	57%
No	0	0%
Question not answered	3	43%
Total	7	100%

¹ Source: [Children's Services - myNet](#)

² Pupils in Norfolk schools (maintained or academy), source: [Children's Services - myNet](#)

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Yes	4	57%	1%
No	0	0%	0%
Question not answered	3	43%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Yes	868	61%	1%
No	0	0%	0%
Question not answered	559	39%	<1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	22	71%
No	4	13%
Question not answered	5	16%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Yes	119	65%	28%
No	10	5%	2%
Question not answered	55	30%	13%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Yes	46,849	75%	39%
No	2,159	3%	2%
Question not answered	13,709	22%	11%
Total	62,717	100%	52%

Respondents were invited to provide comments to support their option chosen.

Where respondents answered 'Yes', they highlight a mix of support, concerns, and suggestions for effective implementation:

1. General Support for Expanding Outreach

- **Support for Capacity Building:** Many respondents agreed that expanding outreach support could be beneficial, particularly for **mainstream schools** that need to improve their ability to support students with **complex needs**. The goal is to **upskill mainstream staff**, enabling them to better manage and include students with significant SEND. This would ideally be a **long-term, capacity-building effort** rather than a one-off intervention.
- **Expertise Transfer:** The outreach could help transfer the **specialist knowledge** and **strategies** from special schools to mainstream schools, allowing for **earlier intervention** and better support for students, including those with **autistic spectrum disorder (ASD)**, **social-emotional mental health (SEMH) issues**, and other complex needs.

2. Challenges and Conditions for Effective Outreach

- **Capacity of Special Schools:** Some responses questioned whether **special schools** have the capacity to support mainstream schools effectively, particularly given the **difference in student needs** (e.g., **adult-child ratios**). If special schools are already struggling to meet their own students' needs, this may limit their ability to offer support to mainstream settings.
- **Balancing Time and Resources:** Expanding outreach requires careful planning to ensure that **staff release time** from special schools doesn't negatively impact the schools' own provision. There is concern about how to balance **resource allocation** to maintain quality provision for both special and mainstream schools.
- **Clear Model and Impact:** There remains **uncertainty** about what this model would look like in practice. Respondents expressed a desire for more clarity about how the **impact** on the **capacity** of special schools would be managed and how sustainable outreach would be in the long term.

3. Tailored and Flexible Support

- **Tailored Outreach Programs:** Effective outreach should be **flexible** and **tailored** to the specific needs of both the mainstream schools and the students they serve, rather than applying a **one-size-fits-all** model. This would ensure the support is relevant and directly beneficial to the schools' existing provision.

- **Specialist Support in Mainstream Settings:** Some responses suggested that **model teaching**, where special school staff demonstrate strategies in **mainstream settings**, could be particularly valuable. This would allow mainstream staff to observe and replicate effective practices within their own classrooms.

4. Limitations and Risks

- **Avoid Over-Reliance:** A key concern is the risk of **mainstream schools becoming too reliant** on special schools for support, which could undermine the goal of developing schools' **self-sufficiency** in managing SEND needs. The long-term aim should be to **empower mainstream schools** to manage these needs independently, reducing the need for continual external input.
- **Not a Long-Term Solution:** Some respondents argued that while specialist outreach might help in the short term, it doesn't solve the **underlying issue**: many children are **not in the right educational setting** for their needs. Thus, outreach support should be seen as part of a broader strategy rather than a standalone solution.

5. Complementary to Other Investments

- **Need for Broader Support:** Outreach should be part of a **holistic approach** that includes investments in **Enhanced Specialist Provisions (ESPs)**, school-wide **SEND strategies**, and the development of **nurture provisions** within mainstream schools. These complementary investments could provide a more sustainable, integrated solution to meeting the needs of SEND students.
- **Leveraging Existing Expertise:** Some responses suggested that **SRBs** (Special Resource Bases) could offer similar levels of support to special schools, as they have the expertise and skills needed to provide valuable advice within **mainstream settings**.

6. Potential for Expanding Outreach

- **Wider Support:** There was recognition that outreach could be valuable not just for individual pupils, but for a broader approach to **SEND provision**. Some respondents indicated they would be willing to fund services that provide **systemic advice** and **guidance** on improving whole-school SEND practices, rather than focusing on individual cases.
- **Support with Setting Up Specialist Provision:** A number of respondents emphasized the value of outreach that helps schools **set up their own specialist or nurture provisions**, ensuring that mainstream schools can provide tailored support for pupils with SEND without always relying on external provision.

In summary, expanding the scope and reach of **specialist outreach support** could be an effective use of High Needs Block funding if it is **well-planned, sustained, and tailored** to the needs of individual schools and students. The focus should be on **capacity building** in mainstream schools, providing **ongoing support**, and avoiding the creation of an over-reliance on special schools. It should also be part of a **broader strategy** that includes investments in **Enhanced Specialist Provisions (ESPs), early intervention, and school-wide SEND support**. While there is potential for significant benefits, the model must be carefully developed to ensure it doesn't strain the capacity of special schools or ignore the fundamental issue of correct placement for SEND pupils.

Where respondents answered **No**, concerns were raised about the **practicality** and **transferability** of ideas between special and mainstream schools, particularly given the significant differences in **staffing ratios** and **resources**. Some respondents suggested that **funding should be directed to mainstream schools** directly, allowing them to purchase **specialist advice** on a needs basis, ensuring that the support is **relevant** and **targeted**.

Conclusion:

Overall, while specialist outreach could be beneficial, its success hinges on providing **realistic, sustainable, and context-specific** support, alongside sufficient **funding** and **staffing** in mainstream schools.

Question: If this investment was to take place, do you have any views on the proposed model?

Responses:

The responses received reflect a range of concerns, suggestions, and considerations:

- **Targeting Highest Need:** Several responses emphasise the importance of directing support to schools with the highest need and ensuring specialist outreach is focused on children who require it most. There is a recognition that mainstream schools might not always be equipped to support these pupils without more intensive help from special schools.
- **Specialist Expertise and Capacity:** Many respondents highlight the need for outreach to leverage specialist expertise from special schools, while acknowledging potential capacity issues. There are calls for ensuring that any charges for outreach services are reinvested back into the special schools to sustain and enhance the support they provide.

- **Ongoing Support and Capacity Building:** There is a strong emphasis on the need for regular, sustained engagement rather than one-off interventions. The outreach should be designed to build long-term capacity in mainstream schools by developing staff skills and confidence to support children with significant needs over time.
- **Flexibility and Tailored Approaches:** Several responses suggest that the outreach model should be adaptable to the unique needs of individual schools, rather than applying a one-size-fits-all approach. This could involve needs assessments to tailor the support to specific contexts.
- **Collaboration, Not Dependency:** There is a desire for the outreach model to foster collaboration between special and mainstream schools, rather than creating a dependency on specialist schools. Mainstream schools should be empowered to apply and develop the strategies they learn, with special schools offering back-up support.
- **Resourcing Special Schools:** A recurring theme is the need for sufficient resourcing for special schools to ensure they can effectively deliver outreach without compromising their own provision. Special schools must have the necessary staffing, time, and funding to manage both their own pupils and the outreach work.
- **Data-Driven Evaluation:** Respondents stress the importance of regularly evaluating the impact of the outreach programme to measure its effectiveness. Clear metrics should be established to assess whether the outreach leads to improved outcomes for pupils and a reduction in the need for EHCP referrals.
- **Concerns about Feasibility and Implementation:** Some respondents express doubts about the feasibility of the proposed model, particularly regarding the challenge of delivering meaningful support with the existing resources in mainstream schools. They also question how the model will impact children who already have an EHCP and whether the support will be accessible and effective.
- **Training Quality and Integration:** There is an emphasis on ensuring that training provided by special school staff is of high quality and appropriately designed for mainstream environments. This includes ensuring that staff are well-prepared to adopt and implement strategies in diverse mainstream settings.
- **Autonomy and School Involvement:** Some responses call for schools to have more autonomy over how they spend funds and select the external organisations they partner with. Additionally, there is a desire for schools to have input into the design and implementation of the outreach model.
- **Need for Pilot Programs:** A few respondents suggest that the model should be trialed first to demonstrate its effectiveness before widespread implementation.

Overall, the key themes are the need for targeted, flexible, and sustainable outreach that builds long-term capacity within mainstream schools, with a strong focus on collaboration and adequate resourcing for special schools. There is also a call for ongoing evaluation to ensure the approach is achieving the intended outcomes.

Question: Would you prefer to see schools receive a charge at the point of use to contribute to this service (or other similar services that offer provision for mainstream settings), or for the High Needs Block to fully cover the costs of the service, which would likely mean a reduction in other high needs funding for mainstream provision?

Submitted responses:

Option	Number of Responses	% of responses
Charge at point of use	17	71%
High Needs Block to fully cover the costs of the service	3	12%
Question not answered	4	17%
TOTAL	24	100%

Option	Number of Schools Represented	% of responses	% of Norfolk Schools
Charge at point of use	110	62%	26%
High Needs Block to fully cover the costs of the service	12	7%	3%
Question not answered	55	31%	13%
TOTAL	177	100%	42%

Option	Number of Pupils Represented	% of responses	% of Norfolk Pupils
Charge at point of use	39,183	64%	33%
High Needs Block to fully cover the costs of the service	7,948	13%	7%
Question not answered	14,159	23%	12%
TOTAL	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Charge at point of use	2	29%
High Needs Block to fully cover the costs of the service	1	14%
Question not answered	4	57%
TOTAL	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Charge at point of use	2	29%	<1%
High Needs Block to fully cover the costs of the service	1	14%	<1%
Question not answered	4	57%	1%
TOTAL	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Charge at point of use	524	37%	<1%
High Needs Block to fully cover the costs of the service	169	12%	<1%
Question not answered	734	51%	1%
TOTAL	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Charge at point of use	19	61%
High Needs Block to fully cover the costs of the service	4	13%
Question not answered	8	26%
TOTAL	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Charge at point of use	112	61%	27%
High Needs Block to fully cover the costs of the service	13	7%	3%
Question not answered	59	32%	14%
TOTAL	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Charge at point of use	39,707	63%	33%
High Needs Block to fully cover the costs of the service	8,117	13%	7%
Question not answered	14,893	24%	12%
TOTAL	62,717	100%	52%

In addition to the options, respondents were able to leave additional comments. The key themes from the comments received in support of a charge at point of use were:

- **Engagement Through Charges:** Implementing a small charge at the point of use could indeed enhance engagement. It encourages schools to use services judiciously, ensuring that resources are allocated where they are genuinely needed.
- **Mixed Funding Model:** A mixed approach, where the High Needs Block covers a basic level of provision while schools contribute a nominal fee, seems like a fair compromise. This model would help maintain essential services while allowing schools to share in the costs, fostering a sense of responsibility.
- **Equity in Access:** It was suggested that scaling fees based on school size and need is crucial. A differentiated pricing structure would ensure that smaller or more disadvantaged schools are not disproportionately burdened, promoting equitable access to services.
- **Protecting Core Funding:** It's vital to safeguard core funding for mainstream provisions. If outreach services are fully funded by the High Needs Block, it could limit resources available for in-house support, which is essential for creating inclusive environments.
- **Collaborative Approaches:** Encouraging schools to collaborate and pool resources can maximise the impact of outreach services. This could be particularly beneficial in areas where schools are geographically close, allowing them to share costs and expertise.

The key themes from the comments received in support of the full costs being covered by the High Needs Block were:

- **Inclusivity and Equity:** Concern was expressed about penalising inclusive schools with point-of-use charges is valid. Ensuring that all schools contribute to the support of SEND children, regardless of where they attend, is essential for maintaining equity and consistency in provision across the region.
- **Service Level Agreements:** A basic service level agreement funded entirely by the High Needs Block could provide a foundation of support for all schools. This would ensure that essential services are available to every school without additional financial burdens, promoting a more inclusive environment.
- **Targeted Support:** Charging for more in-depth or bespoke support at the point of use could be a practical solution. This approach allows schools to access additional resources as needed while ensuring that basic services remain universally available.
- **Reinvestment in Outreach:** The idea of reducing alternative provision (AP) places and reinvesting those resources into outreach services is intriguing. This could enhance support for schools without imposing further costs, allowing for a more effective allocation of resources.

Conclusion

There is strong support from the responses for the proposal of an expansion of the specialist outreach model, with a charge at the point of use. The narrative feedback highlighted the importance of a balanced and equitable approach, considering both the needs of individual schools and the overarching goal of inclusivity, with some constructive suggestions for the LA to consider as further development of the model takes place.

Schools Forum are asked to:

- **Consider the information provided within this report to inform decision making and recommendations required elsewhere on this agenda**
- **Provide any comments or feedback for consideration in relation to the ongoing development of the Local First Inclusion programme.**

Officer Contact

If you have any questions about matters contained in this paper, please get in touch with:

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Schools Forum

Item No. 5(4)

Report title:	DSG Consultation – Mainstream Schools’ Funding Model Affordability
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools in relation to options for ensuring affordability of the mainstream schools’ funding model.

These options relate to the funding distribution formula of the Schools Block of the Dedicated Schools Grant (DSG) from April 2025.

Schools Forum members are asked to:

- **Recommend the approach to ensure affordability of the mainstream schools’ funding formula for 2025-26 for Norfolk.**

Mainstream Schools’ Funding Model Affordability

This year’s DSG consultation asked whether adjusting the NFF factor values within allowable ranges should be the new ‘normal’ for Norfolk (presuming that any move towards a direct NFF by the new Government allows it), or whether a cap on future gains should be reintroduced now that the immediate issue relating to small schools newly eligible for sparsity funding has been resolved.

See section 6 (pages 6 to 10) of the [DSG consultation paper 2024](#) for information about the mainstream National Funding Formula and options for affordability.

Question: Would you prefer that Option 1 (adjustment of NFF factor values) or Option 2 (re-introduction of a hard cap on future gains) is implemented to ensure the affordability of the 2025/26 funding formula for Norfolk mainstream schools?

Submitted responses:

Option	Number of Responses	% of Responses
Option 1 - Adjustment of NFF Factor values	17	71%
Option 2 – Re-introduction of a hard cap on future gains	6	25%
Question not answered	1	4%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of all Norfolk Schools ¹
Option 1 - Adjustment of NFF Factor values	128	72%	30%
Option 2 – Re-introduction of a hard cap on future gains	48	27%	11%
Question not answered	1	1%	<1%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of all Norfolk Pupils ²
Option 1 - Adjustment of NFF Factor values	38,131	62%	32%
Option 2 – Re-introduction of a hard cap on future gains	22,965	37%	19%
Question not answered	194	<1%	<1%
Total	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Option 1 - Adjustment of NFF Factor values	6	86%
Option 2 – Re-introduction of a hard cap on future gains	1	14%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of all Norfolk Schools
Option 1 - Adjustment of NFF Factor values	6	86%	1%
Option 2 – Re-introduction of a hard cap on future gains	1	14%	<1%
Total	7	100%	1%

¹ Source: [Children's Services - myNet](#)

² Pupils in Norfolk schools (maintained or academy), source: [Children's Services - myNet](#)

Option	Number of Pupils Represented	% of Responses	% of all Norfolk Pupils
Option 1 - Adjustment of NFF Factor values	1,247	87%	1%
Option 2 – Re-introduction of a hard cap on future gains	180	13%	<1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Option 1 - Adjustment of NFF Factor values	23	74%
Option 2 – Re-introduction of a hard cap on future gains	7	23%
Question not answered	1	3%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of all Norfolk Schools
Option 1 - Adjustment of NFF Factor values	134	73%	32%
Option 2 – Re-introduction of a hard cap on future gains	49	27%	12%
Question not answered	1	<1%	<1%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of all Norfolk Pupils
Option 1 - Adjustment of NFF Factor values	39,378	63%	33%
Option 2 – Re-introduction of a hard cap on future gains	23,145	37%	19%
Question not answered	194	<1%	<1%
Total	62,717	100%	52%

Additional comments received

Responders to the survey were offered the opportunity to provide additional comments for consideration by Schools Forum and the LA. Those comments received are included in **Appendix C**.

LA Proposal

The feedback from the consultation provides a strong preference for **Option 1 – Adjustment of NFF Factor Values** on the basis of number of responses, number of schools represented, and the number of pupils represented.

This option retains the benefit of continued mirroring of the National Funding Formula (within the DfE definition of being +/- 2.5% either side of factor values) but also removes the risk of any future changes to the National Funding Formula not reaching the schools for which it is intended by the DfE.

On this basis, the LA would propose implementing Adjustment of NFF Factor Values as the methodology for ensuring affordability of the mainstream schools funding formula model in Norfolk for 2025-26.

However, when Forum Members are considering their response to the LA proposal and Schools Forum's recommendation, it should be taken into account that submitted responses only represented c. 32% of schools and c. 33% of pupils, and that there was a significant proportion of responses that preferred returning to Option 2 – Re-introduction of a hard cap on future gains.

Schools Forum members are asked to:

- **Recommend the approach to ensure affordability of the mainstream schools' funding formula for 2025-26 for Norfolk.**

Officer Contact

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Appendix C – Additional Comments Received

Question: Would you prefer that Option 1 (adjustment of NFF factor values) or Option 2 (re-introduction of a hard cap on future gains) is implemented to ensure the affordability of the 2025/26 funding formula for Norfolk mainstream schools?

Submitted responses:

-Voted Option 1 – Adjustment of NFF Factor Values:

“Option 1 was selected last year to ensure consistency across all schools, as option 2 previously significantly impacted the smallest schools in Norfolk.”

“XXXXX response – Option 1 – this ensures that small schools are not disadvantaged and any adjustments are shared evenly across the system.”

“Option 1 preferred since this is the option that is already running in Norfolk and other local authorities and provides a more proportionate distribution of funding”

“Having read the paperwork and attended consultation meeting my thoughts are for option 1 because:

1 - Any funding impacts would be shared across all school settings, making it more equitable

2 - A hard cap appears to present more risk, with less modelling available on this option”

-Voted Option 2 – Re-introduction of a hard cap on future gains:

“Working on the principle that the removal of the cap was to rebalance an unintended consequence, which has now happened, the reintroduction of the cap would allow a reversion to national funding values. Without the school level data it is not possible to ascertain how this could impact schools within Norfolk though, so it would be useful for that information to be shared once it is available before the final decision.”

“As the intended direction of travel is to harmonise the system and align it with the National Funding Formula, we support Option 2 with re-introduction of a hard cap on future gains.”

“Predictability and Stability: Both XXXXX and XXXXX have relatively stable pupil populations, and projections suggest that these numbers are unlikely to grow significantly; in fact, they may contract in the coming years. A hard cap on future gains will provide more predictability in the budget, allowing us to plan effectively for the future without needing to manage potential fluctuations in funding due to changes in certain funding factors.

Focus on Long-Term Financial Planning: With a stable or declining population, it is unlikely that our schools will see significant increases in factors such as deprivation or low prior attainment, which would otherwise drive funding gains. A cap ensures that we can rely on a more consistent level of funding year-on-year, aiding in long-term planning and financial management.

Minimising Unnecessary Surprises: Option 2 helps to avoid sudden, sharp increases in funding that may arise from changes in National Funding Formula factors. This ensures a more controlled and predictable funding environment, which is crucial for schools that do not anticipate significant changes in their pupil population or demographic makeup.”

Question: Would you prefer that Option 1 (adjustment of NFF factor values) or Option 2 (re-introduction of a hard cap on future gains) is implemented to ensure the affordability of the 2025/26 funding formula for Norfolk mainstream schools?

Unsubmitted responses:

No comments received.

Question: Would you prefer that Option 1 (adjustment of NFF factor values) or Option 2 (re-introduction of a hard cap on future gains) is implemented to ensure the affordability of the 2025/26 funding formula for Norfolk mainstream schools?

(Additional responses to be included for engagement, where more than one response had been received for a school):

-Answered Option 1 - Adjustment of NFF Factor Values (but not counted due to duplicate response):

“This ensures that small schools are not disadvantaged and any adjustments are shared evenly across the system”

Schools Forum

Item No: 5(5)

Report title:	DSG Consultation – Schools Block to High Needs Block transfer
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools specifically in relation to the proposed Schools Block to High Needs Block transfer. These proposed changes relate to the funding distribution formula of the Schools Block of the Dedicated Schools Grant (DSG) from April 2025.

Schools Forum are asked to:

- **Consider the feedback from the autumn 2024 DSG Consultation;**
- **Vote on the continuation of the movement of 0.5% from the Schools Block to the High Needs Block for 2025-26;**
- **Via a vote and provision of comments, provide a clear indication, as a Forum, as to whether continuation of the additional 1% from the Schools Block to the High Needs Block is supported for 2025-26.**

1. Introduction

The DSG Schools Block is ring-fenced in line with the DSG conditions of grant, but local authorities can transfer up to and including 0.5% of their Schools Block funding into another block, for example the High Needs Block, with the approval of their Schools Forum. Without Schools Forum agreement, or where they wish to transfer more than 0.5% of their Schools Block funding into one or more other blocks, local authorities must submit a disapplication request to the Secretary of State.

See section 10 (pages 26-29) of the [DSG consultation paper 2024](#) for more information.

2. Specific Implications Responses

Question: Please detail the specific implications of each option upon your school or trust.

- **Option 1:** A transfer of 1.5% from Schools Block to High Needs Block.
- **Option 2:** A transfer of 0.5% from Schools Block to High Needs Block.
- **Option 3:** No transfer from Schools Block to High Needs Block.

Responses:

A full list of responses is provided in **appendix A**, with themes recurring across more than one option (given the impacts may be similar or differing perspectives from responders).

For option 1, schools and trusts highlighted the following key themes:

- **Incentives and Inclusivity:** The current system may discourage inclusivity by incentivising schools to bid for HNB funding rather than using their notional funding effectively. A proposed solution is to reverse this by allocating more high needs money directly to schools, increasing their accountability and encouraging them to manage most pupils' needs. Another is to transfer high needs block funds to the schools block to enable schools to manage most pupils' needs, potentially reversing the current cycle of bidding for additional funds.
- **Impact on Schools:** Schools are concerned about the significant impact of funding transfers on their budgets, potentially leading to less money per pupil and challenges in meeting educational needs.
- **Staffing and Support:** Reduced funding could lead to staffing cuts and less support for Special Educational Needs (SEN) pupils, impacting staff wellbeing and potentially leading to higher turnover.
- **Skepticism on High Needs Block Spending:** There is skepticism about whether all funding within the High Needs Block is being used effectively, including spend on services.
- **Preferred Funding Options:** Some prefer maintaining the current funding arrangement, while others support the transfer to the High Needs Block but acknowledge the impact on mainstream schools.
- **Balancing Needs:** The challenge lies in balancing reduced mainstream funding with the potential benefits for SEND pupils, requiring careful financial planning to ensure all pupils receive quality education.

For option 2, schools and trusts highlighted the following key themes:

- **Balanced Impact and Sensible Compromise:** A 0.5% transfer is seen as a more balanced approach and viewed as a sensible compromise, which would allow for targeted investment in SEND whilst reducing the negative impact on mainstream funding and allowing schools to maintain more of their general funding while still supporting high-needs pupils.
- **SEND Funding and Centralised Support:** Less focused SEND funding and reduced centralised support could risk the progress of pupils who require significant staff time, potentially impacting their learning and the learning of others.
- **Investment in Specialist Places:** The transfer could enable further investment in Alternative Provision (AP) and specialist places for those who need it.
- **Skepticism on High Needs Block Spending:** There is ongoing skepticism about whether the High Needs Block funding is being used effectively, including spend on services.
- **Solidarity with the System:** Supporting a transfer shows solidarity with a system that is under significant pressure.
- **Support for High-Needs Pupils:** Even with a lower transfer, there is a belief that it would still benefit high-needs pupils by providing additional resources and support services.
- **Impact on Special Schools:** Concerns about how the funding transfer might affect special schools, with potential issues if lower percentage is approved.

For option 3, schools and trusts highlighted the following key themes:

- **Retention of Funding:** Schools would retain their full funding, allowing them to invest in inclusivity and maintain current levels of support and resources, but acknowledgement that this may come at the expense of external / LA support.
- **Short-Term Support vs. Long-Term Needs:** While retaining funds in schools supports short-term stability, there's an acknowledgment of the need for specialist provision for pupils with the greatest needs.
- **Pressure on Schools:** Without additional funding for high needs, schools may face increased pressure to meet the needs of all pupils, potentially impacting both SEND and general education.
- **Skepticism on High Needs Block Spending:** There is ongoing skepticism about the effectiveness of spending within the High Needs Block, including spend on services.
- **Impact on Other Services:** Not transferring funds could negatively impact other services that rely on High Needs Block funding, affecting the overall support system for SEND pupils.

- **Long-Term Planning and Stability:** Retaining full funding allows for better long-term planning and financial stability, enabling schools to continue developing key areas of provision.
- **Additional High Needs funding:** Without additional High Needs Block funding, there may be challenges in meeting the growing demand for specialist support, placing more pressure on individual schools.
- **Inclusive Practices:** Schools may need to focus more on early intervention and in-house expertise to support SEND pupils within the mainstream setting, encouraging greater investment in inclusive practices.
- **Recovery Year Proposed:** No transfer could provide a recovery year for school budgets, potentially avoiding further cuts and savings.

3. Rankings from a School / Trust perspective

Question: Please rank your order of preference 1-3 (where 1 is most preferred, and 3 is least preferred) of block transfers in 2025/26 **for your school or trust only**.

Submitted responses:

Option	1 st	2 nd	3 rd
Option 1 - 1.5% transfer to HN Block	10	1	10
Option 2 - 0.5% transfer to HN Block	4	17	0
Option 3 - No transfer to HN Block	7	3	11
Total responses	21	21	21

However, this is based on a single ranking per response and does not take into account the number of schools or pupils represented by federations and academy trusts (115 schools represented by submitted responses, which is approximately 27% of Norfolk's schools):

Option	1 st	2 nd	3 rd
Option 1 - 1.5% transfer to HN Block	27	4	84
Option 2 - 0.5% transfer to HN Block	20	95	0
Option 3 - No transfer to HN Block	68	16	31
Total schools represented	115	115	115

(Note: the question was not ranked in 3 responses representing 62 schools).

Applying the rankings to the overall number of pupils represented in the same way gives the following results (46,849 pupils represented by submitted responses, which is approximately 39% of pupils in Norfolk's schools):

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	5,261	132	41,456
Option 2 - 0.5% transfer to HN Block	8,847	38,002	0
Option 3 - No transfer to HN Block	32,741	8,715	5,393
Total pupils represented	46,849	46,849	46,849

(Note: the question was not ranked in 3 responses representing 14,441 pupils).

Unsubmitted responses:

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	1	0	0
Option 2 - 0.5% transfer to HN Block	0	1	0
Option 3 - No transfer to HN Block	0	0	1
Total responses	1	1	1

(Note: the question was not ranked in 6 unsubmitted responses representing 6 other schools).

Applying the rankings to the overall number of pupils represented in the same way gives the following results (260 pupils represented by 1 unsubmitted response):

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	260	0	0
Option 2 - 0.5% transfer to HN Block	0	260	0
Option 3 - No transfer to HN Block	0	0	260
Total pupils represented	260	260	260

(Note: the question was not ranked in 6 unsubmitted responses representing 1,167 pupils).

Combined responses:

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	11	1	10
Option 2 - 0.5% transfer to HN Block	4	18	0
Option 3 - No transfer to HN Block	7	3	12
Total responses	22	22	22

(Note: 3 submitted and 6 unsubmitted consultation responses did not rank these options).

However, this is based on a single ranking per response and does not take into account the number of schools or pupils represented by federations and academy trusts.

Applying the rankings to the overall number of schools represented (with schools within a federation or academy trust assumed to vote in the same ranked order), gives the following results (116 schools represented by submitted and unsubmitted responses, which is approximately 27% of Norfolk's schools):

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	28	4	84
Option 2 - 0.5% transfer to HN Block	20	96	0
Option 3 - No transfer to HN Block	68	16	32
Total schools represented	116	116	116

(Note: the question was not ranked in 9 responses representing 68 schools).

Applying the rankings to the overall number of pupils represented in the same way gives the following results (47,109 pupils represented by submitted and unsubmitted responses, which is approximately 39% of pupils in Norfolk's schools):

Option	1st	2nd	3rd
Option 1 - 1.5% transfer to HN Block	5,521	132	41,456
Option 2 - 0.5% transfer to HN Block	8,847	38,262	0
Option 3 - No transfer to HN Block	32,741	8,715	5,653
Total pupils represented	47,109	47,109	47,109

(Note: the question was not ranked in 9 responses representing 15,608 pupils).

4. Rankings from a Whole System perspective

Question: Please rank your order of preference 1-3 (where 1 is most preferred, and 3 is least preferred) of block transfers in 2025/26 **for the system as a whole**.

Responses:

Submitted responses:

Option	1 st	2 nd	3 rd
Option 1 - 1.5% transfer to HN Block	7	2	11
Option 2 - 0.5% transfer to HN Block	8	12	0
Option 3 - No transfer to HN Block	5	6	9
Total responses	20	20	20

(Note: 4 submitted consultation responses did not rank these options).

However, this is based on a single ranking per response and does not take into account the number of schools or pupils represented by federations and academy trusts.

Applying the rankings to the overall number of schools represented (with schools within a federation or academy trust assumed to vote in the same ranked order), gives the following results (131 schools represented by submitted responses, which is approximately 31% of Norfolk's schools):

Option	1 st	2 nd	3 rd
Option 1 - 1.5% transfer to HN Block	26	6	99
Option 2 - 0.5% transfer to HN Block	53	78	0
Option 3 - No transfer to HN Block	52	47	32
Total schools represented	131	131	131

(Note: the question was not ranked in 4 responses representing 46 schools).

Applying the rankings to the overall number of pupils represented in the same way gives the following results (54,146 pupils represented by submitted responses, which is approximately 45% of pupils in Norfolk's schools):

Option	1 st	2 nd	3 rd
Option 1 - 1.5% transfer to HN Block	9,527	947	43,672
Option 2 - 0.5% transfer to HN Block	21,696	32,450	0
Option 3 - No transfer to HN Block	22,923	20,749	10,474
Total pupils represented	54,146	54,146	54,146

(Note: the question was not ranked in 4 responses representing 7,144 pupils).

Unsubmitted responses:

There were no unsubmitted responses to this question.

5. Difference between rankings

Question: If your ranking "for your school or trust only" differs from your ranking "for the system as a whole", please tell us why.

Responses:

A full list of responses is provided in **appendix A**.

The key themes highlighted within the narrative responses for the difference between rankings were:

- **Balancing Solidarity and Affordability:** Balancing the principle of solidarity with affordability leads to different preferences among stakeholders.
- **Need for Funding:** There's an understanding that additional funding is necessary, but a preference that it shouldn't come from the Schools Block.
- **Lack of Detailed Impact:** Without detailed information on the impact at the school level, it's challenging to confidently rank preferences.
- **Accepted Default:** Acknowledgement of an accepted default of a small, 0.5% transfer, though it may not be the best option for all schools individually.

6. Summary of Responses

There is a difference in the responses received from the viewpoint of an individual school or trust compared to the responses received when the responder has considered the system as a whole. The question was asked from both perspectives, in line with surveys in recent years.

School / Trust Perspective: Based upon the number of individual responses, a 1.5% block transfer received the most support, followed by no block transfer. Overall, 2/3rds of the responses supported a block transfer.

However, when considering the number of schools or pupils represented, 59% and 70% of the responses, respectively, opted for no block transfer as the first choice.

Through all lenses, a 0.5% block transfer was second choice for the vast majority (presumably as this was the closest alternative option to their first choice).

Responses represented c. 27% of schools and c. 39% of pupils in Norfolk.

Whole System Perspective: Based upon the number of individual responses, there was a more equal spread of first choice views, with the highest number preferring a 0.5% block transfer. Overall, a similar proportion of responses supported some level of block transfer as from a school / trust perspective.

However, again, when considering the responses on the basis of schools or pupils represented, different preferences are expressed with a c. 20:40:40 percentage split between 1.5%:0.5%:no block transfer.

Unlike the school / trust preference, there is a less clear approach to second choice, with high numbers for 0.5% or no block transfer across pupils and schools represented. Responses represented c. 31% of schools and c. 45% of pupils in Norfolk.

Due to the lack of provisional DSG allocations for 2025-26 from the DfE in a usual timeline, there was not any financial modelling to support schools and trusts to understand the financial implications of the options. This seemed to lead to some responders thinking that the proposal would be an additional 1.5% removed rather than continuation of current arrangements, which was also echoed in some briefing event conversations.

Through the consultation document and the briefing events, the LA were clear that if the block transfer was only 0.5% or there was no block transfer, then there would need to be a reduction in resources for maintained schools, likely to be Element 3 funding, given that the resources would be with schools distributed through the Schools Block.

Forum Members should bear in mind that whilst there has been an increase in response rate to the consultation compared to recent years, there are still many schools and pupils not represented by the responses, with a high proportion of responses to the consultation survey overall from academies.

7. LA Proposal

The LA have listened carefully to the feedback received through the consultation briefing sessions, LFI reference group meetings, and consultation survey responses alongside other, ongoing dialogue with schools and trusts.

The wide variety of views in the responses makes it difficult to draw any firm conclusions but, overall, there appears to be a steer towards schools retaining the funding in the Schools Block to invest themselves in inclusive practice, manage their budgets, increasing accountability and encouraging schools to manage most pupils needs. However, there is caution raised regarding the need to ensure that there is appropriate support systems and services in place, as a system, to support SEND pupils with the highest needs.

Over the last few months, there have been multiple conversations regarding Element 3 funding and the link between the block transfer and funding for mainstream schools from the High Needs Block. A clear theme that has come from the workshops and LFI Reference Groups undertaken has been advocating a move towards reversing the principle of a block transfer in Norfolk, enabling funding to remain within the Schools Block (distributed along the principles of the National Funding Formula), increasing Notional SEN allocations and holding schools to account to support pupils to be included within mainstream schools with only those with the very highest needs being support through the allocation of Element 3 funding.

That said, the LA is cognisant of the principles of the Safety Valve plan agreed with the DfE, which included the assumption of an ongoing block transfer, though feedback is awaited from the DfE following the LAs recent submission of the latest DSG modelling. Any move away from the current principle of a block transfer would need to be discussed with the DfE to consider any implications to the Safety Valve agreement.

Additionally, the new Government has made several announcements regarding anticipated reform of the SEND system in the Spring, which followed the recent reports by both the ISOS Partnership and the National Audit Office. At this stage, it is unclear what reform the Government may propose, along with any review or reform of SEND funding.

Given all of these factors, the LA proposes that a block transfer for 2025-26 of 1.5% from the Schools Block to the High Needs Block, but with a view to moving towards a reduced or no block transfer in future years (which would, of course, be subject to future consultation and decision-making by Schools Forum and the LA).

Based upon the feedback received, the LA is of the view that such an approach should support an increase in inclusivity across the mainstream sector, in particular:

- supporting schools to have the funding available within their budget share to be inclusive without allocation from the High Needs Block
- supporting schools to plan financially for the longer term
- supporting accountability of schools and trusts to adapt leadership and ethos, environments, adapt curriculums and training to increase inclusivity across the whole mainstream system
- enabling lower levels of high needs to be met through ordinarily available provision and provision funded through schools' budget share, with Element 3 funding reserved for children with the most complex needs (whether they have an EHCP or not)
- seeking to reduce bureaucracy and central decision-making within the system
- supporting system-wide ownership of the LFI programme
- allowing for the Government's reform announcements, expected in Spring 25, to be considered and Norfolk's approach to be adjusted and aligned.

The proposed medium-term approach outlined would come with significant risks for the LA given, at present, the financial risks of the cumulative DSG deficit, including the cash flow implications even with the statutory override arrangements in place. To avoid a the need to consider further block transfers, the LA would need to see that there is a shift in the system in terms of increased inclusivity in mainstream schools, with reduced numbers of children and young people seeking specialist provision, and with high needs block spend being managed within affordable limits (such as on Element 3 and other services, e.g. those to meet the needs of children and young people who are not currently on a school roll).

It is not proposed to move away from the 1.5% block transfer for 2025-26 due to the knock-on implications that would occur for funding for mainstream schools, primarily Element 3, from April 2025, with limited time to build in transition arrangements. Instead, the LA would suggest that, for 2025-26, the Element 3 funding model seeks to support transition towards a reduction in, or removal of, the block transfer for 2026-27. Additionally, it would be suggested that increasing Notional SEN allocations by an incremental amount for 2025-26, with a move to the 2025-26 national average for 2026-27 (if there is no block transfer). Both Element 3 and Notional SEN allocations are considered elsewhere on this agenda.

8. Schools Forum are asked to:

- **Consider the feedback from the autumn 2024 DSG Consultation;**
- **Vote on the continuation of the movement of 0.5% from the Schools Block to the High Needs Block for 2025-26;**
- **Via a vote and provision of comments, provide a clear indication, as a Forum, as to whether continuation of the additional 1% from the Schools Block to the High Needs Block is supported for 2025-26.**

Officer Contact

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If you need this report in large print, audio, Braille, alternative format or in a different language please contact 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.

Appendix A – Schools Block to High Needs Block transfer (Verbatim as received)

Impact:

Question: Please detail the specific implications of **each** option upon **your school or trust**.

Option 1 impact

-Option 1: A transfer of 1.5% from Schools Block to High Needs Block (submitted responses):

“Assume no impact on funding to Special Schools should this percentage be transferred.”

“The current system has incentivised schools to be less inclusive and not use their notional effectively and then bid for HNF. The top-slice further encourages this behaviour by reducing notional and whole school funding.

We think the challenge needs to be looked at differently. Rather than taking money off schools to then return to them in the high needs block, which has led to increased spend and not all schools supporting inclusivity try reversing this. Give more of the high needs money to schools but make the schools manage the need for the majority of pupils and increase accountability.

This means you pass the cost from the element 3/high needs block to element 2/notional.”

“As a large federation this would significantly impact on us”

*“It needs to happen as there is not a infinite amount of funding.
Less money in schools block”*

“Less money per pupil - so at risk of not meeting the educational needs of all pupils”

“This will lead to a reduction in staffing and less support for SEN pupils in school. It will likely impact on staff wellbeing and lead to more staff leaving the profession.”

“Without the detail of the move at a school level, it is not possible to comment on the specific implications. However, it is obvious that the more money that is moved away from schools then the more pressure they are under and less likely to be able to meet the needs of their children, both from a SEND perspective and an educational perspective. There is still scepticism within the system that all funding within the high needs block is providing best value for money, maximising the spending on children whilst minimising spend on services, such as the School and community teams, where their impact appears to be limited.”

“Continue to be the same”

“– transfer of 1.5% - has the biggest impact on core school funding. Without indicative modelling we are unable to give the specific implications of the 3 options”

“This would have a great impact on the impact of the general school budget.”

“Significant funding transferred out of school block that prevents m from supporting the pupils in my schools - we know these children best.”

"We believe that 1.5% transfer from the School's Block cannot substantially mitigate the huge cost pressures on the HNB in our county (or across the country).

Deducting 1.5% from schools represents a large financial burden on all schools with only a small impact on reduction of the overall system deficit."

“This is too high given significant current pressures on school funding, especially given the rise in notional funding (either 1.5% or in-line with Nat), this will place significant pressure on schools and their ability to effectively support pupils with high levels of need.”

“Preferred option - Enable continuing funding support as per current arrangement”

"Option 1, a transfer of 1.5% from the Schools Block to the High Needs Block, would have several specific implications for our schools:

Reduced General Funding for Mainstream Provision: The transfer would reduce the overall funding available for mainstream education, which may limit the resources we can allocate for non-SEND pupils. This could result in tighter budgets for staffing, learning resources, and general school improvements.

Impact on Staffing and Support Services: With less funding in the Schools Block, we may have to make difficult decisions regarding staffing levels and support services that benefit all pupils. This could include reducing teaching assistant hours or other support staff who provide invaluable help for both SEND and non-SEND pupils.

Increased Pressure on Core Curriculum: The transfer of funds could place additional pressure on core curriculum delivery. With fewer resources available for mainstream services, schools may struggle to maintain the quality and breadth of education for all pupils, especially in areas like enrichment activities, intervention programmes, and extracurricular provision.

Potential Long-Term Benefits for SEND Pupils: On the positive side, the transfer of funds to the High Needs Block could enhance the provision for pupils with significant SEND. This may help alleviate some of the current pressures on SEND funding and provide much-needed support for our most vulnerable pupils, potentially improving their access to specialist services and interventions.

Balancing Mainstream and SEND Needs: The challenge for our school will be balancing the reduced funding for mainstream education with the potential benefits for SEND pupils. While supporting high-needs pupils is essential, it will require careful financial planning to ensure that all pupils continue to receive a high-quality education despite the reduction in the Schools Block.

In summary, while the transfer of 1.5% would provide much-needed support for the High Needs Block, it would also create significant challenges for our mainstream funding, potentially impacting staffing, curriculum delivery, and general school operations."

"Options 1 and 2: Schools are struggling to make overall budgets work, and this impacts on the ability to be inclusive as struggling to meet even basic need.

Taking further money out of school budgets to allocate to the high needs budget does not encourage best inclusive practice, as it makes it so intrinsically linked to the ability to successfully bid for further high needs funding.

By retaining money within school budgets, a change in approach could be supported by adapting whole school best practice which meets the needs of the majority of students, including those with lower level additional needs.

An increase in High Needs Block funding is of little use to schools that won't be able to access it because their notional SEN is so high"

"The current system has potentially incentivised schools to be less inclusive and not use their notional effectively, and then bid for higher needs funding which creates a vicious cycle.

It is proven in other local authorities for the problem to be addressed looking at it the opposite way. Instead of taking money from the schools block and passing it to the high needs block, which doesn't encourage inclusivity, it should be considered to try to reverse this.

Transfer the high needs block to the schools block and help to enable the schools to manage the needs of the majority of pupils.

This way, more of the element 3/high needs block costs are passed to the element 2/notional costs."

"This would continue to depress funding available to schools for another year. Budgets are already at breaking point with balances depleted. This is likely to lead to further redundancies/job losses over and above those that had to be implemented in 2024 25 as a result of the SEN funding changes and in particular the timing of these"

"As a Trust with a wide profile of schools we would support the transfer to the High Needs Block but appreciate that this would have an impact on the mainstream schools in our Trust."

“As a complex needs school this would be our preferred funding option. Unfunded support staff pay awards have had a huge impact on the budget and in turn the quality of provision that we are able to provide. The significant impact of rising numbers of EHCPs and additional needs in Norfolk has an associated cost that needs to be met.”

-Option 1: A transfer of 1.5% from Schools Block to High Needs Block (unsubmitted responses):

No comments received.

-Option 1: A transfer of 1.5% from Schools Block to High Needs Block (additional responses to be included for engagement, where more than one response had been received for a school)

“It is hard to accept this funding level where there are seemingly no spaces and schools asked to do more, for higher needs with less money”

“2 – we believe that the impact on other services by not transferring the 1.5% will be significantly negative given the need to maintain investment / support for the SEN / High Needs services. This applies equally to our Trust and the whole system. On that basis our rank in order of preference is”

“We are already facing huge deficits and have paid out huge amounts over the years on S&CT etc and we are yet to see a great impact from that service”

“less SEND funding available to individual schools”

Option 2 impact

-Option 2: A transfer of 0.5% from Schools Block to High Needs Block (submitted responses)

“Assume issues to Special Schools funding if this percentage was approved.”

“As option 1”

“Slightly less than above”

“Minimises impact on schools block”

“Less focused SEND funding - and less centralised support for those pupils who take up a disproportionate amount of staff time and interfere with other children's learning . Risk that these children will not progress.”

“This enables further investment in AP/Specialist places for those that need this.”

“Without the detail of the move at a school level, it is not possible to comment on the specific implications. However, it is obvious that the more money that is moved away from schools then the more pressure they are under and less likely to be able to meet the needs of their children, both from a SEND perspective and an educational perspective. There is still scepticism within the system that all funding within the high needs block is providing best value for money, maximising the spending on children whilst minimising spend on services, such as the School and community teams, where their impact appears to be limited.”

“This would support both blocks most effectively.”

“This option shows solidarity with the system which is incredibly stretched.”

“We agree with this option if the LA proceed with a 1.5% increase in the NFF.”

“Reduces resources available to support mainstream sector with inclusion and will result in pressure on special school places”

“Option 2, a transfer of 0.5% from the Schools Block to the High Needs Block, would have a more balanced impact on our schools compared to a higher percentage transfer: Moderate Impact on Mainstream Funding: While there would still be a reduction in Schools Block funding, the 0.5% transfer would have a less severe impact on mainstream provision compared to a 1.5% transfer. This would allow us to maintain key areas of staffing, curriculum delivery, and student support, though some adjustments might still be necessary.

Sustaining Quality of Education: The reduced transfer amount helps ensure that we can continue to provide high-quality education and support services for all pupils, while still contributing to the needs of pupils with significant SEND. It allows us to preserve more resources for non-SEND pupils without creating drastic cuts to our operations.

Support for High-Needs Pupils: The 0.5% transfer strikes a balance between supporting the High Needs Block and retaining sufficient funds for mainstream provision. This contribution would help improve SEND provision across the local authority, benefiting high-needs pupils by providing additional resources and support services without overburdening the general education budget.

Sensible Compromise: This option represents a sensible compromise between meeting the needs of high-needs pupils and ensuring that mainstream schools can continue to function effectively. It allows for targeted investment in SEND while reducing the risk of negative consequences for mainstream education.

In summary, a 0.5% transfer would have a more manageable impact on our Schools Block funding, enabling us to continue providing quality education for all pupils while still supporting the High Needs Block to address SEND challenges.”

“As per comments for option 1”

“As above”

“Accepted as the default position and would mitigate some of the negative impact of option 1 above.”

“Whilst this would benefit our mainstream schools we still support the higher transfer to support the children most in need.”

-Option 2: A transfer of 0.5% from Schools Block to High Needs Block (unsubmitted responses)

No comments received.

-Option 2: A transfer of 0.5% from Schools Block to High Needs Block (additional responses to be included for engagement, where more than one response had been received for a school)

“Hopefully this would be enough”

“A middle ground - still a reduction of SEND “

Option 3 impact

-Option 3: No transfer from Schools Block to High Needs Block (submitted responses):

“Assume issues to Special Schools funding if this percentage was approved.”

“This would enable schools to retain funding to invest in being more inclusive”

“No change to currently”

“Does not impact other then high needs funding would be lower as need to balance books.”

“as above”

“Whilst this will support funding in the short term - I accept the need for specialist provision for pupils with the greatest need.”

“Without the detail of the move at a school level, it is not possible to comment on the specific implications. However, it is obvious that the more money that is moved away from schools then the more pressure they are under and less likely to be able to meet the needs of their children, both from a SEND perspective and an educational perspective. There is still scepticism within the system that all funding within the high needs block is providing best value for money, maximising the spending on children whilst minimising spend on services, such as the School and community teams, where their impact appears to be limited.”

“we believe that the impact on other services by not transferring the 1.5% will be significantly negative given the need to maintain investment / support for the SEN / High Needs services. This applies equally to our Trust and the whole system. On that basis our rank in order of preference is”

“We recognise that this wouldn't be a sustainable option.”

“Funding is kept at source and we can maximise positive impact of our current pupils.”

“We would agree with this option if the NFF increase is made to come in line with the National average of 11.5%.”

“Not sustainable as per option 2”

“Full Retention of Mainstream Funding: No transfer would allow our schools to retain 100% of our Schools Block funding, which is crucial for maintaining the quality of education and support across the board. This means we can continue to invest fully in staffing, curriculum, intervention programmes, and general resources for all pupils, including those with moderate SEND needs.

Stability for Long-Term Planning: Without a reduction in Schools Block funding, we can plan more effectively for the long term, ensuring financial stability. This allows us to continue developing key areas of provision, particularly for early intervention and supporting pupils with low-level SEND needs, without facing budget cuts that could affect general operations.

Challenges in Addressing High-Needs Pupils: While no transfer would benefit mainstream provision, it may limit the ability of the High Needs Block to meet the growing demand for SEND services across the local authority. This could result in challenges in accessing specialist support for pupils with the most complex needs, placing additional pressure on individual schools to fund these interventions from their general budget.

Focus on Inclusive Practices: With no transfer, schools may need to continue finding ways to support SEND pupils within the mainstream setting, potentially focusing more on early intervention and in-house expertise. This could encourage greater investment in inclusive practices that benefit all pupils, although it may not fully address the needs of those requiring more specialist, high-cost provision."

"Option 3: Reduce impact of real term budget reductions and allow for more effective budget planning overall."

"As above"

"No transfer would potentially allow school budgets a recovery year and mean further cuts/savings might not be necessary."

"We would not support this option"

-Option 3: No transfer from Schools Block to High Needs Block (unsubmitted responses):

No comments received.

-Option 3: No transfer from Schools Block to High Needs Block (additional responses to be included for engagement, where more than one response had been received for a school):

"Schools have more direct funding for SEND pupils - but this may come at the expense of NCC/external support "

Difference in rankings:

Question: If your ranking "for your school or trust only" differs from your ranking "for the system as a whole", please tell us why (submitted responses):

"Understand it needs to happen but don't feel it should come from block."

"Without the detail of the impact of the move at a school level, I cannot confidentially rank my preference."

"Trying to balance the principle of solidarity with the basic affordability, leads to different preferences."

“For the system as a whole, a 0.5% transfer (Option 2) offers the most balanced approach, ensuring that the High Needs Block receives additional funding to support pupils with significant needs, while limiting the impact on mainstream schools. A 1.5% transfer (Option 1) would provide more substantial support to the High Needs Block, but it may negatively affect mainstream schools’ ability to maintain general provision. No transfer (Option 3) is the least preferred for the system, as it would leave the High Needs Block underfunded, making it difficult to provide adequate support for high-needs pupils across the local authority.”

“N/A – Answered as a Trust”

“Accept that 0.5% transfer is accepted default although this is not the best option for our Trust or schools”

“We believe that many mainstream schools will see that the greater benefit for the most children will be seen through a smaller transfer but do not believe that any would support the principle of no transfer”

Question: If your ranking "for your school or trust only" differs from your ranking "for the system as a whole", please tell us why (unsubmitted responses):

No comments received.

Question: If your ranking "for your school or trust only" differs from your ranking "for the system as a whole", please tell us why (additional responses to be included for engagement, where more than one response had been received for a school):

“The Trust believe that the impact on other services by not transferring the 1.5% will be significantly negative given the need to maintain investment / support for the SEN / High Needs services. This applies equally to our Trust and the whole system. On that basis our rank in order of preference is.”

Schools Forum

Item No: 5(6)

Report title:	DSG Consultation – Notional SEN
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools specifically in relation to the Notional SEN questions. These proposed changes relate to the funding distribution formula of the Schools Block of the Dedicated Schools Grant (DSG) from April 2025.

Schools Forum are asked to:

- **Consider and recommend to the LA**
 - **Either (i) the proposal to increase the average Notional SEN allocation in Norfolk by 1.5% to 9.11% of the budget share for 2025-26, or (ii) an alternative approach.**
 - **Either (i) the proposal to amend the methodology for the calculation of Notional SEN allocations to align with the DfE recommended approach and, if agreed, to ask the LA to bring back a detailed proposal to the next Forum meeting, or (ii) to continue with the current methodology.**

1. Introduction

LAs are expected to decide, following discussions and consultation with schools and Schools Forum, in relation to both the size the Notional SEN budget and methodology for allocation, and are expected to ensure that this is kept under review.

As part of the autumn consultation, the LA has consulted schools on changes to the calculation of Notional SEN for 2025-26 in relation to both the scale of the budget and the methodology of calculation.

See section 8 (pages 13-20) of the [DSG consultation paper 2024](#) for more information.

2. Size of Notional SEN Allocations

Respondents were asked to choose their preference from two options in relation size of Notional SEN budget for 2025-26 in Norfolk:

- **Norfolk should continue to move towards the national average incrementally, with an increase of 1.5% for 2025-26, increasing from 7.61% to 9.11% of Schools Block, as we move towards the last known national average of 11.5%, or**
- **Norfolk should move to the last known national average of 11.5% in 2025/26**

Submitted responses:

Option	Number of Responses	% of Responses
Continue to move towards national average incrementally	19	79%
Move to the last known national average in 2025-26	4	17%
Question not answered	1	4%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools ¹
Continue to move towards national average incrementally	161	91%	38%
Move to the last known national average in 2025-26	10	6%	2%
Question not answered	6	3%	1%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils ²
Continue to move towards national average incrementally	56,777	93%	48%
Move to the last known national average in 2025-26	2,013	3%	2%
Question not answered	2,500	4%	2%
Total	61,290	100%	51%

¹ Source: [Children's Services - myNet](#)

² Pupils in Norfolk schools (maintained or academy), source: [Children's Services - myNet](#)

Unsubmitted responses:

Option	Number of Responses	% of Responses
Continue to move towards national average incrementally	3	43%
Move to the last known national average in 2025-26	0	0%
Question not answered	4	57%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Continue to move towards national average incrementally	3	43%	<1%
Move to the last known national average in 2025-26	0	0%	0%
Question not answered	4	57%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Continue to move towards national average incrementally	693	49%	<1%
Move to the last known national average in 2025-26	0	0%	0%
Question not answered	734	51%	<1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Continue to move towards national average incrementally	22	71%
Move to the last known national average in 2025-26	4	13%
Question not answered	5	16%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools

Continue to move towards national average incrementally	164	89%	39%
Move to the last known national average in 2025-26	10	5%	2%
Question not answered	10	5%	2%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Continue to move towards national average incrementally	57,470	92%	48%
Move to the last known national average in 2025-26	2,013	3%	2%
Question not answered	3,234	5%	3%
Total	62,717	100%	52%

Responders were asked to provide a rationale for their response. See **appendix A** for a full list of the responses received. A summary of the key themes is provided below.

From those advocating incremental increase to national average:

- Schools are already struggling with tight budgets and balancing three-year budgets.
- A sudden shift to the national average funding could lead to significant financial pressures and potential loss of experienced staff.
- An incremental approach to moving towards the national average is preferred to provide financial stability and allow schools to adjust without significant disruption.
- This approach allows for monitoring and adjustments, ensuring effective planning and prioritisation of funds for SEN pupils.
- Trusts with standard operating models designed to be inclusive face challenges with significantly different notional SEN budgets.
- Consideration is needed for the whole Trust and General Annual Grant (GAG) pooling context.
- Schools and their staff should have the freedom to decide how to spend their budgets, with quality assurance around provision for pupils with additional needs.

From those advocating immediate increase to national average:

- Inclusive schools often see an increase in the number of Education, Health and Care Plans (EHCPs), but this increase is not matched by additional notional funding.
- This results in schools having more high-needs children but the same amount of funding, which discourages inclusivity.
- Many schools are already spending significantly more on SEN than they receive in funding, highlighting a substantial financial strain.
- Call for more funding in schools to support SEND children effectively

Where no preference was given, a rationale was provided that schools are already facing significant financial challenges, and further increases to the notional SEN percentage would exacerbate these issues.

Overall, the emphasis was on the need for a balanced and gradual approach to funding changes to ensure financial stability and effective support for SEN pupils.

3. Methodology for Notional SEN

The consultation document discussed the key differences between Norfolk's current methodology for Notional SEN allocations by school, and the principles of the DfE recommended approach, with responders asked to provide their preference for either retaining the current approach or moving to a model aligned to the DfE recommended option:

- 1. Norfolk should retain the current methodology for the calculation of Notional SEN distribution, or**
- 2. Norfolk should align the calculation of Notional SEN allocation to the DfE recommended approach, i.e. the methodology should be based on:**
 - **A small part of the basic entitlement funding**
 - **A larger part of deprivation funding, reflecting the higher prevalence of lower-level SEN amongst disadvantaged pupils, and**
 - **The majority or whole of the low prior attainment factor funding, as this is the best proxy we currently have for pupils with low-cost, high-incidence SEND**

Submitted responses:

Option	Number of Responses	% of Responses
Retain the current methodology for the calculation of Notional SEN allocation	9	38%
Align the calculation of Notional SEN allocation to the DfE recommended approach	13	54%
Question not answered	2	8%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Retain the current methodology for the calculation of Notional SEN allocation	80	45%	19%
Align the calculation of Notional SEN allocation to the DfE recommended approach	94	53%	22%
Question not answered	3	2%	2%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Retain the current methodology for the calculation of Notional SEN allocation	21,886	36%	18%
Align the calculation of Notional SEN allocation to the DfE recommended approach	38,395	63%	32%
Question not answered	1,009	2%	1%
Total	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Retain the current methodology for the calculation of Notional SEN allocation	2	29%
Align the calculation of Notional SEN allocation to the DfE recommended approach	1	14%
Question not answered	4	57%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Retain the current methodology for the calculation of Notional SEN allocation	2	29%	<1%
Align the calculation of Notional SEN allocation to the DfE recommended approach	1	14%	<1%
Question not answered	4	57%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Retain the current methodology for the calculation of Notional SEN allocation	433	30%	<1%
Align the calculation of Notional SEN allocation to the DfE recommended approach	260	18%	<1%
Question not answered	734	51%	<1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Retain the current methodology for the calculation of Notional SEN allocation	11	35%
Align the calculation of Notional SEN allocation to the DfE recommended approach	14	45%
Question not answered	6	19%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Retain the current methodology for the calculation of Notional SEN allocation	82	45%	19%
Align the calculation of Notional SEN allocation to the DfE recommended approach	95	52%	23%
Question not answered	7	4%	2%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Retain the current methodology for the calculation of Notional SEN allocation	22,319	36%	19%
Align the calculation of Notional SEN allocation to the DfE recommended approach	38,655	62%	32%
Question not answered	1,743	3%	1%
Total	62,717	100%	52%

Responders were asked to provide a rationale for their response. See **appendix A** for a full list of the responses received. A summary is provided below.

Comments in support of current methodology:

- Areas with higher deprivation receive more funding, but some schools with a high number of EHCPs and high-level SEND children receive low deprivation funding.
- Current methodology prevents the assumption that schools with greater levels of deprivation have funding that relates to SEND needs, i.e. deprivation funding should reflect the wider societal needs of vulnerable pupils, not just SEND needs.
- Infant schools are particularly disadvantaged as pupil premium funding is often lower than it should be due to parents not claiming means-tested free school meals.
- Changing the total of notional funding and the approach simultaneously could introduce too much uncertainty.
- There is a preference to avoid such changes due to the risk of unintended consequences, especially for schools with high social deprivation and low prior attainment, and concerns about the lack of up-to-date modelling available.
- The SEND landscape in Norfolk is quite different from the national context, necessitating a tailored approach that works specifically for Norfolk's unique needs.

Comments in support of aligning with DfE recommended approach:

- Aligning with the DfE recommended approach helps prevent being an outlier and ensures consistency with national policy and funding.
- This alignment is preferred by many local authorities and is seen as a fairer allocation method, especially for schools with low prior attainment or disadvantage.
- Schools in high deprivation areas often need more support, and inclusive schools with high levels of EHCPs face additional challenges.
- Deprivation funding is significant in areas like Kings Lynn, Thetford, Norwich, and Great Yarmouth, but it may not always reflect the needs of SEND pupils.

Comments where no vote was provided expressed support in principle for aligning with the DfE recommended approach, echoed some of the comments summarised above, but raised particular concerns regarding potential impact upon infant schools where there may be high levels of undiagnosed SEND on arrival in reception.

4. Summary of Consultation Responses

On the basis of number of responses, number of schools represented, and the number of pupils represented, the feedback from the consultation provides

- a strong preference for **Option 1 – Continue to move towards national average incrementally** in relation to the overall size of the Notional SEN budget in Norfolk
- a preference for **Option 2 – Align the calculation of Notional SEN allocation to the DfE recommended approach** in relation to the methodology for the calculation of Notional SEN distribution. The strength of this preference varied depending on whether viewed through the lens of number of responses, schools or pupils represented.

Responses underscore the complexities and challenges of adjusting SEN funding models and the necessity for careful consideration to identify a solution that provides equitable support for all schools and pupils. They highlight the importance of aligning with national standards for consistent and fair funding, while also raising concerns regarding the challenges of high deprivation areas. While there is an understanding of the rationale behind aligning with the DfE recommended approach, there are concerns regarding its impact on infant schools, especially those dealing with undiagnosed SEND on entry.

Some responses reflected that there appeared to be some misunderstandings regarding why Notional SEN allocations at a school level as a percentage of budget share is different to the overall average percentage quoted for Norfolk.

The responses received represent c. 52% of all pupils in Norfolk across 184 schools.

5. LA Proposal

Given the current challenges with high needs funding for the mainstream school system, the LA are of the view that it would be preferable to move to the national average and align the methodology for calculation to the DfE recommended approach at the earliest opportunity. This is due to 'equalising' the expectations across Norfolk schools regarding the proportion of budget share that is expected to be utilised to meet SEN need, as well as moving the expectations of the Norfolk system to be more aligned with colleagues elsewhere in the country, as reported by the DfE. This is a view that has been fed back to the LA by various school leaders during various, recent engagement.

However, the LA also believe that it is important that the formal response of the system is listened to, and the system as a whole takes a lead for 'equalising' expectations.

Therefore, the LA proposes implementing an incremental move towards the national average (option 1) whilst aligning the methodology for the calculation of Notional SEN to the DfE recommended approach for 2025-26, whilst indicating an expectation of moving to the 2025-26 national average for 2026-27.

When considering their response to the LA proposal and recommendations in relation to Norfolk's Notional SEN budget for 2025-26, Schools Forum Members should take into account the range of feedback received and consideration of the whole system view versus the potential impact for individual schools or trusts that may be represented in the responses received.

If Schools Forum agree with the LA's proposal to amend the methodology, the LA suggests that a proposed formula, or limited options, are brought back to the December Forum meeting. This will allow Forum Members to recommend a specific methodology to the LA.

This proposal presumes the continuation of the 1.5% Schools Block to High Needs Block transfer for 2025-26, which will have been considered elsewhere on this agenda.

6. Schools Forum are asked to:

- **Consider and recommend to the LA**
 - **Either (i) the proposal to increase the average Notional SEN allocation in Norfolk by 1.5% to 9.11% of the budget share for 2025-26, or (ii) an alternative approach.**
 - **Either (i) the proposal to amend the methodology for the calculation of Notional SEN allocations to align with the DfE recommended approach and, if agreed, to ask the LA to bring back a detailed proposal to the next Forum meeting, or (ii) to continue with the current methodology.**

Officer Contact

If you have any questions about matters contained in this paper, please get in touch with:

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Appendix A – Notional SEN (full list of comments verbatim as received)

Notional SEN budget size:

Notional SEN budget size (submitted responses)

-Voted 'Continue to move towards the national average incrementally':

"However, if the model for E3 was revised to removed Bands 1-4a and this funding to be transferred back into the DSG block and then provided to schools via notional SEN. We would support moving instantly to the national average. This would provide certainty to schools and meet the objectives of LFI."

"Schools are already struggling. We are all juggling to balance a 3 year budget"

"school budgets are tight - agreeing to some transfer will help LA and schools"

"A hard move is too much for schools to absorb in one hit, given the reduction in Element 3 funding. This will only lead to considerable ill will across the education community and is likely to lose lots of experienced staff from the profession. Schools cannot continue to do more with less."

"Given the significant spend on element 3 and the very large movement from the schools block, we need to ensure that top funding is directed to where it is most needed however any change needs to be manageable based on the current system and implemented over time."

"Otherwise this would have too much of an impact on school's budgets."

"This approach will place significant pressure on already stretched school budgets, this is most pertinent for schools with higher DA as an example, this will allow schools to adapt over time and adjust spending over time."

"Sustainability"

"I would prefer to continue moving towards the national average incrementally, for the following reasons:

- Financial Stability for Schools: An incremental approach provides more stability for schools, allowing them to adjust to the changes in funding without significant disruption. Sudden increases in Notional SEN funding could lead to unintended financial pressures elsewhere, particularly if schools are not prepared to redistribute funds quickly.*

- *Measured Approach to Change: Incremental increases allow schools and local authorities to monitor the impact of the changes and make adjustments as necessary. This ensures that schools can plan effectively, rather than having to react to a sudden, significant shift in funding allocation. A phased approach also allows for more considered decision-making and prioritisation of how these funds are used to support SEN pupils."*

"Consideration needs to be given to notional SEN budget in the context of the whole Trust and GAG pooling. Where Trusts have standard operating models, which are designed to be inclusive for the majority of pupils, such significantly different notional SEN budgets are challenging to make work"

"I think that Norfolk should continue to move towards the national average incrementally.

If Element 3 funding was revised to remove Bands 1-4a and this funding was then transferred to the DSG block and provided to schools via the notional SEN, then as a Trust we could support moving instantly to the national average. I think that this provides more certainty to schools and also meets the objectives of Local First Inclusion."

"NB moving towards an average which includes NCC values as part of the dataset is methodologically suspect. Any change in NNC value will affect that average value in the future - so reaching the 'last known average' is unlikely"

"Our preference would be for schools and their headteachers and staff to be able to have freedom over how they spend their budgets but with quality assurance around provision for pupils with additional needs"

"I think we need to get in line with National averages, but doing this all at once would be too much of a financial jump at present."

-Voted 'Move to the last known national average in 2025/26':

"Notional funding is biggest issue. If you are an inclusive school then number of high needs children increase but this is not reflected in notional funding. Therefore you have more high needs children but same money. This is not an incentive to be as inclusive as possible."

"More funding in schools for SEND children, maintaining support for our high needs children, while waiting for more specialist placements become available."

"We already spend far more on SEN than we receive."

-Did not choose an option:

"Due to a significant immediate negative financial effect on our schools, we do not support further increases to the notional SEN percentage."

The proposed increase even to 9.11% would make access to Element 3 funding very difficult with schools having to absorb more of the additional SEN costs in their core budget. Several schools with high SEND needs do not have reserves to offset the loss of additional funding caused by the increased Notional SEN percentage. Should the % move to 11.5%, this would have a more negative financial effect on the schools that the proposed transfer of 1.5% from the Schools' block to the HNB."

Notional SEN budget size (unsubmitted responses)

-Voted 'Continue to move towards the national average incrementally':

"Hard to say without technical paper." (LA note: A notional SEN technical paper was published online as part of the consultation)

-Did not choose an option:

No further comments received.

Notional SEN budget size (additional responses to be included for engagement, where more than one response had been received for a school)

-Voted 'Continue to move towards the national average incrementally' (but not counted as it was a duplicate):

"Preference is incremental increase.

This ensures that there is incremental progression and mitigates the level of expectation on what schools are able to do within core funding whilst moving towards the expected national levels"

Notional SEN budget methodology:

Notional SEN budget methodology (submitted responses)

-Voted 'Retain the current methodology for the calculation of Notional SEN allocation':

"Areas of higher deprivation already receive more funding than others. We have 22 EHCPs, a high number of high level SEND children but our deprivation funding is low. Infant schools would lose out as pupil premium funding is always lower than it actually should be as parents do not claim means tested free school meals"

"If the total of notional is to change, then changing the approach at the same time risks bringing in too much uncertainty."

"Preference 1 to due to the risk of unintended consequences for schools with high social deprivation and low prior attainment."

"Retain status quo as unable to model the implications due to incomplete data/funding information."

"The Norfolk landscape for SEND is quite different to national. We need a bespoke approach that works for our SEND landscape."

Voted 'Align the calculation of Notional SEN allocation to the DfE recommended approach':

"By aligning it prevents us being an outlier in another area"

"Neither of these are ideal, I also know if you work in a high deprivation area then the children often need more support. Again this does not help if you are an inclusive school and so then end up with a high level of ehcps."

"This reflects the higher funding for schools with low prior attainment or disadvantage so is a fairer allocation rather than a one size fits all approach."

"Significance of children in Norfolk being from deprived back grounds, especially within the larger towns. e.g., Kings Lynn, Thetford, Norwich, Great Yarmouth."

"Of the 2 options, we support option b) as it reduces the departure from the DfE recommended approach."

Is there a mechanism or a formula which would bring the notional funding % on a school level closer to the quote 7.61%, 9.11% or 11.50%?

Several of our primary schools' notional funding is already between 10%-11%, where we expected the values to be closer to 7.61%."

"This approach will better support the local demographic."

"Believe it is better to have a national approach for consistency"

"Align with the DfE recommended approach, since this is the preferred model amongst the majority of other local authorities nationally."

Further changes to the notional SEN allocation nationally in the future would then also be implemented in Norfolk, ensuring alignment with national policy and funding."

Did not choose a response:

"I would prefer to align the calculation of Notional SEN allocation to the DfE recommended approach, but with some reservations, for the following reasons:

- *Better Reflection of Pupil Needs: The DfE's recommended approach bases the allocation on factors such as deprivation and low prior attainment, which are strong indicators of higher levels of SEND. Aligning with this approach would provide a more accurate reflection of the needs in schools like ours, where a significant proportion of pupils with low prior attainment may have underlying SEND needs that require support.*
- *Fairer Distribution of Resources: The DfE approach targets resources more effectively by linking a larger portion of the funding to deprivation and low prior attainment. This ensures that schools with higher concentrations of disadvantaged pupils, who are more likely to require additional support for lower-level SEN, receive the funding necessary to meet those needs.*
- *Challenges for Infant Schools: Our infant school is often at the receiving end of undiagnosed SEND on arrival into Reception, and this poses a significant challenge in the context of funding. With over 20 feeder nurseries and pre-schools, the quality of information and understanding of SEND is highly variable. Many children's needs are not fully recognised until they enter Reception, meaning that the reliance on deprivation and prior attainment as indicators might not fully reflect the needs in an infant school setting. This creates concerns about whether the DfE model would provide the necessary resources for early identification and support in an infant school context.*
- *Consistency with National Expectations: Aligning with the DfE's methodology ensures consistency with national expectations and practices. This would help Norfolk schools to be in line with the broader funding framework, making it easier to compare outcomes and approaches with other regions, and ensuring that funding is allocated based on the same underlying principles used across the country.*
- *Targeting Resources Where They Are Most Needed: By using low prior attainment as the main proxy for SEN, this approach ensures that resources are directed towards the schools and pupils most likely to need them. However, in infant schools, where prior attainment data is unavailable, greater emphasis on deprivation or early years data is needed to ensure that funding reflects the actual needs.*

In summary, while I understand the rationale behind aligning with the DfE recommended approach, I have concerns regarding its impact on infant schools, especially those like ours that deal with undiagnosed SEND on entry. Any adoption of this model should consider the specific needs of infant schools and ensure that funding can still support the early identification and provision for SEND pupils."

Notional SEN budget methodology (unsubmitted responses)

No comments received.

Notional SEN budget methodology (additional responses to be included for engagement, where more than one response had been received for a school)

-Answered 'Retain the current methodology for the calculation of Notional SEN allocation' (but not counted as it was a duplicate):

“Option 3a prevents the assumption that schools with greater levels of deprivation have funding which relates to SEND needs. Deprivation funding reflects the wider societal needs of vulnerable pupils and not that this is about SEND. If the middle bullet point of option 3b were not a factor, we would consider this as a reasonable option.”

Schools Forum

Item No: 5(7)

Report title:	DSG Consultation – Element 3
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools specifically in relation to Element 3 funding for mainstream schools. These considerations relate to the funding distribution formula of the High Needs Block of the Dedicated Schools Grant (DSG) from April 2025.

Schools Forum are asked to:

- **Consider and comment on the consultation responses shared and the key themes identified to inform the final development work for the model**
- **Agree the proposed approach to consider the future model at an additional Schools Forum meeting in December**

1. Introduction

The LA undertook engagement in relation to the distribution of Element 3 funding following urgent changes that had to be made to ensure affordability for Norfolk in 2024-25. These changes have been well documented and reported in various places.

Significant work has been undertaken with a variety of school leaders to consider the future options for the allocation of Element 3 funding in Norfolk, with the outcome of some of that work shared with the system as a whole through the consultation to seek wider feedback and engagement.

See section 9 (pages 20-26) of the [DSG consultation paper 2024](#) for more information.

Like the broader engagement section of this agenda, this report focuses on the themes of the responses to support the decision making elsewhere on the agenda for this Schools Forum, rather than an in-depth review of the responses at this stage.

The themes presented are those that have come through the responses to each question asked even where there is apparent misunderstanding from the responder(s).

There will be opportunities for further, detailed, work on these in the future, detailed towards the end of this report.

Given that the purpose of this report for this agenda of Schools Forum is to provide an overview of the feedback received and to agree next steps, the verbatim comments submitted have not been added to an appendix (as the LA has done with other areas of the consultation). However, these will be shared alongside a future agenda item to consider these responses more substantially.

2. Consultation Questions

The principles of the model are a combination of formulaic funding and individual child allocations for those with the very highest needs.

A. Question: What are the key benefits of this new approach to allocation?

Responses:

The narrative responses identified multiple key benefits to the proposed new approach:

- **Financial Sustainability:** It helps NCC manage within its means, addressing the pressure on the High Needs Block and avoiding unsustainable cost spirals.
- **Clarity and Predictability:** By using a formulaic approach, schools gain clear insights into their funding, enabling better planning for provision, staffing, and budgets. This predictability supports long-term financial planning and reduces costs.
- **Improved Outcomes for Pupils:** With more predictable funding, schools can focus on improving outcomes for pupils, particularly those with high needs, by ensuring resources are directed where they are most needed.
- **Strategic and Proactive Planning:** Schools can adopt a more strategic approach to meeting needs, exploring innovative solutions like Enhanced Support Packages (ESPs).
- **Reduced Administrative Burden:** The new model reduces the time SENDCOs spend on administrative tasks, allowing them to focus more on supporting pupils directly.
- **Targeted Support for High Needs:** Specific payments for pupils with the highest needs (categories 4b & 4c) ensure that resources are directed towards those who need them most.
- **Direct Funding for Pupils:** Schools can apply for additional funds to meet specific needs, ensuring that finance is available for the highest need pupils.
- **Continuity and Security for Staffing:** Greater funding predictability helps schools retain staff, reducing redundancies and loss of staff from the profession.

- **Equitable Resource Distribution:** The model promotes equitable distribution of resources, ensuring that schools with higher numbers of pupils with significant needs receive appropriate funding.
- **Flexibility and Early Intervention:** The approach encourages early intervention and provides flexibility to address both general and high-cost SEND needs effectively.
- **Reduced Bureaucracy:** By simplifying the funding process, schools can focus more on teaching and less on paperwork, leading to better educational outcomes.

B. Question: What are the key disbenefits of this new approach to allocation?

The narrative responses identified multiple key disbenefits to the proposed new approach:

- **Communication Issues:** Some schools and Multi-Academy Trusts (MATs) may not fully understand the new system, leading to confusion and misapplication of funds.
- **Inflexibility for Moderate Needs:** Schools experiencing a high change in moderate needs (e.g., bands 2 or 3) might struggle to meet these needs due to the formulaic approach, which may not reflect real-time changes.
- **Early Identification Challenges:** In infant schools, high-level SEND needs are not always identified early, making it difficult for schools to support these needs promptly.
- **Insufficient Funding for EHCPs:** The current funding may not cover the highest need children in mainstream schools, leading to gaps in support.
- **Allocation Challenges:** Individual child allocations can be problematic, as schools might try to link the highest needs to specific children, complicating the tracking of how funds are spent.
- **Skewed Funding for Larger Schools:** Formulaic funding might not accurately reflect the level of high need within larger schools, potentially leading to inequitable resource distribution.
- **Risk of Underused Funding:** A formulaic approach may not always direct funds to where they are most needed, risking under-utilisation of resources.
- **Inconsistency and Sustainability Issues:** The approach might impact the sustainability of bespoke nurture-based provisions and could lead to funding being reviewed and removed even when needs remain unchanged.
- **Delayed Support for Developing Needs:** Pupils with developing needs might not receive timely support, potentially leading to greater needs in the long term.
- **Equity Concerns:** Schools with a higher proportion of SEND pupils might struggle to fund necessary provisions without sufficient funding.

- **Administrative Burden:** The process of applying for individual high-needs funding can still be administratively burdensome, detracting from time spent on direct support.
- **Impact on Staffing:** Changes in funding allocations can affect the sustainability of support staff employment, especially when individual child allocations move with the pupil.
- **Lack of Flexibility:** The formulaic budget might pressure schools to manage diverse SEND needs within a fixed allocation, lacking flexibility to address unexpected changes in pupil needs.
- **Potential for Inequitable Outcomes:** The model may lead to inequitable outcomes if it does not adequately reflect the needs of pupils at the time.
- **National Funding Issues:** The approach does not address the broader issue of insufficient national funding to meet known needs, introducing another change to an already fluctuating system.
- **Gaming of Funding:** There is a risk that the system could be gamed, with schools potentially manipulating funding allocations to their advantage.

C. Question: Do you think a greater proportion of the funding should be allocated on a formula basis or an individual child basis?

Submitted responses:

Option	Number of Responses	% of Responses
Formula basis	12	50%
Individual child basis	8	33%
Question not answered	4	17%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools ¹
Formula basis	57	32%	14%
Individual child basis	102	58%	24%
Question not answered	18	10%	4%
Total	177	100%	42%

¹ Source: [Children's Services - myNet](#)

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils ²
Formula basis	24,688	40%	21%
Individual child basis	28,099	46%	24%
Question not answered	8,503	14%	7%
Total	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Formula basis	2	29%
Individual child basis	1	14%
Question not answered	4	57%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Formula basis	2	29%	<1%
Individual child basis	1	14%	<1%
Question not answered	4	57%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Formula basis	429	30%	<1%
Individual child basis	264	19%	<1%
Question not answered	734	51%	1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
Formula basis	14	45%
Individual child basis	9	29%
Question not answered	8	26%
Total	31	100%

² Pupils in Norfolk schools (maintained or academy), source: [Children's Services - myNet](#)

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
Formula basis	59	32%	14%
Individual child basis	103	56%	24%
Question not answered	22	12%	5%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
Formula basis	25,117	40%	21%
Individual child basis	28,363	45%	24%
Question not answered	9,237	15%	8%
Total	62,717	100%	52%

In addition to choosing the options, respondents were asked for additional comments.

The narrative responses confirmed that the question of whether a greater proportion of funding should be allocated on a formula basis, or an individual child basis, is complex and depends on various factors. The narrative responses highlighted some key points to consider:

Formula Basis

Pros:	Cons:
Predictability and Stability: Provides schools with a more predictable and stable funding stream, allowing for better long-term planning and consistent provision for SEND pupils.	Inflexibility: May not adequately reflect the real-time needs of schools, leading to potential funding shortfalls, especially for schools with fluctuating or high levels of need.
Reduced Administrative Burden: Simplifies the funding process, reducing the need for constant applications for individual funding, and allowing schools to focus more on early intervention.	Risk of Underused Funding: Could result in funds being allocated to areas where they are not needed, while other areas may face shortages.
Equitable Distribution: Ensures that all schools receive a baseline level of funding to address lower-level SEND needs across the pupil population.	

Individual Child Basis

Pros:	Cons:
Targeted Support: Ensures that pupils with the highest needs receive the specific funding required to support their individual needs.	Administrative Burden: The process of applying for individual high-needs funding can be time-consuming and complex, detracting from time spent on direct support.
Flexibility: Allows for adjustments based on the specific needs of each child, ensuring that resources are directed where they are most needed.	Potential for Inequity: Schools that are more proficient at completing the application process may receive more funding, leading to inequitable outcomes.

Mixed Approach

- A balanced approach might be the most effective, combining the predictability of formulaic funding with the flexibility of individual child allocations:
 - Bands 1-4a: Could be formularised and passed to schools on block, ensuring a stable and predictable funding stream for lower-level needs.
 - Bands 4b & 4c: Should be funded on an individual child basis, ensuring that pupils with the highest needs receive the targeted support they require.
- This mixed approach would allow schools to plan and manage their budgets effectively while ensuring that high-need pupils receive the necessary support. It would also reduce the administrative burden on schools and promotes early intervention, which can prevent the escalation of needs over time.

In summary, the feedback identified that the decision should be informed by a thorough understanding of the specific needs of the pupil population and the effectiveness of the formula used. Flexibility and responsiveness to changing needs are crucial to ensure that all pupils receive the support they need.

D. Question: What level of need within the INDES framework should be the focus of the child level allocations?

The narrative responses highlighted the following key points:

Focus on Higher Needs (Bands 4b & 4c)

- Consensus: Many responses suggest that child-level allocations should focus on the highest needs, specifically Bands 4b & 4c. This ensures that resources are directed towards pupils with the most significant and complex needs.

- **Rationale:** These bands typically include pupils with profound and multiple learning difficulties (PMLD), significant physical disabilities, or complex social, emotional, and mental health (SEMH) needs, requiring specialised and intensive interventions.

Consideration for Bands 4 and Above

- **Moderation and Assessment:** Some responses recommend focusing on Bands 4 and above, with the need for moderation by advisors to ensure accurate assessment and allocation.
- **Behavioral Needs:** There is also a suggestion to include any needs that prevent a child from accessing learning in a mainstream classroom, which often falls within these higher bands.

Potential Issues with Lower Bands

- **Gaming the System:** Concerns are raised about the potential for schools to game the system by assessing needs to fit the decided level, particularly if lower bands are included.
- **Administrative Burden:** Allocating funds at lower bands might increase administrative tasks and complicate the tracking of how funds are spent.

Mixed Views on Specific Bands

- **Bands 5 and Above:** Some responses suggest focusing on Bands 5 and above, emphasising the greatest impact on the child and those around them.³
- **Levels 3 and Above:** A few responses indicate that Levels 3 and above should be considered, though this is less common.

Additional Considerations

- **Prior Attainment and Deprivation:** Some responses suggest considering factors like prior attainment and deprivation in the allocation process.
- **Equity and Flexibility:** Ensuring that the allocation process remains equitable and flexible to address the specific needs of each child is crucial.

³ LA comment: It should be noted that the current arrangements do not include band 5 or above, but reference to such banding was included in more than one narrative response.

E. Question: Would you support using the National Funding Formula or Notional SEN Allocations for the distribution of this funding?

Submitted responses:

Option	Number of Responses	% of Responses
National Funding Formula	6	25%
Notional SEN	9	37%
Neither	4	17%
Question not answered	5	21%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
National Funding Formula	51	29%	12%
Notional SEN	86	49%	20%
Neither	30	17%	7%
Question not answered	10	6%	2%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
National Funding Formula	22,220	36%	19%
Notional SEN	20,281	33%	17%
Neither	15,215	25%	13%
Question not answered	3,574	6%	3%
Total	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
National Funding Formula	1	14%
Notional SEN	0	0%
Neither	1	14%
Question not answered	5	71%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
National Funding Formula	1	14%	<1%
Notional SEN	0	0%	0%
Neither	1	14%	<1%
Question not answered	5	71%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
National Funding Formula	260	18%	<1%
Notional SEN	0	0%	0%
Neither	169	12%	<1%
Question not answered	998	70%	1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
National Funding Formula	7	23%
Notional SEN	9	29%
Neither	5	16%
Question not answered	10	32%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
National Funding Formula	52	28%	12%
Notional SEN	86	47%	20%
Neither	31	17%	7%
Question not answered	15	8%	4%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
National Funding Formula	22,480	36%	19%
Notional SEN	20,281	32%	17%
Neither	15,384	25%	13%
Question not answered	4,572	7%	4%
Total	62,717	100%	52%

In addition to the options, respondents were able to leave additional comments.

The narrative responses as to whether the National Funding Formula or Notional SEN Allocations should be used for distributing funding highlighted diverse opinions:

Support for National Funding Formula

Pros:	Cons:
Consistency and Simplicity: Using an existing model like the National Funding Formula can provide a consistent and straightforward approach, avoiding the complexities of creating a new system.	Potential Weaknesses: There are inherent weaknesses in any formula, and the National Funding Formula may not fully capture the specific needs of SEND pupils.

Support for Notional SEN Allocations

Pros:	Cons:
Alignment with Pupil Needs: Notional SEN Allocations are already based on aspects of pupil need, making them more closely aligned with the specific requirements of SEND pupils.	Historical Data: Notional SEN funding may reflect past needs rather than current ones, potentially leading to misalignment with present requirements.
Targeted and Flexible: This approach allows for a more targeted and flexible distribution of resources, ensuring schools with higher proportions of SEND pupils receive adequate funding.	
Effective Planning: Schools can plan and allocate resources more effectively, addressing the varying needs of their SEND population.	

Opposition to both approaches or did not pick an option highlighted concerns or challenges related to:

- Impact on Infant and Primary Schools: There is a risk that infant and primary schools, particularly those with low uptake of FSM due to UIFSM, might be disadvantaged by either approach.
- EHCP Funding: There was a view that EHCPs need to be funded effectively, and any formulaic approach should not detract from this, but that they need to be written effectively in the first place.
- Local Adaptation of the NFF: Suggestion of a locally agreed formula that avoids duplication of funding, such as Pupil Premium/FSM, to better meet local needs.
- Need for More Information: Some respondents indicated that it is hard to see the impact of different scenarios without technical papers quantifying the options.
- Not supportive of a formulaic approach: Option not chosen given opposition of movement from SB to redistribute via a formula from the HNB.

Those that chose ‘Neither’ from the options were asked an additional question:

F. Question: If neither, please rank the three indicators that you would want to see used in a formula in order of priority

In the survey they then chose the **top three indicators** from the following list that they would want to see used in a formula, and were asked ranked them in order of priority of highest (1) to lowest (3):

- Age Weighted Pupil Unit
- Minimum Per Pupil Funding
- Low Prior Attainment
- Additional Needs Funding
- EAL
- Mobility
- Lump Sum
- Sparsity
- Split Sites

Only 2 submitted responses had selected from the list of factors, and ranked them as follows:

Option	Response 1:	Response 2:
Age Weighted Pupil Unit	1 st	
Minimum Per-Pupil Funding		2 nd
Low Prior Attainment		3 rd
Additional Needs Funding	2 nd	
EAL		
Mobility		
Lump Sum	3 rd	1 st
Sparsity		
Split Sites		
Total		

Response 1 was from a federation of primary schools representing 2 maintained schools and 550 pupils.

Response 2 was from a single primary academy (that had not had a separate response from their trust) representing 1 school and 331 pupils.

The 2 responses combined represent only 3 schools (<1% of Norfolk Schools) and 881 pupils (<1% of Norfolk pupils), so it is a very low response rate.

Narrative responses reiterated points previously summarised above, as well as confirming that choosing just three factors was difficult.

G. Question: Would you prefer the new model to be introduced from April or September 2025?

Submitted responses:

Option	Number of Responses	% of Responses
April	9	38%
September	13	54%
Question not answered	2	8%
Total	24	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
April	17	10%	4%
September	141	80%	33%
Question not answered	19	11%	5%
Total	177	100%	42%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
April	4,556	7%	4%
September	49,040	80%	41%
Question not answered	7,694	13%	6%
Total	61,290	100%	51%

Unsubmitted responses:

Option	Number of Responses	% of Responses
April	1	14%
September	1	14%
Question not answered	5	71%
Total	7	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
April	1	14%	<1%
September	1	14%	<1%
Question not answered	5	71%	1%
Total	7	100%	2%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
April	264	19%	<1%
September	260	18%	<1%
Question not answered	903	63%	<1%
Total	1,427	100%	1%

Combined responses:

Option	Number of Responses	% of Responses
April	10	32%
September	14	45%
Question not answered	7	23%
Total	31	100%

Option	Number of Schools Represented	% of Responses	% of Norfolk Schools
April	18	10%	4%
September	142	77%	34%
Question not answered	24	13%	6%
Total	184	100%	44%

Option	Number of Pupils Represented	% of Responses	% of Norfolk Pupils
April	4,820	8%	4%
September	49,300	79%	41%
Question not answered	8,597	14%	7%
Total	62,717	100%	52%

Responders were asked to provide a rationale for their response, with the narrative responses providing varied views and rationale for introducing the new funding model in either April or September 2025.

When considering these responses, it should be noted that responders reference to full financial years will reflect whether they are responses from academy trusts or maintained schools:

Preference for April 2025

- Alignment with Financial Year: Introducing the model in April aligns with the start of the schools' financial year, facilitating seamless integration into financial planning and budgeting.
- Budgeting Ease: Schools can plan their budgets, staffing, and resources from the beginning of the fiscal year, avoiding mid-year adjustments.
- Full Year of Adjustments: Allows for a full year of financial adjustments, minimising potential disruptions.

Preference for September 2025

- **Alignment with Academic Year:** Introducing the model in September aligns with the academic year, making it easier for schools to plan for pupil-based support and staffing.
- **Reduced Disruption:** Avoids mid-year changes that could disrupt pupils, especially those sitting exams, and reduces the risk of redundancies during the school year.
- **Longer Lead Time:** Provides schools and leaders with more time to understand and implement the new model, ensuring a smoother transition.

Concerns were raised that schools that are already struggling with budgets and staffing may not cope with changes if introduced in April. Additionally, that even if introduced in September, the arrangements would need to be known by April to enable budget setting.

Where no clear preference was indicated, concern was raised that regardless of when a new approach is implemented, there needs to be funding protection in place to avoid sudden change that could impact staffing and operations.

Regardless of when, responders were clear that it is key there is clear communication in a timely manner to enable budgeting and planning, along with support during transition to minimise any negative impacts.

3. Summary

An additional LFI reference group took place on 8 November 2024 to further develop thinking and to building on the work already completed in previous workshops in the Summer. The group explored the summaries of the feedback received from the Element 3 part of the DSG consultation, alongside other emerging ideas, to provide further consideration on the future model. The LA were very grateful for peoples' time.

Given the level of feedback received and the complexity of the issues for consideration, along with the close interlink with the issues of Schools Block to High Needs Block transfer and Notional SEN allocations, the LA are not seeking a recommendation from Schools Forum on a future model or the timing of implementation at this meeting.

If Schools Forum have supported the 1.5% block transfer and support the LA's proposal to seek to reduce or remove a block transfer from 2026-27, then final model development for 2025-26 will need to consider how to support transition to reduced Element 3 funding given that schools will be retaining funding within their budget shares. This model will be based upon the key principles previously discussed and shared via the consultation, with the further work that has been, and will be, undertaken determining the detailed proposal.

Therefore, the LA proposes a further period of work that allows for proper consideration of the feedback and development of a full model for Schools Forum to consider at its additional meeting already provisionally scheduled for 9 December.

This approach is proposed (rather than waiting until January) to ensure that schools can be informed at the earliest opportunity of the agreed approach, funding mechanism(s) and be aware of the implications for themselves.

4. Schools Forum are asked to:

- **Consider and comment on the consultation responses shared and the key themes identified to inform the final development work for the model**
- **Agree the proposed approach to consider the future model at an additional Schools Forum meeting in December**

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Schools Forum

Item No: 6

Report title:	Early Years Budget Grant
Date of meeting:	19 November 2024

Executive summary

The Government announced additional funding is being awarded to local authorities in 2024 to 2025 to support early years providers with their costs, following the recent teacher pay award. Additional funding will be distributed through a new grant, the Early Years Budget Grant (EYBG), covering September 2024 - March 2025. We intend to distribute this funding through additional payments to all providers in the Autumn and Spring terms.

Schools Forum are asked to:

- **Note and comment on the approach to distributing the Early Years Budget Grant to providers, which can be utilised to support future decision making regarding any similar grants**

Early Years Budget Grant (EYBG)

The Government has announced £34 million in additional funding is being awarded to local authorities in 2024 to 2025 to support early years providers with their costs, following the recent teacher pay award. Additional funding will be distributed through a new grant, the Early Years Budget Grant (EYBG), in 2024-25 (covering September 2024 - March 2025).

Local authorities must ensure that EYBG funding is fully passed on to applicable early years providers and not used for contingency or administrative costs. Providers must receive clear communication regarding their allocations. The DfE expects transparency in the distribution process to allow providers to understand the basis of their funding. We therefore propose to communicate this decision to providers very soon and make the Autumn term payment prior to the end of the year.

The methodology for allocating EYBG funding follows the same principles as those applied to the incorporation of the historic Teachers' Pay Additional Grant (TPAG). From 2023-24, TPAG was no longer paid directly to school-based nurseries, and instead this funding was awarded to local authorities, who could determine the best methodology when allocating grant to providers. In 2023-24 the EY TPAG allocation for Norfolk was allocated to all providers providing early education, following consultation with the sector.

The published allocation for Norfolk is £304,897.00. EYBG funding for 2024-25 has been apportioned between the 3- and 4-year-old Early Years National Funding Formula (EYNFF) entitlement and Maintained Nursery Schools (MNS) supplementary funding. EYBG allocations will be paid to local authorities in a single payment on 29 November 2024 to cover the period from 1 September 2024 to 31 March 2025. Local authorities must ensure timely and accurate distribution of the funding to their early years providers.

Local authorities are given flexibility in how they allocate funding locally, although they must adhere to the EYBG conditions of grant. Although there is no requirement to consult on how this funding is allocated, we did discuss the grant with the Early Years Consultative Group on 24 October there was a clear unanimous recommendation to support all providers offering early education, in recognition of the increased costs and to support recruitment and retention across the sector. This approach was supported unanimously by those attending the meeting. This means that, subject to political agreement, we will follow the same principles used last year for EY TPAG and distribute this additional funding in the same way.

We plan to distribute the grant across the two terms based on the number of 3 and 4 hours funded by the LA. Based on current estimates data, all providers will receive an additional £0.06 per hour of early education claimed during the autumn term. We expect to maintain this level of funding in the spring term, but if the level of take up changes we may need to revise this once claims are processed and compliance checks are complete. We will ensure all funding is distributed fairly to all providers.

Within the EYBG an amount of £26,301.00 is allocated for Maintained Nursery Schools (MNS). This funding will be distributed to the three Nursery Schools using the same methodology used for the existing MNS supplement (split based on total hours).

Schools Forum are asked to:

- **Note and comment on the approach to distributing the Early Years Budget Grant to providers, which can be utilised to support future decision making regarding any similar grants**

Schools Forum

Item No: 7(1)

Report title:	Iceni Primary and Secondary - Disapplication
Date	19 November 2024

Executive summary

Following the separation of Iceni Academy from being an all-through school to being two separate schools (Iceni Primary Academy and Iceni Secondary Academy), the Local Authority has, in preparation for the 2025-26 funding formula, made a disapplication request for a baseline adjustment for both schools in 2025-26 as advised by the Department for Education.

The deadline for submission of disapplication requests to DfE is 18 November and, therefore, prior to the November Schools Forum meeting.

In considering the disapplication, the DfE and Secretary of State will consider any feedback from consultation of Schools Forum members which can be retrospectively added to the request.

Schools Forum are asked to:

- **Agree the disapplication for the re-baselining of Iceni Primary Academy and Iceni Secondary Academy following a significant change process to separate the former Iceni Academy all-through school.**

The Department for Education (DfE) approved the de-amalgamation of Iceni Academy from an all-through school into separate primary and secondary schools from the 1 September 2024. The local authority supported this significant change request which was approved by the DfE advisory board in March 2023. To enable the correct funding to be given in 2025-26 the baseline will have to be changed to reflect the separation for each school.

The DfE advised that the LA would need to complete a disapplication for the change and, once approved, the DfE would send a 'ready reckoner' to enable the LA to calculate the appropriate funding for each school in 2025-26.

Although the Secretary of State may approve even if Schools Forum do not agree, the LA's understanding is that the Secretary of State will be expecting Schools Forum support for disapplication requests that they are to approve. It is not clear what action the LA would be expected to take if the Secretary of State does not agree the disapplication request, given that that DfE have already agreed the separation of the two schools.

The deadline for disapplication submissions is the 18 November and so the disapplication has already been submitted at the point of consideration by Schools Forum. However, feedback from Schools Forum can be added to retrospectively to the final disapplication request.

Schools Forum are asked to:

- **Agree the disapplication for the re-baselining of Iceni Primary Academy and Iceni Secondary Academy following a significant change process to separate the former Iceni Academy all-through school.**

Officer Contact

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Schools Forum

Item No: 7(2)

Report title:	Amalgamation Protection - Disapplication
Date	19 November 2024

Executive summary

The Local Authority has, in preparation for the 2025-26 funding formula, submitted a disapplication request for a second financial year of amalgamation protection (2025/26), for the value of 70% of two lump sums, on behalf of Brisley CE Primary Academy.

The deadline for submission of disapplication requests to DfE is 18 November and, therefore, prior to the November Schools Forum meeting.

In considering the disapplication, the DfE and Secretary of State will consider any feedback from consultation of Schools Forum Members, which can be retrospectively added to the request.

Schools Forum are asked to:

- **Agree the disapplication request for a second (and final) year of amalgamation protection for Brisley CE Primary Academy at 70% of two lump sums, for the 2025-26 financial year.**

1. Amalgamation Protection

The 'Schools Revenue Funding 2024 to 2025 Operational Guide' published by the DfE for the funding of mainstream schools in the 2024-25 financial year states that where schools have amalgamated during the financial year 2023 to 2024, or on 1 April 2023, they will retain the equivalent of 85% of the predecessor school's lump sums for the financial year 2024 to 2025. The example provided in the guidance assumes a lump sum of £120,000 and is calculated as follows:

$2 \times \text{lump sum of } £120,000 \times 85\% = £204,000$, minus the lump sum allocated of $£120,000 = £84,000$.

2. Second Year of Protection

Local authorities may apply to the DfE for a second year of protection for schools that amalgamated during the 2023-24 financial year (having already received the first year of protection on the basis of 85% as shown above).

Applications must specify the level of protection sought, although in general the DfE would not expect the additional protection to exceed 70% of the combined lump sums. The DfE considers applications on a case-by-case basis.

In the past, all schools that have amalgamated in Norfolk have received the 70% of two lump sums for the second year of amalgamation protection, applied for by the Local Authority on the schools' behalf. In purely financial terms, amalgamation reduces the overall cost to the formula by the cost of one school's lump sum, and therefore increases funding across the system and, to date, this has been supported through the local formula.

3. Application for Protection 2025-26

Brisley CE Primary Academy and Weasenham CE Primary Academy amalgamated 1st January 2024, to become one larger school and qualified for the first year of amalgamation protection in 2024-25.

The ESFA require confirmation from Schools Forum of their continued support for the disapplication request for a second year of amalgamation protection for the school.

A second year of amalgamation protection for each school, at 70% of two lump sums, is calculated as follows using the 2024-25 lump sum values:

$£132,192 \times 2 \times 70\% = £169,820$, minus one original lump sum value of £132,192 = **£52,877 protection.**

Although the Secretary of State may approve, even if Schools Forum do not agree, the LA's understanding is that the Secretary of State will be expecting Schools Forum support for disapplication requests that they are to approve.

Schools Forum are asked to:

- **Agree the disapplication request for a second (and final) year of amalgamation protection for Brisley CE Primary Academy at 70% of two lump sums, for the 2025-26 financial year.**

Officer Contact

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Schools Forum

Item No: 7(3)

Report title:	Exceptional Premises Factor - Disapplication
Date	19 November 2024

Executive summary

The Local Authority has, in preparation for the 2025-26 funding formula, submitted a disapplication request for the continued use of the exceptional premises factor for five schools that currently receive additional premises funding within the formula. The deadline for submission of disapplication requests to DfE is 18 November; prior to the November Schools Forum meeting.

In considering the disapplication, the DfE and Secretary of State will consider any feedback from consultation of Schools Forum members which can be retrospectively added to the request.

Schools Forum are asked to:

- **Agree the proposed disapplication for use of the exceptional premises factor for hire or lease of buildings or land where the school premises is unable to provide the necessary facility.**

1. Exceptional premises

The 'Schools Revenue Funding 2024 to 2025 Operational Guide' published by the DfE for the funding of mainstream schools in the 2024-25 financial year states that the 'exceptional circumstances' factor must relate to premises costs. It also states that the value of any exceptional factor being requested for a school must be more than 1% of that school's budget and apply to fewer than 5% of the schools in the local authority's area.

2. Approval of the exceptional premises factor

Prior guidance concerning the exceptional premises factor advised that once a disapplication had been approved, it was then able to be rolled forward for several years. Recent guidance from the DfE states that this is no longer the case, and a new application must be made each year.

Although the Secretary of State may approve, even if Schools Forum do not agree, the LA's understanding is that the Secretary of State will be expecting Schools Forum support for disapplication requests that they are to approve.

3. Application for use of the exceptional premises factor in 2025-26

There are five schools that have been reviewed that still meet the criteria for continued use of the exceptional premises factor in 2025-26. The schools and amounts that would be funded to them in 2025-26 are:

- Magdalen Academy – Lease of land, £5,273
- Rockland St Mary Primary School – Use of village hall, £4,870
- Sandringham and West Newton CofE Primary Academy – Use of village hall £8,420
- Surlingham Primary School – Use of village hall, £5,580
- Winterton Primary School and Nursery – Lease of building, £10,000

The total amount to be funded through the exceptional premises factor in 2025-26, if approved, would be £34,143 for all five schools combined.

Schools Forum are asked to:

- **Agree the proposed disapplication for use of the exceptional premises factor for hire or lease of buildings or land where the school premises is unable to provide the necessary facility.**

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Schools Forum

Item No: 8

Report title:	Growth Fund (Schools Block)
Date of meeting:	19 November 2024

Executive summary

In this paper Schools Forum members are asked to approve a Growth Fund, including its criteria for distribution, for the 2025-26 financial year.

Schools Forum are asked to undertake the following decisions:

Decision 1a – All Schools Forum members are asked to approve a £1.047m centrally retained fund for pre-16 growth in 2025-26

Decision 1b – All Schools Forum members are asked to approve the pre-16 growth fund criteria as detailed in this paper.

The growth fund sits within the School Block and all Schools Forum members are required to vote on the criteria and amount.

Pupil Growth 2024-25 Update

In 2024-25, £1.257m was top sliced from the Schools Block for growth fund. The current forecast is for approximately £0.885m of growth allocations to schools in 2024-25 so there is currently an underspend of £0.372m forecast.

The budget for the growth fund is difficult to estimate, given the factors that can impact upon the final demand. This has resulted in under and overspend in previous years. For example, for 2024-25, the decisions of local academy trusts to offer additional places voluntarily to meet parental preference impacted on the need to support others from growth budget; this reflects the position in the Wymondham locality. For Diss and Thetford, despite high catchment figures in these areas, the demand did not materialise because of parental preference applying elsewhere.

The allocations made for growth in 2024-25 are as follows:

School	Budgeted Growth	Budgeted (£)	Actual Growth	Allocated (£)	Variance (£)
Sept'24 Growth:					
Ormiston Victory Academy	90	263,655	90	259,324	(4,331)
Trowse Primary	15	31,168	15	30,656	(512)
Downham Market Academy	30	87,885	30	86,441	(1,444)
North Norwich (Sewell Park Academy)	30	87,885	15	43,221	(44,664)
Wymondham High	30	87,885	0	0	(87,885)
Thetford Academy	30	87,885	0	0	(87,885)
Diss High	30	87,885	0	0	(87,885)
Wayland Academy	30	87,885	0	0	(87,885)
Greenpark Academy	30	62,335	20	40,874	(21,461)
Wymondham College Prep	30	62,335	0	0	(62,335)
Basic Need Contingency:	60	125,000			(125,000)
Hethersett Academy			35	100,848	100,848
St Michael's CE VA Junior			20	40,874	40,874
Pre-Opening Costs:					
Silfield Primary Academy		97,500		195,000*	97,500
Post-Opening Costs:					
Cringleford Prep		88,000		88,000	0
	405	1,257,303	225	885,238	(372,065)

*Only half of the pre-opening costs for Silfield Primary Academy were budgeted for 2024-25, but there is sufficient funds to pay the full £195,000 in 2024-25, reducing the 2025-26 requirement from Growth Fund.

In addition, the following payments were made from Growth Fund for academies for the period April'24 - August'24, but have reimbursed as additional DSG by the DfE (so there was no cost to the Growth Fund):

School Name	Apr-Aug'24	
	Pupils	Amount
Attleborough Academy	21	41,869
Wymondham College Prep	30	42,425
Greenpark Academy	30	42,425
Great Yarmouth Charter Academy	25	49,844
Thetford Academy	26	51,838
Hethersett Academy	35	69,781
Sewell Park Academy	20	39,875
Ormiston Victory Academy	90	179,438
Downham Market Academy	30	59,813
	307	577,308

Pupil Growth 2025-26

The amount requested for pupil growth in 2025-26 is £0.884m based on the current view on admissions for the next transfer rounds, and dependent on admissions applications/local demand.

This is expected to pay for growth in the following schools/areas:

School	Class Size	Estimated Cost (£)
Continuation of existing growth:		
Ormiston Victory Academy	90	260,000
Trowse Primary	15	31,000
Estimated catchment requirements:		
Downham Market	30	90,000
King's Lynn	30	90,000
Great Yarmouth	25	73,000
Wayland/Attleborough	30	90,000
Possible requirements:		
Hethersett VC Primary	30	62,500
Wymondham College Prep	30	62,500
Basic need contingency:		
2 classes of 30	60	125,000
Total Estimated Growth	340	884,000

New Schools

Cringleford Prep

In addition to the growth funding requested for schools' admissions over PAN, a further £75,000 is requested as part of the Growth Fund to cover the ongoing post-opening costs in 2025-26 for Cringleford Primary School which opened Sept'24 and is still growing (the requested post-opening funding is in line with the DfE suggested amounts for new schools).

Silfield Primary Academy

No further pre-opening funding is requested for the new school at Silfield which will open in Sept'25, as there are sufficient funds in 2024-25 to pay the full amount of £195,000.

The value of post-opening funding required in 2025-26 for the new Silfield school is under negotiation and has not yet been agreed with the trust. As a maximum, it is suggested to retain £88,000 for the first year of post-opening funding, which is in line with the DfE suggested amounts for new schools.

Total Growth Fund and Criteria

The total growth fund top-slice requested for 2025-26 is therefore £1.047m (£0.884m pre-16 growth and £0.163m post-opening costs for new schools)

The suggested growth criteria are:

- Growth has been identified by the authority as required for basic need in the area for the following academic year. i.e. a comparison of numbers between the two October counts, and;
- Growth must be the greater of 10% of a year group or 5 pupils and will be funded at 7/12th of the relevant Basic Pupil Entitlement/Age Weighted Pupil Unit 'AWPU' factor value;
- Growth for an additional year group or class will be given at 7/12th of the Pupil Admission Number, e.g. a school/academy is increasing from an intake of 30 pupils to 60 pupils p.a. - school/academy will therefore qualify for 30x7/12th AWPU.
- Growth for pre-opening costs for new maintained schools and academies (including free schools) where the school is opening in response to basic need, maximum value based upon the table below:

Type of School	Grant funding for first school opening in a given financial year	Grant funding for each additional school opening in the same financial year and with the same sponsor
Primary	£195,000	£125,000
Secondary and all-through	£275,000	£175,000
AP	£195,000	£125,000
16-19	£225,000	£145,000

- Growth for post-opening costs for new maintained schools and academies (including free schools) where the school is opening in response to basic need, will be at a value negotiated with the LA based upon financial plans (the maximum being based on the DfE's formula for post-opening grant)
- There are no additional payments to schools or academies in respect of Infant Class Size Funding.
- Where growth fund payments are made to academies for the period September-March, the payment is continued by the local authority for the following April-August.
- Pupils moving from a closing school in advance of that school's official closure date will be funded at their new school at up to 5/12th of the AWPV value (1/12th for each full month) where the number of pupils received early is the greater of 10% of a year group or 5 pupils. The number of pupils on roll does not need to exceed the PAN.
- Funding for closed schools/academies will be transferred into the Growth Fund to support schools admitting the displaced pupils with additional pupil-based funding.

It is proposed that £1.047m is retained centrally from the Schools Block for pre-16 growth and the post-opening costs of new schools, in 2025-26, and that funding should be allocated to schools and academies using the suggested criteria above. This includes growth within existing schools and any new schools set up to meet basic need, whether maintained, academy or free school.

Decision 1a – All Schools Forum members are asked to approve a £1.047m centrally retained fund for pre-16 growth in 2025-26

Decision 1b – All Schools Forum members are asked to approve the pre-16 growth fund criteria as detailed in this paper.

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Schools Forum

Item No: 9

Report title:	Falling Rolls Funding
Date of meeting:	19 November 2024

Executive summary

DfE Guidance for Growth and Falling Roll funds was updated in October 2023. It stated for the first time in 2024-25 that allocations would be based on both Growth and Falling Rolls.

The Falling Rolls fund was discussed at Schools Forum in November 2023, to consider whether it was appropriate to support vulnerable schools in line with the significant demographic decline that is impacting the primary phase in areas of the county. At that time, no Falling Rolls fund was agreed but the LA and Schools Forum agreed to keep it under review annually.

At the September 2024 Schools Forum meeting it was agreed that a small, time-limited working group would be formed to consider the approach in preparation for a recommendation to be made for the November 2024 Schools Forum meeting. This paper sets out the outcome from the working group, which met on the 17 October 2024.

Schools Forum are asked to:

- **agree the recommendation made by the Falling Rolls working group not to introduce a Falling Rolls fund as part of the 2025-26 funding formula for Norfolk schools.**
- **agree the approach to Falling Rolls should be considered and reviewed by LA Officers on an annual basis to identify when this funding mechanism may be required, engaging with Schools Forum where necessary.**

1. Context

In July 2023 Schools Forum agreed to consider the introduction of a Falling Rolls fund to support schools as the Local Authority area experiences a demographic decline. The funding, if agreed, could support schools that may be vulnerable where there is significant decline in pupil numbers, protecting places where the Local Authority expects demand to be retained or growth to return in the future.

At November 2023 Schools Forum, LA Officers presented a paper which set out how the DfE were funding Falling Rolls as a new factor within the DSG from 2024-25, including the criteria for the fund proposed by the LA to Schools Forum. Norfolk County Council's place planning team reviewed the available School Capacity Survey (SCAP) data and concluded at the time that no schools would meet the mandatory requirement of places being required again within 3 to 5 years. On that basis, the LA did not recommend that Norfolk's 2024-25 funding formula should have a Falling Rolls fund, but that it would be reviewed annually by the LA and Schools Forum. This was agreed by Schools Forum.

2. National Funding

For 2025-26, it is expected that the Local Authority will receive funding for Falling Rolls as part of the DSG based on changes between the October 2023 and October 2024 census data. The DfE uses Medium Super Output Areas (MSOA) to determine which geographical areas may qualify for funding, assessed against the ONS based population data.

In 2024-25, LAs received £140,000 per MSOA area that had seen a 10% or greater reduction in the number of pupils between the October census dates. The DfE have not confirmed the formula or amounts to be allocated as part of DSG for 2025-26 at this time.

The DfE have previously issued a Growth and Falling Rolls' calculator tool to LAs to enable estimation of the level of funding which could be expected, although it did not prove to be very accurate for 2024-25.

We will not have a confirmed allocation until December when the final DSG allocations are published. In 2024-25, as an example, Norfolk received only one MSOA allocation for Falling Rolls, totalling £140k.

3. Decisions Required for Norfolk

The Local Authority has discretion when and how to implement the funding for Falling Rolls, but with a mandatory requirement that SCAP data shows school places will be required in the next 3-5 years.

The LA is not required to implement a Falling Rolls fund, as it is not mandatory, and any funds not utilised would be allocated via the funding formula to all mainstream schools. If a Falling Rolls fund was to be agreed, criteria for allocating funding should contain clear trigger points to qualification, and a clear formula for calculating any allocations.

The guidance states that the Schools Forum should agree both the value of the fund and the criteria for allocation, and the LA should consult Schools Forum before expenditure is incurred.

As with the Growth fund, the Falling Rolls fund is within the DSG Schools Block.

For 2024-25, the DfE provided some examples of compliant criteria (still to be confirmed for 2025-26):

- 2022 SCAP shows that school places will be required in the subsequent 3 to 5 years (this is a mandatory requirement)
- surplus capacity exceeds a minimum number of pupils, or a percentage of the published admission number.
- formula funding available to the school will not support provision of an appropriate curriculum for the existing cohort.
- the school will need to make redundancies to contain spending within its formula budget.

Methodologies for distributing funding could include:

- a rate per vacant place, up to a specified maximum number of places (place value likely to be based on basic per pupil funding)
- a lump sum payment with clear parameters for calculation (for example, the estimated cost of providing an appropriate curriculum, or estimated salary costs equivalent to the number of staff who would otherwise be made redundant)

The working party reviewed the current criteria with LA officers highlighting some of their concerns with the funding criteria set by the DFE. The group discussed the proposals and noted the following comments:

- No school currently suggests a return to previously seen numbers and all schools via any methodology suggests a continued decline.
- Schools would be required to make management decisions to respond to the decline as opposed to receive “top-up” funding to sustain an expected falling roll. The existing funding mechanism funds on pupil places, funding for schools with reducing numbers of pupils on roll would therefore reduce and schools would need to respond.
- The group recognised the challenge all schools would face following the projected decline, but did not feel this funding would help schools find a sustainable solution. It could, if supporting schools with continued decline, mask the long-term impact and prevent schools from responding in a proactive and managed way.
- It was felt by the group that the funding methodologies suggested in the guidance to identify Falling Rolls funding would not help schools in the way it was, perhaps, hoped by the DfE.
- The group believed the existing growth fund would target support to schools if growth was anticipated and would support schools to respond in the future.
- From the scenarios considered there was no evidence that Falling Rolls funding for 25-26 would support schools. Schools will need to respond to their individual projected declining pupil numbers.

4. Proposal

Following Schools Forum decision to review the current need for a Falling Rolls fund through a working group of School Forum representatives along with LA Officers, the working group met and considered the factors informing the funding criteria set out by the DFE and the implications for schools if funding were to be introduced as part of the 2025-26 funding formula.

Through these considerations, the working group did not support the introduction of a Falling Rolls fund at this time, but that the possibility should be kept under review for future years if circumstances change. The LA supports the working group’s proposal.

5. Schools Forum are asked to:

- agree the recommendation made by the Falling Rolls working group not to introduce a Falling Rolls fund as part of the 2025-26 funding formula for Norfolk schools.
- agree the approach to Falling Rolls should be considered and reviewed by LA Officers on an annual basis to identify when this funding mechanism may be required, engaging with Schools Forum where necessary.

6. Background Papers

DfE guidance:

<https://www.gov.uk/government/publications/pre-16-schools-funding-local-authority-guidance-for-2024-to-2025/growth-and-falling-rolls-fund-guidance-2024-to-2025>

Schools Forum November 2023, Item 5 (page 13):

https://www.schools.norfolk.gov.uk/media/13555/2023-11-22-Item-5-Schools-Block-Consultation-Part-B/pdf/2n2023-11-22-schools-block-consultation-part-b_1.pdf?m=1701425050997

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Schools Forum

Item No: 10

Report title:	Central School Services Block
Date of meeting:	19 November 2024

Executive summary

In this paper Schools Forum members are asked to approve the funding of central services from the Central School Services Block for 2025-26.

Schools Forum are asked to undertake the following decisions:

- **Decision 1 – All Schools Forum members** are asked to approve the level of Admissions funding (£487,000)
- **Decision 2 – All Schools Forum members** are asked to approve the level of funding for Schools Forum (£30,000)
- **Decision 3 – All Schools Forum members** are asked to approve the level of funding for Fees to Independent Schools for pupil without SEN (£100,000)
- **Decision 4 – All Schools Forum members** are asked to approve funding for responsibilities held for all schools from Central School Services Block, including Teachers' Pay Grant and Teachers' Pension Employer Contribution Grant for centrally employed staff (estimated at £2.714m plus any inflation received through CSS Block)

Central School Services Block (ongoing and historic commitments)

The Central School Services Block (CSSB) funds local authorities for the statutory duties they hold for both maintained schools and academies. The CSSB brings together:

- Funding previously allocated through the retained responsibilities element of the Education Services Grant (ESG);
- Funding for ongoing central functions, in Norfolk this is the Admissions service, servicing of the Schools Forum and fees to Independent schools without SEN;
- Residual Funding for historic commitments, previously top-sliced from the schools' block;
- The licences and subscriptions paid for centrally by the DFE.

Norfolk has not received an indicative allocation for 2025-26 at this time but, for reference, the Central School Services Block for 2024-25 was £4,230,735 covering centrally retained budgets that support all schools.

The 2024-25 figure of £4,230,735 was broken down by the LA as follows:

	(£)
Forum approved line-by-line:	
Ongoing Central Functions	617,000
Central Licences (no approval was required):	
Central Licences (estimate for 24-25 net of VAT)	813,243
Ongoing Responsibilities that required Forum approval:	
Responsibilities held for all schools (including pay and pension grants for centrally employed Teachers)	2,800,492
Central School Services Block	4,230,735

The LA is seeking approval for the same items to be retained centrally for the 2025-26 financial year to support all schools, adjusted as necessary within the final 2025-26 DSG Central School Services Block allocation (expected to be received in December 2024).

Schools Forum are required to approve the retention of Central School Services Block for the following items:

Specific budgets:

Category	2024-25	2025-26	Difference	Explanation for change
Ongoing Central Functions – approval required on a line-by-line basis:				
1. School Admissions	487,000	487,000	0	Budget requirement reviewed. Increased staffing costs are anticipated to be absorbed by efficiencies and income generated. This is an allowable item under the regulations.
2. Servicing of Schools Forum*	30,000	30,000	0	No change. This is an allowable item under the regulations.
3. Fees to independent schools for pupils without SEN (Assisted Boarding Partnership)**	100,000	100,000	0	No change. This is an allowable item under the regulations.
Total	617,000	617,000	0	

***Servicing of Schools Forum - £30,000**

The LA may charge the running costs of Schools Forum to this budget including any agreed and reasonable expenses for members attending meetings, the costs of producing and distributing papers and costs room hire and refreshments and for clerking of meetings.

The £30k approximately covers the costs of the administration, direct meeting expenses, etc., but is not sufficient to cover the cost of significant LA Officer time producing papers and supporting meetings. The LA could increase the requested budget but rather than incurring time estimating these costs, are content that they are covered by the overall Central School Services Block contribution to the LA.

****Assisted Boarding Partnership - Fees to independent schools for pupils without SEN £100,000**

The Assisted Boarding Partnership (ABP) scheme has long standing success in helping families stay together and on improving outcomes for children and young people. Norfolk's Schools Forum has historically supported a contribution from the Central Services Schools Block reflecting a shared moral purpose of promoting life chances of some of Norfolk's most vulnerable children and on the benefits to Norfolk and to its education system of children being able to remain living at home and being cared for by their families.

Children who access the ABP scheme who are at acute risk of entering into the care system. Without this opportunity, children will be at greater risk of the damage and turmoil that can be associated with the care experience, such as adverse childhood experiences and attachment difficulties, with its resulting known impact on children's learning and educational needs.

Without access to this important scheme, such children will be more likely to require specialist care and educational facilities at a much greater cost to the High Needs Block, and even in cases where children are able to remain within a mainstream school setting, they will often require additional significant support, resources and provision from the school with its resulting impact on main school budgets.

The Local Authority sees the ABP as one of the cornerstones of its early help and prevention offer and considers it an effective initiative that not only improves outcomes for children and young people, reflects the Partnership's shared purpose for children and young people to FLOURISH, but is also cost effective for both schools and council budgets through its proven success in meeting children's needs at the earliest stage and before needs escalate to the point of crisis.

Following discussion of the Forum in November 2021, and again in November 2022, a link to research on the Assisted Boarding Partnership was circulated¹: [Norfolk research highlights success of boarding partnerships - Norfolk County Council](https://www.norfolk.gov.uk/news/2018/06/norfolk-research-highlights-success-of-boarding-partnerships)

¹ <https://www.norfolk.gov.uk/news/2018/06/norfolk-research-highlights-success-of-boarding-partnerships>

Schools Forum approval (**vote by all members**) is required on a line-by-line basis for each of the items:

Decision 1 – All Schools Forum members are asked to approve the level of Admissions funding (£487,000)

Decision 2 – All Schools Forum members are asked to approve the level of funding for Schools Forum (£30,000)

Decision 3 – All Schools Forum members are asked to approve the level of funding for Fees to Independent Schools for pupil without SEN (£100,000)

Central School Services Block (Central licences)

The following licences have been negotiated centrally by the Secretary of State for all publicly funded schools, paid for by the DfE from the LA's Central School Services Block:

- Christian Copyright Licensing International (CCLI)
- Copyright Licensing Agency (CLA)
- Education Recording Agency (ERA)
- Filmbank Distributors Ltd. (PVSL/PVSL 'variation')
- Motion Picture Licensing Company (MPLC)
- Newspaper Licensing Authority (NLA)
- Performing Rights Society (PRS)
- Phonographic Performance Limited (PPL)
- Schools Printed Music Licence (SPML)

An estimated cost of licences, net of VAT which the LA can recover, in 2025-26 for all schools based on historic cost is c£900k.

Schools Forum approval is not required for school licences as the final licence cost will be automatically deducted by the DfE from Norfolk's DSG allocations to cover the cost for all schools.

Central School Services Block (Responsibilities held for all schools)

The Education Services Grant retained element for ongoing responsibilities held for all schools became part of the Dedicated Schools Grant in September 2017 and now sits within the Central School Services Block. **Appendix F** provides a breakdown of the responsibilities held for all schools.

Schools Forum approval is required for the LA to retain funding from the Central School Services Block for responsibilities held for all schools. The DfE have not published DSG allocations for 2025-26 at this time to allow accurate calculation of the requested figure, however, as a guide the funding requested for responsibilities held for all schools (including costs of centrally employed teachers) in 2024-25 was £2,800,492.

It is not possible to specifically identify services areas / provision that is funded by the Central Services Schools Block as budgeting is undertaken at an overall level with a significant contribution from the County Council. However, the table below provides a summary of the areas of relevant budget for 2024-25 and the associated funding sources, with budgets provided net for services that have traded elements. Steps have been taken to exclude elements required to be local authority funded, such as high needs leadership, assessment and casework.

Service Area	2024-25 Net Budget, £m
Education Infrastructure and Partnerships	2.649
Inclusion and Opportunity	1.249
Education Intelligence and Effectiveness	0.631
Virtual School CIC	0.757
Quality Assurance, Intervention and Regulation	1.869
School Improvement - Associates	0.084
Total	7.240
Central Services Schools Block funded (inc. TPPG for centrally employed teachers)	-2.800
Norfolk County Council funded	4.440

For 2025-26, the contribution requested is estimated at £2.714m plus any inflation received through the CSS Block, after the deduction of all other items requested to be agreed on a line-by-line basis, and the deduction of licences. The exact final amount will differ based on pupil numbers in the final DSG allocation in December (it may go up or down), and the final licences cost for 2025-26 which has been estimated.

If this contribution was not agreed by Schools Forum, the local authority would need to ask the ESFA to adjudicate given the responsibilities held and funding required to meet these.

Decision 4 – All Schools Forum members are asked to approve funding for responsibilities held for all schools from Central School Services Block, including Teachers’ Pay Grant and Teachers’ Pension Employer Contribution Grant for centrally employed staff (estimated at £2.714m plus any inflation received through CSS Block)

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Appendix F: Responsibilities held for all schools²

Statutory and regulatory duties

- director of children's services and personal staff for director (sch 2, 15a)
- planning for the education service as a whole (sch 2, 15b)
- authorisation and monitoring of expenditure not met from schools' budget shares (sch 2, 15c)
- formulation and review of local authority schools funding formula (sch 2, 15d)
- internal audit and other tasks related to the local authority's chief finance officer's responsibilities under section 151 of LGA 1972 except duties specifically related to maintained schools (sch 2, 15e)
- consultation costs relating to non-staffing issues (sch 2, 19)
- plans involving collaboration with other local authority services or public or voluntary bodies (sch 2, 15f)
- Standing Advisory Committees for Religious Education (SACREs) (sch 2, 17)
- provision of information to or at the request of the Crown other than relating specifically to maintained schools (sch 2, 21)
- revenue budget preparation, preparation of information on income and expenditure relating to education, and external audit relating to education (sch 2, 22)

Education welfare

- functions in relation to school attendance (sch 2, 16)
- responsibilities regarding restrictions on the employment of children (sch 2, 18)
- functions in relation to the exclusion of pupils from schools, excluding any provision of education to excluded pupils (sch 2, 20)

Asset management

- management of the local authority's capital programme including preparation and review of an asset management plan, and negotiation and management of private finance transactions (sch 2, 14a)
- landlord responsibilities, including those in relation to land leased to academies for schools (sch 2, 14b)

Other ongoing duties

- licences negotiated centrally by the Secretary of State for all publicly funded schools (sch 2, 8); this does not require schools forum approval
- operation of the system of admissions and appeals (Sch 2, 9)
- fees or expenses payable in connection with the attendance of non-SEN pupils at schools not maintained by any local authority (sch 2, 10)
- remission of boarding fees at maintained schools and academies (sch 2, 11)

² Source: [Schools operational guide: 2024 to 2025 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/812212/Schools_operational_guide_2024_to_2025.pdf)

- servicing of schools forums (sch 2, 12)
- back-pay for equal pay claims (sch 2, 13)
- writing to parents of year 9 pupils about schools with an atypical age of admission, such as UTCs and studio schools, within a reasonable travelling distance (sch 2, 23)

Historic commitments

- capital expenditure funded from revenue (sch 2, 1)
- prudential borrowing costs (sch 2, 2(a))
- termination of employment costs (sch 2, 2(b))
- contribution to combined budgets (sch 2, 2(c))
- special educational needs transport costs (sch 2,2(d))

I – Information & Discussion D- Decision

	Autumn Term			Spring Term			Summer Term	
20/09/24 (Friday) 09:00 – 12:00	September (Cranworth Room CH) Strategic Planning (inc. Local First Inclusion) Provisional DSG Allocations for 2025/26 and Autumn DSG Consultation, including for Mainstream Schools' Formula Early Years Funding Consultation Annual Audit Report (NAS)	 I D D I	31/01/25 (Friday) 09:00 – 12:00	January (Cranworth Room CH) Election of Chair/Vice Chair Review Membership Strategic Planning (inc. Local First Inclusion) Proposed DSG Budget and 2025/26 DSG Allocations Pupil variations 2025/26	 D D I D I	09/05/25 (Friday) 09:00 – 12:00	May (Cranworth Room CH) Strategic Planning (inc. Local First Inclusion) Dedicated Schools Grant 2024/25 Outturn Annual Audit Report (Norfolk Audit Service)	 I I I
19/11/24 (Tues) 09:00 – 13:00	November (Cranworth Room CH) Strategic Planning (inc. LFI) DSG consultation outcomes and Schools Block transfer EY Budget Grant update De-delegation/Central Schools Services Block Disapplication requests Centrally retained items	 I D I D D D	26/03/25 (Wed) 09:00 – 12:00	March (Cranworth Room CH) Next year's plan Strategic Planning (inc. Local First Inclusion) Final pupil variations (only if changed from January)	 I I I	02/07/25 (Wednesday) 09:00 – 12:00	July (Cranworth Room CH) Strategic Planning (inc. Local First Inclusion) Updates on Scheme for Financing Schools (Financial Regulations) Dedicated Schools Grant Consultation Preparation	 I D I
06/12/24 09:00 – 13:00	December (Cranworth Room CH) Provisional DSG Allocations Element 3 Notional SEN Allocation formula	 I D						

Schools Forum

Item No: 14

Report title:	DSG Consultation – Maintained Schools
Date of meeting:	19 November 2024

Executive summary

This report summarises the responses to the autumn 2024 consultation with Norfolk schools specifically in relation to issues affecting maintained schools only.

Schools Forum are asked to:

- **Consider the feedback from the consultation survey in relation to the possible de-delegations for maternity leave holiday pay for support staff and (ii) shared parental leave, to inform decision making in relation to the De-Delegation paper later on this agenda**
- **Consider the feedback from the consultation survey in relation to options for internal audit, to inform decision making in relation to the De-Delegation paper later on this agenda**
- **Vote on the proposed amendments for Norfolk’s Scheme for Financing Schools, as detailed in the DSG consultation document [here](#), section 13 pages 34-36:**
 - **Change to section 3.6 ‘Borrowing by schools’ for the treatment of leases under IFRS16, ending the distinction between operating and finance leases with all leases treated as finance leases for accounting purposes**
 - **Change to section 3.6 ‘Borrowing by schools’ and Annex J for the use of credit cards/purchasing cards**
 - **Change to section 3.5.1 ‘Restrictions on accounts’ for amendment to the list of allowable banks that schools are permitted to use**
 - **Change to 4.2d ‘Restrictions on carrying forward surplus balances’ to bring up to date wording to reflect the current operation of the balances mechanism**

- **Change to section 4.41 ‘Reporting on deficit balances’, which is covered elsewhere in the Scheme**
- **Proposal for combining and updating the wording of sections 4.5 and 4.5.1 ‘Planning for deficit balances’ into one new section**
- **Change to section 4.8 ‘Balances of closing and amalgamating schools’**
- **Change to sections 4.9e and 4.9g within ‘Licensed deficits’**

1. Maintained School Responses

There were 13 submitted responses representing 24 maintained schools and 5,392 pupils, and 1 unsubmitted response representing 1 maintained school and 260 pupils (also another 6 unsubmitted responses identifiable as maintained schools but that did not respond to any of the maintained-only schools’ questions in the survey).

2. Shared Parental Leave

The consultation offered three options for shared parental leave. See section 11 (pages 30-32) of the [DSG consultation paper 2024](#) for more information.

Consultation survey options:

Option 1:

De-delegate statutory SPL costs of £6,000 only from April 2025 for the 2025-26 period at a cost of £0.20 per pupil.

Option 2:

De-delegate statutory SPL costs of £6,000 and associated salary costs covering periods of school holidays of £104,000 from April 2025 for the 2025-26 period at a cost of £3.65 per pupil.

Option 3:

Remain with the status quo that SPL costs are not de-delegated, and each school needs to cover these costs themselves where they arise.

Question. Which option do you prefer?

Submitted responses:

Option	Number of Responses	% of Responses
Option 1 – De-delegate statutory SPL costs only	1	8%
Option 2 – De-delegate statutory SPL costs and associated salary costs	10	77%
Option 3 – Remain with the status quo	2	15%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools ¹
Option 1 – De-delegate statutory SPL costs only	1	4%	<1%
Option 2 – De-delegate statutory SPL costs and associated salary costs	21	88%	13%
Option 3 – Remain with the status quo	2	8%	1%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils ²
Option 1 – De-delegate statutory SPL costs only	625	12%	2%
Option 2 – De-delegate statutory SPL costs and associated salary costs	4,245	79%	13%
Option 3 – Remain with the status quo	522	10%	2%
Total	5,392	100%	16%

Unsubmitted response:

¹ Source: [Children's Services - myNet](#)

² Pupils in Norfolk schools (maintained or academy), source: [Children's Services - myNet](#)

Option	Number of Responses	% of Responses
Option 1 – De-delegate statutory SPL costs only	0	0%
Option 2 – De-delegate statutory SPL costs and associated salary costs	0	0%
Option 3 – Remain with the status quo	1	100%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 – De-delegate statutory SPL costs only	0	0%	0%
Option 2 – De-delegate statutory SPL costs and associated salary costs	0	0%	0%
Option 3 – Remain with the status quo	1	100%	<1%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 – De-delegate statutory SPL costs only	0	0	0%
Option 2 – De-delegate statutory SPL costs and associated salary costs	0	0	0%
Option 3 – Remain with the status quo	260	100%	<1%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Option 1 – De-delegate statutory SPL costs only	1	7%
Option 2 – De-delegate statutory SPL costs and associated salary costs	10	71%
Option 3 – Remain with the status quo	3	21%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 – De-delegate statutory SPL costs only	1	4%	<1%
Option 2 – De-delegate statutory SPL costs and associated salary costs	21	84%	13%
Option 3 – Remain with the status quo	3	12%	2%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 – De-delegate statutory SPL costs only	625	11%	2%
Option 2 – De-delegate statutory SPL costs and associated salary costs	4,245	75%	13%
Option 3 – Remain with the status quo	782	14%	2%
Total	5,652	100%	17%

As well as selecting an option, respondents were able to leave comments. A list of all the comments is included in **Appendix A**.

Comments were only received in relation to supporting option 2 (de-delegating statutory SPL costs and associated salary costs). The key theme being that this represents the right strategic choice to support greater financial certainty for schools, mitigating unpredictable expenses.

Summary:

There is a strong preference for implementation of **option 2 – de-delegate statutory SPL and associated salary costs** when considering individual responses, schools represented, and pupils represented.

When making a decision, the relevant Forum Members should be aware that responses received to the survey only represented 15% of maintained schools and 17% of pupils within maintained schools.

3. Maternity

The consultation offered two options to be considered under the maternity de-delegated budget reimbursement in relation to holiday pay for term-term staff.

See section 12 (pages 32-33) of the [DSG consultation paper 2024](#) for more information.

Consultation survey options:

Option 1:

Term time support staff holiday pay should not be part of the maternity de-delegated budget reimbursement. The holiday pay costs during the maternity leave period should be paid directly by the school.

Option 2:

Term time support staff holiday pay should be part of the maternity de-delegated budget and be reimbursed at an average rate of 14.5%.

Question. Which option do you prefer?

Submitted responses:

Option	Number of Responses	% of Responses
Option 1 - Not be part of the maternity de-delegated budget reimbursement	3	23%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	10	77%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 - Not be part of the maternity de-delegated budget reimbursement	6	25%	4%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	18	75%	11%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 - Not be part of the maternity de-delegated budget reimbursement	654	12%	2%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	4,738	88%	14%
Total	5,392	100%	16%

Unsubmitted response:

Option	Number of Responses	% of Responses
Option 1 - Not be part of the maternity de-delegated budget reimbursement	1	100%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 - Not be part of the maternity de-delegated budget reimbursement	1	100%	<1%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	0	0	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 - Not be part of the maternity de-delegated budget reimbursement	260	100%	<1%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Option 1 - Not be part of the maternity de-delegated budget reimbursement	4	29%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	10	71%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 - Not be part of the maternity de-delegated budget reimbursement	7	28%	4%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	18	72%	11%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 - Not be part of the maternity de-delegated budget reimbursement	914	16%	3%
Option 2 - Be part of the maternity de-delegated budget and be reimbursed	4,738	84%	14%
Total	5,652	100%	17%

As well as selecting an option, respondents were able to leave comments. However, no respondents provided comments in relation to this question.

Summary:

There is a strong preference for implementation of **option 2 – support staff holiday pay to be part of the maternity de-delegated budget and be reimbursed** when considering individual responses, schools represented, and pupils represented.

When making a decision, the relevant Forum Members should be aware that responses received to the survey only represented 15% of maintained schools and 17% of pupils within maintained schools.

4. Internal Audit

The consultation offered two options for internal audits.

See section 14 (pages 36-41) of the [DSG consultation paper 2024](#) for more information.

Options in consultation:

Option 1:

Implementation of a minimum risk-based assurance approach for maintained schools with the associated charges to all maintained schools' budgets to enable this model and to ensure that there is appropriate assurance activity across all schools for a minimal cost burden.

Option 2:

Continuation with the status quo providing traded audits as part of the RAG requirement and thematic audits.

Submitted responses:

Option	Number of Responses	% of Responses
Option 1 – Implementation of a minimum risk-based audit approach	9	69%
Option 2 – Continuation of the status quo	4	31%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 – Implementation of a minimum risk-based audit approach	18	75%	11%
Option 2 – Continuation of the status quo	6	25%	4%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 – Implementation of a minimum risk-based audit approach	3,110	58%	9%
Option 2 – Continuation of the status quo	2,282	42%	7%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Option 1 – Implementation of a minimum risk-based audit approach	1	100%
Option 2 – Continuation of the status quo	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 – Implementation of a minimum risk-based audit approach	1	100%	<1%
Option 2 – Continuation of the status quo	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 – Implementation of a minimum risk-based audit approach	260	100%	<1%
Option 2 – Continuation of the status quo	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Option 1 – Implementation of a minimum risk-based audit approach	10	71%
Option 2 – Continuation of the status quo	4	29%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Option 1 – Implementation of a minimum risk-based audit approach	19	76%	11%
Option 2 – Continuation of the status quo	6	24%	4%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Option 1 – Implementation of a minimum risk-based audit approach	3,370	60%	10%
Option 2 – Continuation of the status quo	2,282	40%	7%
Total	5,652	100%	17%

As well as selecting an option, respondents were able to leave comments. A list of all the comments is included in **Appendix A**.

Comments were received in relation to both options. Comments relating to support for option 1 (implementation of a minimum risk-based audit approach) was that the option was helpful given budgets are becoming tighter and so this providing a more cost-effective option across schools as a whole. Questions were raised why the first year would be more expensive than subsequent years, and that payroll charges on monthly downloads should be included in the audit.

In support of option 2 (continuing with the status quo), the comments related to concern that all schools should be choosing to buy enhanced audit support and that they should pay for this themselves, rather than other schools subsidising.

One comment referenced they liked RAG ratings and themed audits information shared; option 2 would still continue with the provision of themed audits and associated advice shared, and this proposal is not about discontinuing RAG ratings, but the measure currently related to audit engagement would need to be updated if option 2 was implemented.

Summary:

There is a preference for implementation of **option 1 – implementation of a minimum risk-based audit approach** when considering individual responses, schools represented, and pupils represented. The support appears stronger when considering the individual responses and schools represented, with the split of support closer when based upon pupils represented.

When making a decision, the relevant Forum Members should be aware that responses received to the survey only represented 15% of maintained schools and 17% of pupils within maintained schools.

5. Scheme for Financing Schools

The consultation included a number of proposed updates to Norfolk's Scheme for Financing Schools.

See section 13 (pages 34-36) of the [DSG consultation paper 2024](#) for more information.

Question (A): Do you agree with the proposed changes to the Scheme in respect of section 3.6 'Borrowing by schools' for the treatment of leases under IFRS16, ending the distinction between operating and finance leases with all leases treated as finance leases for accounting purposes.

Submitted responses:

Option	Number of Responses	% of Responses
Yes	12	92%
No	0	0%
Question not answered	1	8%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	20	83%	12%
No	0	0%	0%
Question not answered	4	17%	2%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	5,260	98%	16%
No	0	0%	0%
Question not answered	132	2%	<1%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	13	93%
No	0	0%
Question not answered	1	7%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	21	84%	13%
No	0	0%	0%
Question not answered	4	16%	2%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	5,520	98%	17%
No	0	0%	0%
Question not answered	132	2%	<1%
Total	5,652	100%	17%

Comments received were:

- *“I have no opinion on this in all honesty”*
- *“Yes, I agree with the proposed changes to the Scheme in respect of section 3.6 ‘Borrowing by schools’ to align with IFRS16, ending the distinction between operating and finance leases, and treating all leases as finance leases for accounting purposes. This change ensures that the financial reporting of leases is more transparent and consistent, providing a clearer picture of the school’s financial liabilities. Aligning with IFRS16 is a logical step towards greater financial accountability and uniformity, ensuring that schools manage their lease commitments responsibly and in line with standard accounting practices.”*

Question (B): Do you agree with the proposed changes to the Scheme in respect of section 3.6 ‘Borrowing by schools’ and Annex J for the use of credit cards/purchasing cards?

Submitted responses:

The tables of the responses for this question mirror those for question (A) above and so they have not been reproduced here in the interest of brevity.

Comments received specifically relating to this question were:

- *“I have no preference”*
- *“Yes, I agree with the proposed changes to the Scheme in respect of section 3.6 ‘Borrowing by schools’ and Annex J for the use of credit cards/purchasing cards. These changes are important for improving financial flexibility and efficiency in schools, allowing them to make necessary purchases quickly and efficiently while maintaining clear controls and oversight. Proper governance around the use of these cards will ensure accountability and prevent misuse, supporting schools in managing their resources more effectively without unnecessary administrative burdens.”*

Question (C): Do you agree with the proposed changes to the Scheme in respect of section 3.5.1 ‘Restrictions on accounts’ for amendment to the list of allowable banks that schools are permitted to use?

Submitted responses:

The tables of the responses for this question mirror those for question (A) above and so they have not been reproduced here in the interest of brevity.

Comments received specifically relating to this question were:

Additional comments received were:

- *“I have no preference”*
- *“Yes, I agree with the proposed changes to the Scheme in respect of section 3.5.1 ‘Restrictions on accounts’ for amending the list of allowable banks that schools are permitted to use. Ensuring that schools can only use reputable and secure banks helps to safeguard public funds and maintain financial integrity. Regularly reviewing and updating the list of permitted banks ensures that schools are aligned with best practices in financial management and can benefit from improved services, security, and support from trusted banking institutions.”*

Question (D): Do you agree with the proposed changes to the Scheme in respect of section 4.2d ‘Restrictions on carrying forward surplus balances’ to bring up to date wording to reflect the current operation of the balances mechanism?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	11	85%
No	0	0%
Question not answered	2	15%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	21	88%	13%
No	0	0%	0%
Question not answered	3	12%	2%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	3,952	73%	12%
No	0	0%	0%
Question not answered	1,440	27%	4%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	12	86%
No	0	0%
Question not answered	2	14%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	22	88%	13%
No	0	0%	0%
Question not answered	3	12%	2%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,212	75%	13%
No	0	0%	0%
Question not answered	1,440	25%	4%
Total	5,652	100%	17%

There were no additional comments received.

Question (E): Do you agree with the removal of section 4.41 ‘Reporting on deficit balances’, which is covered elsewhere in the Scheme?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	11	85%
No	1	8%
Question not answered	1	8%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	21	88%	13%
No	2	8%	1%
Question not answered	1	4%	<1%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	3,867	72%	12%
No	900	17%	3%
Question not answered	625	12%	2%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	12	86%
No	1	7%
Question not answered	1	7%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	22	88%	13%
No	2	8%	1%
Question not answered	1	4%	<1%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,127	73%	13%
No	900	16%	3%
Question not answered	625	11%	2%
Total	5,652	100%	17%

There were no additional comments received.

Question (F): Do you agree the proposed changes to the Scheme, combining and updating the wording of sections 4.5 and 4.5.1 ‘Planning for deficit balances’ into one new section?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	12	92%
No	0	0%
Question not answered	1	8%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	23	96%	14%
No	0	0%	0%
Question not answered	1	4%	<1%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,767	88%	15%
No	0	0%	0%
Question not answered	625	12%	2%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	13	93%
No	0	0%
Question not answered	1	7%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	24	96%	14%
No	0	0%	0%
Question not answered	1	4%	<1%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	5,027	89%	15%
No	0	0%	0%
Question not answered	625	11%	2%
Total	5,652	100%	17%

Additional comment received were:

- *“Surely it’s just administrative and no actual change?!”*

Question (G): Do you agree the proposed changes to the Scheme for section 4.8 ‘Balances of closing and amalgamating schools’?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	12	92%
No	0	0%
Question not answered	1	8%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	23	96%	14%
No	0	0%	0%
Question not answered	1	4%	<1%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,767	88%	15%
No	0	0%	0%
Question not answered	625	12%	2%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	13	93%
No	0	0%
Question not answered	1	7%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	24	96%	14%
No	0	0%	0%
Question not answered	1	4%	<1%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	5,027	89%	15%
No	0	0%	0%
Question not answered	625	11%	2%
Total	5,652	100%	17%

Additional comment received were:

- “See above” [reference to comment to previous question]

Question (H): Do you agree the proposed changes to the Scheme for sections 4.9e and 4.9g within ‘Licensed deficits’?

Submitted responses:

Option	Number of Responses	% of Responses
Yes	11	85%
No	0	0%
Question not answered	2	15%
Total	13	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	19	79%	11%
No	0	0%	0%
Question not answered	5	21%	3%
Total	24	100%	14%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,635	86%	14%
No	0	0%	0%
Question not answered	757	14%	2%
Total	5,392	100%	16%

Unsubmitted responses:

Option	Number of Responses	% of Responses
Yes	1	100%
No	0	0%
Question not answered	0	0%
Total	1	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	1	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	1	100%	<1%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	260	100%	<1%
No	0	0%	0%
Question not answered	0	0%	0%
Total	260	100%	<1%

Combined responses:

Option	Number of Responses	% of Responses
Yes	12	86%
No	0	0%
Question not answered	2	14%
Total	14	100%

Option	Number of Schools Represented	% of Responses	% of Maintained Schools
Yes	20	80%	12%
No	0	0%	0%
Question not answered	5	20%	3%
Total	25	100%	15%

Option	Number of Pupils Represented	% of Responses	% of Maintained Pupils
Yes	4,895	87%	15%
No	0	0%	0%
Question not answered	757	13%	2%
Total	5,652	100%	17%

Additional comment received were:

- *“Not sure I understand it!”*

Question (I): Are there other areas of the Scheme for Financing Schools that you believe would benefit from review?

Comments received were:

- *“One area that may benefit from further review is the process for accessing and applying for emergency funding or additional support for schools facing unexpected financial pressures (e.g., due to sudden increases in SEND needs, significant maintenance issues, or other unforeseen circumstances). Streamlining this process could help ensure that schools receive timely support when needed, without facing lengthy bureaucratic delays.”*

Summary:

There is strong agreement for the following proposed amendments to change the Scheme in respect of:

- section 3.6 ‘Borrowing by schools’ for the treatment of leases under IFRS16, ending the distinction between operating and finance leases with all leases treated as finance leases for accounting purposes
- section 3.6 ‘Borrowing by schools’ and Annex J for the use of credit cards/purchasing cards
- section 3.5.1 ‘Restrictions on accounts’ for amendment to the list of allowable banks that schools are permitted to use
- 4.2d ‘Restrictions on carrying forward surplus balances’ to bring up to date wording to reflect the current operation of the balances mechanism
- section 4.41 ‘Reporting on deficit balances’, which is covered elsewhere in the Scheme
- combining and updating the wording of sections 4.5 and 4.5.1 ‘Planning for deficit balances’ into one new section
- section 4.8 ‘Balances of closing and amalgamating schools’
- sections 4.9e and 4.9g within ‘Licensed deficits’

When making a decision, the relevant Forum Members should be aware that responses received to the survey only represented 15% of maintained schools and 17% of pupils within maintained schools.

6. Schools Forum are asked to:

- **Consider the feedback from the consultation survey in relation to the possible de-delegations for maternity leave holiday pay for support staff and (ii) shared parental leave, to inform decision making in relation to the De-Delegation paper later on this agenda.**

- Consider the feedback from the consultation survey in relation to options for internal audit, to inform decision making in relation to the De-Delegation paper later on this agenda
- Vote on the proposed amendments for Norfolk's Scheme for Financing Schools, as detailed in the DSG consultation document [here](#), section 13 pages 34-36.
 - Change to section 3.6 'Borrowing by schools' for the treatment of leases under IFRS16, ending the distinction between operating and finance leases with all leases treated as finance leases for accounting purposes
 - Change to section 3.6 'Borrowing by schools' and Annex J for the use of credit cards/purchasing cards
 - Change to section 3.5.1 'Restrictions on accounts' for amendment to the list of allowable banks that schools are permitted to use
 - Change to 4.2d 'Restrictions on carrying forward surplus balances' to bring up to date wording to reflect the current operation of the balances mechanism
 - Change to section 4.41 'Reporting on deficit balances', which is covered elsewhere in the Scheme
 - Proposal for combining and updating the wording of sections 4.5 and 4.5.1 'Planning for deficit balances' into one new section
 - Change to section 4.8 'Balances of closing and amalgamating schools'
 - Change to sections 4.9e and 4.9g within 'Licensed deficits'

Officer Contact

If you have any questions about matters contained in this paper, please get in touch with:

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APPENDIX A – MAINTAINED SCHOOLS ONLY

Shared Parental Leave

Question: Which option do you prefer?

Voted for ‘Option 1 – De-delegate statutory SPL costs only’:

No comments received.

Voted for ‘Option 2 – De-delegate statutory SPL costs and associated salary costs’ (comments were received against submitted responses only):

“We have been hugely impacted with staff ‘returning’ from maternity and having SPL throughout the summer holidays and it has been very negative for our budget. You can’t plan for it. But that amount seems high. However, I believe analysis would show most staff taking this over school holiday periods as all of mine have.”

“Our budget was significantly impacted on because of SPL payments last year and there needs to be a system in place to support all schools with this moving forwards as more and more staff are becoming aware that this is an option they can take.”

“I would prefer Option 2 – De-delegate statutory SPL costs and associated salary costs. This option ensures that both statutory SPL costs and the additional salary costs during school holidays are covered, providing schools with greater financial certainty and reducing the risk of unexpected expenses. While the cost per pupil is higher than Option 1, it offers comprehensive coverage, which could prevent schools from having to absorb significant costs if SPL leave occurs. This approach also promotes equity, as schools with smaller budgets or those that experience SPL more frequently won’t be disproportionately affected by these costs. Covering the full costs through de-delegation provides more stability and predictability for schools’ financial planning.”

Option 3 – Remain with the status quo

No comments received.

Internal Audit

Question: Which option do you prefer?

Responses:

Voted for ‘Option 1 - Implementation of a minimum risk-based assurance approach’ (submitted responses)

“With tighter and tighter budgets, I feel this is essential.”

“Why is it 83p in the first year and 67p in subsequent years? There does not appear to be a rationale for this. I would be much happier if it were 67p from Year 1 - no reason for higher costs to begin with. If there is a good reason - what is it?”

“As a majority of expenditure in schools, payroll charges on monthly downloads should be included in audit.”

Voted for ‘Option 1 - Implementation of a minimum risk-based assurance approach’ (unsubmitted responses)

No comments received.

Voted for ‘Option 2 - Continuation with the status quo’ (submitted responses)

“For us, I know we do the right thing but it is a concern for schools that don’t buy the enhanced support and could be mismanaging a school budget.”

“schools should pay for their own audit - there needs to be some internal pressure on schools that are not engaging with the process. But each school should pay for their own - not subsidise other schools.”

“I find the RAG ratings and themed audits useful information and is presented in a format which is easily understood by governors. I propose we should continue”

Voted for ‘Option 2 - Continuation with the status quo’ (unsubmitted responses)

No comments received.

Schools Forum

Item No: 15

Report title:	De-delegation (maintained schools)
Date of meeting:	19 November 2024

Executive summary

In this paper Schools Forum Members are asked to decide on the proposed de-delegation of services from primary and secondary schools' budgets in 2025-26 (nursery and special schools are invited to buy-back into the same services).

Schools Forum are asked to undertake the following decisions:

De-delegation and Buy-back

- Decision 1a – The **maintained primary representatives** are asked to decide whether the maternity budget for the primary sector should be de-delegated for 2025-26
- Decision 1b – The **maintained secondary representative** is asked to decide whether the maternity budget for the primary sector should be de-delegated for 2025-26
- Decision 1c – The **maintained nursery representative is** asked to decide whether to buy back into the maternity budget for maintained nursery schools for 2025-26
- Decision 1d – The **maintained special representative** is asked to decide whether to buy back into the maternity budget for maintained special schools for 2025-26
- Decision 2 – The **maintained representatives that are de-delegating or buying-in to the maternity budget for 2025-26** are asked to decide whether the maternity budget should continue to cover the costs of the holiday pay element of term-time support staff on maternity leave in 2025-26
- Decision 3a – The **maintained primary representatives** are asked to decide whether SPL statutory costs only should be de-delegated for 2025-26

- Decision 3b – The **maintained secondary representative** is asked to decide whether SPL statutory costs only should be de-delegated for 2025-26
- Decision 3c – The **maintained primary representatives** are asked to decide whether SPL statutory and salary costs should be de-delegated for 2025-26
- Decision 3d – The **maintained secondary representative** is asked to decide whether SPL statutory and salary costs should be de-delegated for 2025-26
- Decision 3e – The **maintained nursery representative** is asked to decide whether to buy back into an SPL budget for maintained nursery schools in 2025-26 on the same basis as mainstream maintained schools.
- Decision 3f – The **maintained special representative** is asked to decide whether to buy back into an SPL budget for special schools 2025-26 on the same basis as mainstream maintained schools.
- Decision 4a – The **maintained primary representatives** are asked to decide whether the Trade Union Facility Time budget for the primary sector should be de-delegated for 2025-26
- Decision 4b – The **maintained secondary representatives** is asked to decide whether the Trade Union Facility Time budget for the secondary sector should be de-delegated for 2025-26
- Decision 4c – The **maintained nursery representative** is asked to decide whether to buy back into the Trade Union Facility Time budget for maintained nursery schools for 2025-26
- Decision 4d – The **maintained special representative** is asked to decide whether to buy back into the Trade Union Facility Time budget for maintained special schools for 2025-26
- Decision 5a – The **maintained primary representatives** are asked to decide whether the Special Circumstances budget for the primary sector should be de-delegated for 2025-26

- Decision 5b – The **maintained secondary representatives** is asked to decide whether the Special Circumstances budget for the secondary sector should be de-delegated for 2025-26
- Decision 5c – The **maintained nursery representative is** asked to decide whether to buy back into the Special Circumstances budget for maintained nursery schools for 2025-26
- Decision 5d – The **maintained special representative** is asked to decide whether to buy back into the Special Circumstances budget for maintained special schools for 2025-26
- Decision 6a – The **maintained primary representatives** are asked to decide whether the Suspended Staff budget for the primary sector should be de-delegated for 2025-26
- Decision 6b – The **maintained secondary representatives** is asked to decide whether the Suspended Staff budget for the secondary sector should be de-delegated for 2025-26
- Decision 6c – The **maintained nursery representative is** asked to decide whether to buy back into the Suspended Staff budget for maintained nursery schools for 2025-26
- Decision 6d – The **maintained special representative** is asked to decide whether to buy back into the Suspended Staff budget for maintained special schools for 2025-26
- Decision 7a – The **maintained primary representatives** are asked to decide whether the Redeployment/Safeguarding budget for the primary sector should be de-delegated for 2025-26
- Decision 7b – The **maintained secondary representatives** is asked to decide whether the Redeployment/Safeguarding budget for the secondary sector should be de-delegated for 2025-26
- Decision 7c – The **maintained nursery representative is** asked to decide whether to buy back into the Redeployment/Safeguarding budget for maintained nursery schools for 2025-26

- Decision 7d – The **maintained special representative** is asked to decide whether to buy back into the Redeployment/Safeguarding budget for maintained special schools for 2025-26
- Decision 8a – The **maintained primary representatives** are asked to decide whether the Disabled Staff budget for the primary sector should be de-delegated for 2025-26
- Decision 8b – The **maintained secondary representatives** is asked to decide whether the Disabled Staff budget for the secondary sector should be de-delegated for 2025-26
- Decision 8c – The **maintained nursery representative** is asked to decide whether to buy back into the Disabled Staff budget for maintained nursery schools for 2025-26

Decision 8d – The **maintained special representative** is asked to decide whether to buy back into the Disabled budget for maintained special schools for 2025-26

- Decision 9a – The **maintained primary representatives** are asked to decide whether Free School Meals eligibility for the primary sector should be de-delegated for 2025-26
- Decision 9b – The **maintained secondary representative** is asked to decide whether Free School Meals eligibility for the primary sector should be de-delegated for 2025-26
- Decision 9c – The **maintained special school representative** is asked to decide whether to buy back into the Free School Meals eligibility for maintained special schools for 2025-26

Maintained School Internal Audits

- Decision 10a – The **maintained primary and secondary representatives** are asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.

If decision 10 agreed:

- **Decision 10b – The [maintained nursery schools representative](#) is asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.**
- **Decision 10c – The [maintained special schools representative](#) is asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.**

The Schools Forum members eligible to make decisions or vote on the items in this paper are as follows:

[Decisions/votes for maintained primary representatives only:](#)

Martin White, Nebula Foundation (Forum Chair)

Mike Grimble, Avenue Junior School, NGN

Sarah Shirras, St Williams Primary School

[Decisions/votes for maintained secondary representatives only:](#)

Joanna Tuttle, Aylsham High School

[Decision/vote for maintained special school representative only:](#)

Matthew Smith, Sheringham Woodfields School

[Decision/vote for nursery school representative only:](#)

Carole Jacques, Earlham Nursery School

1. De-delegated Services/Buyback

Schools Forum are asked to vote separately by **maintained Primary and Secondary sector** on the de-delegation of services (de-delegation to be agreed amongst representatives of those sectors only).

If agreed, the cost of de-delegated services for maintained mainstream schools will be removed from the Basic Per-Pupil Entitlement at a single per pupil rate for all year groups, except for Free School Meal eligibility which will be removed from FSM deprivation funding. This paper shows the estimated budget requirements for 25/26 based on the latest information available from budget holders, and the proposed rates of de-delegation from schools based on census data (the LA does not yet have the October 2024 census data that will drive the final 2025-26 de-delegation figures so is using October 2023 data to determine the costs per-pupil).

Maintained nursery schools and maintained special schools are offered the same services as a buy back option, as they are not allowed to de-delegate under the statutory finance regulations. (Buy-back to be agreed by representatives of those sectors only). **Academies** are also offered the services on an individual buy-back basis rather than being agreed at Schools Forum.

Apart from Trade Union Facility Time, the rate for which has been separately determined for all schools and academies that might use the service, the cost for nursery schools for each service for 2025-26 is double the rate that is suggested for primary and secondary schools due to higher staff ratios, and for special schools, is based on a rate per place delegated to special schools and representing higher staffing ratios compared to mainstream schools.

1.1 Staff Costs

The staff costs budgets proposed to be de-delegated for 2025-26 relate to the costs or temporary replacement of staff for maternity cover, suspended staff cover, special circumstances (e.g. jury service/public duties), trade union facility time, redeployment/safeguarding and disabled staff support.

In addition, a proposal for de-delegation to meet the costs of supply cover for Shared Parental Leave is also included this year.

The LA proposes that the current practice of allowing Nursery Schools, Special Schools and Special Academies to buy-back into the same fund is continued.

Appendix A provides more information for each of the staff budgets proposed for de-delegation in 2025-26.

For information, the current de-delegation and forecasts for 2024-25 are:

De-Delegation	2024-25 Budget (£)	2024-25 Forecast (£)	Variance (£)
Maternity Cover	696,440	841,211	144,771
Special Circumstances	72,170	93,619	21,449
Suspended Staff	66,080	66,080	0
Redeployment/Safeguarding	54,780	34,780	(20,000)
Disabled Staff	1,450	1,450	0
TOTAL	890,920	1,037,140	146,220

Whilst some budgets are currently forecast to break-even, others are currently forecast to overspend or underspend. Overall, an overspend of £0.146m is currently forecast and this is mainly due to additional allocations made for maternity cover. The LA will offset this overspend against the forecast Growth Fund underspend in 2024-25, as part of the overall DSG outturn at year end (guidance states that funding can only be rolled forward where the LA has an overall DSG surplus).

1.1.1 Maternity Cover – Supply

Included in the de-delegated maternity cover fund is reimbursement of statutory maternity pay, occupational maternity pay and Keeping In Touch (KIT) days. Also reimbursed as a historical legacy is holiday pay for term time support staff.

In 2025-26, for maternity cover, the proposed total budget requirement assuming the same level of cover is estimated as follows:

	£
Estimate of required budget:	
2024-25 De-Delegated Amount (Primary only)	696,440
2024-25 Buyback Amounts (Nursery/Special)	100,570
2024-25 Overspend (based on demand)	144,771
5%Teaching and Support Staff Pay Estimate	47,089
Total Expenditure Estimated for 2025-26	988,870

The proposed rates for maternity, to prevent a similar overspend in 2025-26 are:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	29.80*	28,982.00	863,664
Nursery Buy-back	59.60**	122.34****	7,291
Special Buy-back	84.77***	1,389.00	117,746
Total Budget			988,701

*Rounded to nearest penny (closest to estimated budget requirement)

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools fixed rate increased proportionally from 24-25 level based on higher staffing ratios.

****Nursery Class Hours divided by 25hrs and 38 weeks to reach F.T.E

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the de-delegated maternity cover fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	29.80	1,133.00	33,763

Decision 1a – The [maintained primary representatives](#) are asked to decide whether the maternity budget for the primary sector should be de-delegated for 2025-26

Decision 1b – The [maintained secondary representative](#) is asked to decide whether the maternity budget for the primary sector should be de-delegated for 2025-26

Decision 1c – The [maintained nursery representative](#) is asked to decide whether to buy back into the maternity budget for maintained nursery schools for 2025-26

Decision 1d – The [maintained special representative](#) is asked to decide whether to buy back into the maternity budget for maintained special schools for 2025-26

Continuation or removal of holiday pay reimbursement for term time support staff

Within the DSG consultation, for maintained schools only, the option to continue to to remove reimbursement of the holiday pay element for term time support staff was offered and it is estimated that it would save £0.101m from the maternity cover budget.

Please refer to the paper regarding the consultation feedback earlier on this agenda to inform this consideration.

If this option was chosen the total estimated budget requirement would reduce from £988,870 to **£887,870**.

The rates for de-delegation and buy-back would reduce by £101,000/£988,870, equivalent to approximately 10.2 reduction%:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	(3.04)*	28,982.00	(88,105)
Nursery Buy-back	(6.08)**	122.34	(744)
Special Buy-back	(8.66)***	1,389.00	(12,029)
Total Budget Reduction			(100,878)

*Rounded to nearest penny (budget reduction just below estimated requirement)

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools rate based on higher staffing ratios, reduced proportionally

If secondary maintained were to also de-delegate the maternity budget, this decision would apply to them and reduce their per-pupil rate as well (by £3.04 per-pupil to match primary maintained):

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	(3.04)	1,133.00	3,444

Decision 2 – The maintained representatives that are de-delegating or buying-in to the maternity budget for 2025-26 are asked to decide whether the maternity budget should continue to cover the costs of the holiday pay element of term-time support staff on maternity leave in 2025-26

1.1.2 Shared Parental Leave

As set out in the DSG consultation, it is estimated that to reimburse the SPL statutory cost and the salary costs from April 2025 for the 2025-26 period, the amount that would be required to be de-delegated to cover this cost would be £6,000 for statutory SPL (after offset by 92% statutory recoveries) and £104,000 for salary costs during temporary cover (including on-costs).

Please refer to the paper regarding the consultation feedback earlier on this agenda to inform this consideration.

To cover these options the de-delegation buy-back rates would be as follows:

To cover the £6,000 cost of Statutory SPL costs only (calculated from £6,000/£988,870 based on proposed rates):

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	0.19*	28,982.00	5,507
Nursery Buy-back	0.38**	122.34	46
Special Buy-back	0.41***	1,389.00	569
Total Budget Increase			6,122

*Rounded to nearest penny (budget reduction just above estimated requirement)

**Double (approximately) the maintained primary/secondary rate based on higher staffing ratios

***Special Schools fixed rate based on higher staffing ratios, increased in proportion to extra budget

The additional cost/budget for secondary would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	0.19	1,133.00	215

To cover the full £110,000 for both statutory SPL costs and salary costs (calculated from £110,000/£988,870 based on proposed rates):

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	3.40*	28,982.00	98,539
Nursery Buy-back	6.80**	122.34	832
Special Buy-back	7.60***	1,389.00	10,556
Total Budget Increase			£109,927

*Rounded to nearest penny (budget reduction just below estimated requirement)

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools fixed rate based on higher staffing ratios, increased in proportion to extra budget

The cost/budget for secondary would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	3.40	1,133.00	3,852

Decision 3a – The [maintained primary representatives](#) are asked to decide whether SPL statutory costs only should be de-delegated for 2025-26

Decision 3b – The [maintained secondary representative](#) is asked to decide whether SPL statutory costs only should be de-delegated for 2025-26

Decision 3c – The [maintained primary representatives](#) are asked to decide whether SPL statutory and salary costs should be de-delegated for 2025-26

Decision 3d – The [maintained secondary representative](#) is asked to decide whether SPL statutory and salary costs should be de-delegated for 2025-26

Decision 3e – The [maintained nursery representative](#) is asked to decide whether to buy back into an SPL budget for maintained nursery schools in 2025-26 on the same basis as mainstream maintained schools.

Decision 3f – The [maintained special representative](#) is asked to decide whether to buy back into an SPL budget for special schools 2025-26 on the same basis as mainstream maintained schools.

1.1.3 Special Circumstances – Supply Cover

For 2025-26, due to reporting requirements, it is proposed to split the special circumstances into two distinct areas:

- Trade Union facility time
- Special Circumstances (e.g. jury service and other public duties)

This will allow improved accuracy of reporting of the two different elements to the DfE.

1.1.4 Trade Union Facility Time

Trade Union Facility Time is paid into by both maintained schools and academies and become a single rate since 2024-25. Approximately 27% of the fund relates to income and expenditure for maintained schools.

The cost of providing for Trade Union facility time in 2025-26, taking into account a proportion of the level of demand exceeding the de-delegated budget in 2024-25, and allowing for pay award inflation is estimated at £85,800 as below:

	£
Estimate of required budget:	
2024-25 De-Delegated Amount (Primary only)	72,170
2024-25 Buyback Amounts (Nursery/Special)	3,756
2024-25 Overspend (27% of £21,449 overspend relating to maintained proportion)	5,791
Pay award estimated at 5%	4,086
Total Expenditure Estimated for 2025-26	85,803

The proposed rates for 2025-26 are as follows:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	2.81	28,982.00	81,439
Nursery Buy-back	2.81	122.34	344
Special Buy-back	2.81	1,389.00	3,903
Total Budget			85,686*

*budget just below estimated requirement based on single rate for all schools.

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the trade union facility time fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	2.81	1,133.00	3,184

Decision 4a – The [maintained primary representatives](#) are asked to decide whether the Trade Union Facility Time budget for the primary sector should be de-delegated for 2025-26

Decision 4b – The [maintained secondary representatives](#) is asked to decide whether the Trade Union Facility Time budget for the secondary sector should be de-delegated for 2025-26

Decision 4c – The [maintained nursery representative](#) is asked to decide whether to buy back into the Trade Union Facility Time budget for maintained nursery schools for 2025-26

Decision 4d – The maintained special school representative is asked to decide whether to buy back into the Trade Union Facility Time budget for maintained special schools for 2025-26

1.1.5 Special Circumstances (Jury Service and Other Public Duties)

The cost for providing supply cover related to jury service and other public duties is estimated at £5,000 for 2025-26.

The de-delegation rates proposed are:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	0.16*	28,982.00	4,637
Nursery Buy-back	0.32**	122.34	39
Special Buy-back	0.32***	1,389.00	444
Total Budget			5,120

*Rounded to nearest penny (budget just above estimated requirement)

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools same rate proposed as used for Nursery (not previously split out)

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the special circumstances (jury service and other public duties) fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	0.16	1,133.00	181

Decision 5a – The maintained primary representatives are asked to decide whether the Special Circumstances budget for the primary sector should be de-delegated for 2025-26

Decision 5b – The maintained secondary representatives is asked to decide whether the Special Circumstances budget for the secondary sector should be de-delegated for 2025-26

Decision 5c – The maintained nursery representative is asked to decide whether to buy back into the Special Circumstances budget for maintained nursery schools for 2025-26

Decision 5d – The maintained special representative is asked to decide whether to buy back into the Special Circumstances budget for maintained special schools for 2025-26

1.1.6 Suspended Staff

Where a school has agreed with the HR Consultant that an employee should be suspended, the salary is recoded to this budget.

The same level of fund is proposed for 2025-26 as in 2024-25:

	£
Estimate of required budget:	
2024-25 De-Delegated Amount (Primary only)	66,080
2024-25 Buyback Amounts (Nursery/Special)	14,945
Total Expenditure Estimated for 2025-26	81,025

The proposed rates for 2025-26 are as follows:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	2.28*	28,982.00	66,079
Nursery Buy-back	4.56**	122.34	558
Special Buy-back	10.38***	1,389.00	14,418
Total Budget			81,055*

*Rounded to nearest penny

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools fixed rate continuing at 24-25 level based on higher staffing ratios.

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the suspended staff fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	2.28	1,133.00	2,583

Decision 6a – The [maintained primary representatives](#) are asked to decide whether the Suspended Staff budget for the primary sector should be de-delegated for 2025-26

Decision 6b – The [maintained secondary representatives](#) is asked to decide whether the Suspended Staff budget for the secondary sector should be de-delegated for 2025-26

Decision 6c – The [maintained nursery representative](#) is asked to decide whether to buy back into the Suspended Staff budget for maintained nursery schools for 2025-26

Decision 6d – The [maintained special representative](#) is asked to decide whether to buy back into the Suspended Staff budget for maintained special schools for 2025-26

1.1.7 Redeployment/Safeguarding

The costs related to supporting redeployment/safeguarding is estimated at £35,000 for 2025-26 (down from £54,780 in 2024-25), due to reduced demand forecast with some existing cases of support expected to coming to an end.

The de-delegation rates proposed are:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	1.11*	28,982.00	32,170
Nursery Buy-back	2.22**	122.34	272
Special Buy-back	1.83***	1,389.00	2,542
Total Budget			34,984

*Rounded to nearest penny

**Double the maintained primary/secondary rate based on higher staffing ratios

***Special Schools fixed rate continuing from 24-25 reduced proportionally with reduced budget requirement

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the redeployment/safeguarding fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	1.11	1,133.00	1,258

Decision 7a – The [maintained primary representatives](#) are asked to decide whether the Redeployment/Safeguarding budget for the primary sector should be de-delegated for 2025-26

Decision 7b – The [maintained secondary representatives](#) is asked to decide whether the Redeployment/Safeguarding budget for the secondary sector should be de-delegated for 2025-26

Decision 7c – The [maintained nursery representative](#) is asked to decide whether to buy back into the Redeployment/Safeguarding budget for maintained nursery schools for 2025-26

Decision 7d – The [maintained special representative](#) is asked to decide whether to buy back into the Redeployment/Safeguarding budget for maintained special schools for 2025-26

1.1.8 Disabled Staff

The costs related to supporting disabled staff is estimated at £1,500 again for 2025-26 (no change from 2024-25).

The de-delegation rates proposed are:

Maintained type	£	Estimated Pupil/Places	Total £
Primary De-delegation	0.05*	28,982.00	1,449
Nursery Buy-back	0.10**	122.34	12
Special Buy-back	0.10**	1,389.00	139
Total Budget			1,600

*Nearest penny (slightly above budget requirement)

**Double rate for higher staff ratios (increased from £0.05 to £0.10 for special schools as rate in 24-25 made no allowance for higher staffing ratios)

If the maintained secondary school also wishes to de-delegate in 2025-26, it can be presumed that the budget requirement/demand for the disabled staff fund would also increase. The equivalent amount that would be de-delegated and added to the budget, at the same rate offered to maintained primary schools would be:

Maintained type	£	Estimated Pupil/Places	Total £
Secondary De-delegation	0.05	1,133.00	57

Decision 8a – The [maintained primary representatives](#) are asked to decide whether the Disabled Staff budget for the primary sector should be de-delegated for 2025-26

Decision 8b – The [maintained secondary representatives](#) is asked to decide whether the Disabled Staff budget for the secondary sector should be de-delegated for 2025-26

Decision 8c – The [maintained nursery representative](#) is asked to decide whether to buy back into the Disabled Staff budget for maintained nursery schools for 2025-26

Decision 8d – The [maintained special representative](#) is asked to decide whether to buy back into the Disabled budget for maintained special schools for 2025-26

1.2 Contingency

Where a school with a deficit is to open as a sponsored academy, the deficit remains with the local authority. If Schools Forum agree to de-delegate a contingency provision, then the deficit may be funded from that contingency. Otherwise, the cost must be funded from the LA's core budget and, therefore, is effectively a charge to local council taxpayers and not one that the LA has budget for. In effect, it would reduce the funding available to the LA to support schools and the wider system.

Based upon previous Forum Member decisions, no contingency is requested for 2025-26.

1.3 Free School Meal eligibility

The Free School Meal eligibility budget provides schools with a central service for checking free school meal eligibility data and is fully utilised each year to meet costs incurred.

Maintained mainstream schools and maintained special schools all use this service, and, therefore, the funding required to run the service, which is £31,500 for 2025-26 (1 FTE), has been apportioned between the sectors based on estimated FSM¹ pupils as follows:

	Primary	Secondary	Special	TOTAL
Estimated FSM Pupils*	5,983	195	674	6,852
Share of Budget (£)	27,505	896	3,099	31,500

*Rounded to nearest FSM pupil numbers

The indicative charge to FSM deprivation funding for mainstream schools would be £4.60 (to 2 d.p.) per eligible FSM pupil to cover the costs of this service which include staff costs, postage and other administration costs.

For maintained special schools, which are funded on the basis of place numbers, the cost contribution would be split over 1,389 places equalling £2.23² per-place which is equivalent to the same £4.60 (to 2.d.p) per estimated eligible FSM pupil as for mainstream schools, based on 48.5% of the 1389 special places funded (i.e. 674 places) being eligible for FSM using GIAS data.

The suggested per-pupil/place amount is the rate required to de-delegate a sufficient budget to run the service, £31,500 for 2025-26 (1 FTE), based on an estimate of 6,852 pupils eligible for Free School Meals in maintained schools.

Note that the final de-delegated budgets may differ when based upon October'24 FSM pupil numbers in the final 2025-26 APT. If the final pupil data results in the de-delegated budget being less than the £31,500 required to run the service, then the rate per-pupil would need to be adjusted accordingly to reach £31,500.

¹ FSM meal numbers are from draft 2024-25 APT for mainstream schools and for special schools are calculated as being 48.5% of pupils eligible (based on FSM information from the Government's 'Get Information About Schools' website).

² This methodology, based on number of places and average FSM eligibility levels of 48.5% in special schools, brings the rate for special schools into line with the rate charged to primary/secondary schools for the FSM eligibility service.

Decision 9a – The [maintained primary representatives](#) are asked to decide whether Free School Meals eligibility for the primary sector should be de-delegated for 2025-26

Decision 9b – The [maintained secondary representative](#) is asked to decide whether Free School Meals eligibility for the primary sector should be de-delegated for 2025-26

Decision 9c – The [maintained special school representative](#) is asked to decide whether to buy back into the Free School Meals eligibility for maintained special schools for 2025-26

2. Other De-delegations / Top-slices

Within the DfE's School Revenue Funding 2024 to 2025 Operational Guide, [Schools operational guide: 2024 to 2025 - GOV.UK \(www.gov.uk\)](#), the LA can request de-delegation or top-slices for a number of other purposes. This guidance has not been updated for 2025-26 yet. At this time, the LA are of the view that schools would not want these responsibilities and funding de-delegated/top-sliced (including funding for audits), or the LA is of the view that schools are best placed to make their own decisions:

- Top-slice Schools Block for Falling Rolls Fund – this is considered elsewhere on the agenda – the LA has considered whether this should be top-sliced for 2025-26, however after consideration, the DfE's mandatory criteria based upon SCAP 2022 data and the requirement for demand in schools with falling rolls to be demonstrated to increase again within 3 to 5 years, combined with decreasing birth rates, make it unviable at the current time. The requirement for a Falling Rolls Fund will be reviewed annually;
- De-delegation of School Improvement Services;
- De-delegation of Behaviour Support services– the LA has never requested de-delegation as it has been understood that schools would want to manage these arrangements themselves;
- De-delegation of support to under-performing ethnic groups and bilingual learners – the LA has never requested de-delegation as it has been understood that schools would want to manage these arrangements themselves;
- De-delegation of Insurance/RPA – the LA has never requested de-delegation as it has been understood that schools would want to manage these arrangements themselves;
- De-delegation of Museum and library services – the LA has never requested de-delegation as it has been understood that schools would want to manage these arrangements themselves;
- De-delegation of Licences and Subscriptions outside of central licences scheme

At this point in time, the LA is not requesting de-delegation for any of these purposes.

3. Internal Audit

With the agreement of the maintained members of Schools Forum, the Local authority (LA) can retain funding centrally for some services from maintained mainstream schools' budget shares before allocating funding to individual schools through the formula. See **appendix B**.

In particular, funding may be held by the LA to cover the provision of internal audits and other tasks related to the local authority's Chief Finance Officer's responsibilities under Section 151 of the Local Government Act 1972 for maintained schools (Schedule 2, paragraph 61).

The LA proposes to use this mechanism, if agreed by maintained Schools Forum members to charge maintained schools' budget shares at a per-pupil rate to cover the costs of implementation of a minimum risk-based assurance approach for maintained schools, to ensure that there is appropriate assurance activity across all schools for a minimal cost burden.

Please refer to the paper regarding the consultation feedback earlier on this agenda to inform this consideration.

For mainstream schools, it can only be applied to all schools' budgets at the same per-pupil rate (£0.83 per-pupil), or none. This proposal would require the agreement of all maintained primary and secondary representatives.

Maintained type	£	Estimated Pupil/Places	Total £
Primary/Secondary Budget Charges	0.83	30,115	24,995

For maintained nursery and special schools, the offer would be made at the same per-pupil rate, on a buy-back basis.

Maintained type	£	Estimated Pupil/Places	Total £
Nursery School Buy-back	0.83	122.34	102
Special School Buy-back	0.83	1,389.00	1,153

Decision 10a – The [maintained primary and secondary representatives](#) are asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.

If decision 10a is agreed:

- **Decision 10b – The [maintained nursery schools representative](#) is asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.**

- **Decision 10c – The [maintained special schools representative](#) is asked to decide whether to charge the cost of internal audits to maintained primary/secondary schools' budgets, for implementation of a minimum risk-based assurance approach in 2025-26.**

Officer Contact

If you have any questions about matters contained in this paper, please get in touch with:

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Appendix A – De-delegated / Buyback Staffing Budgets for maintained schools

Maternity Cover

Anyone on maternity leave and entitled to maternity pay is automatically reimbursed from the maternity budget, on the basis of information provided through payroll data.

Shared Parental Leave (New offer)

This budget would cover the cost of staff on Shared Parental Leave either for statutory costs only or also for salary costs incurred during school holiday periods whilst providing for temporary staff cover.

Special Circumstances

This budget covers supply cover costs for special circumstances such as jury service and reservist duties.

School Action: For jury service, and for covering reservist duties, the school should provide evidence of any additional cost incurred to the HR Business Partner (Schools). This evidence could be the relevant supply claims or invoices. Where there is additional cost incurred, the school will be reimbursed usually through a journal transfer.

Trade Union Facility Time

This budget covers trade union facility time.

The money pays for trade union officials who are available to all schools. These officials are paid directly from the budget by the HR Business Partner (Schools).

Suspended Staff

Where a school has agreed with the HR Consultant that an employee should be suspended, the salary is recoded to this budget.

School Action: Speak to your HR Consultant before suspending staff to establish whether this is an option.

Redeployment/Safeguarding

Where there is a risk of redundancy, the school is red rag rated, and the reason for redundancy is financial, then redeployment or salary safeguarding may be a less costly option than redundancy costs.

Redeployment/safeguarding inevitably occurs from a staffing adjustment, so the school will already be working with an HR consultant who will advise on costs and whether redeployment/ safeguarding is an option.

Where salary safeguarding costs are paid by the LA, the salary will be re-coded to reflect that contribution.

School Action: Speak to your HR Consultant at an early stage of the staffing adjustment process to establish whether this is an option.

Disabled Staff

This budget is accessible to schools to support staff who may have additional needs due to disability to enable them to be at work and is decided on a case-by-case basis. In the past this has been used for equipment to enable access to work; training in respect of a disability and for supply cover where it is deemed appropriate (such as phased return to work) and is not covered by the Sickness Insurance Scheme. This does not include Capital Works such as providing ramps for accessibility for those with disabilities, etc.

School Action: The school should be in touch with the HR Consultant about this, and requests are passed to the HR Business Partner. Decisions about spend from this budget will be made alongside other routes that may also provide support, such as Access to Work.

Queries:

Schools should contact HR in respect of the above for information on these funds. These budgets are not advertised on the intranet as funding is only available in certain situations and schools will usually be in contact with HR when they have an issue.

Further to the above, queries can be directed to the HR Consultant or to ehrenquiries@norfolk.gov.uk or to Kate.Philpin@norfolk.gov.uk.

Appendix B

Responsibilities held for maintained schools only

School improvement

- expenditure related to core school improvement activities of local authorities with respect to maintained schools (Schedule 2, 53)

Statutory and regulatory duties

- functions of local authority related to best value and provision of advice to governing bodies in procuring goods and services (sch 2, 58)
- authorisation and monitoring of expenditure in respect of schools which do not have delegated budgets, and related financial administration (sch 2, 59)
- monitoring of compliance with requirements in relation to the scheme for financing schools and the provision of community facilities by governing bodies (sch 2, 60)
- internal audit and other tasks related to the local authority's chief finance officer's responsibilities under section 151 of the Local Government Act 1972 for maintained schools (sch 2, 61)
- functions under regulations made under section 44 of the Education Act 2002 (Consistent Financial Reporting) in so far as the functions related to maintained schools (sch 2, 62)
- investigations of employees or potential employees, with or without remuneration to work at or for schools under the direct management of the headteacher or governing body (sch 2, 63)
- functions related to local government pensions and administration of teachers' pensions in relation to staff working at maintained schools under the direct management of the headteacher or governing body (sch 2, 64)
- HR duties, including advice to schools on the management of staff, pay alterations, conditions of service and composition or organisation of staff (sch 2, 65)
- determination of conditions of service for non-teaching staff (sch 2, 66)
- appointment or dismissal of employee functions (sch 2, 67)
- consultation costs relating to staffing (sch 2, 68)
- compliance with duties under Health and Safety at Work etc Act 1974 (sch 2, 69)
- provision of information to or at the request of the Crown relating to maintained schools (sch 2, 70)
- school companies (sch 2, 71)
- functions under the Equality Act 2010 (sch 2, 72)
- establish and maintaining computer systems, including data storage (sch 2, 73)

- appointment of governors and payment of governor expenses (sch 2, 74)
- budgeting and accounting functions relating to maintained schools (sch 2, 75)
- retrospective membership of pension schemes where it would not be appropriate to expect a school to meet the cost (sch 2, 77)

Education welfare

- inspection of attendance registers (sch 2, 80)

Asset management

- general landlord duties for all maintained schools (sch 2, 78a & b (section 542(2)) Education Act 1996; School Premises Regulations 2012) to ensure that school buildings have:
 - appropriate facilities for pupils and staff (including medical and accommodation)
 - the ability to sustain appropriate loads
 - reasonable weather resistance
 - safe escape routes
 - appropriate acoustic levels
 - lighting, heating and ventilation which meets the required standards
 - adequate water supplies and drainage
 - playing fields of the appropriate standards
- general health and safety duty as an employer for employees and others who may be affected (Health and Safety at Work etc. Act 1974)
- Management of the risk from asbestos in community school buildings (Control of Asbestos Regulations 2012)

Central support services

- clothing grants (sch 2, 54)
- provision of tuition in music, or on other music-related activities (sch 2, 55)
- visual, creative and performing arts other than music (sch 2, 56)
- outdoor education centres (but not centres mainly for the provision of organised games, swimming or athletics) (sch 2, 57)

Premature retirement and redundancy

- dismissal or premature retirement when costs cannot be charged to maintained schools (sch 2, 79)

Monitoring national curriculum assessment

- monitoring of national curriculum assessments (sch 2, 76)

Therapies

- This is now covered in the high needs section of the regulations and does not require schools forum approval

Additional note on central services

Services set out above will also include administrative costs and overheads relating to these services (regulation 1(4)) for:

- expenditure related to functions imposed by or under chapter 4 of part 2 of the School Standards and Framework Act 1998 (financing of maintained schools), the administration of grants to the local authority (including preparation of applications) and, where it is the local authority's duty to do so, ensuring payments are made in respect of taxation, national insurance, and superannuation contributions
- expenditure on recruitment, training, continuing professional development, performance management and personnel management of staff who are funded by expenditure not met from schools' budget shares and who are paid for services
- expenditure in relation to the investigation and resolution of complaints
- expenditure on legal services

Source: [Schools operational guide: 2024 to 2025 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/784442/schools-operational-guide-2024-to-2025.pdf)