

Comments from Schools Consultation

Schools were asked to comment where they answered no to any question.

Q1 –BASIC PER-PUPIL ENTITLEMENT– Primary

Reluctantly, latest information indicates there is not an intention to bring Herefordshire in line with national ratios.

Should be equally divided for primary and secondary pupils.

Seems to be a higher differential than necessary.

Smaller schools require more funding than larger schools. The very nature of Herefordshire schools means that there are many smaller schools. Cutting funding could end with closures and then rural communities have the heart ripped out of them. When the Schools goes then often the shop and then it becomes a retirement village.

Q1: BASIC PER-PUPIL ENTITLEMENT – secondary

This does not make it equitable and one single rate allows for mobility, falling rolls etc.

But no more than this for secondary pupils.

Generally a high school experiences a higher level of costs for KS4 pupils with exam fees, etc.

We do not agree that this is a sufficiently high baseline figure to allow small schools to operate effectively in the context of so much other revenue being lost.

Referring to page 4 of the Consultation and paragraph 2.12, mainstream schools are expected to contribute the first £6,000 of additional educational support.

Q1a: HIGH SCHOOLS ONLY KS3 & KS4 FUNDING - Alternative

I am not sure that year 7-8 pupils cost much more than a year 6 pupils why should they have more. I do agree 6th form student should have more funding.

We would prefer a flat rate across key stage 3 & 4 and a higher baseline figure.

This is £9 less over five years than the Basic Option above

The indicative NSFF allocation shows an average of £ 5,378 per pupil at EMC but due to the capping of formula introduction this would not be achieved in Year 1. (Approx £167 per pupil would be capped)

Q2: DEPRIVATION

At our school the number of children needing support because of unsupportive family backgrounds currently rests at 24%. The FSM Ever-6 formula is not even slightly representative of the cost to us of supporting pupils.

This seems high to me.

Not convinced that Free Schools Meals is an accurate measure of a child's ability to learn and/or achieve. FSM is not an intelligence standard but an indication of family circumstances.

Given that an allocation has to be made and my thoughts are unlikely to be discussed at parliamentary level I agree with the proposal!!

Governors wished to comment that it was important to be able to consider the needs of other vulnerable children who do not fall into the FSM category.

EMC Estimated at £285,000 – 566 High School Pupils (40% is £ 114,000 Notional SEN portion).

Q3: LOOKED AFTER CHILDREN

This seems low to me in comparison with FSM.

LAC in my school don't trigger FSM money (Pupil Premium). Where this happens the amount for LAC should be the same as pupil premium

Q4: PRIOR ATTAINMENT (PROXY SEN)

This seems about right.

I feel secondary school funding is fair but I feel that using child performance to judge funding at end of EYFS will encourage children's progress to be kept low to get increased funding.

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How long will this money follow children for? One year? Every year? At face value, amount not significant enough to be able to make a difference.

This will mean more children will have an entitlement to funding with more so as a school I can use the funding to support more pupils.

For secondary – yes. It is for primaries to decide the other.

The alternative option seems a fairer system with more funding for a lower points score.

We are not satisfied that this is a fair way of assessing this funding. Students from Wales and in some private schools do not always have SAT test scores or even Teacher Assessments and they are not included in calculations. This leaves some schools at a disadvantage. £355 per student is insufficient funding to make a real difference in literacy and numeracy figures within one year.

These rates per pupil do not appear to be based upon any provision costs (ie. An hour of staffing at HC3 per week for instance) The unit figures are merely used to distribute a finite total across all the County Schools.

Entitlement should be for the higher needs children – see below.

Q4: PRIOR ATTAINMENT (PROXY SEN) – alternative

Prefer the alternative below. Pupils with 78 points EYFSP can usually make up the ground with a much smaller amount of individual tuition.

This seems about right.

We feel that £228 is adequate.

I don't agree with 'no pay' if your cohort achieves well. This appears to incentivise low achievement in the EYFS and penalise those setting that achieve well over time. Both systems are wholly unfair and wrong. However, I've chosen the first option as it benefits our current Summer data best!

Fewer children would receive funding with an EYFS 73 points.

But what about next year? What will we use as prior attainment?

We cannot use end of YR results! There is no incentive to do a good job in YR!!

We could see results decrease across the county!

Q5: ENGLISH ADDITIONAL LANGUAGE

The needs of these children vary a great deal and for those who need ongoing support it would be better to have the budget spread over a longer period.

English as an Additional Language – I think there are many of our schools that would benefit from a little more support for this – it is so important for integration of

incoming communities, and also for our economic development as a county. The funding needs to be flexible too – so that it can be put in place very quickly when required.

EAL students need as much help as possible. Funds tend to get spent quickly.

Possible that schools could use all the funding in the 12 months and still need additional [non available] support.

Having not worked with children with EAL I am unsure that I am able to comment on this. I don't not know if it is better to have one bigger year of funding or funding for 3.

This is insufficient funding to support the academic, social and emotional needs of these potentially vulnerable children.

We do not support the reallocation of Specialist School funding, even amongst High Schools, when schools have spent considerable time, effort and money to bid for funds.

£105,000 is insufficient funding to compensate for other cuts in funding to small and rural schools. If this amount is intended to offset unavoidable running costs for small schools (eg Head teachers etc) then why should the same amount be paid to each school in a federation or similar where there is shared HT provision?

Primary schools often have smaller premises and fewer staffing needs than secondary schools; we do not feel that a flat rate is fair.

In addition we do NOT support the funding of any Free Schools in the county and feel it is to the serious detriment of existing provision in other schools.

This would defray costs of establishing EAL pupils in school, translation services, dictionary and resources purchased. But takes no account of casual admissions after Census day.

Q5: ENGLISH ADDITIONAL LANGUAGE – Alternative 1

The biggest rate of progress should be seen in the first year. If not then assessment for additional needs must be proceeded.

More time should be given to students to assimilate English. One year's intensive work is not enough. Staff need to be given time to identify any learning barriers or needs and then have an opportunity to act upon it.

Enables schools to plan additional resources over a more appropriate time scale.

Alternative 2 is simpler.

I feel that all EAL children should receive the same amount of funding when joining our education system irrespective of age.

Prefer the alternative below. More protracted support than one year is usually required.

Our data shows that EAL children make the most progress with English in the first year of school. Therefore a block of funding at the start would help to support them best.

Funding up front for the first year allows for intensive support when it will make most difference – unless the two years span primary secondary when funding might be split to support the transition.

Q5 – first option was preferred.

Q5: ENGLISH ADDITIONAL LANGUAGE – Alternative 2

Two years funding should be sufficient.

Too long and support could not be intensive enough.

This time scale is too long and doesn't 'force' the school to focus the resource accurately.

Q6: LUMP SUM

Seems about right, but I would go for a bit less - maybe £90K.

Governors wished to express a concern that this may discourage potential federations between schools.

Differential running cost and teaching costs for different phases and sizes of school, e.g. specialist equipment for specialist subject teaching means that high schools need more lump sum funding than primary schools. Similarly a small primary school does not need the same lump sum funding as a larger primary school and in turn a larger high school needs more funding than a smaller one. Funding should follow the students.

Although this could be reduced to £100K to create a higher buffer for high needs.

We agree a lump sum should be given, but give a lower amount to every school so that the difference between the suggested lump sum and the revised amount can be pooled. The pooled money can create an SEN fund which can then be reallocated to schools but based on SEN measures, perhaps attached to the number of statemented children in a mainstream school.

This is neither site specific or equivalent to the cost of a "standard" premises staff team. If there is a need to reduce total funding allocated to schools then cutting this back by £5,000 tranches over the next 5 years would be a clear mechanism for moving resources from the Primary Schools sector to the Secondary Schools.

Q7: PUPIL MOBILITY – OPTION 1

The deduction of this money would not help a number of schools because the pay back would be less than the cost.

A little bit on the fence with this one! The reduction of £23 per pupil is not going to make a huge difference to the budget and we do have a high proportion of mobile pupils, but I don't think it would make a great deal of difference either way.

Option 1 and 2 appear to be about different groups of children?

The second option is better as it will allow primary schools a better chance to “put things right” before students come to secondary school. We should as a Herefordshire family of schools support this.

Most 'mobile pupils' will be disadvantaged by this measure as only a very few schools with exceptionally high numbers of in-year transfers will be 'better off'. The overwhelming majority of schools will lose more from (£23xnumber on roll) than they will gain from (£200x number of mobile pupils). If the majority of mobile pupils are in the schools, which are net losers then the majority of mobile pupils will paradoxically be disadvantaged by this proposal.

Laudable principle but counter productive mechanism.

The results of this consultation will incur merging of schools, so mobility will become a greater issue.

We feel that more schools, especially of our size, would lose out by opting for additional allocation.

The loss per pupil would necessitate a large influx of pupils to ever allow the school to break even.

We cannot afford to lose £23 per pupil.

We have relatively low mobility - our long term loss would be £1738.

School would have to have a large number of pupils moving to make this worth while. For most schools this is not an issue.

The loss of £9 per pupil (on our figures) against the percentage of students who are mobile is too high to justify this additional allocation. Not every mobile student has high needs – if they do then High Needs is the appropriate source.

Smaller schools would be at a loss financially on this proposal, as the initial budgets would be cut to subsidise the pupil mobility funding pot.

This is not cost effective for us – the amount paid out is unlikely to be recouped. £200 is an insufficient amount for what could be almost a year's provision of services until the next financial year.

Cost is £9 x 586 = £ 5,274 on the draft figures. That's more than 26 casual admissions a year. It is not clear whether this would be at all beneficial to EMC.

Disproportionate funding of the £200.

Q7: PUPIL MOBILITY – OPTION 2

We are against the principle of the LA deduction from school budgets and holding pots of money which they are allocated according to their criteria.

This seems a fairer way of supporting pupil mobility however would this amount be enough?

There are advantages and disadvantages to both options, but I wouldn't go for either.

For SEN, transportation is likely to be more in demand as pupil numbers rise. The geographical spread of pupils will become greater.

I would want to examine the criteria for accessing such funding before agreeing to this proposal.

Option 1 and 2 are not comparable and therefore don't form a logical choice option.

Not comparable to option 1 – different thing altogether.

However this would be preferable to option 1 so if an either/or then yes to option 2.

We would prefer to have control over our funding and easier access to intervention places of our choice.

Cost to EMC £ 1,758

Q8: SPLIT SITE COSTS

Split site (Q8) – I'm concerned as to whether there being no split site allocation might penalise schools that are federating and finding other ways of working collaboratively and co-operatively. These would seem to be ways of working that we should be encouraging and incentivising rather than penalising.

Q9: BUSINESS RATES

The Business Rates at EMC are the highest in the County. This policy ensures that whatever the amount of Business Rates the cost is zero to the Education budget.

Q10: PFI CONTRACTS

PFI should never be seen as an option for schools (or hospitals)! We are not here to make profit but to educate for the future. It is becoming increasingly difficult to do this in a time where we should be competing with the BRIC countries, not trailing miserably behind.

It should be reduced and some of the cost should be met by Whitecross school.

All schools have supported this cost for a long time out of the DSG it should not come from there as it replaces council stock, it should be the council responsibility.

Iniquitous.

In so far as this could be met from Council funds – not DSG.

However if/when Whitecross convert to an academy we are assuming the LA are no longer responsible for funding this cost as the PFI contractual commitments would be transferred with the change in ownership in becoming an academy.

If the LA is responsible for continuing this funding once the school is an academy, we would disagree with this allocation.

Applies only to Whitecross High School

Q11: NOTIONAL SEN BUDGET

I feel that this is going to push schools to not admit pupils who could be offered a place in a special school because they cannot afford to. I believe passionately in inclusion and in raising standards for children. This budget will adversely affect both.

Governor comments: Agree in principle but for those children who do not meet the criteria there needs to be a mechanism in place to draw down funding. SEN children may not be eligible for FSM funding but 40% of funding still drawn from this pot.

I fundamentally disagree with devolved SEN funding . Money should be attached to pupils not schools. The council should have a clear a fair system for allocating funding to school with pupils with need. How is it right for schools with no SEN pupils to gain money? When schools with large numbers of SEN pupils loose out at a cost to the main stream children. This could lead to schools trying to avoid taking band 4 pupils.

Funding should follow the student. Lump sum funding does not reflect student need in each school.

We do not feel that funding is set at a sufficiently high level and are concerned at the loss of banded funding and the ability to apply for in-year funding for serious cases of need.

This element of the formulae must be very clearly described as having no link to the Additional Pupil Premium money.

The Notional SEN Budget is not extra money, it is a percentage of the source formulae allocations.

Q12A: OPTIONAL DE-DELEGATION (FOR LOCALLY MAINTAINED SCHOOLS ONLY)

I would prefer that the money be delegated to schools.

Schools should be able to choose whether to take up an SLA.

Not for trade unions.

Give funds to schools so they can make the SLA decisions.

Q12B: OPTIONAL DE-DELEGATION (FOR LOCALLY MAINTAINED SCHOOLS ONLY)

No Comments

Q13A: SPECIAL SCHOOL FUNDING 2013/14

No Comments

Q13B: SPECIAL SCHOOL FUNDING 2013/15

No Comments

Q14: PRU FUNDING OPTIONS (FOR HIGH SCHOOLS & PRUs ONLY), Q14 (i): BASIC DfE FUNDING MODEL

This seems fair to me & discourages exclusions.

We would prefer to be able to buy in services as appropriate to the student.

Option 14 (ii) would be more favourable to the vulnerable schools in Herefordshire.

This option would ensure funding is available for LA cases coming into PRU such as out of county students, students currently home educated who need support to return to education, students who have not attended a school for a long period and are not on roll or those coming via Fair Access for example. This option may lead to schools opting for permanent exclusion as there appears to be no cost involved or for schools to feel they have no funding for internal support measures.

The alternative PRU funding option seems more pragmatic.

There are different views between Secondary Schools about how PRU and Special School placements should be financed. High Schools are often left to finance taxi transport to short-term placements whilst pupils are dual-registered. If a pupil is permanently excluded and therefore no longer on the school roll then in following years the school has no income to pay the PRU – see below:

Q14: PRU FUNDING OPTIONS (FOR HIGH SCHOOLS & PRUs ONLY). Q14(ii): HEREFORDSHIRE FUNDING MODEL

This would ensure schools can make a choice of placement and that they have funds for internal support. This option may cause PRUs to not have a clear enough idea of year to year budgets.

Why is this extra funding needed? The APWU follows the student so funding should come from this.

Pupil Referral Units are funded to provide a set number of places. So a charge on High Schools is a dis-incentive to referring a pupil to a PRU that would meet their needs. However if our intervention costs were likely to exceed the Pupil Allocation (Average £ 5,378) then this option becomes attractive if it encourages the PRU to provide for an additional pupil above their capacity.

I am writing to express the serious concerns of the Senior Leadership about the impact of Pupil Referral Unit charging proposals outlined in paragraphs 5.16 to 5.18 in the consultation document.

Whilst 5.17 explains that by delegating funds, schools have a choice about the style and location of intervention, the position after a pupil has been permanently excluded and taken off roll is not clearly set out. An initial pro-rata charge during that financial year ONLY, should be approved.

When a pupil is taken off roll the allocation of money for that pupil stops at the end of the financial year following the census recording that change. Therefore the school has no funds to continue a Pupil Referral Unit placement into a further financial year.

The Herefordshire Funding Model needs to reflect:

“There would be no charge to schools for PRU placement following permanent exclusion”

Please ensure that this slight amendment preserves a fair funding arrangement.

ADDITIONAL COMMENTS

With the mobility measure it is clear to see what the cost of the measure is to the per-pupil allocation and what the gain would be. It would be interesting to explore this ratio on the other redistribution mechanisms. What is the cost of the other measures to the basic pupil entitlement and how many schools will gain more than they lose? Are we sure, for example, that the majority of LAC will be in schools which are net beneficiaries of this funding redistribution device? If not then the mechanism will 'harm' more 'LAC' than it will help.

Small schools – I'd like to see greater weighting given to keeping our smaller schools financially viable – the rural sparsity of our county is well-attested, and there are so many good reasons to keep our small schools functioning at the centre of their communities. The nature of our county means we must accept this as cost to be borne. Is there not some kind of measure for rural sparsity that can be used to allow additional funding for schools identified as being in this category?

It is pleasing to see funding directed towards genuine rather than notional deprivation so that areas excluded from the Excellence Cluster but with high needs children, such as Leominster, will now benefit. This is overdue and welcome.

On the whole this seems a very fair distribution of funds. Thank you

We are concerned that changes to SEN funding will affect small schools with higher numbers of SEN funded children.

Herefordshire faces an acute challenge with so many small schools who will in time be significantly affected by the elimination of their small school subsidy. We need to find a way to sustain our rural education system in these difficult financial circumstances otherwise there will be many more children commuting longer and longer distances to schools in and around the market towns. These funding changes make this an even more urgent priority.

The figures on the spread-sheet draw attention to the amount any given school might *lose* or *gain*. This figure *must* be considered alongside the overall changes to the per-pupil funding levels and careful consideration should be made of how this figure compares with other schools in Herefordshire and beyond. Many of the 'losers' in absolute terms will still be funded at relatively high levels on a per-pupil basis.

It is interesting and important to note that if the amount of funding per pupil invested in a school was directly proportionate to the levels of progress and attainment in that school, then St. Paul's would have the lowest achievement levels in the county. I can confirm that it does not.

Early intervention – I would suggest that the earlier intervention takes place, the better it is, including cost effectiveness, so I would like to see a little more financial weight given to Early Years Foundation Stage and Key Stage 1- for some children even intervention at age 4 is too late. Also, earlier intervention (say on reading skills, engagement with education etc) should have a knock-on effect for later schooling. My principle would be “more help sooner”. These comments apply to SEN as well.

As a broad principle it can be counter-productive to reduce these figures to skew funding towards particular groups of children. By doing so many schools receive a net reduction in funding and find it harder to support the groups of children who are intended to benefit from these mechanisms. There is a limit the economies of scale, which can be achieved in larger schools.

When will we hear the composite results of this survey?
Some questions were difficult to answer in the absence of information about how /where the money would otherwise be used.

Concern about the £6k coming out of school budgets for Band 3&4 children. This will impact severely on rural small primary schools.
Also very concerned about the primary/secondary funding ratio moving from 1:1.75 to national average of 1:1.27 which will reduce the primary school lump sum by £25k - equivalent to a teacher's salary.

Hope this meets you in time as we note that in fact there is a meeting on the 4th, yet the response is due for 5th October!

This form doesn't present much choice in terms of how we are consulted about our funding. The main thing that currently concerns our school is the 'equalisation' of funding ratios between primary and secondary settings. The potential for primary settings to lose approximately £25,000 from our lump sum, to fund secondary settings to receive the 'average' ratio is potentially devastating for small primary schools. I do not believe that this should take place and the current funding ratio should be maintained.

Herefordshire is the third worst funded LEA and you should be campaigning for more funding not making cuts to schools. I do not believe we should accept this policy. Herefordshire should be at the heart of a campaign that draws together all those similar rural LA's. A fairer funding system should be about fairer funding to LA's, Harmonisation of funding depending on the socio economic, deprivation factors, urban, rural costs etc of the LA as a whole. Similar schools across the country should receive similar funding.

I believe the Local authority should refuse to implement this funding formula and make a stance against this policy in the Media and with the local MPs. If in the end we are forced into doing this then the basic block funding should be much larger to

enable smaller schools to survive and critically give each child an entitlement to a good education in a local area without putting four year olds on buses and destroying the rural communities that make up most of our County. Schools will need to evolve and change and we all need to plan this. However any changes should not be detrimental to the rural communities who are at the heart of our county . Larger Urban schools that are close to capacity have more resources now than the smaller schools so this will just widen the gap between rural and city school and make for more inequalities not harmonisation. Urban schools who are operating with a large numbers of places should be reviewed.

Funding for Special Needs should not be devolved in anyway. All funding should be kept by the local authority with a clear criteria to support the most needy pupils in our communities. This is even more critical for the most needy pupils Band 4. We do not want a two tier system of schools with the most needy pupils being forced in to a lottery of which school accepts them or even worse they end up in special schools when they could with funding be in the main stream. Schools without SEN pupils should not gain at the cost of those who do. Nor should mainstream children miss out fund SEN. Schools that have worked hard to become outstanding practitioners with many SEN pupils will have huge budget cuts to deal with. The more SEN pupils a school has the more funding they should have not less!

Due to the SEN funding being the most contentious issue, we have suggested a different modelling solution within question 6. The lump sum could be reduced in order to fund a SEN 'funding pot' which can be reallocated to schools but based purely on SEN measures. It doesn't have to be complex or involve bidding, but funding could be attached to the number of statemented children within mainstream schools. This option would help fund these pupils who do have a higher level of needs.

The Head Teacher and Governing Body are dismayed at these proposals which have a potentially devastating effect on our high-performing school, simply because of its small size and geographical location, both of which are significant factors in its enduring success.

Whilst we understand that Herefordshire has not chosen this method of funding schools and is a woefully under-funded county, we cannot endorse a budget which would appear to punish small schools, particularly in the Golden Valley, and leaves us with a potential 8.5% drop in our already limited budget in 2 years time.

We urge the county to go back to central government and represent the very real damage cuts like these will do to our education system and the future of our young people. Herefordshire is fortunate in having a wide variety of educational opportunities, particularly at secondary level, which offer true parental choice and allow young people to receive an excellent education, no matter where they are in the county. Key to this variety are the smaller, more rural schools which offer a different experience from the larger comprehensives. Undermining the financial security of small schools can only lead to a decrease in choices available and an insistence on a "one size fits all" approach.

Fairfield High School has stood for years in Herefordshire with a clear set of principles which focus education on the individual in a nurturing environment which

allows academic ability and creative talent to flourish. This requires proper resourcing and support. Less is not more. Less is less.

Concerns about the Proposed funding formula changes

With regards the Proposed funding formula, my concerns are detailed below. I refer to the funding presentation received from GIH (Oct 1st 2012) and the response I received from Bill Wiggins MP (August 10th 2012) and Sarah Teather MP (August 6th 2012) to my letter to my MP (Bill Wiggins). To put the Minister's response to my letter in context I should add that Edward Timpson MP replaced Sarah Teather in her post in the September re-shuffle of the Cabinet.

1. Ref: Slide 1 Does the LA pick up the funding of the 'Robert Owen Free School'? Is this not a centrally funded development?

2. Ref: Slide 2 Does the time frame for the transition to a national funding formula take account of the changes in SEN provision that will be enshrined in the Children and Families Act currently going through the parliamentary system *but* will become law early in 2013?

3. Ref: Slide 2 *The transition period*: I refer to comments made by Chowdry and Siebeta (Nov 2011) in their publication '*School funding reforms; Empirical Analysis of Options for a national funding formula*' (Institute of Fiscal Studies) The transition to a funding formula any transition period of less than a decade will involve significant, sustained losses for some schools. If phased in over 5 years as proposed, wont this exacerbate problems further in terms of winners and losers?

4. Ref: Slide 4 'de-delegation (retention of funding) for local authority schools' Does this affect Academies?

5. Ref: Slide 6 AND Slide 11. I refer to the draft document Children and Families Act, September 2012. Changes to SEN provision of assessment and funding.
Ref: Sarah Teather: "we intend to require local authorities to set out a local offer of education, health and social care services available to families of children and young people with SEN or who are disabled in their areas".

Ref: Draft Act **6 (1) JOINT COMMISSIONING ARRANGEMENTS**

A local authority in England and its partner clinical commissioning groups must make arrangements ("joint commissioning arrangements") about the Education, Health and Care (EHC) provision to be secured for children and young people for whom the authority is responsible who have special educational needs.

(11) Local Offer for children and young people with special educational needs

(13) Children and young people with EHC plans –In a case within section 19(5) or 20(2) local authority must secure that the plan provides for the child or young person to

be educated in a maintained nursery school, mainstream school or mainstream post-16

institution, unless that is incompatible with the wishes of the child's parent or the young person or

b) the provision of efficient education of others.

There is no reference to this proposed 'Local Offer' or the integrated working policies

that underpin both 'Support for Aspiration' or the 'Children and Families Bill'. Should the contributions and deduction cited throughout the presentation document also include

knowledge of a) what contribution will be made by our local health service partners. SEN provision/funding is going to change radically 2013-2015 but the proposed funding formula makes no reference to this. Below I give a summary of the joint commissioning plans.

Joint commissioning: *LAs and clinical commissioning groups would have to put arrangements in place to ensure that services for disabled children and young people,*

and those with SEN are planned and commissioned jointly. This would help ensure that

agencies work together to agree the best package of support as well as avoiding lengthy

disputes over who should pay for services. The Department of Health will, subject to consultation, use the mandate to the NHS Commissioning Board to ensure that the NHS

commissioning system and, in particular, clinical commissioning groups, are focused on

Improved outcomes for disabled children and those with SEN.

The proposed formula does NOT make reference to this 'Joint Commissioning' at all or

the local offer as summarised here:

Local offer: *all LAs would publish a 'local offer' of support, so parents would know exactly what is available instead of having to fight for basic information. It is envisaged*

that all parents would be given details of: early years, school and colleges provision and

transport to and from it; social care services available, including short breaks; health services, including speech and language therapy; how to access specialist support; and

special and specialist school provision available – including training providers and apprenticeships.

6. Ref: Sarah Teather. 'Local authority education and children's services will continue to be able to determine spending in line with local priorities. Similarly schools have freedom to use their resources to raise pupil attainment gaps. From 2013-2014 we are introducing a new system for funding pupils with SEN and Disabilities in schools which should facilitate a closer working relationship between local authority commissioning services for such pupils, and the providers of those services'.

Again, this reinforces the need for service providers to work in partnership, but again, what contributions are our local health service providers making to special education provision? This is not taken into account in the funding proposal.

7. Time frame for consultation My final concern is about the short time frame for consultation. Surely something as important as this warrants an extensive consultation, and across disciplines if the local authority is to be prepared for the changes that will be coming on line after the Draft Act has its first reading and passes through its parliament trajectory?

