Comments Received Date	Name	Position Held	School	Comments
Terl Bryant has			no have all said they	don not like the county carrying out a 'cost cutting exercise'. He has
	m that this is not a cost cu			
29.01.2010	Andy Craven	Headteacher	Horncastle CP School	Regarding SEN funding. I have had a lot of problems with SEN this academic year and wrote to the Director on Dec 5. I still await a reply.
				I am very surprised that the proposals are going to be considered further by the forum at a special meeting without first discussing these at the next round of heads meetings. It is very difficult to respond to the proposal from the paper presented. Many questions arise which may be answered perfectly well. However I feel that everything is being pushed through without full consultation with heads which we were promised. Heads meetings to discuss the proposals after they have been agreed is not consultation.
29.01.2010	Graham Dobbs	Chair of	Binbrook Primary School	Sorry to go on but I am alarmed at some of the things I hear and witness. Looks like a better way of funding SENdinn
29.01.2010	Tom Smith	Headteacher	Skegness Junior School	Suggested funding formula change is seriously bad news for all junior schools
29.01.2010	Tom Smith	Headteacher	Skegness Junior School	I am deeply concerned by the implications of what you are proposing.
				Our feeder infant school typically reports that 75%+ of pupils are on track.
				Our assessments clearly show that on entry only 33% of pupils are on track after 3 months here and substantial extra intervention.
				We are already punished during ofsted inspections for this KS1 data, now we will be punished every single day by inadequate funding for our pupils with extra needs.
				This is clearly highly punitive to pupils in junior schools.
				Are you trying to make junior school pupils fail? Do pupils in junior schools not count?

				I deeply urge you to think again.
29.01.2010	Denise Kitson	Chair of Governors	Wyndham Park Nursery School	I am writing to you in response to the recent circulation on this topic for heads and chairs of governors.
				I was disappointed to note that the funding is to be "delegated" to settings as opposed to devolved and I wondered when the decision was made to use this terminology. At the working party on the 18th January there was some considerable discussion about this and my perception was that the term "devolved" would allow conditions to be attached to the funding to assure that it was used appropriately and for the purpose intended. The term "delegate" does not allow for such conditions (as per Tony Warnock's definitions). In terms of auditing the use of the funding and monitoring outcomes, I feel that past lessons should be learnt and as such the terminology is key to a successful outcome.
29.01.2010	John Cork	I loodtooobor	Crowland South	I would very much value your comments to clarify the situation
29.01.2010	John Cork	Headteacher	View CP School	Further to the information that has come out today regarding the above I have one or two concerns;
				The information supplied does not allow us to make any financial calculation in the medium or long term as it gives no financial formula that the authority will be using. It will be difficult, if not impossible, to assess the impact on our pupils.
				Free school Meals can change. We began the year with a relatively low number and now, six months later, we have 38. Schools that have a low uptake for a variety of reasons will probably lose out.
				Some pupils coming into school from other authorities and/or countries arrive at the door with no previous attainment details or certainly any lacking in detail. (These are often the exact children who require support)
				Given the lack of detail in `real` terms on how the actual allocation of money will be made against suggested criteria it is difficult to give unqualified support to the information provided.
				As this arrived this morning and feedback needs to be received by next

		Friday I thought I would send this to you immediately, although it will be difficult for Governors to look at this in detail given the short time span.

29.01.2010	Karyn Wiles	Headteacher	Kedney Drove End School	I have just read through all of the information about the new SEN arrangements. I have a query that I would like you to raise for me please at your meeting. As small schools our cohorts vary hugely from year to year. I am concerned that sometimes our results in Foundation Stage and Key Stage 1, for example next year, wouldn't truly represent the make up of additional needs in our schools. We could be in a situation where we have good results in EYFS and KS1 but poor children in Years 4-6. My results have for EYFS varied from 40% achieving 6+ in 2008 to 80% achieving 6+ in 2009, the same goes for KS1 results they can vary from 100% achieving L2+ last year to predicted 50% this year. My overall spread of additional needs has not changed but with small cohorts data trends can sometimes be inaccurate. Similarly we do tend to have quite high mobility, with an inward mobility of say 2 or 3 children with additional needs having a huge impact in potentially a cohort of maybe 6 children. What happens about those children who move after magical census day, at present if a statemented child moves the next school receives their funding, this presumably wouldn't happen, we could get a 50% change in a cohort all of which have additional needs, but potentially if these children joined after KS1 we would never receive any additional funding for them as our KS1 results may be high. I do think in essence the idea is a good one and I would relish the thought of not having to go through the statementing process, I just worry with small schools our data varied so hugely that we may well miss out. However it could equally go the other way, but I know I do not have the flexibility with staff or finances to be able to swallow up the associated costs of one to one teaching assistants. I hope this makes sense, let me know if you need anymore information.
30.01.2010	Peter Garland	Chair of Governors	St Jonh's Spalding	I see there is only one week from the date of your letter to the closing date for comments. In fact, for some reason, I did not receive this yesterday but only this morning. Therefore we only have in effect 4 working days to prepare our response. In this time, the Headteacher and I should be able to discuss the proposals, but there is little opportunity to discuss with other governors. I suggest that we need more time to do this.

30.01.2010	Paul Reid	Headteacher	St John the Baptist CE Primary School	 I have briefly looked at the proposed changes to SEN funding and wish to make the following known to members of the School Forum; I agree that we need to have a change to funding arrangements as the current system is time consuming and stops early intervention. I am concerned at the proposal which seems to simply a calculation on FSM and the area that children come from. Not all SEN is linked to areas of deprivation and the take up of FSM is still very patchy. I am concerned that this seems to be a simplistic formulaic system that will not take any account of individual circumstances. SEN does not follow this simplistic approach. I believe that there needs to be some sort of input of individual circumstances. I am extremely concerned at the time frame for this "consultation". I have not had the opportunity to look at how I think this would impact on my school, have not had a chance to discuss with colleagues or with Governors.
31.01.2010	Rebecca Mayfield	Headteacher	Tattershall Primary School	I am in total agreement with the principles and content of the proposals AS LONG AS THE SCHOOL IS DELEGATED SUFFICIENT FUNDING TO FULLY SUPPORT THE PUPILS IT IDENTIFIES AS NEEDING IT.
31.01.2010	Janet Corcoran	Chair. Spalding Special Schools Federation V-Chair The Phoenix School Secretary Lincolnshire Autistic Society Member of:- Childrens Steering Group		PROPOSAL FOR ADDITIONAL NEEDS - NEW FUNDING ARRANGEMENTS As Chairman of Governors The Spalding Special Schools Federation I received this information late on Thursday 28 th January asking me to respond by 5 th February. This has made it impossible for me to put together a proper unanimous response from our Governing Body. Given the timescale on these proposals I have grave concerns about the consultation process. I am also secretary of the Lincolnshire Autistic Society (LAS) and as

Learning Disability Partnership Board Task and Finish Groups Autism (Adults and Children	such am involved along with other members of the LAS at a high level right across the County. We have worked tirelessly for a considerable number of years in partnership with all County agencies but disappointingly have received no communication on these proposals as a Society, hence my reply will cover LAS concerns too. The LAS is also represented on the Lincolnshire Parent Carer Council (LPCC). I would suggest that the voluntary sector knows how to communicate and network.
	Consultation There has not been sufficient time for Headteachers to properly share this information with the Governing Body and for Governing Bodies to discuss thoroughly. Parents have not been consulted in a sufficiently robust and inclusive way. Two members of the LPCC are on the stakeholder group but have not been able to share information, as up until very recently, it has been confidential. This has put a great strain on those two members who already do a huge amount of voluntary work for this County and have considerable loads to carry in their family lives. Other stakeholders, the LAS to name but one, have not been consulted. This in the face of Autism being recognised locally and nationally as a most important issue across all mainstream schools and other settings. We feel the whole process has been rushed through.
	Identification, Assessment and monitoring Given the County paediatric situation and ongoing review, parents and indeed school staff, have serious concerns with regard to diagnosis and assessment of a child's needs. Diagnosis and Statements have necessarily and rightly been seen as the only option to obtaining a sufficient recognition of a child's needs and the way of getting anywhere near the support for that particular child. How are we to reassure parents in the current climate? Having taught mainstream children all my working life, I would question the ability and capacity within mainstream to identify and assess individual children with a wide range of conditions. Teachers are given very little SEN training and schools are under enormous pressure from a whole host of Government directives. What support are staff getting to undertake this work? How

				will SEN funding be monitored within a school and how will parents have the comfort that their child's needs are identified and addressed? I very much agree that the Statementing process is lengthy and time consuming, and I note that you recognise some children will always need a Statement. I agree that early intervention is the key and recognise and know well the training initiatives and support that the County makes available to schools. But I still question the capacity of mainstream schools to cope given the drive to keep as many children as possible within County and indeed within their own locality. I fear our vulnerable MLD children will find themselves in mainstream with very little understanding and support. Transport issues are well known to us all and we would certainly welcome the situation where children are not taxied across this huge county, but children cannot be kept local if the local school is not able to meet their needs. Our Special Schools are full and thriving which speaks volumes. I could go on, but in the interest of efficiency I would add that as a Governor and as a representative of the LAS we echo the comments that the Lincolnshire Parent Carer Council have made to you. The email to me asks me to respond to the Schools Forum and gives a list of members. This is most unsatisfactory as I do not have an individual name or central contact. Therefore I have selected a group from the list and will expect a reply outlining decisions and next steps as soon as possible after your extraordinary meeting on 9 th February 2010.
01.02.2010	Andy Craven	Headteacher	Horncastle CP School	I have spoken to forum members and have been informed to email you too. I am surprised and disappointed that the proposal are going to be considered further by the forum at a special meeting without discussing the proposal with all heads at the next round of Headteacher's meetings to be held shortly. At the last round of head's meetings in the autumn term we were assured that there would be extensive consultation, which would be shared with all stakeholders. SEN is an agenda item at the head's meetings I mention above and I

01.02.2010	Chris Brady	Headteacher	Grainthorpe School	think all head's felt that the proposals following the working group would be discussed, rather than heads just being told what the decision was. At this stage it is impossible to say whether I am for or against the proposals because I need the opportunity to listen to the proposals, seek clarifications where necessary and make a considered response. I appreciate that any changes will not be universally popular but all changes must be transparent and follow the stated consultation process. If it was the intention to decide what the changes would be before sharing them with heads this should have been said at the head's meetings. I feel strongly that the proposals are being pushed through without full consultation with Headteachers which we were promised. I appreciate that timing linked to budgets is a factor but heads were informed over two years ago that changes were being considered! I reiterate that I am not necessarily against the proposal but I feel that we need to work in a climate of trust and that the process outlined to heads will not have been followed if a decision is made at the forum meeting. I recently received an e-mail and several documents about the changes to SEN funding. I feel, like others I've spoken, to that this sounds potentially like the right idea in principle if it ends the burdensome statementing process which does not allow a rapid response to a child's needs. However, the documents provided do not allow schools to work out what the actual financial outcomes of this process will be for them, thus making an informed choice difficult. I think some form of local meeting to look at this issue more closely and a calculation of funding for each school, based on the recent census data, needs to be offered so that a more informed discussion can take place.
01.02.2010	Emma Hunt	Headteacher	St Gilbert of Sempringham C of E Primary School	The proposal looks ok to me. I can see it having an interesting and challenging implementation period especially where school budgets are reduced using the new indicators. Nevertheless the indicators seem to be 'fair' and carefully considered.
01.02.2010	Carol Walker	Headteacher	Keelby Primary School	I note that you are a member of the School Consultation group for SEN funding and request that you feedback to your next meeting that, as a Headteacher, I have some concerns regarding the way the funding will

				be calculated. I feel that there is a need for this to be discussed properly and agreed by all headteachers at a future meeting.
01.02.2010	Sally-Anne Caunter	Headteacher	Barkston & Syston CE School	Thank-you for the information regarding the proposals to delegate funding to mainstream schools for statements at bands 1 – 5.
				I would like to request that the funding model is not based on income—based deprivation.
				As a school, Barkston and Syston is considered to have a high IDACI score, however, as you will know from data, the percentage of children with special educational needs at this school is considered to be high.
				I do not understand the statement that 'income-based deprivation correlates to the likelihood of a pupil having additional needs'. Is this presuming that financially 'well-off' parents cannot have a child with special educational needs?
				As a small school, it would not be possible to meet individual children's needs without the continuing support of a Statement which fully funds their needs. I fully believe that each child should be assessed as an individual and their needs met at their level. This should not be dependent on a funding formula and which school they attend. If 'every child matters' then every special needs child should matter too.
01.02.2010	Katie Barry	Headteacher	Gainsborough St Georges C of E CP School	I would like to log with you my approval of the proposed SEN funding changes. That said, I do feel that something this important should really be brought to everybody's attention in a very public and transparent manner with people able to ask questions for clarification etc.
01.02.2010	Emma Nugent			As a relatively new Headteacher and that of one of the relatively few Junior Schools left in Lincolnshire these changes do concern me. My concerns centre on the use of KS1 results which we have no control over and FSM data which can give an inaccurate picture. Presently we have a 186 pupils on roll, of which 70 children are on the Special needs register, 9 with statements. I would welcome an opportunity for this to be discussed properly and agreed by all Heads at a special meeting or regional meeting.

01.02.02	Steve McGuiness	Chairman	On behalf of the CAPAAS	Re: Proposal for Additional Needs – New funding Arrangements
			strategic planning team	As Chairman of CAPAAS (Children and Parents Asperger Autistic Support) I am writing to express some of the concerns of our county wide autism support group membership, with regard to the above proposal. Background. It has become increasingly apparent that local authorities have for some time now been seeking to delegate funds for special education provision to schools. Delegation of funding has given rise to a number of General concerns with regard to the security of provision for children with special education needs (SEN), as well as more specific concerns when particular delegation arrangements and/or publicity appear to place an Authority in breach of their duties under EA 1996.
				General Concerns CAPAAS and its membership are aware that once a statement has been issued, the Local Authority has a clear and non-delegable duty under the Education Act 1996 to arrange the provision in that statement – even if the pupil's school fails to do so. Parents have a right to be involved in arrangement of provision, and the Local Authority has the chief responsibility for dialogue with parents over the entitlement. It is the concern of our membership that the Local Authority aims to delegate as much of the SEN budget to schools as possible to give schools more flexibility in making SEN provision, in doing so is the Local Authority also shifting responsibility onto schools? We are concerned that this will result in fewer statements and less detail on provision in the statements that do exist, i.e. the statements that will exist will not be clear in stating the provision, which would mean that parts two and three of these statements will not be clearly specified or quantified as it should be as stated in the SEN code of practice. We are also concerned that in shifting the responsibility for managing parental expectations to schools, in practice parents will lose their rights to dialogue with the Local Authority, and appeal to the First-tier Tribunal (Special Educational Needs and Disability). Another concern is that having delegated all, or nearly all, of their SEN funding to schools, the local authority may argue that most 'special' educational provision is not technically 'special' anymore – so, fewer

children with learning difficulties have special educational needs. We also believe that another consequence for parents of a system without statements is a significant reduction in their rights. Without a statement they cannot expect any real participation by the LA in their child's life at school and oblige the LA to arrange provision under their child's statement. Without assessment and statementing, parents also have no right to annual review by the Local Authority or any right of appeal to First-tier Tribunal (Special Educational Needs and Disability). As such their only resource is to try and take the school to task on the weaker ground that the governors are not using their 'best endeavours' to secure their child's SEP (under s317(a) Education Act 1996). There is also concern with regard to the way in which the delegated funding process will be policed/monitored, will there be parental involvement here?

We believe that if the Local Authority decides to use a lawful scheme, then any and all published information on SEN needs to be scrutinised very carefully. CAPAAS as a group would become increasingly concerned that the Local Authority in seeking to strengthen its funding schemes, may publish information that could contain unlawful descriptions of the criteria that the Local Authority may use when policies contain one or a combination of the following:

- Informing parents that schools now have a responsibility for assessing children.
- Including over-restrictive criteria for deciding to conduct statutory assessment by the local authority such as
 - 1. Children with 'severe', 'complex' and 'long term' difficulties:
 - 2. Children that fall within 1%, 1.5% or 2% of the most disabled children.
 - Stating that even if a statement is issued for a child, no further funding will be provided by the Local Authority to that child's school outside the delegated funding arrangement; i.e. The Local Authority saying "we have delegated all the funds so a statement will make no difference".

We believe these can be challenged as blanket policies which 'fetter discretion', do not adequately implement the legal test for assessment in s323 EA 1996, and are therefore 'unreasonable' and/or a failure to discharge a duty in terms of s496/497 EA 1996.

They can also be challenged as breaches of the Local Authorities' duties

They can also be challenged as breaches of the Local Authorities' duties under the Special Educational Needs (Provision of Information by Local Education Authorities) (England) Regulations 2001 ("Information Regulations"). Regulation 2, paragraph 3 of the schedule, requires Authorities to publish: "3. The General arrangements made by the local education authority, including any plans, objectives and timescales, for...

- organising the assessment of children's educational needs pursuant to section 323 of the Education Act 1996 in the local education authority's area including any local protocols for doing so;
- 2. organising the making and maintaining of statements in their area including any local protocols for so doing;

Further, these policies can be challenged as a breach of duty under s 313 (2) to 'have regard to' the Code of Practice, which in its paragraph 7:34 sets out clear guidance on LEA's duties to undertake assessment and which makes no mention of a percentage figure nor of the severity, complexity or longevity of a child's needs/condition.

We have serious concerns with regard to true and meaningful parental involvement, worried at the distinct lack of communication between service providers and those service users, the recent consultation highlights again the lack of involvement given to parents and carers in particular who choose to sit outside of group involvement. On behalf of these parents alone I would ask yourself and other county councillors how is the voice of the parent/carer who sits outside of these groups taken to the decision makers. We along with many other parents have no involvement in any consultations and are not informed of any issues within this county, and yet we are aware that the Lincolnshire Parent Carer Council was formed to be a communication channel for this very purpose, we believe that they are failing in their remit by claiming they represent all parents/carers of disabled children, they certainly do not! CAPAAS will ensure that we will challenge at the highest level, wherever possible and whenever necessary the decisions of the County Council to

			ensure the best outcomes for the children with special educational needs/disabilities.
Mrs Therese Lord	Chair	Lincolnshire Parent Carer Counci;	Re: LPCC overview of SEN review On behalf of the Lincolnshire Parent Carer Council (LPCC), I would be grateful if you would accept the following information in addition to the document titled Parental anxieties regarding LCC report 'Additional Needs: Next step in the direction of travel' and also our report LPCC Proposal for Additional Needs in Lincolnshire (Sept 2008). Historical influence: As a group, we are unsure how much influence the portfolio holder, Councillor Patricia Bradwell has with the executive board, as it is perceived that the outcomes of this proposal were long decided even before the recent stakeholder group concluded all their meetings. Two years ago, Councillor Bradwell declared that transport costs were going to decrease in the county as a result of stopping issuing statements up to band 7. Soon after, a proposal to stopping reliance on issuing statements was halted but it has since left many parents and carers feeling quite anxious and suspicious. Current Concerns: The process of the stakeholder's group meetings has done little to mitigate that anxiety due to the following: 1. Meetings were rushed through which created cynicism amongst attendees including head teachers. 2. Serious discussion regarding delegating/devolving funds to schools overlooked exploration of other models such as a phased approach of first monitoring School Action and School Action plus and, if required, then introduce a further level of intervention after reviewing the progress made. This would have ensured parental confidence, beneficial outcomes for the children and a positive perception of the local authority. 3. Parents and carers told us from 2 years ago in our LPCC
	Mrs Therese Lord	Mrs Therese Lord Chair	Parent Carer

	consultations, that they had little confidence in the system and
	that they were dissatisfied with School Action and School Action
	plus levels of support; hence they felt desperate to take on the
	arduous task of applying for a statement. Many have told us
	how much more difficult the process was due to having to go
	through appeal and tribunal. This view was reported in our
	consultation document whereby ring fencing of funds would have
	stemmed the rise in statements and allowed for a quick and
	positive outcome to a child's progression and welfare. This
	LPCC report reflects the key points addressed in the Lamb
	Inquiry yet the information went unheeded.
	4. Further cynicism and reduction in confidence occurred when it
	was discovered that the final report from the stakeholder's group
	was already completed and printed before the start of the 4 th
	stakeholder meeting. This does nothing to instil confidence,
	transparency and genuineness on behalf of the county council.
	5. Consultation with parents did not happen. Instead, 2
	representatives were invited to attend but were under a strict
	confidentiality embargo not to discuss matters outside the group.
	This is not consultation.
	6. Parents and carers are still unaware of the proposal and its
	implications for their children.
	7. Consultation with teachers, teaching assistants and SENCos
	should be undertaken in particular as it is the increased level of
	work on them that will be new bureaucracy. It is felt that
	teachers are already under a lot of pressure and this new
	proposal will just exacerbate that.
	8. Inclusion into mainstream is not necessarily the right direction for
	some children as expressed by Warnock's own reflections to the
	original report. By following through with inclusion for children
	who clearly need special school settings, can be seen as
	discriminatory practice.
	9. There will be further repercussions on other non-SEN children if
	the inclusion agenda overwhelms schools with additional
	pressures to cater for children that would otherwise be requiring
	specialist provision.
	10. If assessment of a child's needs is to continue to be provided albeit by the schools, then why do away with the current system
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which currently gives parents some form of redress if they are unhappy? Will there be an appeal system in place for parents unhappy with a school's assessment? 11. Assessment through schools by utilising outside agencies causes further angst as the schools already find it difficult enough to secure the required time with these professionals
 (proof of this is available if required). Some children have lengthy delays before they are seen by outside agencies due to high demand and thereby eradicating any benefits that early intervention would have made. 12. How can localised provision be put in place when the local
schools are not equipped to meet the needs of the children concerned? This has an impact on transportation as parents have no choice but to transport their children to schools were they have provision to meet the needs. 13. The threat to special schools has been profoundly reverberated and the anxiety around this needs to be stemmed urgently.
Advantages expressed:
There is an agreement that:
 children should be supported as efficiently as possible School Action and School Action plus funding should be closely monitored
 stability in <u>trained</u> teaching assistants/learning support assistants is required
LPCC reassurances to parents and carers:
Parents and carers require reassurance on this proposal to move to delegate funds to schools as it is being perceived as a move away from statementing children between bands 1 to 5, which of course would be illegal.
Due to lack of consultation with parents and carers, the LPCC have taken advice from the DCSF to clarify the position for parents and carers and we will therefore be putting out information to the network regarding

the fellowing
the following:
 Delegation of funding is NOT taking away the legal right of having a statutory assessment/statement. By delegating funds to schools, this is NOT to be used as a blanket policy to stopping issuing statements for children as this would be illegal Statements should clearly identify provision and needs in section 3 of the statement even if it includes, for example,'3 hours of specialist tuition to be funded from the school's budget' (which may have already been delegated to that school in advance) For existing statements, these should only be ceased to be maintained if and when the child has made such progress that would render the statement as no longer required. Parents have the right to appeal/tribunal if a statement is going to be ceased without their agreement. A statement will continue to be in force up till tribunal. Parental confidence can be raised further by informing them that should they fear the local authority is practising improperly, they have the right to redress through the local authority ombudsman for maladministration. Further reassurance can be given that the local authority has a duty to monitor SEN funding.
No doubt the local authority has taken advice from the National Strategy Advisors on this.
The way forward:
Perhaps the best way forward is a suggestion that School Action and School Action plus funding be monitored with immediate effect. This has been long overdue and it is astonishing that the local authority had not undertaken monitoring of this funding per the DCFS guidelines.
A clear SEN criteria giving guidelines for School Action and School Action Plus was released last year to schools but not all are aware of it and there is ambiguity if all schools are interpreting this in the same way. Consistency therefore can be achieved if further guidance is given to

				schools after they are refreshed of the criteria's existence. Guidelines for issuing statements should be widely publicised and this will go a long way to raise confidence in parents as well as give complete
				clarity of the processes involved. More focus on SEN training for school staff as it is this support that is fundamental in ensuring that children are appropriately provided for. Further discussions regarding setting up small specialist units for certain children with additional needs are required.
				I hope the above information proves useful to your discussions with the executive board and if I can be of any further help, please do not hesitate to contact me. Attachments SEN review Jan 2010, LPCC SEN proposal Sept 08, Parental anxieties regarding Lcc report Jan 2010
02.02.2010	Tim Howley	Headteacher	The Bluecoat School and Nursery Unit	RE: Additional Needs: Next Step in the Direction of Travel In response to the paper above I would like to make the following observations:
				1. I fully support the inclusion of as many children with identified additional needs in mainstream schools as possible provided that their needs can be met appropriately and that meeting their needs does not adversely affect the needs of other children within their classes.
				 I fully support the principle of delegating as much funding as possible to schools so as to enable them to address developing concerns for children with identified additional needs as soon as possible. I recognise that the current system of funding for children at
				School Action and School Action plus is open to abuse because of the current lack of accountability. It is therefore in schools' financial interests to identify children within these categories regardless of their actual level of need. For your information, in Northamptonshire, where I was a head 15 years ago, there was an annual audit of need for SAP

children that meant schools had a common baseline to work from. This ensured that there was a common understanding of when children met thresholds for SAP. I would however raise the following concerns 1. The criteria for devolving funding to schools based on free school meals and income deprivation may not be as equitable as it would seem to be. Whilst in larger towns/conurbations this may work well, in smaller towns such as Stamford and particularly in towns where there are only pockets of deprivation, schools such as my own which has a statistically high incidence of Special Needs and a considerably higher than national average percentage of children with statements could be considerably financially worse off under the new system. Because of the nature of the surrounding wards for our school, the deprivation indices do not, I would suggest, reflect the reality of deprivation levels present in the school. This would mean that we are able to provide less support than currently and thereby further damage the life chances of children who are already significantly disadvantaged. 2. I am concerned that whilst there are ways of monitoring progress from KS1 to KS2 for children with Special Need as through the Fischer family Trust reports, there is no such reliable measure for measuring progress from the Foundation Stage to Key Stage 1. This is an ongoing issue (tracking progress form end of FS to end of KS1) that no one seems to be able to agree on, so including this as a measure of performance is spurious. I am not convinced that using the PHSD element as an indicator of progress is academically proven and would welcome proof that this is the case to put my mind at rest.
3. I am also concerned that as in an changes there will be

				initially a huge increase in the workload of SENCOs and Headteachers involved in reporting the usage of SEN funding. This always seems to be a feature of such changes in their early implementation stages, before reality and trust sets in again. In small schools and even medium sized schools such as my own where the Headteacher is also the SENCO this additional workload could potentially be the proverbial straw. In light of these concerns I would welcome the chance for further discussion with my fellow Headteachers and officers at special meetings where this is the only item for consideration. I trust that these comments are pertinent to the debate and that they might help the Schools Forum when they come to consider their response to the paper at their emergency meeting on 9 th February
02.02.2010	Ian Howells	Headteacher	Bassingham Primary School	We have three concerns which at present means that we disapprove, First, it is not clear how robust the statement process will continue to be. It reads as though it will devolve more to the school to sort it out for itself with the associated pressure of having to make the child's needs 'fit' within the available delegated funding. The current process is more detached than this and actually pays for the identified needs. Secondly, we don't see the connection between the criteria that have been identified for the funding formula and the distribution of special needs among our children. Special Needs are not confined to areas of deprivation or to lower income families. Allied to this, it would seem to us paramount that the new formula should allocate any school at least as much funding as it currently receives to meet the needs of those children that have already been identified as needing special provision. Thirdly, No exemplar models of finance showing any figures have been shown. It's a little like buying a house without seeing the plans. What real difference will it make to a school finances, its staff and most importantly the children? Could the proposal leave vulnerable children without the support they

				need? Surely it is better that funding follows the child.
02.02.2010	Jean Dagg	Headteacher	Lea Frances Olive Anderson CE Primary School	Proposal 3 Very concerned that schools like mine are going to lose out in this. We have more and more children coming into the school with autistic type behaviour, children who are under threat of exclusion from other schools, or who have been excluded from other schools. The fact that we work hard to be inclusive and to help these children achieve to national standards will mean that we will lose out if this goes ahead. Additional funding is not always easy or timely to access, and is only short lived. I still believe there should be funding in each school for access to a Behaviour Support Worker – even if shared, and a Learning Mentor. Question: Will children who are already statemented still receive that same funding in our delegated budget until they no longer need it? –
02.02.201	Lesley Tyreman	Headteacher	Heckington St Andrew's	I have read through the information given by both school admissions and parent council, but I don't feel I yet have enough information of the implications to make a decision. However initial thoughts are as follows: I am very concerned about the free school meals indicator, this has serious implications for those schools which do not offer hot dinners. My current school does, but we only find a number of eligible pupils once we take them on a residential trip or offer music lessons. Prior attainment is only a useful measure if assessment is accurate. Deprivation is a bizarre indicator, we have a number of pupils who struggle who come from 'professional' homes. In conclusion I believe the proposals need to be discussed in a wider forum, perhaps at area heads meetings or at a dedicated meeting, the implications are potentially too great for a few people to make on their own.
02.02.2010	Denise Popplewell	Headteacher	Tealby and Willoughton Schools	I'm very comcerned about the effect these planned changes in SEN funding will have on small rural schools like mine with low deprivation factors and hardly any free meals and would like to see a wider discussion taking place with heads before a decision is made to implement them. I have many questions about how the system will work and would like the opportunity to have them answered.
02.02.2010	Paul Fox	Headteacher	St Michael's C of	I know you're on the Schools Forum and will have discussed the

			E Primary School	probable changes to SEN so thought I'd drop a professional line! I can see the reasoning behind it – Lincolnshire doesn't want 4% of children having statements compared to 2% nationally. My prime
				concern is for my school and that we don't lose out. As I understand it the new funding formula to cover Band 1-5 statements will be based on FSM, Deprivation Indices & Prior Performance.
				I appreciate it is hard to decide on criteria, but this does presume children on FSM are more likely to be on the SEN register. At our school 33% of our SEN children also have FSM or to put it another way 37.5% of our FSM are on the SEN register.
				Did the Forum consider using schools SEN registers as an indicator? Not wanting to be cynical, I suppose if they did you would probably find that all of a sudden half the children in schools would be at School Action!
				Anyway, I feel that in all likelihood, a school like ours on the 42 nd percentile for deprivation, 15% FSM and good previous scores will lose out despite having many children with additional needs who we work very hard with to reach the required standard!
				For some schools to gain – others will lose. I bet we're the latter.
02.02.2010	Ralph Slaney	Headteacher	Mrs. Mary King's CE School	In response to the consultation on proposed changes to the SEN provision in this authority, I would have to say that I disagree with the proposals. In my opinion, this change would reduce the effectiveness of the funding for the children who really need it. Money would not be effectively targeted. Children at schools with low FSM or high prior attainment or in a high socio-economic area could miss out on what they really need just because of a funding formula.
				If clusters of schools have to agree between them on where to allocate funding, there are many potential pitfalls. "Pushy" heads or SENCOs may well win out at the expense of others and relationships between schools could be undermined. It is my opinion that all funding decisions should be based on the needs of the individual children and not on area formulae.

02.02.2010	Susan Beveridge	Headteacher	Binbrook CE Primary School	I have looked at the information sent to me and I do have concerns regarding the proposals, I feel that much more consultation is needed before these proposals are endorsed.
02.02.2010	Angela Douglas	Headteacher	Digby The Tedder	'I feel that there is a need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings.'
02.02.2010	Stephen Tapley	Headteacher	Isaac Newton Primary School	I have just looked at the SEN funding proposals. Our governors are looking at the proposals this coming Monday. I think for Isaac Newton Primary School the indicators are exactly right for funding allocations. However it is very difficult to make an informed decision without a comparison between the current levels of SEN funding our school receives and levels of funding we would receive under the proposed system.
02.02.2010	George Trafford	Headteacher	Morton C of E Primary School	I write in connection to the changes in SEN funding for you to use at the School's Forum Meeting.
				I was aware of changes to the system as discussed at the Head's Breakfast Meeting. We had a lengthy discussion, particularly in our group, as to how services could be located closer to schools. We also discussed how schools could work in partnership and services could be located at individual schools allowing for quicker access for children needing the support. I listened to the summary that was provided at the end of our discussion and felt it was beneficial and allowed schools to air their views. Nobody seemed particularly happy with the current system and the length of time it is taking for schools to gain statements.
				However, this model of funding seems removed from the current model and also from the discussion that we had about local support services. I believe that certain schools will not benefit from this change in funding. We have, as do a number of schools, a small role but a high number of special needs. Our FSM quota is low and our deprivation index is also low.
				I do not feel that I understand the new system enough to say how it will affect us because no detail is given on the allowance that would be given to the devolved budget. However, I don't believe that the proposed system is what professionals have been asking for. Devolved money into budgets doesn't mean that access to additional services is going to be resolved.

				As a result I would disapprove of the proposed model and we would be looking for more clarity and explanation of the proposal.
02.02.2010 Chris White Headteacher	Newton-on-Trent CE Primary School	I have always understood, as a Headteacher and former SENCO, that funding for Special Educational Needs is a finite pot of money and that a Statement of Special Educational Needs is not a magic wand. However, I have been greatly concerned that this major shift in policy and funding from the County, is not to improve the Service for the child, family or school, but a cost cutting exercise being brought in by stealth. I remain to be convinced that this new funding formula will improve the quality of the service we provide in schools for our children with additional needs.		
				I feel very strongly that Headteacher's Meetings were cancelled for this Term. I do not accept that it was to ease our burden because of the new SEF etc. etc. I believe that it was an attempt to get these new funding proposals in before Headteachers had time to formulate their replies, once they had understood the proposals.
				This matter should be discussed properly and agreed by all Headteachers at special meetings where Senior Officers and the Director of Children's Services is present; firstly to present their case lucidly and cogently, not through a barrage of paper and power points; and to listen to the concerns and responses from Headteachers. These children are the most vulnerable in our schools and time and care should be taken to discuss whether the proposals are in their best interests or the County's Education Budget's best interest.
				Just to reiterate, I do not think we should accept the Forums Proposals without sensible detailed discussions. If we, as an Authority, get theses funding proposals wrong, it could be a whole generation of children with additional needs who will suffer. I feel litigation in the air!
02.02.2010	Mel Oyston	Headteacher	Hackthorn CE Primary School	Re: comments on proposed redistribution of SEN funding The principle of earlier statements/support at school level is good but the method proposed to distribute funds will cause severe consequences for many schools and deny equality of access to provision for all pupils who require it.

	Yes help has to be accessed faster
	Yes there has to be less paper work But the proposed allocation of funding will not enable this to take place
	fairly
	SEN provision could become a post code lottery with a child who
	happens to be in small rural schools, for example, receiving less support than a child with identical needs elsewhere – this is not an equal access
	system.
	My concerns:
	Small Schools
	In a small school the make up of each cohort varies enormously AND
	can change drastically over the passage of that group through the school – funding needs to be flexible to cover these discrepancies
	In a small school ONE child with a statement would have a massive
	effect on the school budget (it would cost around 8% of our total base budget to fund our one pupil with a band 6 statement)
	The cost of two band 5 statements could just about buy another full time
	teacher for our school and increase the number of teaching staff by 33%
	Budget Pressures
	Schools may be forced to make decisions based on budget share NOT pupil need - this cannot be right.
	Relationships With Parents
	There is a tension between every parents' wishes for their child and the
	school ability to provide that in the context of whole school provision.
	As the key holder of SEN finance schools will be placed under enormous
	pressure from parents demanding their child's needs are met but by
	giving one or two statements a small school would end up with a negative budget
	Conflicts will be created between parents and the school especially with

		the growing trend in middle class areas of parents seeking their own private diagnosis of their children's needs which are then presented to schools with demands that these needs are met. There will be conflict between parents and what they see as their 'rights' for their child and the school's capacity to deliver them. Schools will need to consider the effect on the whole school budget which could have a damaging effect on relationships Reduction In SEN Services There has already been a reduction in access to Ed Psy support (27 one hour sessions per term for all the schools in our area) Relationship Between Proposed Factors And Unprdictability Of Needs Provision of free school meals, levels of deprivation and the prior attainment of pupils are not useful indicators when it comes to dealing with the randomness of special educational needs – a single child with autism for instance does not follow any of these indicators. This is particularly relevant to the many small schools in Lincolnshire. Brain development, autism, medical issues etc. are not dependent on free school meals Inequality Of Provision Individual children with SEN will receive a different response depending on their location – this would be unfair – any scrutiny system introduced to monitor the situation and try and provide equality will result in additional paperwork which the new system is proposing to reduce Additional questions to be answered: What happens when new children arrive from other schools/authorities with levels of funding already issued but which cannot be met by the receiving school? What provision will there be for schools who go into the red as a result of an influx of pupils with SEN or a sudden increase in SEN within the school?
		school?

02.02.2010	Gillian Bassett	Headteacher	Louth Lacey Gardens Junior School	It seems that the only response is number 3. This all seems very hasty. A small presentation at the Heads meeting in October and now sweeping statements which need a lot of clarification.
02.02.2010	Dominic Lloyd	Headteacher	Tower Road Primary School	October and now sweeping statements which need a lot of clarification. I fully appreciate the big picture regarding the need to address the issue of SEN funding in Lincolnshire but it is important members understand the consequences at local level from a wide range of settings. On a personal school level, we are one of the largest primary schools in Lincolnshire with 615 pupils and therefore we have the lowest funding per pupil when everything is taken into account. Historically we also have a below average percentage number of statemented pupils and work very hard to address issues at school action - records will show that we only apply for an MDA in extreme cases. We are certainly not a 'leafy suburb' school but it would appear we are to lose out if the funding was based purely on the criteria set out in the paper and particularly if free meals is at the forefront of the formula. Like many schools that do not provide hot meals the number of parents coming forward who receive government benefits, is not a true reflection of the situation. If the primary aim of the proposed changes is to 'save schools from requesting a statement of need from the authority thus decreasing the bureaucracy, time and effort and costs in *administering the statement', then it is vital that schools are very clear as to the exact amount of money which has been delegated so that we can address the monitoring arrangements required of schools as stated in the summary report. *What are the calculated savings to be made from the decrease in administration costs and will they be delegated? I welcome the idea that 'The main driver of this approach of delegating funds for statements is to enable schools to respond earlier, and promptly, building capacity to meet a wider range of needs' but we can only achieve this if funding is equitable, fair and maintained, particularly if emergency funding is to be delegated by formula or removed altogether.

				Question: Can schools be confident that the needs of a child requiring a statement above band 5 will be given serious consideration and will there be an LA SEN Annual Report as to the number of statements increased/decreased, their type/band and how many were successful/unsuccessful? If this were to happen way it would show transparency, accountability and provide evidence as to how successful the changes had been for both the LA and pupils as well as providing a clearer SEN financial picture. Thank you for your time and I trust that the right decision is made for all our pupils.
02.02.2010	James Greenwood	Headteacher	Manor Leas Junior School	As the Head teacher of Manor Leas Junior School in Lincoln, I would like to voice my concerns over the proposed changes to SEN funding from April 2010. I would like to request that the whole situation is discussed in a professional manner by all Heads at a special meeting or at regional meetings. It is important that if every child really does matter in Lincolnshire that transparent, open dialogue is encouraged and reflected upon to improve SEN provision. We should not rush through such an important matter. I thank you for representing my views at the Schools Forum and look forward to receiving your feedback on the meeting.
02.02.2010	Carol Clare	Executive Headteacher	Boston Park & Gosberton CP Schools	Please find below my response to the 'Proposals for Additional Needs: New Funding Arrangements' Considerations/Questions re. Next Steps: Additional Needs With regard to: Current statements (Bands 1-5) being the responsibility of the school to fund from within its delegated budget • Will the level of funding for existing statements be matched in the delegated budget (at Park School we currently have 7 pupils with statements at Bands 1-5 which could potentially cause a significant shortfall if funding is not matched)? • Who makes the decision, in reality, of the amount of support the pupils who currently have a statement will receive if this is not

identified?-what is felt to be appropriate facilities, arrangements and resources by one person/school may be completely different by another. Pupils with statements are some of our most vulnerable pupils with complex needs; the very fact that they
have a statement means their needs are planned for as priority in a school. Without a statement the pupils' needs may not be adequately supported or their needs not fully understood. Without question the multi-disciplinary assessment process is lengthy, time consuming and involves effort on the part of many but it is the means by which a pupils special educational needs
are assessed and communicated-surely a worthy outcome in itself?
 Current statements (Band 1-5) will continue and be monitored through the Annual Review process-currently the level of funding can be appealed and increased if it is felt the pupils needs are no longer being met, will it be the responsibility of the school to divert increased funding to a particular pupil from what would appear to be a set budget as from January School Census? Current statements are a legal document-if not implemented as stated (despite potentially schools not being given matched funding for them) schools could be put in the position of putting themselves at risk of legal proceedings. There is no detail on the 'direction of travel' with regards to current statements above Band 5. There is no detail on the procedures for schools to follow should
a pupil be admitted with an additional need that is felt could not be met in a mainstream setting (we have experience of admitting pupils from Europe whom it later comes to light have attended 'special provision' in their home country. Currently, it would only be through proceeding through the statementing process that their needs would be assessed and thus the pupil transferred to a special school setting).
The Funding Model
With regard to the proxy deprivation indicator of pupils claiming a Free School Meal-in Park's particular situation of having 50% pupils with EAL it is recognized that a significant number do not claim a meal (although eligible) because of food preferences as

a result of cultural differences.
With regard to the proxy prior attainment indicators-this only
relates to pupils' SEN relating to their learning . There is no
mention of other aspects of SEN like for example, visual
impairment, a medical condition which affects accessibility to the
physical environment and thus curriculum or social, emotional
and behavioural difficulties. This would have a significant impact
on us at Park-as it stands many pupils would be identified as
having SEN through their BESD and receive pastoral support
and support within the classroom but there would be no account
of this in the delegated budget.
From our experience of pupils admitted at Park who are termed
'difficult to place', it is only with the significant levels of funding
and therefore support that we are able to put in as a result, that
they are integrated from other schools from which they have
been permanently excluded. It would seem under the current
proposals that there would be an expectation to admit and
support these pupils from the delegated budget. Surely this
would make it even more difficult to place such pupils as schools
would not be so willing to go over PAN in such circumstances.
This would be a move away from rather than towards inclusion
for these pupils.
Pupils with BESD very often become a cause for concern within
a very short period of time in response to critical life events; it is
our experience that their needs can be addressed through the
Inclusion Funding mechanism which has proved to be very
successful in the past. If this were no longer available schools
may potentially proceed to permanent exclusion before
exhausting every avenue of support as a means of conserving budget- a clear case of putting budget concerns before pupils.
budget- a clear case or putting budget concerns before pupils.
In general
We raise concerns regarding the lack of consultation, the lack of
communication with schools and those working on the 'front-line' who
have already experienced many hours of work wasted in collating
evidence and making referral to LA for multi-disciplinary assessment
when it is now clear there was little point in doing this due to the new
funding arrangements.

				We raise concerns regarding the seemingly piecemeal approach to communicating the 'Proposals for Additional Needs'. We have only had very basic details regarding one small aspect of the 'big picture' i.e. the proposals for Band 1-5 statements. Surely such fundamental and farreaching changes should be set out in full in order that they can be considered and evaluated in their entirety? I believe, therefore, there is an urgent need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings
02.02.2010	Julie Harrison	Headteacher	Billingborough Primary School	Malcolm, I disagree with the new changes to the SEN funding. Last academic year I had 4 pupils with a statement out of 110 pupils and have great reservations that this new system will allocate effective funding to a small school to meet these pupils needs. Julie Harrison Headteacher Billingborough Primary School
02.02.2010	Jeremy Watt	Deputy Head	CEAS	Proposals for Additional Needs: New Funding Arrangements Thank you for sending me copies of the proposals being made by Lincolnshire County Council in respect of funding for children with additional needs. As you know, CEAS is a MOD Service established to provide information, advice and support to all those with an interest and involvement in the education of Service children. In this capacity, I am happy to make some comments on the proposals you have sent to me. I am content for you to share these comments with colleagues in the county if you feel that would be helpful. I am aware that, nationally, the drive continues to be for local authorities to devolve to schools as much funding as possible, including those funds for special educational needs. I understand that one of the intended outcomes is to reduce the number of Statements made by local authorities. Lincolnshire's proposals are entirely consistent with these objectives.

However, those of us with a particular interest in the education
of mobile Service children with SEN have concerns about how the system nationally, both within England and across the U.K., can fail to meet the needs of these children and the schools
which serve them. Just within England, there are significant variations between local authorities in policy, special educational provision and funding arrangements; movement into and
between local authorities in England can result in Service children with SEN and their parents being significantly disadvantaged. This disadvantage can manifest itself in a number of ways:
 Inappropriately slow movement through the SEN stages; Time lost in assessing, at School Action and School Action Plus, children's SEN due to difficulties in transferring records, the need for settling in periods and the differing perceptions of need and its complexity and severity between different educational settings; Unavailability of required provision in receiving authorities, having been available in a child's previous authority, with or without a Statement; Delays, sometimes across more than one authority, in assessing need and making appropriate provision, with or without a Statement;
Differing thresholds for access to provision external to schools between authorities, resulting in delays in determining need and provision as well as confusion and concern for parents and professionals alike;
Potentially (because there is no reliable data to support this), a comparatively and disproportionately low number of Service children becoming the subjects of completed Statements for the reasons outlined above;
Comparatively greater difficulty experienced by Service parents in obtaining access to the SEN and Disability

Tribunal;

• Greater devolution of funds resulting in less portability of provision.

I am aware that there is some overlap between these issues and the list is by no means exhaustive. The issues, however, are real.

CEAS is aware of over 600 schools in England that serve military communities. Almost universally, SEN is one of their main areas of concern in respect of mobile Service children. Many of them share the issues outlined above and, in addition, express frustrations about:

- The financial implications of making provision for children who arrive with poor quality information about their needs, who previously were in receipt of provision not (immediately) available in their new school and who may not react well to change;
- The disruption an incoming Service child with SEN can cause to planned SEN expenditure within a school's devolved budget and the potential disruption to provision for other children with SEN.

Within this context, the devolution to schools of funds for SEN can be problematic as, inevitably, the issues considered in structuring the rationales for the funding formulae stop at authority boundaries.

With regard to Lincolnshire's specific proposals, if I understand them correctly, the basis outlined for devolving funding to schools discriminates unwittingly against schools serving military communities. This is because Service children are rarely eligible for free school meals (even though some may exhibit in school symptoms of social and, even, financial deprivation), do not usually live in post code areas considered to be deprived and the

				prior attainment data relevant to their needs may not figure in the data to be used by the authority if they have been/are mobile. Consequently, under these proposals, it is likely that schools serving military communities in Lincolnshire will be underfunded in terms of their SEN funding, making it more difficult for them to meet need effectively and promptly and making it more likely that mobile Service parents will pressurise the local authority into making statutory assessments and Statements – the opposite of one of the stated objectives of the proposals. Clearly, many of the contextual issues referred to earlier in this letter can only be resolved at a national level. The MOD will be expressing its views about changes required to the SEN Code when the Code is reviewed in due course. However, whilst I understand the drive towards the devolution to schools of funds for SEN provision, I hope that further consideration can be given to finding ways of ensuring that those schools serving mobile military communities are not disadvantaged by any changes to funding mechanisms in Lincolnshire. I hope you find these comments helpful. Please do not hesitate to contact me further if you would like to discuss any aspect of this issue.
02.02.2010	Tom Verity	Headteacher	Pinchbeck East C of E Primary School	Thank you for bringing this to my attention. Are the deprivation figures taken from the last census or more recent figures as the village where I work has changed considerably since then. The figures from Raise online that indicate the number of parents who have taken part in higher education is a good indicator of how children perform.
				The final issue that came to mind was for those children with emotional

02.02.2010	Helen Richardson	Headteacher	Wyberton Primary School	and behavioural issues who are not necessarily showing gaps in prior attainment - how will this be addressed? I have read the information sent to me regarding the allocation of funding for SEN. I have some concerns and feel that proper consultation with Heads has not taken place. I would like to request that further meetings be arranged with Head Teachers to discuss the changes before any final decisions are made.
02.02.2010	Catherine Teale	Headteacher	Mablethorpe CP Primary School & Nursery	I am writing in response to the information received at the end of last week. As I am sure you will appreciate, due to the incredibly tight time frame for a response, I have not been able to discuss this with my Senior Leadership Team or the Governing Body. However, having called an emergency meeting with Key members of staff I feel we do need to voice our concerns. Your most recent e-mail reflects the fact that it may not achieve a full and accurate response due to the ridiculously short time frame. Heads may not see this as such a priority if their SEN population is low. As a non-teaching Head I have had the luxury of being able to call an emergency meeting. Free school meals as an indicator is still an inadequate measure, for example in our school we broadly estimate that 33% of our cohort should be claiming FSM. The actual figure is 18%. The statement regarding FSM uptake is far too sweeping. I would be much more interested to see if FSM has increased along the deprived coastal strip as this is not our experience. Another concern is the assumption that only children with poor prior attainment require banded support. Sensory impairment, autism and physical disability are only three examples of where support may be required by academically bright children. We also suffer from a turbulent population, our in year admissions have shown up to 50% of these children going straight onto our SEN register. Will there be provision for in-year adjustments if we receive children who would have previously been eligible for banded support? The 12 month "transition protection "arrangements are an insufficient period of time, particularly if a significant staffing

				restructure is required. It is very difficult for us as a school to gauge the impact of these changes without having a financial exemplar which illustrates the possible impact on our provision. Statements referring to winners and losers are equally sweeping and do not assist with making an informed decision. In our school's case 94.7% of our banded provision would be affected. I do not feel I have been given enough time or detail to make an informed decision and therefore I would reject the current proposal on these grounds. I would favour an opportunity for scrutiny of specific data and funding arrangements in order that the best decision could be made for my school and pupils. On a closing note, having recently taken part in a consultation process, regarding proposed changes to formula funding of Early Years. I feel that
				the detail and transparency of information in that model should be seen as an example of good practice and be applied to this situation.
02.02.2010	Sharron Close	Headteacher	White's Wood Lane Community Junior School	Your name has just popped up on the schools forum list so thought I'd share my thoughts with you. My main concern as we clearly expressed at the relevant HT meeting is that no funding should be delegated to groups of schools which would then put them in a position to bid in any way for entitlement of funding between each other. Also although the document says how they would calculate we have no guarantee of the level of funding or how this would be calculated and FSM are not claimed by many children who need them because of the system that does not allow for those who claim child tax credit. In addition (yes, there's more!) I have a serious concern that this is a way of cutting funding. I know from reviews I have submitted that it is becoming harder and harder to even get a statement let alone get extra time. I have been chasing inclusion funding for weeks for a child who is on phased reintegration and I have been told that not only is the pot empty but that the actual budget may well not even exist next year. As a result we are having to pay for a 1-1 all morning for a child who does not have a statement and is unlikely to get one and will definitely be excluded if we don't put someone with him 1-1. The cost is crippling and

				not included in current budget shares. Of course I can exclude him??
				Hope my whingeing is not too bad but feel quite strongly that this shouldn't be this hard for these children and schools that have to manage this. A Head said to me the other day 'but you are set up for it'. I wish.
02.02.2010	Sarah Weldon	Headteacher	Our Lady of Good Counsel Catholic Primary School	As a fairly new Head Teacher and not having been a SENCo I have limited experience of the funding arrangements for pupils with a statement of SEN. Having read the attached documents and a more detailed report of the meeting held on 22nd January 2010, it appears to me that it is questionable as to whether the LA is meeting its legal duty as an authority if it delegates this funding directly to schools.
				Although it would allow me, as a Head Teacher, to get away from some of the bureaucracy of the process and make decisions at school level, where I know what individual children need, the proposed arrangements seem to be open to possible abuse. The monitoring and accountability arrangements would need to be very tight indeed.
				My other concern with this proposal is that it is based on FSM and deprivation indicators. Mine would, more than likely, be one of those schools who 'lose out'! Our percentage of pupils eligible for FSM and deprivation indicators are below national averages, although they are rising and we would therefore lose out financially. However, despite being below, we still have pupils who have SEN for whom we need to provide; learning difficulties, such as autism, take no account of socioeconomic background!
				I can see the situation arising where we would struggle to provide properly for their needs because our funding has been reduced, or worse still, have to make unacceptable decisions as to who receives support and who does not. SENCos and Head Teachers will be reluctant to put pupils with SEN onto the register knowing that they are unlikely to receive appropriate funding for them.
				Although I welcome the opportunity to reduce the bureaucracy of the funding process, I cannot be sure that this is the best route to take

				and hope that my concerns will be included at the meeting on 9th February.
02.02.2010	Charlie Hebborn	Headteacher	Scampton C of E Primary School	Response to Changes to SEN Funding I would agree that the current system for applying for statemented funding is rather bureaucratic and would support measures to streamline the system presumably leading to savings that could be passed on for the benefit of pupils. My concern with the proposed change lies in two parts. Firstly, a small rural school such as Scampton with just a few children eligible for free school meals, a perceived low deprivation measure and with few individuals far below their expected levels, it seems unlikely that we shall receive a sizeable share of additional funding. The description I have just given may make the school sound as if it has no need of special needs funding but in fact, we have a great need. As a small school, we have few staff and as creative as we try to be in the deployment of our staff to meet children's needs by clustering groups of children for intervention work etc, often the only way to meet those needs are the close personal attention that can be given by a 1:1 teaching assistant - this is targetted support that may only be needed at key, strategic times of the day (often falling in Band 1 to 5). Secondly, in the last few years, we have seen our special needs cohort grow largely due to parents choosing a small setting such as ours which they feel suits their child's additional need and our experience in this setting is that these children are not typically socially deprived - a major factor that would influence the level of funding that we would receive under the proposed scheme. With the limited staffing that we have, we deploy staff carefully taking into account the needs of the children across the school. From time to time (and happening more often here) children join us with particular needs and sometimes a statement. Currently, children already with a statement moving between schools in Lincolnshire would have their statements transfered with them along with the funding to support. I can imagine under the proposed scheme a number of pupil movements unaccomp

				3) A need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings.
02.02.2010	Peter Garland	Chair of Governors	St John's Spalding	I see there is only one week from the date of your letter to the closing date for comments. In fact, for some reason, I did not receive this yesterday but only this morning. Therefore we only have in effect 4 working days to prepare our response. In this time, the Headteacher and I should be able to discuss the proposals, but there is little opportunity to discuss with other governors.
l				I suggest that we need more time to do this.
03.02.2010	Sheriden Edwards	Headteacher	Denton CE School	I would like to respond to the proposed changes to the way that SEN funding is to be allocated from April 2010. As head of a very small school with high levels of special needs (23%) I feel that my school would be seriously disadvantaged with this new system. Parents tell me that they select our school because it is small and they feel that their child will benefit from closer supervision. However the vast majority of my parents are from reasonably affluent households and most of my parents work so the free school meals and depravation indicators would not truly reflect the need in the school. I am also concerned that looked after children, once they have been adopted may still have significant special needs issues but may be adopted with a family who do not fit with this criteria either. I think that this needs to be discussed properly at local level where a variety of options can be considered.
03.02.2010	Maxine Purvis	Headteacher	Belmont CP School	My school has a higher than average number of SEN and I have concerns about the key factors to be used to distribute funding for Bands 1-5.
				 Post codes are not a reliable indicator of deprivation. Housing associations have purchased many properties on the 'Sunningdale' estate and in Alma Park the 'Avenues'. Many of these properties are let to families with very low incomes and complex social needs. How will prior attainment be decided for those children entering Reception classes? We have 9 feeder nurseries and the quality of the evidence passed on to us is of varying quality and relevance. Like many schools, I have children on the SEN register, who are

				entitled to FSM, but whose parents decline them. Will these children's needs be unfunded? What guarantees will there be that actual costs of interventions will be devolved to schools and that this will continue. Will it be a repeat of the PPA costs which were devolved to us in a 1% increase in the budget which was not maintained, leaving schools with an increasing financial burden which has become increasingly difficult to meet?
03.02.2010	Julie Czajkowski	Headteacher	Holy Trinity CE Primary	I have considered proposals and do not agree with them as I feel schools will not gain and there will not be sufficient funding mad available. Will money be ring fenced? What about high level dyslexics who require support to achieve potential but attainment falls within normal expectations.
03.02.2010	Hazel Belcher	Headteacher	Saxilby CE Primary School	Having carefully studied the paperwork I am writing to express my concern about the proposed new funding arrangements for additional needs. Saxilby Primary School would appear to be located in an area of social advantage and this is indeed borne out by the national 2000 census statistics. However the village is changing significantly. An example of this change is the rise from 6 children taking free school meals in September 2008 to 23 children now eligible (February 2010) and this number is increasing daily. (At the time of the Forum 7 census 2010 19children were taking a free school meal). The number of children in the school with additional needs has increased significantly with 21% of children having SEN and 2.8% having statements of SEN. (See below)
				School National
				SEN with Statement 2.8 1.4
				All SEN 21.0 19.7
				At the end of KS1 Statutory Assessment 2009 only 5 children were assessed at 'working towards' in the single area of writing, meaning that given the proposed weighting ascribed to prior attainment, the school would again lose out.
				Given the proposed criteria for funding Saxilby School (and others statiscally similar) the school would lose out on funding for children with

				 I therefore am against the proposal I am concerned that all learners at Saxilby could be disadvantaged if the proposal is approved if the formula funding does not generate funding equal to the current statement generated funding (even taking into account the proposed weighting to the model). It will be necessary to make savings elsewhere in the budget to guarantee support for SEN at the current level. This could mean the loss of a teacher. Funding for children with special needs should be directed to the child specifically and not to the school generally. 'The main driver is to increase the capacity at school level to meet a wider range of pupils' needs.' I have grave concerns that Saxilby would be unable to fulfil this aim given the proposed funding model. There is a need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings. I therefore request that meetings be convened so that Heads may have professional discussions on the proposal. I do agree that 'the capacity at school level to meet a wider range of pupils' needs without the need to wait for a statement or to go through lengthy assessment processes' is desirable but given then funding proposals I do not believe that all schools (including mine) would be able to fulfil that aim.
03.02.2010	A Wright		Lincoln Christs Hospital	Thanks for the consultation document. I think many Heads will be nervous as much of the SEN funding comes via statements, so any change which might impact that will cause disquiet, even though we all recognise that that the process is slow and cumbersome. For my part, SEN funding based on IMD, prior attainment and FSM will help target money where I most need it, but not all schools will see it that way. I am broadly in favour, but recognise the difficulties that such a change may cause others.
03.02.2010	Nicola Gough	Headteacher	Ingham Primary School	I believe there is a need for this to be discussed properly and openly with all Headteachers either at a special meeting or at regional meetings. This is a significant change to the way funding will be allocated and feel that a small rural school like ours, given the proposed indicators will not

03.02.2010	Debbie Barkes	Acting Head	St Faiths CE	receive the funding it requires to meet the needs of the children who have Special Educational Needs. What about the Every Child Matters agenda? The current system for applying for funding for children with special educational needs is bureaucratic and time consuming and I would support any procedures that could be put in place to ensure that those children who need additional help can access it quickly and efficiently. A streamlining of the current system is needed, which would undoubtedly result in savings which could then be of benefit to children who need additional support. Ingham is a small rural school, and from reading the proposals, and discussing them with my Governing Body, we feel that the proposed indicators will result in a small share of the additional funding available. We have few children eligible for free school meals and, according to raiseonline, a low level of social deprivation. Given these indicators, I cannot see how we will receive the funding we require to meet the needs of the children who currently receive additional support through the current system. As a school we still have a sizeable number of children who are at school action and school action plus and also children receiving funding for bands 1-5 and who benefit from additional support. We are a small staff and a significant proportion of TA time is given to supporting individuals and groups of children with specific focus. One of my concerns is with mobility of children with special needs. If a child moves to our school, as we sometimes get, with additional needs, their funding moves with them. There is no mention of this happening (for bands 1-5) with the new proposals as schools are to meet these needs within the school budget. If this happens then learning and the needs of the children who already attend our school will be affected.
03.02.2010	Dennie Daikes	Acting Head	Infant School	to make about the proposed changes: Not all children who are entitled to free school meals actually claim them. The funding does not take into account children who have SEN who meet National Curriculum expectations but who are not

				 meeting their potential. It does not take into account individual cases of severe need, or transfers from other schools. There would be a need for exceptional funding.
03.02.2010	Liz Jones	Headteacher	St Michael's CE Primary School	On behalf of St Michael's CE Primary School Thorpe on the Hill I would like to register that we are strictly against the new proposals . We have a high number of children with statements who would be adversely affected and a very low level of deprivation – free school meals etc. The current system is too bureaucratic but at least if you persevere there is adequate funding to support children with additional needs. I believe the governing body will also send an email to register a similar view.
03.02.2010	Andrew Fulbrook	Headteacher	William Lovell School, Stickney	I have received your email this morning with further information on this proposal. I should like to point out that I am deeply concerned that this information is presented some two days before the consultation 'window' closes. This consultation opportunity in itself is very limited (five working days); this new information further compounds my concerns about the timescale of this process. I should also point out that it is not helpful that the letter from Terl Bryant attached to today's email is dated the 15 th February!
03.02.2010	Jo Spriggs	Headteacher	Spilsby Primary	February. We received information about the changes to Additional Needs: New Funding Arrangements only last week and both my staff and governors are very concerned about the short notice we have been given to respond to such an important issue.
				Therefore our response is that there is a need for this to be discussed properly and agreed by <u>all</u> Heads at a special meeting or regional meetings <u>before</u> we can say whether we approve or disapprove of the changes.
03.02.2010	Jane O'Farrell	Acting Headteacher	St Margaret's C of E	Having just read through the information received about the proposed changes to funding arrangements, I think it sounds from the model and summary report as though these would be more effective in providing much needed early intervention and would therefore strongly support the

				proposals.
03.02.2010	Rachael Glendinning	Headteacher	Caythorpe Primary School	The closing statement seems to indicate that these arrangements will apply from April 2010; is this the case? At the last head's briefing I had the impression that it would take longer. I would be grateful if you could pass on concerns regarding the allocation of SEN funding to Schools. I have copied Tim in as I know enquires
				email addresses can sometime be lost. As a head/SENCo of a small rural primary school it is difficult enough to be able to offer the necessary resources for children within the community. Our deprivation ranking is around the 50% mark and our take up on FSM is around 6%. This figure should be higher but as our families either do not want to claim it or the children do not like the meal options provided it is difficult for this to be an accurate measurement. We currently have 22% of children on the SEN register with 2 children having statements.
				No matter how much money is given to support children's individual needs the school will not be able to accommodate some specific needs and I am sure that we are not the only school in that situation.
				Labelling families through deprivation indicators seems to be an unfair way of assuming children from low income families are the only ones with SEN.
				Perhaps there needs to be more clarity on how schools could access funding with children who don't fall into these indicators but are clearly in need of support.
04.02.2010	Yolanda Smith		Sutton Bridge Werstmere School	Our comments about the SEN funding proposals are: The need to ensure the funding will be clearly identified when it comes into the budget Will schools have the opportunity to apply for additional funding if they have higher numbers that the funding allows
				 Will the statementing process be the same What will happen to the children already on statements Could this result in less over 15 hr statements being given

			When awarded over 15 hours, would county only fund over the 15 hrs or would they fund the whole lot
04.02.2010	Christine Wright	Fleetwood Lane School	With regard to the SEN funding model - the cynic in me asks if this means less money to schools - where is the funding for children with behaviour, social and medical needs - since these cannot always be linked either to deprivation or low prior attainment? Perhaps I've missed something in reading all this or are there to be special arrangements made for these children and their families? I must admit it does concern me that there are to be no statements for children in mainstream, although this should mean improved consistency and financial planning, I believe it will almost certainly mean that some children are missed out. What will happen to those in mainstream who already have a full statement - like one of my year one pupils?
04.02.2010	Sonya Ripley	Tydd St Mary CE School	With regards to SEN bits I currently get £22,000 funding for my children with statements which is needed and used! As a small school will this be secure? I read the bit about FSM and deprivation etc but will current provision be maintained ie will I still get the same amount of money? This bit - Current statements at Bands 1-5 will consequently be the responsibility of the school to fund from within its delegated budget. doesn't really make it clear to my muddled Mon brain! It is probably very clear I've just had one hell of a dayand it's only half way through

04.02.22010	John Cork	Headteacher	Crowland South View	At the moment we have several pupils on `low hour` statements (about 10 hours a week or less) who really need at least 20 hours. As statements are being `knocked` back/refused and increased hours are proving exceptionally difficult to get there is concern that parents will see the fact that schools now have all of the funding and will simply put pressure on schools – rather than the LA – to come up with what they want for their child. This is going to impact on other pupils in the school who may then lose out. Schools will then be left open to accusations that they did not meet a child`s need. Having the money is fine – if it meets needs in each school. Who will deal with parents who are not happy?
04.02.2010	Nicola Wilkinson	Headteacher	Quadring Cowley and Browns PS	Sorry I am so late in sending my reply. I have had discussions with several people about this including the SENCo and Chair of Governors. We believe that the changes will not benefit the children at our school whose postcodes will most likely not qualify under the new criteria for funding. We also have few free school meals – it does not always equate that FSM means underachievement. Therefore, we are against the proposal.
04.02.2010	Rowena Hanks	Headteacher	Stickney Primary	I am writing to say that I disapprove of the changes to SEN funding and I AM VERY CONCERNED for the following reasons: I am concerned that the funding will not be fairly distributed and it will be the same schools that already qualify for and receive lots of extra funding that will be receiving more. This is the first time I have seen recommendations for the distribution of funding - there has not been sufficient discussion with all Heads about this and it is not clear. It does not take into account individual and specific needs of certain children - there is much talk of monitoring but little mention of support or advice I am concerned about losing bands 4 and 5 and losing the assessments and advice that come with statements. I understood that all current statements would stay but reading the attachments this doesn't seem to be the case. Will we continue to get the same level of funding for these statements? Because if not there will be a huge backlash from parents. If we can't afford to continue to pay our 1-1 LSAs who will foot the redundancy bills? I am particularly concerned about smaller schools like ourselves with pupils with a wide range of very specific and individual needs who may miss out because we will not have the funding to meet their needs

				What about medical funding? Will that continue?
				At the very least there is a need for this to be discussed properly at regional meetings – to include all interested Heads and other interested parties perhaps such as EPs.
04.02.2010	Sarah Akhurst	Headteacher	Loyth Eastfields Infant and Nursery	Thank you Malcolm for bringing this to the attention of Headteachers. My opinion is that we should choose choice 3, that Headteachers and other interested parties should have more time to meet together and make a considered judgement.
				Headteachers were given a short power point presentation in October at the Breakfast briefing regarding this and yes we did all think that the suggestions that were being made sounded very sensible, eg putting money into budgets instead of long drawn out paper work for statements etc etc however there was very little detail. The paper work that you have sent through for us to peruse is frankly quite difficult to understand, I have spoken to other heads and we all have a different take on what is being said.
04.02.2010	Sally Wickham	SENCO	Spalding Monkhouse	I have read the summary of the proposed changes to the allocation of SEN funding and understand that it is best to send our school response to you. I am the new SENCo at Spalding Monkshouse Primary and having just moved from Peterborough, these proposals are quite different for me as I believe they are to the Lincolnshire schools. I have discussed the changes with the Head and these are our main concerns: - Will the budget take into account the already statemented children who are at Band 5 and below or will the school be merely assessed for funding on the 3 areas of FSM, income deprivation and attainment of pupils? - What will happen if a new statemented child, or a few families with poor attainment and low incomes, arrive mid-way through the school year - does the funding go into the budget or do we have to wait for the new financial year? -Are we able to find out what our school funding will be to see if we think this is a fair amount before the money is devolved to schools? -There may be a reluctance for inclusive schools to admit any statemented pupils, especially mid-year, because of the unknown committments to funding. -There could be a reluctance to request statutory assessments for children as there may be no money left in the budget to accommodate any more Band 1-5 children. -If a child is awarded funding for Band 6 and above, will the county fund the whole amount or will schools be expected to fund the first 15 hours of the statement? Please pass our comments on to the forum

04.02.2010	Peter Douglas	Headteacher	Kirkby on Bain Primary School	We feel the criteria for identifying children is incorrect. There will be many children who require statements who are not included within the funding criteria. For example, dyslexic, autistic children who are quite bright, children who are currently statemented on medical grounds, higher attainers with behavioural problems or diagnised as having ADHD. These will not fall within the prior attainment criteria. eg We have two children receiving emergency funding (10 hours a week) for bahavioural issues who we have to cover for every minute of the day and attendance at after school clubs. When the funding runs out as we move towards MDA what are schools supposed to do if they are refused a statement? I can only see that with the criteria for funding being as it is it will not 'include' many children and this will inevitably lead to an increase in exclusions. We are currently running way over budget for these two childen. Without any funding we have no other option but to exclude if they are a danger to other children. Some serious consideration needs to be given to this as not all pupils with behaviour difficulties are low attainers. Any delegated funds should be clearly ringfenced within the budget share. Will there be sufficent funding to support the above pupils and enable schools to be inclusive? Support from external agencies needs to be much more fluent, streamlined and less time consuming
04.02.2010	Mike Thomas	Chair of Governors	Lincoln "The Meadows"	Tracy, thanks very much for sight of the papers. As Chair of Governors at Lincoln 'The Meadows' where we have around 40% of our school roll on our SEN register I think we are well placed to understand the need to specifically target children's needs. I think however I am correct in saying there is not always a direct correlation between deprivation and SEN although there is an increased likelihood. I am personally interested as a parent as I have 2 sons (adopted) one of which is at SA+ now and the other receiving specific targeted support around speech and language therapy organised under the looked after children process rather than School. Notwithstanding that I am not sure how the proposal will affect schools like The Meadows where we already are very progressive in our SEN capability and attract parents specifically because of the nurture role we demonstrate (recognising the pressure on attainment that inevitably follows). I do agree that there are specific tensions when it comes to actions where we require support from services beyond the school. I am not sure how these services will be accessible/improved through these proposals. Can you help me please?
04.02.2010	Karin Espin		Coleby CE Primary School	I am the headtecher of a small primary school with only 67 children on roll. My concerns with the proposed new formula funding are as follows: We have a relatively high proportion of SEN and Statemented children; many choose our school for

				the small, intimate environment and have often transferred to us from other schools. Our families are not in areas of high deprivation and none claim free school meals. That is not to say that their children do not have needs. Whilst I understand, (having looked at the PowerPoints sent), that there is a correlation – none of the 3 indicators therefore apply to us but that does not reduce our needs in any way! FSM These have to be taxied in, at great cost, if we can find someone willing to provide a tiny number of meals. No-one eligible takes up their meal. It has long proved incredibly difficult for us to provide them and whist realising it is an entitlement, our location and small number mean that people choose not to take up meals. DEPRIVATION INDEX Our school population come from a wide area, only 20% are able to walk to school. Living in an advantaged are does not stop you being deaf, having dyspraxia, having attachment disorder, one leg or the multitude of other needs that we currently have(all on the list are current, some statemented, others SA or SA+) PRIOR ATTAINMENT Although I do use prior attainment in traditional statementing quests, some needs (see list above) are not especially dependent upon these. I mentioned moving schools earlier. 2 of our 6 statemented/ SA+ children did their KS1 SATS elsewhere and as they have not progressed in Optional SATS scores I do not know the level of support they had, and can only assume that they scored higher in their prior attainment than I might have scored them. A 2B at KS1, therefore is not going to trigger any money in this instance! I do agree that the whole funding issue needs looking at. The current system is not meeting my needs. I would have liked to have had more time to have discussed this more with colleagues but the nature of my teaching headship means that I am very time limited. I appreciate that this is a sensitive issue for all concerned, and that no one is likely to feel a winner, and that change is always difficult. I would like to say tha
04.02.2010	Sandra Nelson		Cranwell	Having discussed the 'SEN issue' with my chair of governors yesterday, he did ask the question: If the L.A. were criticised for their system of deploying funds for SEN in their last 'Review', hasn't somebody researched other authorities which had a 'good' `rating from OfSTED and taken their model as a basis for the new systemand if they have done, why, has it not been 'shared' with Heads etc.
04.02.2010	Nicola Reid	SENCO Headteacher	Thorpe on the Hill St	Just passing on a view for what its worth. I would like to pass on some comments to the forum regarding changes to SEN.

	Mrs Jones		Michael's CE Primary School	At St.Michaels Primary Thorpe-on-the-Hill we are completely against the new proposals. We have several children at our school who already do not have a high enough banding and as a school our resources become exhausted. It is our responsibility to ensure individual children are supported at the approprioate level, with the statement process at all levels we feel that our most vulnerable children are at risk. Our SEN. Governor is in agreement with us. Could some points be clarified? The children who are currently band 1-5: will there statements come to an end? How is the funding under the new proposals going to distributed fairly? We are a small school with a higher than average level of special needs.
04.02.2010	Melonie Brunton Dr Rob Weeks	Head Teacher Chair of Governors	Middle Rasen Primary School	On behalf of myself and the Chair of Governors we would like to reply to the suggested funding for SEN. Middle Rasen School has a very low uptake of free school meals and is not in a socially deprived area, although 45% of children that attend Middle Rasen do not come from the catchment area. However we do have 2 statemented children that would not come into these categorise either. At the moment both children, diagnosed with autism, have 1:1 support. The school will not be able to sustain that funding if the LA changes how it funds SEN. Both children are prone to violence and without adult support the governors have agreed that these children will be excluded if they exhibit violent behaviour towards children or staff.
				Underperformance of 2 levels will only become evident when the child moves into key stage 2, this is after 3 years of education in the school. One of the statemented children came to school with a statement from his pre school setting, how could he be 2 levels below? Are the LA saying that SEN children only come from low income and socially deprived families? Is Autism now a by product of social deprivation? We strongly believe that changes in funding will seriously change the provision for our statemented children and could have a knock on effect to the rest of the school.
04.02.2010	Alison Buddle	Acting Headteacher	Gipsey Bridge Primary School	feel this matter needs to be discussed properly before any final decisions can be made. From the information received it is still not clear what the full impact on the school budget would be.
04.02.2010	Mark Burton	Headteacher	North Kelsey Primary School	Many thanks for the correspondence regarding SEN funding. I am categorically against the proposed changes. Past experience has repeatedly shown that when funds are delegated to schools in this way, the vast majority of it is allocated to schools where KS2 performance has in the past been low, and to town and city schools with a higher proportion of free school meals. The travesty of recent allocation of funded 1:1 tuition places illustrates this perfectly. It takes no account

				of individual circumstances of smaller rural schools. The current statementing process is by no means ideal, HOWEVER, I am very concerned that if this proposal is adopted, that schools such as ours will increasingly find themselves having to struggle on trying to support an increasing number of learners with profound difficulties from an ever shrinking school budget. If the LA is committed to inclusion and to supporting young people in mainstream education then they simply must commit to maintaining this support financially. Without such support the numbers of exclusions will inevitably rise again, and the implications for the learning of these pupils and, we should not forget, their peers is a matter of great concern. I understand the LA's desire to reduce SEN spending, but this proposal is not in the best interests of schools and learners. Headteachers were asked their thoughts on this matter at briefing sessions earlier in the year but this was in no way conclusive, and no agreement was reached. An opportunity for proper informed discussion, solely on this matter should be arranged, with the opportunity to discuss a range of proposals and perhaps vote on the issues.
04.02.2010	Elizabeth McCaffery W Keast	Headteacher Chair of Governors	Scotter Primary School	I think proposal 3 would be the most appropriate, 'a need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings'. LincoInshire Schools' Forum – Proposals for new funding for additional need Having read through the documentation provided the graphs provided relate the proportion of a school's population that have been identified as in need of school action or school action plus to the proportion of pupils claiming free school meals, an index of economic deprivation or prior attainment. I find nothing unexpected in these showing a degree of correlation. Free school meals uptake being closely linked to economic deprivation. If a pupil has low prior attainment the school may clearly need to take action to tackle this. However the covering letter proposes delegating funding to mainstream schools for statements at bands 1-5 based on two of these indices (80% prior attainment and 20% economic deprivation). Have I missed the connection? Surely the Forum is not suggesting that physical disability, cerebral palsy, selective mutism, autism, severe behavioural problems or psychological problems are related to pupils' prior attainment or economic deprivation! The fact that either more parents are exercising the right to, or are now meeting the criteria for, free school meals should not be a reason to change funding strategies.

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				plus indicat funding for consistency	tes a greater ne statements. All y issues – there	cies between schools in applying criteria for school action or school action and for moderation by an external body, not the wholesale changing in ocating this money to schools, however determined, will not address will be as much inconsistency but with an increased resource.
						cess may be long-winded and require and require lengthy assessment needs review not that it be scrapped.
						to general funding allocated to schools to provide resources to for school s, then I have no objections to the use of the 'formula'.
				would be a	retrograde step	ace the current provision of statements then I am strongly against them. It in meeting the additional needs of these pupils.
04.02.2010	O10 Linda Headteacher Heaver		St Mary's Catholic Primary School	schools like the current have spent	e our own, with proposals. We all the money of this funding, w	concern at the proposals for SEN funding. From my understanding, low free school meal take up and little deprivation, could loose out under have always prided our selves in arrangements for SEN children and given to us and a lot more beside, to fund this provision. If we were to we would be unable to meet this commitment and children's learning
				seems unn	ecessary and d	haste in which this is proposed – to implement this by April of this year ifficult to implement properly, especially as we don't know the details of be looking to set budgets in the very near future.
				proposals,		cant consultation with head teachers and no clear explanation of the ter from the authority – not the best way of communicating when be at stake.
				I would be	verv grateful if v	you would pass on these concerns at your next forum meeting.
04.02.2010	Linda	a Laminam			sby Primary	Schools are overwhelmed with EVERYTHING (hence a possible reason why so few replies have been received)
						The SEN funding issue may be a good idea in some ways but there is currently not enough information about how it will work for schools or what level of funding may be provided according to each school's SEN register. More detail is needed before real decisions can be taken. To that effect

		we need more time, less overload - an extension to the deadline is
		necessary.

04.02.2010	Martin Taylor	Headteacher	Thomas Cowley	Concerns about 'New Direction of Travel'
			High School	The process has been flawed
			High School	This is clearly a major change. Some of the most vulnerable students in the system will be affected. There is potential for difficulties with parents and carers as their children are no longer in receipt of extra help. There is a potential for vulnerable children to be 'lost' in the new Statementing arrangements. It has potentially significant budgetary implications. All these 'potentials' needed to be discussed and debated. The proposed system should have been the subject of rigorous examination by all stakeholders. This clearly has not been the case. The large Stakeholders group was given tabled documents. There was no time for thinking and reflection. It is clear from talking to those who were on the group that materials had been long in preparation and each meeting saw a further tabled set of facts and figures. Some members of the group felt that its size did not lend itself to the sorts of discussion needed to properly scrutinise such a key proposal. Headteachers have been given even less time and information to view the proposals. We are now being besieged with fresh views and revelations on a daily basis. Is this the way to introduce such a major change in direction? Underpinning the proposal is a clear financial imperative. The Authority is looking to save money. No one can have a problem with that. However if this saving is going to be at the expense of a crucial part of educational provision then perhaps it needs to be made much more transparent. No figures have been given to individual schools to see the impact of this proposal. The Authority must have this information but has chosen not to share it. A school like mine already subsidises its SEN provision to the tune of over £75,000 per year. It is therefore relevant to my response to these proposals to have a clear understanding of the financial implications. I am aware from discussions with Tony Warnock that the Authority is concerned about the long term financial health of an increasing number of secondary schools. It is madness for the Authori
				fact that transitional arrangements are being mooted suggests that some schools will lose out. Therefore they may have to make significant alterations
				to staffing levels in a year's time – at the end of the transitional arrangements. So a number of five year plans will need to be re-written.
				I wonder whether the unions have been informed? It would seem likely that a

number of TAs will be out of a job in a year's time.

All this is, of course, mere speculation because we have not been given the information on funding that we need.

It ignores the views of Parents

The Lamb Inquiry was commissioned to investigate how parental confidence in the SEN system could be increased and draws the conclusion, "We have heard a clear message: parents need to be listened to more." Lincolnshire Parent Carer Council (LPCC) report that consultation with parents over the 'new direction' did not happen. Two of their representatives were invited to attend but were under a strict confidentiality embargo not to discuss matters outside the group. This was not consultation.

In an angry response to the proposals, LPCC point out that "A policy stopping issuing statements for children would be illegal." Further, that parents have the right to appeal if a statement is ceased without their agreement. The view of the LPCC is that parents should be informed that they have the right to redress through the local authority ombudsman for maladministration.

The views relating to statements expressed in the LPCC's response to the proposals mirror precisely those set out in Lamb: "parents told us they value the security of a statement and the confidence it gives them to challenge the authority if the provision agreed is not forthcoming. **Parents were crystal clear that they wanted the letter and sprit of law adhered to** and the system made to work better." They do not want the system to change – only its maladministration.

The formula for delegated funding is not fit for purpose

The formula uses data which is, at best, questionable in its accuracy and veracity. There is no need here to rehearse the many arguments against the KS2 tests. The fact is that these arguments persist and thus undermine the formula's integrity. The proposed formula, with its emphasis on prior attainment, excludes those students who present with any difficulties other than SpLD. All schools are likely to have children with behavioural emotional and social difficulties, autism spectrum disorders, speech, language and communication needs as well as SpLD. Indeed, Lamb found that at secondary level, 38% of those at SA+ have BESD.

It is therefore quite wrong to work on the assumption that children attaining national expectations at KS2 do not have SEN. 'It should not be assumed that

children who are working at or near age-related expectations do not have SEN. There needs to be a greater awareness of the specific difficulties that may affect children's progress and attainment and, in particular, their profile of attainment, which may be uneven." (Lamb)

The ill-informed formula reflects no such awareness and the driver, clearly, is simply to limit numbers. Only this imperative explains the arbitrary requirement for students to be a level below national expectation in English **and** Maths in order to qualify for funding (at the lowest – unspecified – level). Those with an 'uneven profile of attainment' do not feature.

There is, of course, the recognition within the formula that reading is a core skill and that students **two** levels below national expectation are in need of additional support. Practitioners, however, know that within Level 3 lies a broad range of reading ability and that many dyslexics do in fact achieve this level. **The average reading age of KS2 Level 3 readers at TCHS is 8.4.** Indeed, 50% of those currently receiving additional support because they have a reading age below 9 achieved a KS2 Level 4c.

There is no doubt that, unless the funding per student is enormous (and of course we have no figures so calculations are impossible) it will not be possible to meet learners' needs. Quality first teaching cannot replace the structured, repetitive, multi-sensory 1:1 phonics interventions which alone can meet the needs of those with persistent reading difficulties. (Rose Review of Reading).

Conclusion

This is a bad scheme, hastily introduced without proper, meaningful consultation. It is morally unacceptable that SEN learners, the most vulnerable members of our school communities, should be the victims of county council maladministration. There is nothing wrong with the SEN system. It just needs people to run it properly. The reference made to Lamb in Sue Wescott's document as justification for the proposed changes is as best ill-informed and at worst dishonest:

The Inquiry is clear that, whilst it is desirable to meet children's needs without having to go through statutory procedures to get a statement, many parents do have more confidence where their child has a statement. In particular, having a statement gives parents confidence to ask questions and challenge when things are not happening for their child or when something is going wrong. 164, 165 **We would not therefore recommend any change to statute or any target to reduce the number of children with a statement.** Where children are progressing well and parents are confident then it is

				serendipitous that statements may also reduce. However, we need to focus on the pre-conditions: children's progress and parental engagement, not the by-product: the reduction in the number of statements. The pity is that, having spoken with colleagues, the changes will inevitably occur despite any misgivings from those who will be charged with making the new system work.
04.02.2010	Jean Lammond	Headteacher	Boston St Mary's RC Primary School	I am extremely concerned that the educational needs and the rights of the child may be compromised by the new proposed arrangements. Where children's needs are complex and present many barriers to their learning; yet don't fit neatly into the three areas outlined: FSM, income deprivation, prior attainment, and these children are in danger of becoming part of a "lost generation of learners." I feel strongly that existing statements should be "honoured" until such a time when the statement is no longer required/the child has completed his/her education.
	John Poucher	Chair of Governors	Boston St Mary's	Headteachers/SENCOs do not seek statements unless it has been deemed absolutely essential to the child's education, emotional, social and behavioural development. It is my opinion that the proposals are designed to save money and alleviate LCC staff of having to process Headteachers SEN statements, which are undoubtedly more time consuming and expensive than the proposed model where a delegated funding would be issued for the disposal to schools within the designated geographical area. The present system allows Headteachers and SENCOS to assess the INDIVIDUAL needs of the child under review and then to make a bid to fund the number support staff hours necessary to meet the child's needs. Headteachers do not object to the assessment of identified children or to writing statements because they understand that this is the only way of ensuring that a child is satisfactorily provided with both resources and
				staffing. The criteria outlined will result in the creation of generalized data, which will not be specific to the needs of the child. There can be no guarantee under the system outlined in the consultation document that the funding provided will be sufficient to finance the number of hours

				demanded to allow the child to fulfil his or her potential. If LCC proceed with the proposed system, which seems certain, funding streams should be allocated to a group of like type schools (in our case Primary schools) within an accessible geographical area. This would allow the Headteachers of those schools to meet and make professional decisions about how the budget should be divided for the maximum benefit of the children in need. reject absolutely the idea that funding should be allocated to the Headteacher of a large Secondary school who would then allocate money to other Heads in his geographical area. The idea of our Headteacher having to go 'cap in hand' to a local colleague who would the use collected data to dole out the money using the Wisdom of Solomon! This individual Headteacher would have no knowledge of the children involved and the system is open to possible abuse and
04.02.2010	Sandra Nelson	Cra	ranwell	Having discussed the 'SEN issue' with my chair of governors yesterday, he did ask the question: If the L.A. were criticised for their system of deploying funds for SEN in their last 'Review', hasn't somebody researched other authorities which had a 'good' `rating from OfSTED and taken their model as a basis for the new systemand if they have done, why, has it not been 'shared' with Heads etc. Just passing on a view for what its worth.

04.02.2010	K F Thrower	Headteacher	Chapel St Leonard's Primary School	In response to the changes in the mechanism for SEN funding, I offer the following points for your consideration which mirror the comments of Mr Cameron from Seathorne School and many other colleagues in the Skegness Coastal Partnership group. • While the current statementing process is overly long and extremely time consuming it serves a very important purpose. At the end, an individual child has their precise needs and the actions that should be taken to address them documented transparently. It is a legal document that parent/carers, schools and the LA can have confidence in. The new proposal would abolish this for many children. In the current process the statementing panel act as a 'quality control' ensuring that a child will receive appropriate support irrespective of the school they attend. Who will monitor whether Seathorne is 'matching' the provision of other schools? • An ever greater responsibility is being transferred to schools. Without the formal statementing procedure for bands 1 – 5, schools will find themselves under ever greater threat of litigation from parents who feel their child needs more and more. This will be fuelled by the fact that schools do not all have identical provision. A parent transferring their child to Seathorne will expect to be provided with the same as at their previous school. • The proposal states that "Some statements will still be issued especially where there is low parental confidence or the need is not fully understood or could become more complex." This sounds as though a vocal, articulate parent will be able to excerpt pressure. Who will speak for the less articulate parent? Who will decide if the need is fully understood? • As schools have to take more responsibility the workload of SENCos will also increase. The likelihood is that a school like
				 excerpt pressure. Who will speak for the less articulate parent? Who will decide if the need is fully understood? As schools have to take more responsibility the workload of SENCos will also increase. The likelihood is that a school like ours, with above average levels of special needs, will find that
				 the workload increase disproportionately to the funding it attracts. The funding formula is too simplistic. Schools like ours on the coastal strip, are subject to high levels of pupil transience and there is no mechanism to allocate additional resources to

				support children who are admitted mid-year. It appears as though a school would have to fund support for a child admitted in September through its own resources to the detriment of others. • From the proposal, it appears that children's prior attainment will only be measured twice, at the end of Reception and the end of K.S. 1. What will happen to a child who is not two levels behind in year 2 but is by the end of year 4? Their additional needs will not be recognised by the funding arrangements. • The formula only recognises learning needs. FSM and IMD data is hardly an accurate measure of emotional and behavioural needs. The inability of the Extended Schools Project to maintain PSAs (who resigned due to the stress of their impossible workloads) in East Lindsey indicates that this is a more significant factor that can simply be attributed to parental income. • The formula doesn't even reference medical needs. • I have concerns about the contracts of staff working as 1-to-1s. These are currently 'attached' to statements. What will happen when the statement disappears but the child's needs remain or change. It will be the Headteacher who will have to make the decision to alter a contract but on what legal basis. Employment law is highly complex. • There is no mention of Special Provision and how this will be access without the MDA process. In the future, how will a child who is currently at Band 5 access a place at a Special School in KS 3? I do hope these points will be viewed favourably in light of the schools commitment to cater effectively for the needs of its SEN pupils.
04.02.2010	Sally Wickham	SENCO	Spalding Monkhouse	I have sent this e-mail to Anne Grief of the Schools Forum but know that you need a copy as well to collate the information for next week's meeting. I would like to share our school's views, on the new funding proposals for SEN in the county, and hope you will be able to take them to the meeting on Monday. We are concerned that the money delegated into the school budget in April will not take into account the statemented pupils we already have in

04.02.2010	Dawn Berry		Welton St Mary's CE Primary School	school who are at Band 5 or below. Will the delegated money merely be worked out FSM, income deprivation and pupil's attainment and not consider the statements we already have in place? If statemented pupils arrive new to school, from in or out of county, will the money automatically go into our budget or will we have to wait until the beginning of the next financial year to claw it back? Inclusive schools may be reluctant to admit statemented pupils, especially mid year, because of unknown commitments to funding. There may also be a reluctance to request statutory assessments for children as there may be no money left in the budget to accommodate their needs and hours within school. Will the county fund the whole cost of a statemented child who is at Band 6 and above or will school have to carry the cost of the first 15 hours? Is every school able to find out how much their SEN budget will be in April to see if it is a fair amount for their circumstances, or do we wait to find out that it is not enough in April, when there is nothing we can then do about it? Thank you for taking the time to read our concerns, I am just reading the info on the websites provided in Ted's letter (is it Ted?). They are really useful and so much more thorough than what has been given to the Forum for Lincs. Have you heard Therese Lord from Parent Partnership? I spoke to her the other day. She is hopping about the way the paper from the stakeholders group has been presented. They have not consulted, they presented us with a fait accomplis really and the work on how money was to be delegated was done by a small hand picked group and then presented to the whole group. The management of the group was masterful in terms of making sure that noone disrupted their own agenda. I shall respond to school's forum myself to say how I feel as a member of the stakeholders group.
04.02.2010	Debbie Butcher	Headteacher	Wyndham Park Nursery School	I wish to inform School Forum of my feelings regarding the above proposals. Firstly I must state that I strongly feel that I have not been party to any consultation and the time given to this is very short.
1	I	I	i	My thoughts are as follows:

				 I would like to see a model showing how the funding would look from April, thereby enabling me to see the possible effects to my school I would like to be part of full consultation I require time to fully discuss proposals and implications with the school's Governing Body An indication as to how as a Nursery School the proxy indicators would operate as we are not mentioned at all There is a need for this to be discussed properly and agreed by all Heads at a special meeting or during regional meetings
04.02.2010	Janet Reeder	Headteacher/SENCO	Potterhanworth	I look forward to receiving further detailed information. I am very concerned about he way funding in the future is being delelgated for those children who in the past were statemented on the lower bands The worry is the way the division is going to take place. ie FSM, income deprivation, relative prior attainment and the future impact that will have on my school. I apologise if i have not grasped the details correctly. From my understanding (I may be incorrect in this) – it would be very unlikely that money will come into my school budget to address the needs of those children who, historically, in the past have required it (I have been here 7 years and we have had never less than 3 and has been as high as 7 statemented pupils – for very specific reasons. these children in the future will not get funding because of where they live - as our school would not benefit from the suggested delegation. (Iam referring to future children - At Potterhanworth Few parents take up FSMs area of deprivation is not not high -BUT we do have a pocket of very needy children (in place at school -Family learning, 2 CAFS, 1 child in need:as it happens 2 with CAF are statemented, 1 child in need working with social services -this child is SAP- and 'hovers' regularly on my SENCO list -should i go to ARM- I haven't - but my LSS suggests that she just meets criteria -she works in a year belowwe struggle on -she will be Y5 next year -I have pumped into my support staff 32 hours above my

				delegated SAP money -to support my 21% SEN children - I have a child on emergency medical funding at present (finishes Easter- statement refused recently) she is an elective mute and we are working with our Ed Psych on a specific sliding in programme (she has 5 hours medical at present) - such children would not be funded There needs to be a away of considering specific children who do not live in a deprived area - like my 2 statements (who came to school with no language + my elective mute) I am in the process of re submitting info for continued medical funding for my elective mute (I am not very optimistic- I have to admit) I know this is long and too detailed but the only way i can explain my concerns is to explain our context. What I would like to ask is what will happen to these individual cases in the future? -if the school does not fit the right box to get funding? - that the specific children who are living in Potterhanworth, who have specific 'unusual' needs eg do not have language in entry to school, my elective mute, -etc etc -how do they access the delegated funding. I hope this expresses my worries. And my apologies for it being long winded and not succinct -I have just finished parents evening (teaching head of a small school + SENCO)
04.02.2010	Julia Marshall	Headteacher	St Peter in Eastgate CE	We would have welcomed a meeting involving all heads to discuss the new proposals for SEN. We have concerns about the amount of money that small schools will have to meet the needs of the children in our care.
05.02.2010	Kris Radford-Rea	Headteacher on behalf of the staff and Governors	Edenham C of E Primary School	The staff and governors at Edenham School would like to express their opinions about a number of the proposals detailed in the Overview and Scrutiny Report: Next Step in the Direction of Travel. We agree with the Principles described in paragraph 1.1 but also that we are concerned about how this will translate into practice. Formula Indicators We accept there is a high correlation between SEN and social deprivation indicators; however this is NOT always the case. We have a

	low level of deprivation amongst our families but we experience issues affecting learning, health and well-being that are as equally complex and challenging for many of our children.
	As we have a low level of deprivation and a relatively high level of parents/ carer in employment, the majority of our children are not entitled to a Free School Meal . Those that are entitled do not always take up the opportunity and this has not changed despite now providing high-quality hot school meals (prepared off-site).
	Again we do not feel that the number of FSM necessarily reflects the issues that impact on our children's learning, health and well-being.
	We would also like to clarify how national changes to entitlement will impact on the numbers of children entitled to FSM before any decision is many as to whether or not this is an appropriate indicator.
	 Prior Attainment measures we accept should be a key factor forming part of the decision making process BUT; Measures of English and Maths only do NOT reflect fully or satisfactorily the complex needs of many of the children who we know need additional support – for example, we are seeing an increase in those who need social and emotional support who may attain relatively well in English and Maths but fail to engage with their peers or adults or show signs of high levels of stress and anxiety that affect their potential in other aspects of their learning, health and well-being. We are not confident there has been satisfactory guidance on how we should be correlating outcomes at the end of FS and progress to the end of KS1. We are concerned we can see no discussion about the timescale to which our teacher- assessment judgements about progress should be carried out – for example, if a child scores low in PSRN at the end of FS, at what point will we be able to access funding thereafter if we are still advised not to correlate measures of FS scores with NC outcomes? It could cause delays in our ability to access additional support for children in need.

05.00.0040	Obvis Dealest		The Description	We accept that the monitoring of the impact of expenditure on SEN is an important and necessary part of our school self-evaluation process — we are concerned however at the level of expectation on the School Improvement procedures. We have a very limited supply of time from our School Improvement partners as it is and we would request that serious consideration is given to how their time could be increased in order to address a rapidly growing agenda. Monthly reports to the Executive DMT on the use made of delegated funds and its impact on pupils and their progress — WHO will be responsible for delivering these, using what information? We are deeply concerned about the ever increasing time-pressure for our Leadership Team and our SENCO. We are not in a position in a school of this size (PAN 117, 4 classes, full time teaching SENCO) to delegate tasks such as this. Too much time is spent writing reports for the numerous agencies demanding of school time and too little on freeing our Leadership Team to actually see teaching and learning in action. We are uncertain at the moment as to how the proposals will work to REDUCE bureaucracy. In summary, we are always in favour of changes to procedures that enable us to access the best support in order to meet the needs of our children, but, whilst we can see the benefit of the 4 Principals, we remain cautious that these proposals are the best way to achieve them. We look forward to receiving more details in response to the LA's consultation.
05.02.2010	Chris Beckett	Headteacher	The Deepings School	Following a meeting, attended by representatives from the following schools; The Deepings School, Langtoft, Baston, Market Deeping, William Hildyard and Linchfield Primary Schools; we would like to express our concerns about the potential financial impact of the proposed changes to schools like ours. • Why is the forum taking this decision, when statutorily decision

			Nursery School	funding arrangements.
				We all agree that there does need to be change, but we are not convinced that the proposed changes would be the best solution. Our main concern are for those pupils with behavioural difficulties, caused through a variety of reasons, who would not tick enough of the boxes to initiate any extra funding. We envisage being forced down an exclusion route, which we would not want to do.
				Therefore, we think further discussion needs to take place, so fears can be addressed. After all, we all want the much-needed changes to be successful.
05.02.2010	Christine Goldson	Senior Administrator	Lincoln The Sir Francis Hill CP School	Mrs Hackney has asked me to reply by saying that she feels this has not been discussed properly and there ought to be more consultations with the Heads regarding this matter.
05.02.2010	Helena Allen		Sturton by Stow Primary School	In response to the SEN ' Consultation' documentation I would like to make the following comments:
				 Children occasionally enter school in Reception classes with very complex needs that may have been met adequately in pre- school provision due to high ratio of adult:child in those settings. This is very different for a child entering school with the normal ratio of 15:1 (if the class has a full-time learning support assistant) What measures will be put in place to provide the required support at the time when early intervention could make a difference?
				 Prior attainment is referred to as an indicator for funding; what will the baseline be? Will funding only be released after end of KS1 SATs identify children's learning needs? It is not only children from low socio-economic backgrounds that have special educational needs!!
05.02.2010	Ian Widdows	Deputy Headteacher	The Giles School, Old Leake	Re. Proposed changes to SEN funding Following a meeting of schools in the Deepings I would like to express my concerns about the potential financial impact of the proposed changes to schools like ours.

	Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+, should be challenged. A way forward could be, for SA and SA+ funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy indicators. Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. The transitional / protected funding for 1 year is insufficient. Funding for current statemented children should be protected until they reach school leaving age. What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people? The potential impact of this proposal in some schools is likely to result in redundancies, leading to even greater pressure on school budgets and staff. All learners could be disadvantaged if the proposal is approved. In schools that are impacted by this process, presumably it will be the responsibility of the Head Teacher to inform parents, who are already used to a level of support, about the changes in provision? We would welcome the opportunity for further discussion about this proposal, prior to any decisions being made. I would request that the meeting be deferred, until a financial model is made available and the true impact of the proposal can be carefully considered.
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05.02.2010	Tim Smith			I have only had a quick look at this but I do have a few issues/concerns – mainly around: Ø the timing (they seem to want to push this through very quickly) Ø the funding mechanism (I guess I am taking the view that our funding will be reduced – as we have very few FSM, located in an area where deprivation is not really too much of an issue and standards are generally very good, so our funding will be cut, but we still have children that need this support Ø The fact that they do not seem to have a very clear monitoring process in place – the points made around monitoring seem a little vague/wholly Ø There does not seem to be a measure for monitoring success – where are the KPI's Not sure what you think, these are my initial views having had a skip through the document
05.02.2010	John Orrey	Headteacher	Coningsby St Michael's CE Primary School	Having discussed the issues surrounding Additional Needs: Next Steps in the Direction of Travel with my Senior staff and Governors this week, we are all of the opinion that this should not be agreed and rushed through by April 1 st 2010. In a discussion with my SENCO we are very concerned about the number of children we admit mid term / year with statements or additional needs who very quickly move towards statementing. Under the new proposals, will funding follow a child or will new provision have to be found out of our already delegated amount? Our other major concern is regarding inclusion. We support totally the inclusion agenda – we have a child who is in a wheelchair who is included in every aspect of school life. Having said that, our resources are now proving to be inadequate as he gets older. We have had many conversations with SEN / Mouchel / etc about providing a suitable "hygiene suite" to cater for his needs but each time they have said it is not possible, especially as there is one at another local school. The parents have chosen to place him in our school where they feel he receives outstanding support. His needs are growing to a point where

				we may not be able to cater for them and quite rightly his parents are looking at alternative provision. If we have other children admitted to our school without the appropriate resources how can we cater for each individual's needs? It would appear that there will inevitably be an increase in the amount of "data crunching" and reporting to ensure we are using the funds appropriately (paragraph 1.21, section viii). Where does the funding come from to give our SENCO / Assessment leader the additional time to carry out these duties? We have already had to increase SENCo time due to the huge increase in statements over the past 12 months (3 to 12) with the majority of these being additional admissions to school. We would like to be able to meet on a local cluster / area basis to discuss further the implications of this sort of change to delegation of funds in order to fully understand what it means for our children. It seems very sad that within the Overview and Scrutiny Report (22 January 2010) it uses the phrase "win and lose" – paragraph 1.19. It seems that the powers that be have already agreed that there will be winners and losers – surely there should be no losers in respect of children's education!!
05.02.2010	Sue Bradley		Kirkby La Thorpe	I think everyone needs the opportunity to have this proposal explained in greater details, as I question quite a few of the statements. A series of meetings for all heads would give us the opportunity to discuss the proposals properly.
05.02.2010	Michael Pell	Governor	Thomas Cowley School	I am writing to you as a long standing governor of the Thomas Cowley High School, Donington, who has grave concerns with regard to the proposed changes to SEN funding that Lincolnshire County Council wish to implement.
				Firstly I would question if the whole process including the so called consultation has met legal requirements and guidelines laid out by the local government association in relation to the amount of time given to those who would make a judgement upon information put to them to judge. The guidance is that before a decision should be made those who would make a decision should have all relevant information furnished to them six days prior to the day of decision as is the common practice in

for example a planning authority.
It is my understanding that throughout this process information has been tabled at the meetings therefore not allowing time for an informed decision to be made.
Secondly one of the major points whereby a statement would be judged applicable relates to DEPREVATION I question how the authority arrive at a decision as to who exactly is deprived as there is no quantitive measure to accurately arrive at how an individual school is judged to be in an area of deprivation. I can only assume therefore that it will be a POSTCODE LOTTERY based on information from the six local district authorities, if this be the case for example the district of South Holland would show that there is no deprivation whatsoever based upon the criteria they used to assess such, as normally the major considerations are based upon a. house prices, b , the amount of band D council tax rateable values, c , the local unemployment figure and d. the amount of free school meals issued within the area. As the SHDC area has a large amount of affluent incomer pensioners coupled with a high proportion of high value housing and a near zero level of unemployment based on the need of migrant workers I would doubt very much any school within the SHDC area would actually qualify for the first 20 percent of funding proposed under this scheme.
The other part 80 percent of the funding is proposed to represent the required need for SEN based upon the year 6 SATS results, it has long been questioned as to whether these results accurately show the actual level of the Childs ability especially when the incentive for the primary school is to show good figures at this stage, It is very clear that when a child is assessed early in KS3 there is mostly a huge discrepancy in what the child has said to be able to achieve and what it actually can achieve. I have further concern that the whole process is flawed as it would appear that this decision has been made to simply cut funding and at the same time tick the right boxes for central government to show that the local authority is placing funds towards recognised areas that reflect a
trend towards urban deprivation (a vote winner for the Labour heartlands) I am disappointed that this authority has chosen to adopt a

05.02.2010	P Clark	Chair of the Finance	Thomas Cowley	sympathetic policy toward helping to achieve a government objective. The issue regarding the process is very questionable when it would seem the process is officer led and backed by the ruling political party leaders, the so called scrutiny is open to question given the huge majority of seats held by the ruling party. In my experience of local government the "brains of the party" are selected to the more powerful cabinet positions, leaving the rest to make up the scrutiny panels most of whom were either not capable of higher positions or are just merely along for the ride on the political dreamboat and therefore will never dare to challenge their political leaders I will not say anymore other than to beg of you to ask exactly who this will benefit as a whole, it most certainly will not benefit those most in need i.e. the children who perhaps one day may be in a position to decide on your future. I would further like you to ask if the whole process leading to you having to make this important decision has in itself been fair, open and accountable where all those involved have been privy to all the facts. The system in place at the moment is not perfect but at least it gives every child the opportunity to receive the help it deserves on an individual need basis. Finally I would like to ask what has happened to the Governments latest initiative of 'Every Child Matters' and what has happened to the obligation of a council to ensure that provision is met for the needs of all people no matter what their disabilities may be. There are disability laws already in place to enforce this.
03.02.2010	r Clair	Committee	School	Arrangements letter, which has been sent out to Head Teachers and Govenors, I wish to make my disapproval for the proposal known. As Chair of a Finance committee for a Secondary school how can you agree to accept new funding arrangements for the school without the financial impact imformation? Is this morally and legally right to ask Govenors/Head Teachers to make decisions which can and possibility

05.02.2010	Chris Rolph	Monks Dyke	will have employment impacts on staff in this way? This would also seriously affect the learning provisions on students without creditable information; have the parential rights issue to appeal if a statement is ceased without their agreement been addressed? Have parents been informed that there maybe a change in provision for their child? Schools and Govenors have a legal responsibility to keep and maintain financial budgets, how can you plan or agree for possible short falls in funding without the financial information? In regards to the transitional funding arrangements or in other more direct words "blackmail"- accept the proposals or you won't get the money to cover your shortfall which is caused by the new proposals, is evidence to me that the majority of schools will lose out. What financial proposals do LCC have for the long term in respect to five year plans in these difficult financial times which will be "blown out of the water" by this ill-conceived proposal? I would like to highlight the fact that our school already subsidises the special needs provison for the sum of £70K+ per year! The formula for proposed future funding I believe is flawed and at best questionable. In response to the time scales given to reply to the proposals again is the evidence that this document is being rushed through without the wider debate with schools etc, which is totally necessary. Again the goal posts are moving in favour of the LCC saving money over, giving the provision of learning of students. I believe that this document at present is flawed and asking too great "a leap of faith" from Govenors & Head Teachers for agreement, therefore I would respectfully request the School Forum to reject the proposal.
05.02.2010	Chris Kolph	Techonolgy College	I understand that there is an ongoing consultation regarding SEN funding. This affects all schools, both primary and secondary, has significant financial implications with consequences for staffing, yet not all schools appear to have been consulted. We did not receive the letter

from Sue Westcott, either by e-mail or on paper. However, having received the information third hand I have passed it to the SENCO for comments, but have had no opportunity to discuss it with governors or other senior staff. While I have every confidence in the schools' forum to represent our views. I nonetheless would have valued an opportunity to make comments on the proposals. I think it is equally important to make comments on the process: If only a subset of schools has been invited to take part in the consultation, this should have been made clear to other schools at an early stage so that we could have seen the proposals and fed the comments in.

Given the importance of these matters and the need to

react quickly if we need to lose staff when funding changes at Easter I feel it would be more appropriate for ALL schools to be involved in the consultation process.

As the matters are so important, paper copies of correspondence should have been sent to schools in case technical problems delayed e-mails or prevented their receipt.

The timescale for this is very short—responses by 12 noon today to fairly hefty documents which were not sent out until January 28th (5 working days) does not give a realistic time to discuss with governors and relevant staff, and put together a proper response

Panel meetings are currently being arranged with Tony Warnock where we are planning for redundancies for other reasons—a little joined up thinking in Lincoln would have enabled these to take into account SEN issues as well, but the timing will not allow for this.

The cynical view of course would be that this is a consultation exercise in name only, that decisions have already been made, and that responses from schools will be minimised if the timescale is short and only a few are asked to respond. This is most disappointing, shows scant regard for the professionals working in schools, and does not have children at the heart of the process. I am not naïve enough to think that we are not

				going to have to make some cuts throughout the system, but it seems I was naïve in believing in the every child matters agenda so proudly espoused by LCC—clearly the children in our school don't matter.
05.02.2010	Penny Wetton	Headteacher	Helpringham Primary School	I would like it noted that my response to the changes to SEN funding is: A need for this to be discussed properly and agreed by all Heads at a special meeting or regional meetings.
05.02.2010	Lynne Saint	Headteacher	Blyton cum Laughton C of E Primary	I am writing in response to the proposed changes to SEN funding considered by the Scrutiny Committee. In context, this school has 164 pupils and the SEN register accounts for 25% of the school population. One child has a band 3 statement. The school does not have a high degree of free school meals at 6%. It is a firm belief that parents entitled do not claim for a variety of reasons and the statement in respect of the increase in free school meals for the last three years could be related to the fact that there was no provision for hot school meals prior to 2005. We introduced hot meals in 2006, and now have 6% free meals which for this school is significant. Therefore to have free school meals as a prime indicator would be seriously detrimental in terms of funding for this school. The school does not have a high level of deprivation relating to home postcode at 0.1, yet we have a significant number of pupils with learning difficulties and rural deprivation is not taken into account in the deprivation measure. However this does not mean there are needs to be addressed and to have deprivation as a prime indicator would be seriously detrimental in terms of funding for this school, autism for example spans all social classes, post codes, and can affect learning. One child in school has a statement at band 3 and the process took five years. We are in the process of seeking statements for two other children, if granted the funding is likely to be of similar banding and it would seem much more effective for it to be processed in such a way that is more cost effective and the delegation of funding to schools would enable pupils to have their needs met as needed.

				It would seem the fairest way of allocating SEN funding would be through prior attainment indicators which are seen at the foundation stage, then in key stages one and two, although I would suggest to be two levels below expected progress is too great a gap before funding is triggered as all pupils, including SEN children at KS2 are expected to make two levels progress. The trigger should be based on average point scores with 4 points below average progress significant for funding. If the trigger is two levels then schools in a similar position to this school will be under funded and resources over stretched. This will lead to this, and other schools deemed to be failing their pupils who will not make expected progress. If the first proxy indicators of free school meals and deprivation levels are initiated then funding will become a post code lottery with many rural schools such as mine seriously losing out.
05.02.2010	Julie James		Gainsborough	On the surface I believe the proposals to be fair ones. My questions would be: What about children who start part way through a year and are not on your school census? These children can occasionally, depending where you live socially, have a massive impact and require a lot of support. What is happening to bands 6+ Why have we only had one week to respond? This is a tight deadline on such an important issue! Are the figures for funding always going to be in our budget and clear for all to see —or are we going to be told — they are in our budget and we can't find them? We almost need ring fenced spending that is clear to all!
05.02.2010	Debbie North		Louthkidgate	We have had a lot of discussion about the SEN prosposals, and although, in theory we support the proposals we are concenred about how the funds for statements will be delegated into the school budget. We have not got the fundings to support our 1:1s within our budget and have not made preparation for such a large amount of money to be ring fenced from our current budget.
	Rob Reeve	Headteacher	Grantham Church (VA)	I have many concerns about the funding proposals but the fundamental concern stems from the apparent lack of involvement with the head teachers who will have to manage the effects of these new

			arrangements. It would seem to me that a significant section, of the stake holders in this issue, have not been involved with the processes. The true impact on this school is difficult to calculate given the information I have. I would like to see far more consultation and explanation of the rationale before any changes are implemented.
05.02.2010	Governing Body	William Farr	These are the comments from members of the governing body of William Farr Church of England Comprehensive School. The consultation time of one week was insufficient to call a meeting of the full governing body, and governors would, therefore, urge for a longer and more thorough consultation period with all stakeholders.
			1 Lack of consultation
			The school and our Learning Support Department have not formally been made aware of any proposals. A working group has been set up, but neither school staff nor governors have been invited to participate or have input into its work. There remains concern that the process has already begun and may reach a conclusion without any input on our part.
			Which parent groups have been formally consulted and for what period of time? Which other stakeholders have been consulted? SENCOs, teaching assistants and teachers also appear not to have been consulted.
			 The speed of implementation goes against the advice in the 'Managing SEN expenditure document' referred to in the Scrutiny Committee report. Section 5.3 states one year to begin phased implementation.
			 No information has been provided to us of who is on the stakeholder representative groups and how they were chosen.
			There is still no formal consultation from the County Council. The timescale has been set by the School Forum's meeting.
			2 Inadequate data in presentation/report to Scrutiny Committee
			All the statistical analysis is done without a benchmark, ie is 12 'good', 'bad' or indifferent?

The secondary school table only has 29 data sets, and yet there are 63 secondary schools!
All the data analysis refers to School Action and School Action Plus; none of the tables compare data for statemented children.
 The FSM data is misleading, as hot school meals were only introduced two years ago, which coincides with an increase uptake of FSM.
 In the scrutiny report, the data comparison should be to statistical neighbours and not regional neighbours, which are very different. What is the cohort of regional neighbours we are being compared against?
 In the scrutiny report, the outcome chosen was not one of those considered as an alternative. On what basis was the change made?
 Reference is made in the scrutiny report to paragraphs 1.17 and 1.18 of the Management of SEN expenditure document, and yet these paragraphs do not exist.
3 Funding
 The governors strongly feel that the first concern should be appropriate support rather than funding and that the proposals appear without consultation to be driven more by a desire to save money than to provide support for the child. There is again scepticism that sufficient funding will be available to provide adequate support, as the funding would be diluted across a number of schools.
The two components which will support the level of funding we will receive, show no knowledge of SEN and how children are supported in school. To base all funding on FSM and Pupil Attainment shows a complete disregard for the various complexities surrounding a pupil in a school with SEN. Using the

two funding components William Farr will have the SEN Funding
drastically cut. We will no longer be funded on the number of pupils on the register at SA or SA+. We do not have a high number
of pupils on FSM and the number of pupils arriving at the school 1
or 2 levels below the expected norm is also small but, having
discussed this before, when we screen the pupils for Reading
Comprehension and spelling there is a significant number of pupils
with Spelling and reading ages two years below their chronological
age.
There is no mention of receiving funding for pupils with
• ASD
Aspergers Syndrome
• Dyslexia
Dyspraxia
Speech, Language, Communication Disorder
Emotional, Behavioural
These pupils could well be working at the normal Attainment levels
but, to get them there, keep them there and meet their individual
needs requires SEN Interventions and TA support in the classroom. Teachers will eventually not have TAs supporting
pupils in their classrooms.
The school currently buys in the Learning Support Service (approx
£6-7000) yearly to work with Dyslexic pupils in Year 7 and to
assess for exam access arrangements. It will probably not be
possible to afford to continue this. This would have an impact on staffing with mainstream teaching commitments having to be cut.
Schools such as William Farr have attracted statemented children begans of the quality of the carries. However an eritoria of lower. Company of the quality of the carries. However an eritoria of lower.
because of the quality of the service. However on criteria of lower prior achievement and free school meals their funding will be low.
Further the uptake of free school meals may be related to the
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recent provision of hot meals in Primary schools.
There will be an increase in bureaucracy to implement the new system, including assessment, monitoring, etc. How will schools fund this new level of administration?
What is the transition period and what does this mean?
4 Statementing
 What security have we that present statements will be honoured and funding ample to permit support work to continue with all pupils on SEN register as has already been set up? Pupils/students will not react favourably to a reduction in support and it could have an immediate and lasting impact on their progress, self esteem and well being. It is unclear what will happen to the funding for current statements and medical funding (we have 3 pupils who receive this).
What will the new process be to identify and define levels of need to replace the statementing process? What support will there be?
 What is the process for borderline cases near to band 6? What will the percentage reduction in cases sent to the statementing board be when those currently in bands 4 and 5 are included as borderline? What will happen to the existing staff whose jobs are tied in to statements?
Cost implications of the new School Action and School Action Plus monitoring compared to the saving of the changes.
5 Special Schools
Governors are concerned at the suggested intention to close special school provision. The school is not set up to cope with

children with moderate or severe difficulties, nor does it have the
facilities. There is a fear that this could not only affect the learning
environment and educational standards of the existing students,
but represent a huge cost to the school.
but represent a mage cost to the sonooi.
6 Workload and bureaucracy
How are SENCOs to be supported in the inevitable increase in
workload that any change of procedure brings?
The constant of the constant o
 The proposed changes will produce new bureaucracy especially if schools are expected to bid for funds.
7 Staffing
7 Stanning
If some schools see a significant reduction in SEN funding, what
safeguards will be put in place regarding staff in permanent
positions, ie how will their salaries get paid?
The funding will impact on the employment of TAs. Most
Secondary schools are expecting to lose staff as the impact of the
changes works through. Our major problem will be the higher rate
of pay at TA2 level. It could be that we cannot sustain that level of
funding and the TA2 job description might not fit what needs to be
delivered. The points for the Assistant HOD also come out of SEN
funding and not the school budget.
8 Outside agencies/support services
Governors have recently heard at the Learning and Guidance
Committee from professional staff at the school about the lack of
support from outside agencies. Staff reported that the school had
no Educational Welfare Officer for 3 months, and that out of 3.6
staff covering the area, 3 full timers were on sick leave. There is
no longer an individual school nurse attached to the school, which
means a lack of continuity for students and the school. Many
qualified staff from the Emotional and Behavioural Support Service
had left. The Pupils Out of School Unit was unsure about its future

				and the educational psychologist was difficult to contact. On one occasion at a team around the child meeting, the school was the only agency in attendance. No other outside agency was present. The outside agencies and the school are overwhelmed by the sheer numbers of students requiring support. There, therefore, remains a great deal of scepticism about access to services to meet the child's needs mentioned in the presentation.
				 If funding comes in bands into schools, will there be sufficient support agency staff to cover the need or will schools have to look out of County; another time issue.
				9 Experience of other counties where this is in operation
				Great difficulties in procuring extra funding and great difficulties for the SENCO.
				Conclusion
				The governing body would like you to register its strong concern over these proposals, the lack of consultation, the short timescales and piecemeal information for a proposal, which will have a major impact on many stakeholders.
05.02.2010	Peter Tong	Chair of Governors	Seathornne Primary School	Reference your email of 30 January 2010. I have discussed this with the Headteacher and SENCo at Seathorne Primary School, Skegness and I attach a copy of the headteacher's respose with which I totally concur.
				I have to say I am disgusted at the indecent haste with which such an important issue is being being rushed through and how it can be claimed that 'no response is agreement' beggars belief.
	Ian S Cameron	Headteacher		I strongly oppose the suggested changes In response to the changes in the mechanism for SEN funding, proposed by the 'stakeholder group', I am writing in my capacity as Headteacher of Seathorne Primary School to register my strong opposition to the revisions outlined.

The proposals, as outlined in the <i>Summary of report to Scrutiny Committee</i> , are extremely vague and raise more questions than they answer. Where a nil response is taken as agreement, one is left with the impression that this is an attempt to sneak in a highly controversial change, through the back door, without proper consultation. The responses to the agenda item at the Headteacher's Breakfast Briefing were not an endorsement of the proposals as they stand. My concerns are as follows:
• While the current statementing process is overly long and extremely time consuming it serves a very important purpose. At the end, an individual child has their precise needs and the actions that should be taken to address them documented transparently. It is a legal document that parent/carers, schools and the LA can have confidence in. The new proposal would abolish this for many children. In the current process the statementing panel act as a 'quality control' ensuring that a child will receive appropriate support irrespective of the school they attend. Who will monitor whether Seathorne is 'matching' the provision of other schools?
 An ever greater responsibility is being transferred to schools. Without the formal statementing procedure for bands 1 – 5, schools will find themselves under ever greater threat of litigation from parents who feel their child needs more and more. This will be fuelled by the fact that schools do not all have identical provision. A parent transferring their child to Seathorne will expect to be provided with the same as at their previous school.
• The proposal states that "Some statements will still be issued especially where there is low parental confidence or the need is not fully understood or could become more complex." This sounds as though a vocal, articulate parent will be able to excerpt pressure. Who will speak for the less articulate parent? Who will decide if the need is fully understood?

As schools have to take more responsibility the workload of
 As schools have to take more responsibility the workload of SENCos will also increase. The likelihood is that a school like ours, with above average levels of special needs, will find that the workload increase disproportionately to the funding it attracts. The funding formula is too simplistic. Schools like ours on the coastal strip, are subject to high levels of pupil transience and there is no mechanism to allocate additional resources to support children who are admitted mid-year. It appears as though a school would have to fund support for a child admitted in September through its own resources to the detriment of others. From the proposal, it appears that children's prior attainment will only be measured twice, at the end of Reception and the end of K.S. 1. What will happen to a child who is not two levels behind in year 2 but is by the end of year 4? Their additional needs will not be recognised by the funding arrangements. The formula only recognises learning needs. FSM and IMD data is hardly an accurate measure of emotional and behavioural needs. The inability of the Extended Schools Project to maintain PSAs (who resigned due to the stress of their impossible workloads) in East Lindsey indicates that this is a more significant factor that can simply be attributed to parental income. The formula doesn't even reference medical needs. I have concerns about the contracts of staff working as 1-to-1s. These are currently intered in text and the property what will happen.
 There is no mention of Special Provision and how this will be access without the MDA process. In the future, how will a child who is currently at Band 5 access a place at a Special School in KS 3?

				Should you require any further information, please do not hesitate to get in touch.
05.02.2010	Tracy Bowman	Headteacher	Lincoln Birchwood Junior School	I would like to know how the funding for band 1-5 will be allocated and what will happen to the funding of existing statements??
05.02.2010	Kris Radfor-Rae	Headteacher	Edenham C of E Primary	The staff and governors at Edenham School would like to express their opinions about a number of the proposals detailed in the Overview and Scrutiny Report: Next Step in the Direction of Travel.
				We agree with the Principles described in paragraph 1.1 but also that we are concerned about how this will translate into practice.
				Formula Indicators
				We accept there is a high correlation between SEN and social deprivation indicators; however this is NOT always the case. We have a low level of deprivation amongst our families but we experience issues affecting learning, health and well-being that are as equally complex and challenging for many of our children.
				As we have a low level of deprivation and a relatively high level of parents/ carer in employment, the majority of our children are not entitled to a Free School Meal . Those that are entitled do not always take up the opportunity and this has not changed despite now providing high-quality hot school meals (prepared off-site).
				Again we do not feel that the number of FSM necessarily reflects the issues that impact on our children's learning, health and well-being.
				We would also like to clarify how national changes to entitlement will impact on the numbers of children entitled to FSM before any decision is many as to whether or not this is an appropriate indicator.
				Prior Attainment measures we accept should be a key factor forming part of the decision making process BUT; - Measures of English and Maths only do NOT reflect fully or satisfactorily the complex needs of many of the children who we

know need additional support – for example, we are seeing an increase in those who need social and emotional support who may attain relatively well in English and Maths but fail to engage with their peers or adults or show signs of high levels of stress and anxiety that affect their potential in other aspects of their learning, health and well-being. We are not confident there has been satisfactory guidance on how we should be correlating outcomes at the end of FS and progress to the end of KS1. We are concerned we can see no discussion about the timescale to which our teacher- assessment judgements about progress should be carried out – for example, if a child scores low in PSRN at the end of FS, at what point will we be able to access funding thereafter if we are still advised not to correlate measures of FS scores with NC outcomes? It could cause delays in our ability to access additional support for children in need. We accept that the **monitoring** of the impact of expenditure on SEN is an important and necessary part of our school self-evaluation process we are concerned however at the level of expectation on the School Improvement procedures. We have a very limited supply of time from our School Improvement partners as it is and we would request that serious consideration is given to how their time could be increased in order to address a rapidly growing agenda. Monthly reports to the Executive DMT on the use made of delegated funds and its impact on pupils and their progress - WHO will be responsible for delivering these, using what information? We are deeply concerned about the ever increasing time-pressure for our Leadership Team and our SENCO. We are not in a position in a school of this size (PAN 117, 4 classes, full time teaching SENCO) to delegate tasks such as this. Too much time is spent writing reports for the numerous agencies demanding of school time and too little on freeing our Leadership Team to actually see teaching and learning in action.

We are uncertain at the moment as to how the proposals will work to

				REDUCE bureaucracy.
				In summary, we are always in favour of changes to procedures that enable us to access the best support in order to meet the needs of our children, but, whilst we can see the benefit of the 4 Principals, we remain cautious that these proposals are the best way to achieve them. We look forward to receiving more details in response to the LA's consultation.
05.02.2010	Sue Eveleigh	Headteacher	Long Bennington C of E Primary School	Long Bennington Church of England Primary School response to new proposals for SEN funding. We are all extremely concerned about this new method of SEN funding which for a school like this means we will receive very little if any. The reasons being as follows: Our children are on the whole from advantaged backgrounds with 'good' post codes Very few families claim free school meals because it is seen as an embarrassment in an area such as this They achieve highly because of the intense support we give to each individual child regardless of ability or disability Despite the above we do have many children with Special / Additional needs. Parents' ability to pay for large houses in positive post codes and to pay for their children's food does not mean their children are necessarily academically able! We do not think the above indicators reflect fairly the needs of all schools and do not agree with the proposals. We also do not agree with the terribly short time scale given in order for us to properly consult with staff and governors before making this response. We think that this April is a year too soon to make such a significant change and urge you to postpone any changes until April 2011 in order that a proper debate and consultation process can take place.

05.02.2010	Ross Webber-	Vince Principal: Head	Monks Dyke	To whom it may concern,
00.02.2010	Jones	of School	Technology	It is very concerning that the e-mails about the proposed changes to
	Conco	01 0011001	College	Addition Needs were not sent to our school, we were fortunate that they
			College	were sent to us by another school, otherwise we would have had no idea
				of where the present discussions were leading.
				If the content of these e-mails are so important, then why have we been
				given so little time to make our responses? Even schools that were included in the initial e-mails have had little time to respond and yet it is
				hoped that these changes will be in schools by April of this year. As a
				college we have had no chance to include Governors or our Chair of
				Governors when making this response.
				The current statementing process does take time and is expensive, but
				will it continue in its current form for students with very complex needs
				and who require Band 6-8?
				When will schools be informed of their delegated budget, especially as
				there will now be staffing implications? Also why is the transition funding
				only in place for one year?
				One factor as part of the delegated funding formula is pupils claiming
				free school meals, why not have pupils entitled to free school meals
				rather than those claiming them?
				One other factor to be taken into consideration for the delegated funding
				formula is prior attainment and one of the graphs indicates not only
				English and Mathematics, but also Reading – how will this be
				measured? Schools use a range of tests for Reading, would we be
				expected to use the same test for standardisation?
				These changes will effect staffing ratios within schools, it is very
				concerning to see the removal of the special needs funding from the
				minimum funding guarantee.
				With current statements, what happens if the new funding formula does
				not cover the cost of supporting these? Are schools expected to change
				the support, maybe involving a reduction in support for an individual
				student? In particular the changes in funding could have a great impact
				on those students with a diagnosis of ASD.
				Funds for School Action and School Action Plus will now be monitored,
				but the proposals for monitoring are vague but if passed, will be in place
				by April 2010. What will happen if it is felt a school is not meeting he
				needs of the students? What will be the intervention procedures? As
				mentioned in paragraph 1.21 (vi) of the Overview and Scrutiny Report.

05.02.2010	Robert Young D	Headteacher	Cliffdale	Also in the Overview and Scrutiny Report paragraph 1.21 (viii) it states that there will be 'monthly reports to the Executive DMT on the use made by schools of the delegated SEN funds and its impact on pupils and their progress,' How will this information be gathered? What impact will there be on schools? Will there be any discussion or training for SEN staff, or will these changes be introduced like the new criteria, with no information and access on the website very difficult to access? Why has there been so little information for SEN staff for such an fundamental change in their working practices and funding, especially as these changes are to be implemented, if passed, by April of this year? It is indicated on the first power point slide in the Proxy Indicators for Additional Needs Funding that there may be inconsistency from school to school and possible inequalities, but a further slide showing the readily available and accurate indicators miss out the all important SEN need of a pupil. This slide also talks about removing the inconsistencies between schools but does not say how this will be done. Lincolnshire has always had the needs of the pupil at its heart and although the current statementing process is expensive and long, it at least takes into account the needs of the student. This information is also already readily available through the census returns made by every school and to which you will be referring for some of the indicators to be taken into consideration under the new system. Reducing funding for SEN pupils to a postcode lottery is a retrograde step, even if free school meals and prior attainment is taken into account. The move away from the current statementing process is to be welcomed, but greater information needs to be given to the front line staff about these changes. It is very unfortunate that there seems to have been no representation on the Scrutiny Committee for SEN staff and they do seem to be the one group of professionals left out of discussions.
	Booles			Response and comments to the document:
				Overview and Scrutiny Report, Children and Young People Scrutiny
				We have considered the proposals for the delegation to schools of

SEN Statement Funding for Bands 1 to 5. It is our view that the criteria for the distribution of these funds will be extremely detrimental to pupils in this school who have additional needs at this level. The criteria for the distribution of the funds make too narrow assumptions about where pupils with additional needs will be found. We do not approve of these proposals as they are. Wider discussion with schools should occur before any delegation of funding is implemented. Please consider these comments with respect to the proposed next steps for the provision for children with additional needs.
Page 2 Principles.
(i) Inclusion. All children should be in a local school is fine in principle.
However this should not be a doctrine for the integration of all pupils with additional needs into mainstream schools without ensuring that schools are adequately resourced to provide effectively for them.
Some pupils with additional needs are best provided for in a special school setting.
Furthermore if children with additional needs are placed in mainstream schools with insufficient resources to effectively meet their needs this can have a serious detrimental effect on the education of the other children without additional in the class / school.
We note that the response from the Lincolnshire Parent Carer Council to Councillor Hill dated 28.10.2010 includes similar comments to these, ref points 8 and 9 of the Chair, Therese Lord's letter.
Page 3: 1.4 The ideal of achieving a more streamlined process to get

my print with the contract of	How the scarce and limited resources that are available are distributed needs considerable thought before any system is implemented. We would appreciate if the following comments on the most recent proposals for the distribution / delegation of Band 1 to 5 statement funding are considered before a final decision is made. Who will lead and coordinate at local level? Page 3: 1.5. This contains some ideals of what benefits the delegated system will promote for local schools and children with additional needs. However the proposal lacks specific detail. How will it work in practice? How will the distribution of resources be decided in the local group? Which schools will be in which group? These are all important points if the use of funds is to be effective. There will have to be some form of organisation that will require the input of someone's time. These will be tasks which are currently not required of persons in schools at the moment. There has to be an increase in the workload of someone. There is a risk that delegated SEN funds will be used to fund bureaucracy at local level to make this idea of local cooperation work. Who is going to perform the coordination at local level to make it work? Schools are already at full stretch with current initiatives and demands on time. Will headteachers be able to undertake the task? There are problems recruiting new headteachers now because of the overload in the role. We appreciate that the current proposals for delegating funding have been considered with thought by the working group. However, we are concerned that the delegation of the funds from statements for Band 1 to Band 5 according to numbers of pupils claiming free school meals the school based measure of deprivation and relative prior attainment
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will unfairly discriminate against the pupils with additional needs in schools similar Cliffedale The measures make a blanket assumption that schools that do not 'score' very highly do not require so much funding in terms of meeting the additional needs of pupils. Whilst acknowledging that there are schools with higher numbers of pupils with additional needs, it should not be assumed that schools that do not 'score' on the three measures automatically have no need of funding for pupils with additional needs. There are limitations in the measures chosen. **Free school meals.** There is mention in the discussion paper that hot school meals are widely available in primary schools. This is not the case in Cliffedale. It is also not the case in all of the Grantham area where the provision of hot meals in all primary schools has not yet been possible. Cliffedale has very few children claiming free school meals. If hot free meals were available the number claiming free meals would be higher. The school based measure of deprivation, IDACI. This measure does not provide indication of the deprivation levels of individual pupils in school. It is an average measure of the total of all pupils. For example, forty six percent of pupils attend Cliffedale as their most local school and come from what are regarded by post code as less deprived areas but fifty six percent of pupils, for whom Cliffedale is not their closest school, come from a variety of areas that include post codes which give higher social deprivation indications. This measure is contradictory to the current emphasis on Every Child Matters. It implies that pupils from areas of higher social deprivation matter more when it comes to meeting their additional / SEN needs. Children with special educational needs are not exclusive to areas of social deprivation.

Relative Prior Attainment. If too much emphasis is placed on this measure it would be more beneficial to a school not to bother too much about promoting pupil progression because, for example, high prior attainment at the end of Key Stage 1 will result in less funding under the proposals. Cliffedale, for example, puts a considerable amount of resource into providing Teaching Assistant time in Years R, 1 and 2 to support our weaker pupils to attain as highly as possible.
Existing Funds allocated through the LMS Main Budget Share Formula. Some of the schools that will benefit most from the proposed criteria for the delegation of funds already receive significant additional funding in their main budget share to acknowledge factors such as 'extraordinary social circumstances' and 'personalised learning'. These main budget allocations relate quite closely to the criteria in these proposals. Some schools already receive very little, or no, funding at all through these additional allocations.
Funding for pupils on the SEN Register The funding for pupils on the SEN Register at School Action and School Action + is heavily moderated for Cliffedale School, and perhaps for schools in similar circumstances to Cliffedale, through the crude moderation process of an NFER / Nelson Reading Test in Year 4. This reading test takes no account of the range of children within the school who have special educational / additional needs. It assumes if a school has good reading attainment in one year group then the whole school has few children with SEN. For example, due to this process Cliffedale only received 41.4% of the funding that it would have received if all the pupils on the SEN register were fully funded for the amount in the LMS Budget Formula. The result was that the school received £ 9,540 instead of £23,100 in the 2009-10 financial year.
We have had occasions when parents/carers, and those in positions in the LCC Additional Needs/SEN Dept tell us that we should use our SEN Register funds to support pupils. This is very frustrating when we know that 58.6% of that funding has been removed through a crude and dubious moderation system.

				It will add to this frustration if a further system is introduced that discriminates against schools such as Cliffedale through simple
				assumptions that we do not have many pupils with SEN / Additional Needs.
				These proposals will result in a further restriction on the funds available to support pupils with additional needs / SEN in this school.
				Please consider:
				The proposals recommend that the funds are delegated to schools 'by formula' (Page 7). If such a system is implemented we suggest that each school, irrespective of the scores in the three suggested criteria, receives a 'block' of funds through this formula to ensure that each school receives a minimum allocation for a financial year. If a school is left with no funding through this criteria how will it support the pupils with additional needs who would previously have had Band 1-5 statements?
05.02.2010	Norah Walkeley	Headteacher	North Hykeham & Fosseway	We at Fosse Way Primary School would like to register that we are not in favour of the new proposals for the revised funding for SEN as they stand.
				We believe that there needs to be more information sharing and an opportunity for debate in place of the very short consultation period. It is clear that that there will be winners and losers and while this is inevitable, using free school meals, deprivation and prior attainment as criteria for allocating funding for such a diverse and complex issue as SEN is not appropriate and does not reflect the needs of individual schools.
05.02.2010	Leanne Giles		Allington with Sedgebrook C of E Primary School	I would like to express my views on current proposals for Additional Needs funding. I appreciate that there is a need to reduce bureaucracy and fully support funds being tailored to children who are most in need.
				We received £3,070 last year to cater for our pupils with additional needs and have further funding for two children with statements at Band 5 and

05.02.2010	Zoe Hymas	Headteacher	Caistor Joint CE/Primary	6. We do not qualify for any additional funding through any other means. We find it difficult to support our 10% of pupils who might for example, have severe dyslexia or might be in KS2 and be two levels behind on this level of funding and I am unsure, with the current funding proposal, whether this amount would even be maintained. Your proposed funding model also suggests that schools would fund statements at bands 1-5 within its delegated budget. I appreciate that many schools are in much more difficult circumstances than ours but would welcome further clarification of how we would find funding for a statemented child from our delegated budget when deprivation indicators would suggest that we would receive very little. The current system, although time consuming, at least guaranteed that a child with a statement for their physical needs (band 5) at our school had their needs met regardless of postcode or based on the academic abilities of the remaining pupils. I apologise if I have misinterpreted the information. I am unsure of the benefits that the new proposed scheme will have to my school and therefore do not lend my support the proposals at this moment in time. Caistor Primary School has a large SEN register, pupils tend to join us because we are seen to be effective with SEN progress, but we do not have a large percentage of pupils on the FSM register. In my experience, as this process took place in NELincs where I previously worked, this meant that for such a school as Caistor, it resulted in less funding within the budget for the same amount of pupils. As to the statementing process, there should be a consistent process across the authority with clear guidance. Do the new proposals mean that there will be additional funding for our most needy pupils without the need for a recognised statement of SEN? I would like further information , as would other local Heads, before a final decision is made.
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05.02.2010	Nadia Dawson	Headteacher	Osgodby Primary School	I wish to register my concerns regarding the new proposals for SEN funding. I believe that a more in depth study of the way in which funding will be distributed should be considered and that every headteacher who will be affected should be given the opportunity to be consulted and their views taken into account.
05.02.2010	Alison Ross	Headteacher	Sleaford Kesteven & Sleaford High School	We as a school are absolutely appalled at even the mention or notion of changes regarding the Special Educational Needs funding, as outlined in the recent communications 28 January, 3 and 4 February this year. It is our opinion that much of the change proposed actually is in danger of being discriminatory and counter to all earlier recommendations, as outlined in the Disability Discrimination Act of 2002 – and, of course, to rural areas which Lincolnshire is. It appears absurd to means test pupils disability, look at postcodes and free school meals as factors particularly as the County does have areas of selective education. If a child has a disability surely it does not matter whether they meet any of the latter as a disability is a disability. Pupils are entitled to support whatever their economic or geographical background. This cannot be allowed to happen and as a school we would be prepared to take it to the highest places. Please represent these views at the meeting on the 9 February and, as a school, we shall certainly be at the meeting scheduled for 23 February to do likewise.
05.02.2010	Sylvia West Kate Waghorn	Headteacher SEN Governor	Barrowby CE Primary School	We very strongly believe that this current funding proposal/change SHOULD NOT be approved by the Schools' Forum or Local Authority according to the proposed indicators. We believe the current proposals to be flawed, discriminatory, and contrary to the best interests of all SEN pupils in this county, and we very much hope that they will be rejected. We wish to make the following comments regarding the proposed changes, and hope that they will be given full consideration: 1. We agree that funding for SEN should be delegated to schools but not as proposed under the current proposal.

2. The proposal that 20% of funding should be based on number of
free school
We believe this proposal to be discriminatory and inherently unfair to children with special needs who attend schools in areas which do not have high number of free school meals and/or a high deprivation index.
 We believe that it should be fundamental to any proposal regarding funding for special needs that every child with such needs is treated equally, based on those needs alone, and irrespective of any other factors affecting the school in general. Children from all home backgrounds and all economic levels may have special needs. All these children deserve to have their needs met, within the school their parents have chosen. This principle of equality of opportunity is surely at the very heart of the 'Every Child Matters' agenda.
 Eligible schools already receive considerable additional funding based on free school meals and extraordinary social need. Using these measures to weight SEN funding means that they would, in effect, benefit twice, at the expense of schools which do not qualify for additional funding under these heads
3. Proposal that 80% of funding should be based on prior attainment.
 We believe that the proposal discriminates against schools which provide early and effective intervention for children with special needs. In our school children are identified as soon as possible, and long before they fall as far as two levels behind. In some cases this early intervention means that children do not remain on the special needs register. Under the proposals, these children would receive no funding. Early intervention not only benefits the child, it is also cost effective.
 In effect, this proposal removes funding from children at School Action, as most of these children will not – yet – be far enough behind to qualify.

	The result of this proposal would be that schools which currently put money and resources into early intervention, thus addressing special needs before they result in a child falling so significantly behind, will get very little, if any, funding. This will inevitably mean that early intervention is reduced – which may then, of course, result in children falling far enough behind to trigger funding later on. We cannot see how this can possibly benefit the child or the school.
	4. Schools like ours, where most of the children come from average income families, across a mixture of social backgrounds, work very hard to provide for pupils with special needs, whilst receiving a comparatively small amount of funding, even under the current system. Children with special needs make good progress, and this is reflected in Ofsted judgements.
	If the current proposals are implemented, it seems likely that all or most of our SEN funding will be lost to us. The consequences of this will inevitably result in a reduction in the TA hours we are able to use to support our large class sizes (sometimes as large as 37 pupils, due to appeals), and to work with SEN children both within and outside the classroom, and/or our not being able to continue with support from an LSS teacher (currently ½ day per week). This will undoubtedly have a major impact on the progress of SEN children in this school.
	5. The premise behind the proposals – that the current system is inconsistent – has not been tested. We believe that headteachers and teachers should be trusted in their professional judgement about which children in their school are at School Action, or School Action Plus, or who should be put forward for a statement, according to criteria. If it is felt that there are serious inequalities in the current method of funding, further research needs to be done to identify how these have come about, and to seek a solution which is fair to all children with SEN.
	6. It is very disappointing that information concerning this matter has reached schools so late in the day, and with an extremely short time scale to respond to proposals which could have very significant, and very damaging consequences for some schools, and for a considerable

		number of children.
		Thank you for considering our comments.

Frances Dicker	Headteacher	Baston CE Primary School	Re. Proposed changes to SEN funding
		T imiary Solicon	Following a meeting, attended by representatives from the following schools; The Deepings School, Langtoft, Baston, Market Deeping, William Hildyard and Linchfield Primary Schools; we would like to express our concerns about the potential financial impact of the proposed changes to schools like ours.
			 Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+, should be challenged. A way forward could be, for SA and SA+ funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy indicators. Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. If the model of assessing free school meals uptake and postcode analysis is the driver for this, as a cluster we are going to feel a greater financial impact. With the financial pressure of a small intake also hitting some of our schools in 2011/2012, the potential additional impact of this proposal is likely to result in redundancies, leading to even greater pressure on school budgets and staff. The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. The transitional / protected funding for 1 year is insufficient. Funding for current statemented children should be protected until they reach school leaving age. What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people?

				 All learners could be disadvantaged if the proposal is approved. In schools that are impacted by this process, presumably it will be the responsibility of the Head Teacher to inform parents, who are already used to a level of support, about the changes in provision? We would welcome the opportunity for further discussion about this proposal, prior to any decisions being made. The cluster requests that the meeting be deferred, until a financial model is made available and the true impact of the proposal can be carefully considered.
05.02.2010	Rachael Shaw	Headteacher	Branston Junior School	
				Original Message
				From: Mrs Rachael Shaw [mailto:mrsshaw@branston-
				junior.lincs.sch.uk]
				Sent: 05 February 2010 10:49
				To: Eileen Russell
				Subject: Children and Younr People Scrutiny Committee
				Dear Eileen,
				I am writing in response to the recently recieved information regarding the Children and Young People Scrutiny Committee. I am not sure (from reading the accompanying email) who I need to respond to, other than sending an email to yourself.
				I would like my views to be considered (if they are actually to be considered and this is not simply a paper exercise - this is no disrespect to yourself)I believe that funds for statements in mainstream should NOT be delegated. However I would certainly appreciate having the opportunity to discuss this in more detail with other Heads at a special meeting or a regional meeting, as there are many questions that I would like to ask to seek further

				clarification for myself, for the Governing Body and to be able to plan so as to ensure that the reduced funding that will be received by schools for children with specific needs, will not damage this school's capacity to provide opportunities for every child in the school to achieve to the best of their abilities. I do feel that this process of consultation has been somewhat 'rushed' in order that budget cuts can be achieved from April 2010, and feel most strongly that such an important decision can only be made by headteachers and Governing Bodies, when they have had ample information and ample time to discuss the potential implications for the pupils and their education - hence my request for regional meetings to discuss the issue in more detail. I do hope that my response and the responses from other
				headteachers is actually taken into consideration, when the final
05.02.2010	Mary Pearce	SENCO	Cherry Willingham Community School	decision is made as to the allocation of SEN funding. I have tried without success to get greater clarity on what this means for schools. I have concerns about existing statements at bands 1-5 and the implications that changes to funding may have on staffing. Will action in April 2010 apply only to new intake pupils or will it be retrospective?
05.02.2010	Adrian Reed	Headteacher	Haven HighTechnology College	I agree in principle with the proposals regarding additional needs / SEN funding. It has long been argued by head teachers that the statementing process is labour intensive and follow up annual reviews for all statemented pupils – particularly for lower band statements.
				The delegation of funding to schools will enable head teachers to plan support for children. I would guess that some schools may worry that due to their intake they may have a cut in funding. Data shows, however, that prior attainment, FSM and high levels of

05.02.2010	Adrian Clark	Headteacher	Spalding High School	deprivation are good indicators for the number of children in a school that will need support. What will be of major importance is how the LA configure other support services (EBBS & PRUs) to support school in a cluster basis – this will compliment and add value to the proposals. Whilst the proposed changes will not make a significant difference to my school, I should be grateful if the point could be made that these proposals appear to have come out of the blue with little time for digestion and discussion.
05.02.2010	Liz Shawlhume	Headteacher	The Gleeds Technology College	Thank you for offering the opportunity to feedback on this most important issue. Whilst the concept of having the money in the budget upfront to better support the needs of our learners is attractive, the mechanics, I fear may be less so. Having gone through this process in my previous Local Authority, I feel that each school should have a worked model which shows what the implications could be for their funding – this is particularly vital at a time when indications are that budgets are going to be squeezed and when some schools are already forecasting budget deficits. Absolute transparency is vital. What will the SEN overall budget be in comparisons to current and how much will be held centrally. Presumably more will be devolved to schools as the process will be less bureaucratic, but unless this is demonstrated, I believe their will be suspicion and a feeling that this is a cost cutting exercise rather than a change to better meet the needs of young people. If students who currently have a statement are to keep these and they become monitoring statements with no monetary value, then this increases the load for SEN departments and I am concerned that in the future there will be no incentive for schools to identify

				students who would previously have been put forward for a band 1 – 5 statement if this creates additional administrative burdens and additional meetings. Thank you again for giving us the opportunity to voice our thoughts to you.
05.02.2010	Chris Beckett	Headteacher	The Deeping School	The situation for us is desperate. We have an emergency meeting tonight with our school and local Primary schools. Nobody knows what the pot will be, what the protection is etc. we could lose anywhere from 20k to 100k. We have low FSM, nice postcode and reasonable/good attainment on entry! I guess we will be the biggest losers. It will be great telling parents and making TA's redundant! We will send a response after the meeting - THIS IS NOT consultation!!!
05.02.2010	Peter Beighton	Headteacher	Branston Community College	Funding changes: a less fair system appears to be about to be imposed because of concerns with a few schools 'cheating'. Challenge that problem rather than creating what I think will be greater iniquities. Separate to that grave concerns about systems changes resulting in students in greatest need being integrated into main school rather than accommodated in Special schools. Model used may be 'right on' but follows that in Nottingham which is discredited according to colleagues who have experience of that system. Permanent exclusion explosion predicted.
05.02.2010	Rob Boothroyd	Headteacher	Yarborough School	 I think we could do with examples of the impact on school budgets The documentation sent out does not fully explain the system. A power point out of context is not easy to understand It appears rushed through the system. My experiences of a similar model in Nottingham City did not work.
05.02.2010	Rev. Canon Alan Robson	Chair of Governors	De Aston School	I write to express our Governing Body's extreme concern regarding the proposed changes in the 'Direction of Travel' of special educational needs funding. Whilst supporting the need to change the current bureaucracy regarding statementing, we believe that the specifics of the

current proposals will prove damaging for many young people with
special needs and for school finances more generally.
Special needs and for school finances more generally. 1. The polarisation that is likely to occur in school funding as a result of this formula. The formula presented seems to muddle social deprivation and special needs funding. We have no difficulty with the idea of funding socially deprived schools more generously, but why has this been wrapped up with special needs funding? The two elements need to remain separate. I am aware that Lincolnshire Children's Services have come under scrutiny in the past because of their funding of social deprivation, but surely it is wrong to funnel monies from one vulnerable group to another. I am extremely uneasy about this and I know many of our parents will be when we make them aware of this. 2. Included in the proposals is the intention to remove special needs funding from the minimum funding guarantee. The LA proposes to provide one year of 'transitional funding' to help ameliorate the impact of this change. However after this point, schools will be expected to fend for themselves. There will, for example, be no additional help with redundancy costs which might emerge. (Are the trade unions aware of the impact this will have in some schools, I wonder?) As the LA is proposing to implement in April 2010- i.e. in two months time, this protection would cease right at the point when the three year funding settlement for schools comes to an end. Given what we all know
about the likelihood of education cuts, falling rolls, changes in post-16 funding, there can no doubt that this additional pressure could force some schools into deficit. 3. Schools like ours, graded as 'Outstanding' by Ofsted for both the progress of learners with special needs and care, guidance and support, may well be forced to effectively dismantle the support that has made this progress possible. What analysis has been done of the impact of the proposed changes on existing provision?
I would like your assurance that the Schools' Forum will be given the opportunity to hear my concerns. I intend to contact the Secretary of

				State in co-ordination with other Chairs of Governors from both the primary and secondary sectors with regards to the proposed changes in the minimum funding guarantee to outline our concerns.
05.02.2010	M A Taylor	Headteacher	The Thomas owley High School	Concerns about 'New Direction of Travel'
			omey riigii concer	The process has been flawed
				This is clearly a major change. Some of the most vulnerable students in the system will be affected. There is potential for difficulties with parents and carers as their children are no longer in receipt of extra help. There is a potential for vulnerable children to be 'lost' in the new Statementing arrangements. It has potentially significant budgetary implications. All these 'potentials' needed to be discussed and debated. The proposed system should have been the subject of rigorous examination by all stakeholders. This clearly has not been the case. The large Stakeholders group was given tabled documents. There was no time for thinking and reflection. It is clear from talking to those who were on the group that materials had been long in preparation and each meeting saw a further tabled set of facts and figures. Some members of the group felt that its size did not lend itself to the sorts of discussion needed to properly scrutinise such a key proposal. Headteachers have been given even less time and information to view the proposals. We are now being besieged with fresh views and revelations on a daily basis. Is this the way to introduce such a major change in direction? Underpinning the proposal is a clear financial imperative. The Authority is looking to save money. No one can have a problem with that. However if this saving is going to be at the expense of a crucial part of educational provision then perhaps it needs to be made much more transparent. No figures have been given to individual schools to see the impact of this proposal. The Authority must have this
				information but has chosen not to share it. A school like mine already
				subsidises its SEN provision to the tune of over £75,000 per year. It is therefore relevant to my response to these proposals to have a clear
				understanding of the financial implications.
				I am aware from discussions with Tony Warnock that the Authority is
				concerned about the long term financial health of an increasing number

of secondary schools. It is madness for the Authority to introduce a new funding arrangement for schools without making it clear to them what the long term implications will be. I am aware of the 'transitional arrangements' that have been made. That's almost like blackmail — accept the proposals or you won't get the money to cover your shortfall (that shortfall a direct result of the proposed changes). The very fact that transitional arrangements are being mooted suggests that some schools will lose out. Therefore they may have to make significant alterations to staffing levels in a year's time — at the end of the transitional arrangements. So a number of five year plans will need to be re-written.

I wonder whether the unions have been informed? It would seem likely that a number of TAs will be out of a job in a year's time.

All this is, of course, mere speculation because we have not been given the information on funding that we need.

It ignores the views of Parents

The Lamb Inquiry was commissioned to investigate how parental confidence in the SEN system could be increased and draws the conclusion, "We have heard a clear message: parents need to be listened to more." Lincolnshire Parent Carer Council (LPCC) report that consultation with parents over the 'new direction' did not happen. Two of their representatives were invited to attend but were under a strict confidentiality embargo not to discuss matters outside the group. This was not consultation.

In an angry response to the proposals, LPCC point out that "A policy stopping issuing statements for children would be illegal." Further, that parents have the right to appeal if a statement is ceased without their agreement. The view of the LPCC is that parents should be informed that they have the right to redress through the local authority ombudsman for maladministration.

The views relating to statements expressed in the LPCC's response to the proposals mirror precisely those set out in Lamb: "parents told us they value the security of a statement and the confidence it gives them to

challenge the authority if the provision agreed is not forthcoming. Parents were crystal clear that they wanted the letter and sprit of law adhered to and the system made to work better." They do not want the system to change – only its maladministration.
The formula for delegated funding is not fit for purpose
The formula uses data which is, at best, questionable in its accuracy and veracity. There is no need here to rehearse the many arguments against the KS2 tests. The fact is that these arguments persist and thus undermine the formula's integrity. The proposed formula, with its emphasis on prior attainment, excludes those students who present with any difficulties other than SpLD. All schools are likely to have children with behavioural emotional and social difficulties, autism spectrum

BESD.

It is therefore quite wrong to work on the assumption that children attaining national expectations at KS2 do not have SEN. 'It should not be assumed that children who are working at or near age-related expectations do not have SEN. There needs to be a greater awareness of the specific difficulties that may affect children's progress and attainment and, in particular, their profile of attainment, which may be uneven." (Lamb)

disorders, speech, language and communication needs as well as SpLD. Indeed, Lamb found that at secondary level, 38% of those at SA+ have

The ill-informed formula reflects no such awareness and the driver, clearly, is simply to limit numbers. Only this imperative explains the arbitrary requirement for students to be a level below national expectation in English **and** Maths in order to qualify for funding (at the lowest – unspecified – level). Those with an 'uneven profile of attainment' do not feature.

There is, of course, the recognition within the formula that reading is a core skill and that students **two** levels below national expectation are in need of additional support. Practitioners, however, know that within Level 3 lies a broad range of reading ability and that many dyslexics do in fact achieve this level. **The average reading age of KS2 Level 3 readers at**

				TCHS is 8.4. Indeed, 50% of those currently receiving additional support because they have a reading age below 9 achieved a KS2 Level 4c.
				There is no doubt that, unless the funding per student is enormous (and of course we have no figures so calculations are impossible) it will not be possible to meet learners' needs. Quality first teaching cannot replace the structured, repetitive, multi-sensory 1:1 phonics interventions which alone can meet the needs of those with persistent reading difficulties. (Rose Review of Reading).
				Conclusion
				This is a bad scheme, hastily introduced without proper, meaningful consultation. It is morally unacceptable that SEN learners, the most vulnerable members of our school communities, should be the victims of county council maladministration. There is nothing wrong with the SEN system. It just needs people to run it properly. The reference made to Lamb in Sue Wescott's document as justification for the proposed changes is as best ill-informed and at worst dishonest:
				The Inquiry is clear that, whilst it is desirable to meet children's needs without having to go through statutory procedures to get a statement, many parents do have more confidence where their child has a statement. In particular, having a statement gives parents confidence to ask questions and challenge when things are not happening for their child or when something is going wrong. 164, 165 We would not therefore recommend any change to statute or any target to reduce the number of children with a statement. Where children are progressing well and parents are confident then it is serendipitous that statements may also reduce. However, we need to focus on the preconditions: children's progress and parental engagement, not the by-product: the reduction in the number of statements.
				The pity is that, having spoken with colleagues, the changes will inevitably occur despite any misgivings from those who will be charged with making the new system work.
05.02.2010	Nick Law	Headteacher	Carre's Grammar School	With regard to the SEN proposals, whilst I agree that there needs to be a streamlining of approach and that spending should be on services and

not on bureaucracy, I would like to make the following observations:
 The proposed criteria for funding works against grammar schools as Very few students receive FSM By the very nature of the selection process, grammar schools will not have students with L3, but Carre's has been recognised as dealing well with pupils with Aspergers, ADD and ADHD (Ofsted 2008.) Are these students no longer to be considered as worthy of support? By removing the funding, and therefore, the TA support for pupils with AEN, this will have a negative impact upon the other students. What is needed is funding to be guaranteed for pupils with AEN so that they can receive proper support. In a time of shrinking budgets this will not be possible.
Removing special needs funding from the minimum funding guarantee is damaging to all schools on many levels: The LA propose to provide one year of 'transitional funding' to help schools with this potential loss. However, after this point schools will be expected to fend for themselves. There will, for example, be no additional help with redundancy costs which might emerge. Changes in post 16 funding will make it hard to balance budgets, but I'm not sure that this has been taken into consideration and would question if there has been any real joined up thinking? Similarly – falling rolls which the LA keep telling us will affect numbers and, therefore, funding, and raising age profile in many schools, linked to the above will cause many schools to have a budget deficit.
Primary schools rely on the support of TAs for providing high quality education, and the yet the proposals seem to militate against this.

				In these financially difficult times in which we are encouraged, cajoled and bullied to raise standards, cutting staff and leaving students without adequate qualified support is not a positive way forward. I am hopeful that sensible decisions can be made and that the views of stakeholders are seriously taken into consideration.
05.02.2010	Melonie Brunton		Middle Rasen Primary School	I have read the e mail sent about funding of SEN. Have I got it right that statement funding will no longer come into the budget but schools have to fund this themselves from main budget? Just a little concerned as we have 2 1:1s at the moment.
05.02.2010	Mike K Eyre	Headteacher	Tennyson High School	In response to SEN funding arrangements I would like to say that I support the move to delegate funding directly to Heads for the Lower Bands and therefore support the proposals to be put in place. From Tennyson's point of view the assessment using prior attainment and FSM will also be a positive move forward. I am a little concerned however at the short turnaround and implementation of this and would have preferred for there to be a meeting of the Secondary Heads to allow discussion.
05.02.2010	Margaret Reeve	Headteacher	King Edward VI Humanities College, Spilsby	I would be grateful if you would pass on my views to the School Forum re the above proposal. However, I have to say that the speed of this process leads me to feel that the decisions have already been taken in haste and representations are futile. My evidence for this view is partly fuelled by receipt of two new statements on 4th February for two students previously receiving a total of 40 hours banded funding. The statement made no mention of their funding, banding or any additional support outside that provided by the classroom teacher. I thought that this was yet to be finalisewd? Obviously decisions have already been taken. However, my ongoing concerns about the proposals are these, probably raised already by colleagues facing similar problems of support: Secondary modern schools by nature contain a greater percentage of students needing SEN support, far above the national average, usually around 36% of school popaulation. The additional funding is currently used to provide the support both in and out of class needed to ensure that students achieve and stay within the school system. If SEN funding

				is removed from the minimum funding guarantee, this work cannot continue, needs will not be meet and exclusions will probably escalate. For SEN students transferring between schools, they will have the added difficulty gaining a place in a school due to the impact on their funding considering funds would have already been delegated. How can this be addressed? How will the funding affect existing statements? Will these be systematically removed at the next annual review? Are the funds saved going to be used to provide additional specialist schooling to meet the needs of students? I think not, so will we lose this provision too? How would students be chosen to access EBD placements if NHS are withdrawing from diagnosis, teachers are ill equipped to make such judgements and statements are withdrawn? TA's currently are entitled to redundancy payments, will there be additional help to pay for the increase in funds needed? In summary, the needs of students will not be met, standards of achievement and behaviour will be reduced and students left 'outside the educational system' because they will vote with their feet or will face exclusion because staff are unable to meet their needs. The Inclusion Development Programme, due for completion by 2011 was designed by the DCSF to meet the needs of students and keep them within the system. This proposal runs counter to every principle in the procedures. Every Child Matters? - not in Lincolnshire
05.02.2010	Andrew Fulbrook	Headteacher	William Lovell School, Stickney	Thank you for your recent letter (undated) sent via an email which I received on Friday 29 th January. I have a number of questions and points that I would like to share regarding the proposals and the process. In October all Headteachers in Lincolnshire attended a series of briefings on this subject matter. I made copious notes during the meeting I attended and my understanding of the principles and more importantly, the next steps, as discussed then, varies from the proposal as presented.

Firstly, (and I refer to the PowerPoint slides as presented) we were informed very clearly of the process which would be followed, which was identified as: 1. Endorsement of our principles 2. Revise our inclusion policy 3. Feasibility study of special school provision 4. Working Group: delegated resources 5. Analysis of need 6. Consultation I do not feel I have been made aware of each of these steps; I am not convinced they have been completed. I would appreciate a detailed response to this concern (especially in relation to documentation that should have been presented for stages 2-5 above. Does this exist?) Furthermore, when I consider the detailed briefings I and other Headteachers have listened to about numerous other local and national initiatives (some trivial and some essential), I find it unbelievable that this huge shift is presented as a proposal for consumption and consultation without a formal presentation. A formal presentation, with an opportunity for questions and answers would seem to be a minimum requirement as we approach such an important issue which has direct consequences in terms of meeting the needs of young people. I am at a loss as to understand why we spent the vast majority of our time at the 'Boston cross phase meeting' last October discussing 'cluster' organisation of SEN funding. What has happened to this priority? Now to the detail of the proposal, at this point I have a series of questions to present: 1. As previously mentioned, this documentation is difficult to understand without a clear presentation. Can this be made available? 2. Why have our lead professionals (SENCOs) not had an opportunity to be involved?

Т	1	1		
			3.	How do we arrive at the new level of proposed statements?
			4.	Who will coordinate what was previously the multi-disciplinary assessment that led to the statement? In the case of children who would have been banded 1-5, will this level of assessment and decision making now fall to the school?
			5.	How will this be consistently moderated across schools?
			6.	What will happen with the current Banded allocations of funds identified (those students due to start in secondary schools in September 2010)? Will the commitments made be honoured? For example, it is more than reasonable to expect parents to test the legality of the allocation provided by individual schools under this new proposal if it falls short of the original commitment. From examples that we are aware of in this school, more and more parents are referring to the SEN Code of Practice to support their case under these circumstances.
			7.	In relation to the Proxy Deprivation Indicators: Although only accounting for 20% of the funding, these measures are notoriously unreliable. There are many social factors that impact upon this measure. Stigma of claiming free schools meals is just one! This in itself is a very real issue in rural community schools!
			8.	Furthermore, how do we factor for the student with a social, emotional or behavioural statement or those who have Autism but are high functioning academically or whose parents are affluent and who have good or above average prior attainment? This is a common scenario; I have grave reservations and fear that their needs will not be met!
			9.	In relation to Proxy Prior Attainment Indicators: There are many issues around the validity of this data. There is a potential risk that the pressure placed upon primary schools in relation to 'Achievement and Attainment' outcomes could translate to questions about the validity and accuracy of PA levels. This in

itself would have a negative impact on the allocation of funds to
meet needs. Furthermore, with a potential change in
Government, we could see end of KS2 tests or these tests
completed in secondary schools; given this scenario, the
adverse of my previous point could be true! Furthermore, in
recent years we have experienced questionable external
marking which has been a national scandal in the case of KS3!
10. Are there any 'costed' models published; given the current
wealth of data available about schools it must be possible to
present this information and compare it to the existing allocation
for all schools in Lincolnshire? This information is essential so
that we can make informed contributions to the debate and also
to allow us to attempt to plan for expenditure. It is my
understanding that in Derbyshire and Nottinghamshire, the
perception is that schools in relatively 'middle class' areas are
losing out to schools that are in areas of 'urban deprivation'.
11. Has any consideration been given to the staffing implications in
terms of stability of care and possible redundancies? This
problem is compounded because the proposed changes are due
to be implemented in April which disrupts the school year and
our whole school planning?
Gar more concer presuming.
12. Who would meet the cost of redundancies?
13. The logistics of completing this task without detriment to the
children are virtually impossible given the timescale. Has this
been considered?
both considered.
14. Is this money to be ring fenced? If not, why? Not to do so would
cause internal conflict in school and external distress for parents
and families.
15. Most importantly, has there been any consultation with any
parents of children who have SEN?
· ·
In summary, I would like to state that I am in support of the principle of
meeting the needs of our students. However, I am not convinced that
,

				this proposal will do so. I am very concerned that the proposal has not been effectively communicated and that opportunities to discuss the detail have not been offered. I am also particularly worried about the timescale and the lack of presentation and discussion opportunities at all levels. The consultation period itself is ludicrously short, with further detail presented mid point through the 5 day consultation period (email from admissions team and letter from Terl Bryant received on the 3 rd February). Above all, I am deeply concerned that individual needs will not be met due to insufficient funds being made available as a result of the inadequacies of the proposed funding model. I would like to thank you for the opportunity to participate in this consultation process.
05.02.2010	lan Wilkinson	Headteacher	Deeping St James CP School	 Re. Proposed changes to SEN funding Following a meeting of schools in the Deepings I would like to express my concerns about the potential financial impact of the proposed changes to schools like ours. Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+, should be challenged. A way forward could be, for SA and SA+ funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy indicators. Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. The transitional / protected funding for 1 year is insufficient.

				 Funding for current statemented children should be protected until they reach school leaving age. What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people? The potential impact of this proposal in some schools is likely to result in redundancies, leading to even greater pressure on school budgets and staff. All learners could be disadvantaged if the proposal is approved. In schools that are impacted by this process, presumably it will be the responsibility of the Head Teacher to inform parents, who are already used to a level of support, about the changes in provision? We would welcome the opportunity for further discussion about this proposal, prior to any decisions being made. I would request that the meeting be deferred, until a financial model is made available and the true impact of the proposal can be carefully considered.
05.02.2010	C Beckett	Headteacher	The Deeping School	 Re. Proposed changes to SEN funding Following a meeting, attended by representatives from the following schools; The Deepings School, Langtoft, Baston, Market Deeping, William Hildyard and Linchfield Primary Schools; we would like to express our concerns about the potential financial impact of the proposed changes to schools like ours. Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+, should be challenged. A way forward could be, for SA and SA+ funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy indicators.

				 Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. The transitional / protected funding for 1 year is insufficient. Funding for current statemented children should be protected until they reach school leaving age. What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people? The potential impact of this proposal in some schools is likely to result in redundancies, leading to even greater pressure on school budgets and staff. All learners could be disadvantaged if the proposal is approved. In schools that are impacted by this process, presumably it will be the responsibility of the Head Teacher to inform parents, who are already used to a level of support, about the changes in provision? We would welcome the opportunity for further discussion about this proposal, prior to any decisions being made. The cluster requests that the meeting be deferred, until a financial model is made available and the true impact of the proposal can be carefully
05.02.2010	E M Jordan	Headteacher	St Norbett's Catholic Primary School	Having considered with Staff and Governors the new SEN budget proposals we feel that Proxy Deprivation Indicators are unacceptable for a number of reasons At St Norbert's School, although there are 29% of families who would /are entitled to FSM at present, only 1 family claim.
				We wish to propose that funding be met using Proxy Prior Attainment Indicators. We have here in St Norbert's a rigorous Pupil progress and Tracking system. Funding must be based on children's individual needs ie PSED and CLL, Early Years and the KS1 Incremental level of attainment indicators.

				We also believe that the allocation of funding should be more transparent with separate allocations for children on SA, SA+ and for those children where we would normally apply to the LEA for a statement. This would reduce the paperwork and the impact would be immediate, allowing the schools to decide where the need is greatest. Support would be sustained for all children in need rather than 1:1 support only available once Statemented. This would eliminate the distress caused to parents and children whilst waiting for a Statement. We hope our proposal is accepted and we can move forward to support the children we have identified as being in most need.
05.02.2010	Elaine Niblett	Headteacher	St Peter at Gowts	I am replying to the proposed new arrangements for SEN funding as outlined in the recent correspondence. Proxy Prior attainment Indicators – 80% weighting Is the implication that all children not making expected progress are identified as having SEN? • Our children enter school significantly below National expectations. Excellent provision including increased staffing, ensures that our children now make at least good progress. • Children with special needs are identified through school's SEN procedures, as we become fully conversant with their requirements. • Does this mean that over time funding will decease as our attainment will be good? • We are a school with high mobility. Additional children with SEN either leave or join school throughout the year. Could you please explain how funding will be adapted for this? My concern is how schools are to budget effectively, if funding cannot be accessed according to the changing needs to the pupils on roll? • The implication is that a school doing less well will receive more SEN funding. Is this correct?

				Safeguarding present statements Staffing has been set for this academic year in line with the expected funding for statemented children. It is essential that this funding is safeguarded at least until August 2010, or preferably until the child no longer needs a statement. We need to know if this is not the case to put redundancy procedures in place.
05.02.2010	Margaret Johnson	Warden	King Edward VI Grammar School, Louth	At King Edward VI Grammar School, Louth ECM meeting we felt here was little time to look in detail at the proposals and we were not happy with them. Having been in touch with our Deputy Head with responsibility for Every Child Matters we totally agree with William Farr's Governors. Looking at other emails coming in to the Forum members today I am inclined to agree with a lot of what is being said. It is far too tight a timescale to consult with all Governors and even though, I am a member of the Schools' Forum, I too am not happy with
05.02.2010		The Governors	Holton Le Clay Infant & Junior Schools	We, as the governing body of the Infant and Junior School, do recognise the need for the proposed changes to the Funding Arrangements and acknowledge the reasons that have been put forward by the Local Authority. It certainly does feel very bureaucratic and time consuming for the staff at our schools and we can appreciate that it is true for the LA staff. Also, we believe that there has been an inequality within the existing system – there are times when pupils seem to be allocated statements by the panel and other pupils who certainly seem to have a stronger need, get turned down. Therefore, whatever system is operated for all banding and attached funding we need to feel that it treats children and families/schools equitably. Our two schools have established a great reputation locally for our Special Educational Needs provision, and this does attract families to Holton-le-Clay. Therefore, our main concern is that the suggested measures for delegating the funding will mean that the two school budgets could be substantially reduced whilst the needs of some of our pupils remain. Of course you do recognise the need for a

				transition to cushion such schools - of which we suspect we may be one - and that is a great relief, but the key question is – for how long? The deprivation indicators, prior attainment etc; are all very well but they can camouflage the percentage of pupils who require this level of support within a school. Our understanding of the proposals suggests that a school may have 10 pupils who fall into this category (let us assume that equates to a total 50 hours over a week) but the funding allocated within the school budget only really allows staffing to provide support for a total of 32 hours. How can an individual school balance that dilemma? How can we answer families who have approached the Local Authority SEN office and have been told that each school has the finances within their budget to provide extra support for their child? Would we have to tell the family that the money has run out in our school and that they need to find a school that hasn't used their allocation? We feel that there should be some indication or indeed guarantee, that those schools who find themselves unable, substantially, to fund the pupils who currently and in the future would be Band 1-5 would be recognised by the Local Authority. In that event, there would be someway of re-evaluating the funding received/allocated each year to that school. Not just a 'cushion' for the transition. In conclusion, we know that in our two schools we wish to provide the best possible outcomes for all our pupils and therefore we do need to feel that the future of any one of our pupils are not jeopardised by their postcode or the fact that they majority of the learners sat next to them are making expected outcomes or do not have free school meals!
05.02.2010	L Findlay	Headteacher	Brocklesby Park Primary School	We are not happy for the county council to make the decision for us. We would like the deadline to be postponed until there has been time to discuss and consider this proposal in much greater depth.
05.02.2010	Adrian Reed	Headteacher	Haven High Technology	I agree in principle with the proposals regarding additional needs / SEN funding. It has long been argued by head teachers that the statementing process is labour intensive and follow up annual reviews for all statemented pupils – particularly for lower band statements. The delegation of funding to schools will enable head teachers to plan

				support for children. I would guess that some schools may worry that due to their intake they may have a cut in funding. Data shows, however, that prior attainment, FSM and high levels of deprivation are good indicators for the number of children in a school that will need support. What will be of major importance is how the LA configure other support services (EBBS & PRUs) to support school in a cluster basis – this will compliment and add value to the proposals.
05.02.2010	Tim Clark	Headteacher	Spalding High School	Whilst the proposed changes will not make a significant difference to my school, I should be grateful if the point could be made that these proposals appear to have come out of the blue with little time for digestion and discussion.
05.02.2010	Liz Shawhulme	Headteacher	The Gleeds Girls' Technology College	Thank you for offering the opportunity to feedback on this most important issue. Whilst the concept of having the money in the budget upfront to better support the needs of our learners is attractive, the mechanics, I fear may be less so. Having gone through this process in my previous Local Authority, I feel that each school should have a worked model which shows what the implications could be for their funding – this is particularly vital at a time when indications are that budgets are going to be squeezed and when some schools are already forecasting budget deficits. Absolute transparency is vital. What will the SEN overall budget be in comparisons to current and how much will be held centrally. Presumably more will be devolved to schools as the process will be less bureaucratic, but unless this is demonstrated, I believe their will be suspicion and a feeling that this is a cost cutting exercise rather than a change to better meet the needs of young people. If students who currently have a statement are to keep these and they become monitoring statements with no monetary value, then this increases the load for SEN departments and I am concerned that in the future there will be no incentive for schools to identify students who would previously have been put forward for a band 1 – 5 statement if this creates additional administrative burdens and additional meetings.

				Thank you again for giving us the opportunity to voice our thoughts to you.
05.02.2010	Lynn Saint	Headteacher	Blyton cum Laughton C of E Primary	I am writing in response to the proposed changes to SEN funding considered by the Scrutiny Committee. In context, this school has 164 pupils and the SEN register accounts for 25% of the school population. One child has a band 3 statement. The school does not have a high degree of free school meals at 6%. It is a firm belief that parents entitled do not claim for a variety of reasons and the statement in respect of the increase in free school meals for the last three years could be related to the fact that there was no provision for hot school meals prior to 2005. We introduced hot meals in 2006, and now have 6% free meals which for this school is significant. Therefore to have free school meals as a prime indicator would be seriously detrimental in terms of funding for this school. The school does not have a high level of deprivation relating to home postcode at 0.1, yet we have a significant number of pupils with learning difficulties and rural deprivation is not taken into account in the deprivation measure. However this does not mean there are needs to be addressed and to have deprivation as a prime indicator would be seriously detrimental in terms of funding for this school, autism for example spans all social classes, post codes, and can affect learning. One child in school has a statement at band 3 and the process took five years. We are in the process of seeking statements for two other children, if granted the funding is likely to be of similar banding and it would seem much more effective for it to be processed in such a way that is more cost effective and the delegation of funding to schools would
				enable pupils to have their needs met as needed. It would seem the fairest way of allocating SEN funding would be through prior attainment indicators which are seen at the foundation stage, then in key stages one and two, although I would suggest to be two levels below expected progress is too great a gap before funding is triggered as all pupils, including SEN children at KS2 are expected to

				make two levels progress. The trigger should be based on average point scores with 4 points below average progress significant for funding. If the trigger is two levels then schools in a similar position to this school will be under funded and resources over stretched. This will lead to this, and other schools deemed to be failing their pupils who will not make expected progress. If the first proxy indicators of free school meals and deprivation levels are initiated then funding will become a post code lottery with many rural schools such as mine seriously losing out.
05.02.2010	Rachel Shaw	Headteacher	Branston Junior School	I am writing in response to the recently recieved information regarding the Children and Young People Scrutiny Committee. I am not sure (from reading the accompanying email) who I need to respond to, other than sending an email to yourself. I would like my views to be considered (if they are actually to be considered and this is not simply a paper exercise - this is no disrespect to yourself)I believe that funds for statements in mainstream should NOT be delegated. However I would certainly appreciate having the opportunity to discuss this in more detail with other Heads at a special meeting or a regional meeting, as there are many questions that I would like to ask to seek further clarification for myself, for the Governing Body and to be able to plan so as to ensure that the reduced funding that will be received by schools for children with specific needs, will not damage this school's capacity to provide opportunities for every child in the school to achieve to the best of their abilities. I do feel that this process of consultation has been somewhat 'rushed' in order that budget cuts can be achieved from April 2010, and feel most strongly that such an important decision can only be made by headteachers and Governing Bodies, when they have had ample information and ample time to discuss the potential implications for the pupils and their education - hence my request for regional meetings to discuss the issue in more detail. I do hope that my response and the responses from other headteachers is actually taken into consideration, when the final decision is made as to the allocation of SEN funding.

				Please could you inform me via email, if I need to send this email to anyone else other than yourself.
05.02.2010	David Airey	Principal	The Charles Reed High School	As the Principal of a small rural secondary school with a high proportion of SEN students (36% 2009-10) I am extremely concerned about the impact of the new arrangements. These seem to have been brought in with limited consultation with school leaders and other stakeholders.
				As stated we have an extremely high proportion of SEN pupils but are not situated in an area of deprivation nor do we have a high take up of FSM and I fear that we will be particularly hard hit. We have a reputation of providing outstanding care support and guidance in a small but safe environment. It is the reason that many parents/carers choose us. If these proposals go through the effect on students, parents and staff morale will be devastating.
				The current funding mechanism allows us to support all pupils, but especially those with SEN, so that they make outstanding progress as evidenced by our CVA score of 1045 which places us in the top 2% of schools nationally.
				I firmly believe that areas of deprivation need support but this should not be at the expense of other schools that currently provide outstanding care and support and have high numbers of pupils with SEN
				It seems to me that this is simply a way of Lincolnshire County Council fulfilling their commitment to areas of deprivation at the expense of others. As a school we are deeply concerned about the effects this will have on our ability to continue to deliver outstanding care, support and guidance. Over the years we have worked hard to raise aspirations and achievements of all our pupils and this will be compromised if the proposed funding system is implemented.
05.02.2010	F D Young	Headteacher	Cliffedale Primary Schoo;	We have considered the proposals for the delegation to schools of SEN Statement Funding for Bands 1 to 5. It is our view that the
	D Booles	Chair of Governors	·	criteria for the distribution of these funds will be extremely detrimental to pupils in this school who have additional needs at this level. The criteria for the distribution of the funds make too narrow assumptions about where pupils with additional needs will be found.

We do not approve of these proposals as they are. Wider discussion with schools should occur before any delegation of funding is implemented.
Please consider these comments with respect to the proposed next steps for the provision for children with additional needs.
Page 2 Principles.
(ii) Inclusion. All children should be in a local school is fine in principle.
However this should not be a doctrine for the integration of all pupils with additional needs into mainstream schools without ensuring that schools are adequately resourced to provide effectively for them.
Some pupils with additional needs are best provided for in a special school setting.
Furthermore if children with additional needs are placed in mainstream schools with insufficient resources to effectively meet their needs this can have a serious detrimental effect on the education of the other children without additional in the class / school.
We note that the response from the Lincolnshire Parent Carer Council to Councillor Hill dated 28.10.2010 includes similar comments to these, ref points 8 and 9 of the Chair, Therese Lord's letter.
Page 3: 1.4 The ideal of achieving a more streamlined process to get resources to children with additional needs to ensure that the money is spent more effectively is one that very few people would disagree with.
How the scarce and limited resources that are available are distributed needs considerable thought before any system is implemented.

schools similar Cliffedale. The measures make a blanket assumption that schools that do not 'score' very highly do not require so much funding in terms of meeting the additional needs of pupils. Whilst acknowledging that
numbers of pupils claiming free school meals the school based measure of deprivation and relative prior attainment will unfairly discriminate against the pupils with additional needs in
We appreciate that the current proposals for delegating funding have been considered with thought by the working group. However, we are concerned that the delegation of the funds from statements for Band 1 to Band 5 according to
How will the distribution of resources be decided in the local group? Which schools will be in which group? These are all important points if the use of funds is to be effective. There will have to be some form of organisation that will require the input of someone's time. These will be tasks which are currently not required of persons in schools at the moment. There has to be an increase in the workload of someone. There is a risk that delegated SEN funds will be used to fund bureaucracy at local level to make this idea of local cooperation work. Who is going to perform the coordination at local level to make it work? Schools are already at full stretch with current initiatives and demands on time. Will headteachers be able to undertake the task? There are problems recruiting new headteachers now because of the overload in the role.
Who will lead and coordinate at local level? Page 3: 1.5. This contains some ideals of what benefits the delegated system will promote for local schools and children with additional needs. However the proposal lacks specific detail. How will it work in practice?
We would appreciate if the following comments on the most recent proposals for the distribution / delegation of Band 1 to 5 statement funding are considered before a final decision is made.

there are schools with higher numbers of pupils with additional needs, it should not be assumed that schools that do not 'score' on the three measures automatically have no need of funding for pupils with additional needs.
There are limitations in the measures chosen.
Free school meals. There is mention in the discussion paper that hot school meals are widely available in primary schools. This is not the case in Cliffedale. It is also not the case in all of the Grantham area where the provision of hot meals in all primary schools has not yet been possible. Cliffedale has very few children claiming free school meals. If hot free meals were available the number claiming free meals would be higher.
The school based measure of deprivation, IDACI. This measure does not provide indication of the deprivation levels of individual pupils in school. It is an average measure of the total of all pupils. For example, forty six percent of pupils attend Cliffedale as their most local school and come from what are regarded by post code as less deprived areas but fifty six percent of pupils, for whom Cliffedale is not their closest school, come from a variety of areas that include post codes which give higher social deprivation indications.
This measure is contradictory to the current emphasis on Every Child Matters. It implies that pupils from areas of higher social deprivation matter more when it comes to meeting their additional / SEN needs. Children with special educational needs are not exclusive to areas of social deprivation.
Relative Prior Attainment. If too much emphasis is placed on this measure it would be more beneficial to a school not to bother too much about promoting pupil progression because, for example, high prior attainment at the end of Key Stage 1 will result in less funding under the proposals. Cliffedale, for example, puts a considerable amount of resource into providing

Teaching Assistant time in Years R, 1 and 2 to support our weaker pupils to attain as highly as possible. Existing Funds allocated through the LMS Main Budget Share Formula. Some of the schools that will benefit most from the proposed criteria for the delegation of funds already receive significant additional funding in their main budget share to acknowledge factors such as 'extraordinary social circumstances' and 'personalised learning'. These main budget allocations relate quite closely to the criteria in these proposals. Some schools already receive very little, or no, funding at all through these additional allocations. Funding for pupils on the SEN Register The funding for pupils on the SEN Register at School Action and School Action + is heavily moderated for Cliffedale School, and perhaps for schools in similar circumstances to Cliffedale, through the crude moderation process of an NFER / Nelson Reading Test in Year 4. This reading test takes no account of the range of children within the school who have special educational / additional needs. It assumes if a school has good reading attainment in one year group then the whole school has few children with SEN. For example, due to this process Cliffedale only received 41.4% of the funding that it would have received if all the pupils on the SEN register were fully funded for the amount in the LMS Budget Formula. The result was that the school received £ 9,540
instead of £23,100 in the 2009-10 financial year. We have had occasions when parents/carers, and those in positions in the LCC Additional Needs/SEN Dept tell us that we should use our SEN Register funds to support pupils. This is very frustrating when we know that 58.6% of that funding has been removed through a crude and dubious moderation system. It will add to this frustration if a further system is introduced that discriminates against schools such as Cliffedale through simple assumptions that we do not have many pupils with SEN / Additional Needs.

				These proposals will result in a further restriction on the funds available to support pupils with additional needs / SEN in this school. Please consider: The proposals recommend that the funds are delegated to schools 'by formula' (Page 7). If such a system is implemented we suggest that each school, irrespective of the scores in the three suggested criteria, receives a 'block' of funds through this formula to ensure that each school receives a minimum allocation for a financial year. If a school is left with no funding through this criteria how will it support the pupils with additional needs who would previously have had Band 1-5 statements?
05.02.2010	Patricia Ruff	Headteacher	Dunholme St Chads	Principles of proposal I fully support the principle to increase the capacity at school level to meet a wider range of pupils' needs. This would enable schools to • plan provision for pupils with additional needs in a more strategic way • gain access to resources promptly • ensure strategies have maximum impact. Funding Model and our School Context From my initial look at the funding model I have some concerns about how our pupils would be served based on the indicators proposed. It is difficult to know the impact of the proposed funding arrangements — would we be better or worse off? Our current profile is a follows • 7 pupils with Cognition and Learning Needs • 4 pupils with Specific Learning Difficulties • 8 pupils with Communication and Interaction: Autistic spectrum disorder • 3 pupils with Behavioural, Social and Emotional Difficulties • 10 with medical care plans including 3 with ADHD • 1 Looked After Child with PEP Statements, School Action+, School Action, Class Action • 2 statements of special educational needs

•	9 pupils on school action +
	40 minutes are a shared a still and

- 10 pupils on school action
- 9 class action

Looking at this profile against the proposed indicators there is

- no correlation between additional needs and FSM (only 2 pupils identified with additional needs receive FSM's)
- Little correlation between attainment and needs for those with Communication and Interaction needs or Behavioural, Social and Emotional Difficulties.

Therefore what funding will we have to support interventions for pupils that don't match the indicators? It would be useful to have an indication of what it would 'look like' for us.

Issues with current funding arrangements

We work closely with all relevant outside agencies to support a range of needs within the school.

Learning Needs

SEN funding, alongside school budget, enables us to provide additional support for learning intervention groups and one to one support. Where needs are related to learning children work together in groups and/or supported in the classroom and we are well supported by LSS (buy into service) and Dyslexia Outreach.

Communication and Interaction, Behavioural, Social and Emotional Difficulties

We are well supported by Autism Outreach and EBSS but the needs of individuals, who fall into these categories, are often complex and tailored specifically for a child, or the child needs close monitoring by an additional adult because of health and safety, or the child needs support at particular times for example transition and this is difficult to resource. As a result, for a number of pupils, we request inclusion funding, of which each child has a maximum of 4 terms funding. During this period either the intervention has worked or we have to consider the statementing process as a means of continued support. This can result in a time lapse in relation to funding.

				How will this be resolved through the new funding arrangements?
				 To successfully be an inclusive school we need the capacity at school level to: Address the profile of pupils with additional needs – which can change year on year (new system must ensure we don't have to prioritise one child over another because of limited resources) Plan strategically and put in preventive / supportive measures Resource a range of groupings to enable pupils with additional needs to work on social skills, emotional literacy, anger management, motivation, anxiety, work avoidance etc Have resources to deal with class dynamics when there are several pupils in one class with complex needs Flexibility
05.02.2010	Rob Reeve	Headteacher	Claypole CE Primary School	I have many concerns about the funding proposals but the fundamental concern stems from the apparent lack of involvement with the head teachers who will have to manage the effects of these new arrangements. It would seem to me that a significant section, of the stake holders in this issue, have not been involved with the processes. The true impact on this school is difficult to calculate given the information I have. I would like to see far more consultation and explanation of the rationale before any changes are implemented
05.02.2010	Heather Burns			 I disagree with the proposal for the following reasons The use of FSM as an indicator is flawed, at my school we have very few children receiving free meals but there are others who would be eligible if parents chose to apply. There is still a stigma attached to accepting them. Although deprivation may be a factor in SEN, children who do not suffer from deprivation may also have SEN and their needs seem to be overlooked in the proposed model. Use of prior attainment discriminates against children with SEN who have made good progress because schools have used their own resources to support them. Although I agree that there are currently inconsistencies between schools regarding the point at which children are placed on SA or SA+, the use of EYFS and KS1 data remains open to

				the same inconsistencies even though this data is moderated.
05.02.2010	John Gibbs	Headteacher	Harrowby/National Schools Federation	In response to the proposed changes to the allocation of SEN funding I would like to make several comments: My chair of governors and I support the necessity for change and can see the potential benefits of the proposed new funding system in targetting schools which may well have more need of the funding. However there are no models in the suggestions and it is difficult to see how individual schools would be winners or losers at this stage. The proposed re-distribution of SEN funds masks the problems of the generally low level of funding for primary schools through the Lincs LMS formula which is where the main debate should be. The timescale for response is ludicrously short and there has been no meaningful dialogue with schools through local heads' groups of these proposals. It is important that further debate is given to these proposals in order to avoid a system which fails to meet additional needs of substantial numbers of children whilst benefitting others through the lottery of their postcode.
05.02.2010	John Richardson		South Hykeham	My view is that I'd like the Local Authority to give us an indication of the impact on the current budget i.e.09 / 10 calculated using their proposed methods to give us a concrete example of how it would affect our school budget and thus our ability to meet special needs. Heads could then make an informed decision about whether the proposed system would work in their own schools.
	Julie James		Gainsborough	On the surface I believe the proposals to be fair ones. My questions would be:
				What about children who start part way through a year and are not on your school census? These children can occasionally, depending where

				you live socially, have a massive impact and require a lot of support. What is happening to bands 6+ Why have we only had one week to respond? This is a tight deadline on such an important issue!
				Are the figures for funding always going to be in our budget and clear for all to see —or are we going to be told — they are in our budget and we can't find them? We almost need ring fenced spending that is clear to all!
05.02.2010	John Beaven	Headteacher	Pollyplatt Primary School	I'm emailing regarding the Proposed Changes to Additional Needs Funding Arrangements; I don't support the proposal, at the moment, as I have a number of unanswered questions; • What about the transient nature of some SEN children? What happens if a child moves into your area with a statement, will funding be provided? What happens if there is an increase of FSM during the year, after funding is allocated? • Isn't illegal not to issue statements, what would happen to children who fulfil the criteria but fit into the 1-5 banding? Do we still complete the paperwork? The current system of statementing focuses on the needs of each pupil; I'm not sure how giving the funding to schools will still focus on this especially as it seems to be focused on statistic and not child-centred. The proposal seems to be yet another rushed through initiative focused on money at a time with we are encourage to focus on the needs of children. It needs proper consideration by all involved with the correct amount of clear information provided.
05.02.2010	Nigel Manders- Jones	Headteacher	Market Deeping Community PS	 Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+, should be challenged. A way forward could be, for SA and SA+ funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy

05.02.2010	Norah Walkley	Headteacher	North Hykeham Fosse Way	 indicators. Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. The transitional / protected funding for 1 year is insufficient. Funding for current statemented children should be protected until they reach school leaving age. What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people? The potential impact of this proposal in some schools is likely to result in redundancies, leading to even greater pressure on school budgets and staff. All learners could be disadvantaged if the proposal is approved. We at Fosse Way Primary School would like to register that we are not in favour of the new proposals for the revised funding for SEN as they stand. We believe that there needs to be more information sharing and an opportunity for debate in place of the very short consultation period.
				It is clear that that there will be winners and losers and while this is inevitable, using free school meals, deprivation and prior attainment as criteria for allocating funding for such a diverse and complex issue as SEN is not appropriate and does not reflect the needs of individual schools.
05.02.2010	Susan Bradley		Kirkby La Thorpe	I think everyone needs the opportunity to have this proposal explained in greater details, as I question quite a few of the statements. A series of meetings for all heads would give us the opportunity to discuss the proposals properly.
05.02.2010	Tom Emery		South Witham	Am in favour of the proposal. Seems sensible to delegate the spending power to those that know the children best and will be able to prove good value for money! From our location I can see a benefit but I am a little concerned with the possible or perceived 'loss' that some schools may experience (although there has been consideration given in the document). What about children beyond Band 5. Do we go through the general

			process for the additional, additional needs? (From a personal point I have a child that I believe needs full support to remain in mainstream schooling).
05.02.2010	Nicola Driffill	Nettleham Infant School	 How can the LA email out a presentation which contains their logo declaring 'Every Child Matters in Lincolnshire' when the policy changes being proposed show that this is clearly not the case? How does such a policy help ensure standards are kept high for children with SEN when funding depends on these children not achieving! This will surely lead to a dramatic dip in achievement in the end of FS and end of Key Stage One assessments as schools strive to secure adequate levels of funding. Such a policy penalises schools that try hard with a very limited budget to ensure support is in place to help children with SEN achieve. As a head I would have been very interested to hear the speech that went with the presentation emailed out to all heads this week. It looks as though it was designed to baffle and bamboozle people into believing that the way proposed is the best and only way. Could it be that some children on the SEN register in schools that are seen to be achieving high point scores do not in fact have their main difficulty in reading, writing or maths? Many children with high functioning Autism excel in certain subject areas but struggle with social and emotional aspects of everyday life. How will these proposals meet their needs? Why does the LA feel that children who live in areas which do not have a low level of deprivation not have special needs? Why are their parents seemingly not entitled to access the financial support necessary for their children to get appropriate help in school? Does the committee hope that these parents will privately fund extra support for their children? The proposed criteria suggests that deprived areas would be funded more favourably which is completely against the 'Every Child Matters' agenda. This document states that, 'Children will have access to the support they need regardless of their background or circumstances.' This is a totally divisive and unfair way of deciding funding levels. Because of the nature of its geogra

small rural pockets of extreme deprivation located within the
catchment areas of schools in areas perceived to be wealthy.
Parental choice also means that as long as there is a place and
parents can get their children to a school they may commute to a
nearby village that they feel would be better for their child rather
than an urban school. One child with specific needs makes a
massive difference to a class and school. A child with
specific needs can come from any social or economic group
in any area of the county. This is why specific funding for a
named child is so important.
The summary of the scrutiny committee states that Lincolnshire
has higher levels of statements than other LA's – could this be
that we need those levels for a reason? Natural variations within
the population will mean that some areas of the country have a
higher need for support than others. The causes of and the
numbers of Special Needs is surely not finite and it would be
unwise to 'cap' figures in an attempt to fit in with a 'National
Picture'.
Parental confidence will reach an all time low if such proposals
are put in place. Statements are not requested by schools or
parents on a whim. They are requested for children who have
specific needs. As a head I am more than aware of the stress
and strain many parents find themselves under when their child
goes through the system. Putting such a system in place would
make this task even more bureaucratic and time consuming for
the parent, child and school.
These proposals have been hinted at for the last four years but
thorough consultation has not taken place with the parties who
would be most affected by these changes. The time scales on
the documentation sent into school this week show that the
consultation began in October 2009 with a view to agreement by
Schools forum in the next few weeks. Most parents do not even
know this is happening and schools have not had time to put the
systems in place to cope with such changes in funding
effectively from 1 st April 2010. All of this at a time when schools
are being told by the LA that we have to continue to look for
ways to save money and work more efficiently.
These proposals will increase the workload of already over

children will be penalised when it comes to the funding formula. More so in our case as we are an Infant School. Where will the funding go based on our KS1 results? To us or the Junior School? If these proposals are to be in place by the 1st of April 2010 what happens to the funding for those children who have statements up to band five in school now? Will the funding that is to be put in place reflect the true cost to school or will it be a token gesture? If this is the case do you not think that SEN will be inundated with requests and requiring an increase in funding levels for these children due to an increase in their needs in an attempt to push them into band 6 or above? This would most certainly lead to an increase in one should be a suit on an increase in appeals and tribunal hearings with an increased cost to the LA. Does this include children who have funding for specific medical conditions? If this is the case the formula funding used again is unfair. You cannot control where children live when they get ill with such conditions as diabetes and leukaemia. Under these current proposals these children or the rest of their class will loose out on support. Schools and parents would not be so worried if they could be assured that the funding being delivered is adequate to address the needs within each individual school, not just a token amount which would provide minimal support. The current SEN funding is low when you receive £7550 for 19 children at SA and SA+ for a whole year (based on PLASC 08/09). Our school pays £2440 for a specialist teacher to work 1:1 with those requiring extra
reading and phonics work. We also have teaching assistants in our Y1 and Y2 classes to support individuals and small groups at a further cost of £19, 590. We also ensure that the school SENCO is released on a weekly rota to observe and advise on children in school. As a school we have made that decision to enable all our children to succeed, but it is impacting on our main budget at a time when we and other schools in similar positions can no longer afford it. Schools have to assess children using outside agencies which is

				 also under funded and overstretched. Schools cannot secure the time of these professionals without a long wait. These delays in intervention mean that opportunities are lost and schools have to put their own systems in place to ensure that children do not fall too far behind their peers. The current Governments aim is for every child regardless of their background to have the support they need to: be healthy stay safe enjoy and achieve make a positive contribution achieve economic well – being
05.02.2010	Heidi Dows	Headteacher	Tetnet Primary School	I have considered the information with my SENCo and we would like to raise the following concerns; Although something needs to be done re funding, we are concerned that our low take up of free school meals and the fact that we are not in a deprived area and generally have good foundation stage results, will mean that we will lose much of our current funding. I understand that there is plans to cushion schools like us but over time this will continue to be an issue. We have 3 statements running at the moment and we're not sure how they would continue to be funded. We are also about to go to ARM re a child with significant behavioural and learning difficulties who needs 1:1 support and it is unclear as to how this process will be affected and how we can ensure he gets the help he needs.
				Would there be any protection against redundancy of any 1:1 TA's if we did not have sufficient funding for them to continue in their role. Children with SEN do well at our school, because of the level of support we are able to give due to the statementing process. We do not want the support we are able to offer to diminish because of lack of funds.

				We do think it is a good thing that the school be given money at an earlier stage to support children who may have needed a statement. If money was in a school's 'statement budget' then we know we can get support to that child quicker, but thinking of reception children who may arrive with significant needs or children who have moved to the school, if the school's budget has already been allocated - what happens then? I appreciate that some of these comments may be due to my lack of understanding (especially as I have only been in Lincolnshire for 18 months) but felt it was important to raise them.
05.02.2010	Lynn Findlay	Headteacher	Brocklesby Park Primary	We are not happy for the county council to make the decision for us. We would like the deadline to be postponed until there has been time to discuss and consider this proposal in much greater depth.
05.02.2010	Cherry Edwards	Headteacher	Bourne Abbey CE Primary School	I am writing to you in your role as a Head teacher representative on the School's Forum regarding the proposed new funding arrangements for SEN. It was with some surprise that I received a document outlining the proposed new funding arrangements for SEN in Lincolnshire without having had a period of full consultation for heads, governors and parents. Senior colleagues and governors at Bourne Abbey believe that the proposed new funding model is notable for the questions it leaves unanswered and in addition there has been no attempt to draw up any example models relating to the effects that the proposals will have on schools. From the information given in the document as it stands Bourne Abbey would have the following questions to ask as well as concerns that we wish to be convinced will be addressed. Deprivation Indicators - Free school Meals Will there be in year census points and additional adjusted funding to reflect agreed threshold % levels of increase in pupil numbers? Relative prior attainment of pupils
				Relative prior attainment of pupils

 pupils. (Often putting a great deal of funding into targeting SEN provision) Why should low performing schools in terms of quality of overall provision receive high funding re this factor? To mitigate the impact of skewing funding in this way there needs to be weighting given to 'on entry' attainment scores to Foundation Stage (Reception), rather than, or as well as end of Foundation Stage scores. The LA is in a position to make this data and information readily available. If some schools do not submit this on entry baseline data then it is a good incentive for them to do so. This should be happening anyway! Needs to be weighting re mobility of SEN pupils into Yrs 3 – 6 related to the suggested attainment criteria at end of KS1. Perhaps pick up this data at the end of Yr 4 and keep SEN contingency to adjust funding for individual schools accordingly. 'Some statements of need for low and moderate level of additional need will still be issued especially where there is low parental confidence or the need is not fully understood or could become more complex. In these cases the statement would identify the appropriate facilities, arrangements and resources to be found within the schools budget.'
 down approach. There will be little or no incentive for schools to apply for such statements (1 -5), as they will know and in many cases be concerned re the cost implications. Therefore with regard to this statement Who will request such a statement? Who will draw together the evidence for such a statement? Who will identify appropriate facilities? 'low parental confidence' Will this mean 'those parents who shout the loudest'! Such statements will inevitably carry with them parental expectation for the rights of their child. Will the LA then tell parents that the school already has the funding in their budget

				very stretched and may not match up to such expectations? Experience of working in other authorities leads me to believe this will happen. • Pupils with current statements 1-5 are eligible to attend MLD schools. Will the criteria change to still enable this category of pupils to be able to access such schools without statements? This is really crucial. Mobility of Statemented pupils. Will All current statements for mobile pupils within County and from out of County be honoured and fully funded through in year or end of year funding adjustments. How long will this continue? Will it continue for all bands? If not the cost implications will be more than some schools can bear. We would ask you please bring these questions and concerns to the School's Forum on our behalf and emphasise that Bourne Abbey believes that these proposal should not go ahead without a period of full consultation.
05.02.2010	James McCullough	Headteacher	Langtoft Primary	 Re: Proposed changes to SEN funding Following a meeting, attended by representatives from the following schools; The Deepings School, Langtoft, Boston, Market Deeping, William Hildyard and Linchfield Primary Schools; we would like to express our concerns about the potential financial impact of the proposed changes to schools like ours. Why is the forum taking this decision, when statutorily decision making is outside their remit? The vote should be unbiased, and should not be influenced by forum members own school. Issues surrounding SA and SA+ funding and proposals to distribute funds under the new proposals will have a major financial impact on schools. The abuse and lack of accountability in determining whether a child is SA or SA+ should be challenged. A way forward could be, for SA and SA+

				funding to be monitored with immediate effect as opposed to being devolved in accordance with the proposed proxy indicators. • Why hasn't there been any financial modelling put forward to accompany the proposals? This would allow individual schools to assess the impact, whether positive or negative. • The whole consultation process has been rushed and has not allowed for the involvement of all stakeholders. • The transitional / protected funding for 1 year is insufficient. Funding for current statemented children should be protected until they reach school leaving age. • What evidence is there to prove that the proposal will result in improved provision and better access to support for children and young people? • The potential impact of this proposal in some schools is likely to result in redundancies, leading to even greater pressure on school budgets and staff. • All learners could be disadvantaged if the proposal is approved. • In schools that are impacted by this process, presumably it will be the responsibility of the Head Teacher to inform parents, who are already used to a level of support, about the changes in provision. • We would welcome the opportunity for further discussion about this proposal, prior to any decisions being made. The cluster requests that the meeting be deferred, until a financial model is made available and the true impact of the proposal can be carefully considered.
27.02.2010	Angela White	Chair of Governors	William Farr	At the schools last Full Governing Body meeting and at a more recent Learning Support Committee meeting, governors were informed of a presentation on Additional Needs given to the November governor partnership meeting, as part of the agenda. A number of concerns were expressed by governors and professional staff concerning the proposals, and the governing body has asked me to write on its behalf to outline some of the issues it has.

1 Lack of consultation The school and our Learning Support Department have not formally been made aware of any proposals. A working group has been set up, but neither school staff nor governors have been invited to participate or have input into its work. There remains concern that the process has already begun and may reach a conclusion without any input on our part.
2 Reduction in statements There is a general consensus of opinion that the local authority intends to reduce the number of statements provided at primary level. Governors feel it inappropriate to reduce the system of statements, which offers help for many students with difficult needs. They wonder what the provision will be for children who would have received statements. The amount given per pupil for School Action Plus of £736 would not provide sufficient funding to cater for children who would otherwise have received a statement.
3 Closure of special schools Governors are concerned at the suggested intention to close special school provision. The school is not set up to cope with children with moderate or severe difficulties, nor does it have the facilities. There is a fear that this could not only affect the learning environment and educational standards of the existing students, but represent a huge cost to the school.
4 Finance The governors strongly feel that the first concern should be appropriate support rather than funding and that the proposals appear without consultation to be driven more by a desire to save money than to provide support for the child. There is again scepticism that sufficient funding will be available to provide adequate support, as the funding would be diluted across a number of schools.
5 Lack of support from outside agencies Governors have recently heard at the Learning and Guidance Committee from professional staff at the school about the lack of support from

				outside agencies. Staff reported that the school had no Educational Welfare Officer for 3 months, and that out of 3.6 staff covering the area, 3 full timers were on sick leave. There is no longer and individual school nurse attached to the school, which means a lack of continuity for students and the school. Many qualified staff from the Emotional and Behavioural Support Service had left. The pupils Out of School Unit was unsure about its future and the educational psychologist was difficult to contact. On one occasion at a Team Around the Child (TAC) meeting, the school was the only agency in attendance. No other outside agency was present. The outside agencies and the school are overwhelmed by the sheer numbers of students requiring support. There, therefore, remains a great deal of scepticism about access to services to meet the child's needs mentioned in the presentation. The Governing Body would like you to register its concern and, if at all possible, involve itself and its professional school staff in the working group, which is looking at these proposals.
05.02.2010	Ian Widdows	Giles School	Deputy Headteacher	Please see below some queries/comments regarding the proposals for changing the funding arrangements for additional needs. I hope you will be in a position to take these into consideration within this consultation. Consultation Process I attended a briefing meeting in October (for Head teachers) where some of these issues were raised. I am concerned, however, that the processes as outlined at that meeting have not been made clear within this consultation. In particular I would be very interested in details of the resources used by the working group. I would have expected to have had the information in the pack (e.g. the scatter graphs used to indicate a potential correlation between Additional Needs, Prior Attainment and measures of deprivation) presented more formally (perhaps a brief meeting?). The time scale for this consultation is very short. The initial email which outlined the consultation was received in school on Thursday 28 th January. The deadline for views on this to be sent by 5 th February gave me one week for this to be carried out. The problem with this short timescale is exacerbated by the fact that

	Headteacher	further details were sent to schools on 2 nd February. I have some concerns that the role of consultation has effectively been delegated to representatives on the School's Forum. The secondary Head teachers on this forum do not come across all areas of Lincolnshire, with four out of the six Head teachers coming from a limited geographical area to the north of Lincoln. Proposals The drive to make these changes appears to be concerns regarding the complexity of the current system. Have other considerations been made to reduce the bureaucracy associated with this to make this system more effective? I would have appreciated the opportunity to compare fully costed models, so that realistic comparisons regarding these allocations could be made. The measures which are being considered to be incorporated into this methodology have limited reliability (FSM, IDACI and KS2 results). Can we be sure that these will identify the needs of a school more effectively then the work of a professional (to identify levels of Special Educational Needs)? Rather than being based on an identification of learners needs (and funding being provided to meet these), the new model appears to be a division of a county budget. Is the real 'Direction of travel for Additional Needs' a reduction in levels of funding? The proposed model removes a level of responsibility for a school to meet the specific needs of individual students (based on identified Additional Needs). I am in full support of making the system more efficient and ensuring that funding is delivered to the point of need. I do have concerns that i) the new methodology is flawed from the outset and that ii) the consultation process has been in no way thorough to really consider all of the alternatives. We should like to express my concern to the proposed changes to
IIr Mrs B Wells		Additional eeds Funding in Lincolnshire.

05.02.2010	M A Guest	Headteacher	Sir William	 From looking at the documents I would like to make the following points. We believe the consultation process was flawed because the Stakeholder Group is not a fair reflection of those affected, the Stakeholder Group was told that the pass-porting of funds was going to happen, the consultation was in connection to the process only and the issues raised were not addressed; Only one model of proxy indicators was presented to the group, again no effective consultation as to the process; The process has been rushed through and the proposed transition of 12 months is too short; The allocation of funding relating to prior attainment and income deprivation does not cater for students who may have a physical impairment or be on the Autistic Specturm; Nottinghmshire is being use as an example of good practice but parents and schools in Nottinghamshire do not support the outcomes. The stated outcome of the pass-porting was to get funding to schools without the time delay and cost of assessing for a statement. The proposals will delegate some funds to schools but the savings made is not assessing and the administrative savings of not processing reports etc is not being passed on to schools. This is a missed opportunity to get more money to the children who need it; The Lincolnshire AWPU is so low it is unrealistic to state that it should cover predicable need. This is particularly is large schools because of the favour shown to small schools through formula weighting; The support for students who have benefitted from a Learning Support Assistant will no longer be sustained because of funding cuts which will not be supported by parents In summary the documentation indicates that the core focus is to meet student need and support real student outcome. As the points above show, this will not be the case for the majority of students.
-	J Dixon	Chairman of	Robertson High	proposed changes to SEN funding in Lincolnshire.

Governors	School	
Governors	School	The proposal to delegate funds by formula, to mainstream schools for Statements in Bands 1-5 is being promoted on the basis that it would 'achieve a more streamlined process to get resources to children with additional needs through quicker and earlier access to support services in schools and redirection of resources to ensure that money is spent on services rather than bureaucracy.' However, having spent tweleve years teching in Nottinghamshire and working within this model on a daily basis, I am well aware of how the system operates in practice. Headteachers and SENCOs are continually frustrated by the consistent refusal of the Local Authority to issue Statements and to quantify need. In Nottinghamshire, Additional Needs' Funding is based upon national curriculum attainments and the number of children receiving free school meals. This funding (alongside AWPU) comes nowhere near to the actual costs of supporting SEN pupils in school. This presents schools with a dilemma: either to use funds which should be designated to other areas to provide appropriate support, or to reduce the level of SEN support to pupils. In my experience I have
		never found a Headteacher, SENCO or parent of a child with significant needs in a Nottinghamshire mainstream school who would argue that SEN funding in the Authority is either transparent of equitable. The proposed model for Lincolshire is predictated on a similar funding model to Nottinghamshire (i.e. free school meals, income deprivation and prior attainment in Key Stage 2 tests). We currently have 35 Statemented pupils within our cohort of 521 Lincolnshire pupils – far higher numbers than the average nationally for schools of this size. Parents frequently cite a s a key reason for choosing this school its inclusive ethos and effective track record of working with SEN pupils. However out pupils generally have good prior attainment at Key Stage 2, the school overall has a favourable IDACI index and our parents are traditionally reluctant to claim free school meals. As a result schools such as my own – and there are many across Lincolnshire – will lose out significantly on SEN funding. Pupils with pronounced and demonstrable needs will continue to attend
		this school, but without the funding to support them effectively. Given

		the already tight budget situation for many schools, this will only serve to increase deficit budgets and will force schools to look to redundancies to balance the books. I understand that after the traditional funding there will be no additional help with redundancy costs. There seems to be no appreciation that pupils are on a five year journey through the school and we cannot cut them adrift when the funding model changes. Unfortunately the Local Authority proposals will leave schools to manage the parental outcry which will certainly emerge. Pupils who would traditionally have benefited from a Learning Support Assistant will find that support can no longer be sustained due to the funding cuts. My experience in Nottinghamshire tells me that parents who complain to the Local Authority about the lack of support provided in schools are simply told that the money is already in the school budget to provide support for their children. I would certainly hope that this would not be the response from Lincolnshire since for many schools like my own this will patently not be the case. As the percentage of our pupil roll with Statements has grown year-on-year, we have contested the admission of further Statemented pupils to our school from beynd our designated transport area. Despite expressing our opposition to admitting these pupils through the formal Local Authority consultation process, the wishes of parents to gain a place at the school have consistently been upheld. This is not taken into account in the proposed LA funding model for SEN. Having been instructed to admit these pupils by the LA against our wishes, funding is no longer guaranteed by the LA for their support. Inevitably this will impact on the school's ability to deliver an effective and efficient education to all of its pupils. I should welcome a response from the Local Authority to the points I have raised. Thank you in anticipation.
31.02.2010	Comments	1.1 - inclusivity is difficult with bands 1-5 because of the low levels of funding involved and "effective use of resources" is fine in principle, but in practice we don't get much support, for example EBSS input is limited and dyslexia outreach has been cancelled

				 1.4 - the money we get for SA and SA+ barely covers a TA salary 1.10 - how is there going to be any consistency around what a school defines as the needs of a child? 1.16 - the criteria indicated here won't help with funding for dyslexic students where there is less of a link to FSM or income deprivation Concerns that there will be a rush of applications for statements in the
				next few months. It would be nice to have stability of contracts with a core of TA staff, but if resources reduce so will the number of TAs that we can employ. This in turn will lead to a greater need for training for teachers around differentiation in their classrooms if additional support is not available. The outreach we get now is limited - apart from the EP and EWo we get very little at the moment.
05.02.2010	Karin Nicholls	Headteacher	Hogsthorpe School	In response to the changes in the mechanism for SEN funding, proposed by the 'stakeholder group', I am writing in my capacity as Headteacher of Hogsthorpe Community Primary School to register my reservations to the revisions outlined. My concerns are as follows: While the current statementing process is overly long and extremely time consuming it serves an important purpose. At the end, an individual child has their precise needs and the actions that should be taken to address them documented transparently. It is a legal document that parent/carers, schools and the LA can have confidence in. The new proposal would abolish this for many children. In the current process the statementing panel act as a 'quality control' ensuring that a child will receive appropriate support irrespective of the school they attend. Who will monitor the provision in every school? ever greater responsibility is being transferred to schools. Without the formal statementing procedure for bands 1 – 5, schools will find themselves under ever greater threat of litigation from parents who feel their child needs more and more. This will be fuelled by the fact that

				schools do not all have identical provision. As a very small school with limited staff could we provide with the same as a larger school? The proposal states that "Some statements will still be issued especially where there is low parental confidence or the need is not fully understood or could become more complex." This sounds as though a vocal, articulate parent will be able to excerpt pressure. Who will speak for the less articulate parent? Who will decide if the need is fully understood? schools have to take more responsibility the workload of SENCos will also increase. The likelihood is that a school like ours, with above average levels of special needs, will find that the workload increase disproportionately to the funding it attracts. e funding formula is too simplistic. Schools like ours on the coastal strip, are subject to high levels of pupil transience and there is no mechanism to allocate additional resources to support children who are admitted mid-year. It appears as though a school would have to fund support for a child admitted in September through its own resources to the detriment of others. The formula only recognises learning needs. FSM and IMD data may not be an accurate measure of emotional and behavioural needs. The formula does not reference medical needs.
05.02.2010	Rebecca Green	SEN Governor	St Michael's Thorpe on the Hill	Further to your information regarding the above issued to parties on 2 nd February 2010, I write to give my displeasure at the proposals that are trying to be hastily put through. My first comment is with regard to the Stakeholders. No explanation as to how the Stakeholders were put together has been explained. There is a distinct lack of representation. Certain schools are represented but smaller schools are not. Also, the schools which are represented will surely have a Conflict of Interest when it comes to deciding the percentage of money that schools should receive. How will this issue be addressed? There is a high proportion of Council Stakeholders which is slightly defeating the object of putting it into the schools hands when the Council are still "running the show".

Whilst The Priory is a fine establishment I find it hard for them to be on a panel for Special Educational Needs when their own SEN is very lacking. It is agreed that School Action and School Action Plus is working well since the Local Authority delegated the funding. However, I question why all the money needs to be put in "one pot" with the Additional Needs. This again is taking it out of thee schools hands and limiting the funding that they need for this. It seems to me on this point alone - if it isn't broke don't fix it!! I previously stated that these proposals are hastily being put through. The Forum met on 2nd February 2010 and you require a response before 9th February 2010 when you meet again. This gives schools little time to digest the information put to them. This has gone out to our Governors by email as we do not meet till 10th February 2010, therefore we cannot discuss fully with them the implications of the proposals and how it will impact on our school. There has been a lack of consultation between Head teachers. SEN Coordinators and SEN Governors. I certainly haven't been asked to attend any meetings regarding this issue so that every point could be put across clearly. Your letter itself to all Head teachers and Chair of Governors (no mention of SEN Governors) is dated the 15th February 2010. This may be a clerical error but shows swiftness in which you wish to get this information out!! I fully agree that the current system is not working effectively enough. Our school alone has had many problems getting outside Agencies to look at our children to which we have complained on numerous occasions. However, I fail to see by your proposals how you will change this. It is plain to see that the schools in deprived areas will get a hefty amount of the money and other schools will be overlooked.

05.02.2010	M H Duncalfe		Alford Primary	It is not essentially the school that needs the money it is <i>the child</i> . I think more investigation and explanation needs to be made in the area of Transitional Protection. The words win and lose do not inspire confidence for our children. In conclusion, significant work between October 2009 and January 2010 may have been done between the Stakeholders but little work has been done with the schools. This proposal needs more consideration as a whole and the impact it will have on the children it involves. I shall not therefore be recommending it to the Governors of our school on 10 th February 2010 as I cannot honestly see how our children will benefit from the proposed changes. Further to your request I am writing to let you know that at present I am
00.02.2010	Will Duncaire		7 moru i iiiiaiy	against the new proposals for SEN Funding. I am particularly concerned that this change will be made before it has been possible to analyse what the impact will be at individual school level. In addition, as schools we will be vulnerable to the LA controlling the gateway to statementing. This could result in schools struggling to provide for children and having no access to further support.
05.02.2010	Lesley McKenzie	Administrator/Clerk to the Governors	Moulton Chapel PS	 This will have a big impact on this school. Governors' comments from their meeting held on 4th February 2010: Is there a Contingency Fund for the situation of a child coming to us part way through the year when we have not received funding in the Base Budget through the proposed formula? How will the formula/allocation of funding allow for a new child joining a small primary (under 100 pupils) who has significant needs (although this may be within Bands 1-5). Is there a Contingency Fund that will provide for this circumstance?

				 What about inflation – increase in salaries – will this be taken into account year on year? How will inflation be taken into consideration for total of devolved budget and adjustments to the formula on an individual school basis year on year? Will the Additional Needs funding be ring fenced or will school need to identify the funding and monitor its expenditure? Will a return have to be made to justify the use of funds? (Additional administration required – with financial implications). Will unused funding be clawed back at year end? SENCO workload will greatly increase when more responsibility is delegated to school for identifying and ensuring provision is adequate for child's needs. How will this be funded? Deprivation does not equal SEN! This criteria does not do our school any favours. Children from affluent families still have SEN. Tying funding to deprivation is wrong.
05.02.2010	S. M Manders	Chair of Governors	St John's Primary School	As Chair of Governors at St. John's Primary School, I would like to voice my concerns regarding the proposed changes to funding. If the proposed changes go ahead: v St. John's School is in danger of losing funding. The postcode does not always give an indication of need and Bracebridge Heath in particular has a great deal of hidden needs v The needs of children with multiple SEN needs will not be met if funding is devolved, especially if they happen to be in a postcode area where SEN needs are deemed to be low v This is a cost cutting exercise going back to the 70/80's where many special schools were closed v Other pupils will be discriminated against if there are several children

with SEN needs and no funding to support them because of postal addresses
v School meal take up does not accurately reflect SEN needs, especially in dormitory areas around Lincoln
v Statements are needed to ease the passage of children between Schools and to secondary schools