

Cabinet

8 January 2019

Name of Cabinet Member

Cabinet Member for Education - Councillor K Maton

Director Approving Submission of the report:

Deputy Chief Executive (People)

Ward(s) affected:

All

Title:

Outcomes of the Fair Funding Consultation 2019-2020

Is this a key decision?

Yes – the proposals in the Fair Funding Consultation 2019-20 will affect all schools and all providers of funded early years education the City.

Executive Summary:

This report is to inform you of the results of the consultation on proposed changes to the Fair Funding Scheme of Delegation ("the Scheme") and seek approval for recommended changes to the Scheme and the Fair Funding Formula.

Recommendations:

Cabinet is requested to:

- (1) Approve the recommended changes to the Fair Funding Formula and Fair Funding Scheme of Delegation, which are summarised in section 3 of the report.
- (2) Delegate authority to the Cabinet Member for Education and Skills, following consultation with the Director of Education and Skills, to make any necessary amendments to the final detail of these recommended changes, in order to comply with the School Finance (England) Regulations 2018 once full detail of the schools funding settlement has been published by the Department for Education for 2019/20. Any changes will be made following discussion with the Schools Forum as appropriate.

List of Appendices included:

Appendix 1 - Fair Funding Consultation 2019-20: Summary of Responses
Appendix 2 - De-delegation levels approved for 2018-19
Appendix 3 - Fair Funding Consultation 2019-20

Background papers:

None

Other useful documents:

Draft Fair Funding Scheme of Delegation available on the Coventry City website:
<http://www.coventry.gov.uk/ffsd-consultation>

One Strategic Plan – SEND proposal for the use of the Woodlands site

Has it or will it be considered by Scrutiny?

No

Has it, or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title:

Outcomes of the Fair Funding Consultation 2019-20

1 Background

- 1.1 Under Section 48 of the School Standards and Framework Act 1998, Local Authorities (LAs) are required to have schemes of delegation which set out the financial controls and arrangements that will operate between schools and the LA. Any proposed revisions to these schemes and/or the Fair Funding Formula must be the subject of consultation and require approval by the Schools Forum.
- 1.2 The Department for Education (DFE) published the "Schools Revenue Funding 2019 to 2020: Operational Guide" which sets out the school revenue funding arrangements for 2019-20.
- 1.3 The DFE introduced its National Funding Formula (NFF) for LAs in 2018-19, whereby allocations for LAs were determined under the NFF approach, but LAs retained control over how they chose to distribute that funding amongst their schools. In Coventry the decision was made to mirror the NFF allocation for schools as far as possible as this provided all schools with a minimum 0.5% increase in funding per pupil.
- 1.4 There have not been any significant changes to the operation of the local school funding formula for 2019-20; with the main changes (including a new funding floor factor) aimed at providing flexibility to allow LAs to honour the Funding Floor (a net 1% per pupil funding increase compared with 2017-18) as set out in the NFF (see section 2 for further detail). In this report we are proposing to make some corresponding changes to the funding formula, and are seeking approval of the Fair Funding Scheme of Delegation.
- 1.5 The consultation document was circulated on the 5th November 2018 to Head Teachers including Academy Head Teachers/Principals, Chairs of Governing Bodies, Trades Unions, Diocesan authorities, the Coventry Governors Association, members of the Schools Forum and Early Years Free Entitlement providers in the private, voluntary and Independent (PVI) sectors. The 4-week consultation period ended on 30th November 2018.
- 1.6 Stakeholder groups were briefed throughout the consultation period. These included Primary and Secondary Head Teacher Partnerships, Primary Finance representative head teachers, the Schools Trade Union representatives, Coventry Governors and the Schools Forum. The consultation document also seeks to act as an information document to school stakeholders regarding anticipated local budget pressures.

2 Context of the National Funding Formula

- 2.1 The DFE implemented a 'soft' National Funding Formula for the 2018-19 and 2019-20 financial years. This means that the DFE will run the NFF for each school and the sum total of Coventry schools' allocations will become the total budget available for schools in Coventry. The LA is still required to go through the usual budget setting process and run the local schools funding formula to distribute the resource.
- 2.2 The national announcements surrounding the 1% increase over two years, and the publication of individual school allocations, set a level of expectation that all schools would see at least a 1% per pupil increase in their funding vs 2017-18 allocations.
- 2.3 It remains the case that the pure NFF (without any protection) delivers significantly less resource for Coventry schools. The estimated value of protection in 2019-20 for Coventry schools is estimated to be £11M. It is not clear what protection arrangements will be in

place after 2019-20 as this will be subject to the Government's forthcoming Comprehensive Spending Review.

- 2.4 Further background on the National Funding reform and full details of the following proposals can be found in the Fair Funding Consultation 2019-20 which is included in this report at appendix 3.

3 Options considered and recommended proposals

3.1 Fair Funding Formula options

- 3.1.1 As a result of the continued application of the National Funding Formula (NFF) we consulted on 2 options in relation to the application of the schools funding formula:

Option A) Continue to mirror, as closely as possible, the allocations and protection arrangements set out in the NFF; meaning the majority of schools will see a ca. 0.5% per pupil increase (subject to affordability)¹ compared with 18-19.

Under option 1 all schools would have received at least a 1% per pupil increase in formula funding between 2017-18 and 2019-20 (as set out in the NFF), although eight schools that received an increase above 1% in 2018-19 would see small reductions, but remain at or above the minimum 1% increase level received by all other schools.

Option B) Move away from mirroring NFF allocations and protection levels as closely as possible, instead protecting all schools with an equal, but reduced (<0.5%), protection level per pupil compared with 18-19 funding allocations.

Under option 2, all schools would see an equal increase in per pupil formula funding between 2018-19 and 2019-20. However, under this approach no school will receive an allocation in line with those published as part of the NFF detail.

- 3.1.2 The consultation document asked stakeholders to feedback any general comments on the proposal. The consultation responses received were mostly in favour of option A. Please see appendix 1 for a summary of the responses.

- 3.1.3 The Schools Forum, which contains stakeholders from all representative groups, voted unanimously to recommend option A. Primary Finance representative head teachers were also in favour of option A.

- 3.1.4 **Recommendation:** The LA should calculate school budgets which continue to mirror, as closely as possible, the allocations and protection arrangements set out in the National Funding Formula (NFF) documentation (subject to affordability).

3.2 De-delegated Services

- 3.2.1 The 2013-14 reforms directed that a number of centrally held budgets within the Schools Block should be delegated to schools, listed below;

- administration of free school meals eligibility;
- insurance;

¹ For a number of factors within the NFF, the funding for LAs is based upon historic cost – our ability to fund the additional 0.5% will depend on the extent to which our future costs are higher or lower than the historic funding.

- licenses or subscriptions;
- staff costs or supply cover;
- support for minority ethnic pupils or underachieving pupils;
- behaviour support services; and
- library and museum services
- school improvement

3.2.2 These budgets have to be allocated to schools through the formula but can be de-delegated for maintained primary and/or secondary schools. This means that these schools can chose to pool resource to continue delivery of a service centrally.

3.2.3 In 2018-19 Primary maintained schools opted to pool resources for most of the de-delegated services offered. Trade Union facility was not de-delegated by secondaries. The same de-delegation arrangements are available in 2019-20.

3.2.4 De-delegation items must be approved by Schools Forum with Primary and Secondary maintained member representatives deciding for their own phase. The table within appendix 2 shows the values approved for de-delegation in 2018-19. School phases can also opt to de-delegate resources for services previously delegated.

3.2.5 Approval has already been given by the Schools Forum for 2019-20 to de-delegate the areas previously de-delegated last year. The only centrally managed service offered that was not de-delegated was Trade Union facility for secondary schools.

3.2.6 The consultation document asked stakeholders to feed back any general comments on the proposal. The responses were unanimously in favour de-delegating funding for these services. Please see appendix 1 for a summary of the responses.

3.3 Minimum Funding Guarantee Disapplications

3.3.1 As part of the schools funding formula the LA is required to apply a Minimum Funding Guarantee (MFG) protection mechanism to provide funding stability to schools on a per pupil basis.

3.3.2 In order to enable the LA to closely mirror the NFF allocations and protection levels (as per Proposal 1, option A), an MFG protection exemption is needed to ensure all schools are protected equivalently. We proposed to apply to the DFE for an MFG disapplication related to this aim.

3.3.3 A second disapplication was proposed in order to allow one-off reserve funding to be delegated to schools without affecting their calculated protection level.

3.3.4 A further disapplication to the funding regulations was also proposed in order to allow a DSG revenue reserve contribution to capital of up to £1.25M in relation to the LA's proposal to relocate and expand Woodfield Special School onto the former Woodlands Academy site.

3.3.5 The consultation document asked stakeholders to feed back any general comments on the proposal. The responses received were unanimously in favour of all the proposed disapplications. Please see appendix 1 for a summary of the responses.

3.4 Commissioned High Needs Places

3.4.1 High Needs places for Coventry pupils are commissioned by the LA directly with providers. The costs of these placements are funded from the Dedicated Schools grant (DSG).

3.4.2 The proposal highlights the continuing places pressure on the Further Education and Special School sector, and ongoing work that is taking place in order to identify the number of additional places that need to be commissioned for 2019-20. Specifically, it highlights an additional 10 places that need to be commissioned at the newly rebuilt Tiverton Special School. It also sets out that as the commissioning work develops it will be discussed in detail with the Schools Forum.

3.4.3 The consultation document asked stakeholders to feed back any general comments on the proposal. The responses were unanimously supportive of the proposal. Please see appendix 1 for a summary of the responses.

3.5 Early Years Funding – Monthly Payments

3.5.1 The 'Early Education and Childcare statutory guidance' published in March 2018 set out that Local Authorities should pay early years providers on a monthly basis. The LA has been working to identify the most appropriate approach to meet this requirement and has begun testing potential approaches with a number of pilot providers which cover private, voluntary and independent (PVI) early years providers (including childminders) across all pre-school age groups.

3.5.2 The proposal sets out the LAs intention to move to monthly payments of early years funding to PVI providers from April 2019, subject to the outcomes of the current pilot programme and development of the necessary IT system.

3.5.3 The consultation document asked stakeholders to feed back any general comments on the proposal. The majority of responses were in favour of the proposal. Please see appendix 1 for a summary of the responses.

3.6 Fair Funding Scheme of Delegation

3.6.1 Section 48 of the School Standards and Framework Act 1998, and Schedule 14 to the Act set out that Local Authorities (LAs) should have a Scheme of Delegation. LAs are required to publish schemes for financing schools setting out the financial relationship between the LA and the schools they maintain.

3.6.2 In making any changes to their schemes, local authorities must consult all schools in their area and receive the approval of the members of their Schools Forum representing maintained schools. Local authorities must take this guidance into account when they revise their schemes, in consultation with the Schools Forum.

3.6.3 The proposed changes to the scheme for 2018-19 include;

- Increasing the maximum power of virement (budget transfer) able to be delegated by the Governing Body to the Headteacher; and creating an exemption to this limit in order to recognise new grant income.
- Updating the procurement thresholds set out in the Purchasing, Tendering and Contracting section.
- Updating the Credit Union Loan guidance to reflect the DFE directed revision to the national scheme loan schemes should only be used to support schools in spreading the cost of large, one-off, individual items of a capital nature.
- Updating the rules around a schools' Unofficial Funds to reflect that they no longer mandated to be held in a separate bank account.
- Amending various references to LA officer job titles as appropriate.

3.6.4 The link to the consultation version of the Fair Funding Scheme of Delegation is www.coventry.gov.uk/FFSD-consultation

3.6.5 The fair funding consultation document asked stakeholders to feed back any general comments on the revised scheme. The majority of responses were in favour of the proposal. Please see appendix 1 for a summary of the responses.

4 Results of consultation undertaken

4.1 The Fair Funding Consultation is an annual consultation. All Local Authorities are required by the Department for Education (DfE) to consult with all relevant stakeholders on the proposed changes to the local fair funding formula.

4.2 The consultation document was circulated on the 5th November 2018 to Head Teachers including Academy Head Teachers/Principals, Chairs of Governing Bodies, Trade Unions, Diocesan authorities, the Coventry Governors Association, members of the Schools Forum and Early Years Free Entitlement providers in the private, voluntary and Independent (PVI) sectors. The 4-week consultation period ended on 30th November 2018.

4.3 In addition, where possible, stakeholder groups were briefed throughout the consultation period. These included Primary and Secondary Head Teacher Partnerships, Primary Finance representative head teachers, the Schools Trade Union representatives, Coventry Governors and the Schools Forum.

4.4 The result of the consultation is set out in Appendix 1 to the report.

5 Timetable for implementing this decision

5.1 We are required to submit a proforma to the Education and Skills Funding Agency (ESFA) by 21st January 2019 setting out the draft Fair Funding Formula, including proposed changes. Once the proforma is checked for compliance and approved by the EFA, the proposed changes will then be implemented from April 2019.

5.2 We are not required to submit details of our high needs top-up rates for special schools to the EFA, however we are required to inform all special schools of the top-up rates that will apply to them in 2019-20 by the end of February 2019.

5.3 Any changes to the Early Years hourly funding rates will be informed to providers before the beginning of the 2019-20 financial year.

6 Comments from the Director of Finance and Corporate Services

6.1 Financial Implications

Financial implications on schools

6.1.1 Schools will face significant cost pressures in 2019-20 as a result of price inflation and increasing staffing costs which still be more than the extra 0.5% increase to pupil led funding. These pressures are likely to be exacerbated in schools where there are surplus places or falling rolls.

- 6.1.2 Mainstream schools will continue to be subject to the minimum funding guarantee (MFG) protection arrangements in 2019-20. The MFG seeks to protect schools against historical levels of pupil led funding for the purposes of stability. The level of the MFG in 2019-20 will be set at negative 1.5%, which means no school will see a per pupil funding decrease of more than 1.5% per pupil (subject to affordability)². Schools therefore may still see a significant cash reduction where there are falling rolls.
- 6.1.3 Within the National Funding Formula (NFF) there is a highly significant level of protection (ca. £11M) being applied to school budgets compared with the pure NFF allocations. It is not clear what protection arrangements will be in place for schools after 2019-20 as these will be subject to a future spending review. We do not anticipate that the full protection will be immediately removed, but schools must be made aware of the level of protection included within their funding allocations, so that they can begin to scenario plan and manage vacancies so that they are prepared to take swift informed decisions should the level of protection reduce in 2020-21 or beyond.

Financial Implications on the LA

- 6.1.4 The DfE's School Funding Reform requires Local Authorities (LA)s to delegate some centrally spent dedicated schools grant (DSG) to schools. Maintained schools can then agree to pool funding and return to the LA to be spent on their behalf. Areas that this includes are Minority Group Support Services (new arrivals), maternity & Trade Union staffing. This is reviewed and approved by the Schools Forum on an annual basis. Should a decision be taken not to pool funding for a service, then the LA would either need to operate a Service Level Agreement or stop providing the service. This would have financial and staffing implications that would need to be addressed.
- 6.1.5 Should the significant level of protection funding in schools (see 6.1.3) be quickly reduced after 2019-20 this could result in a number of schools needing to carry out restructures and make staffing redundancies. In this event, there is likely to be an increased call on the LA's small core budget (£100k) for employee termination and early retirement costs. Overspend on this budget cannot be met from the Dedicated Schools Grant and would create a core funding pressure. Work to mitigate this is continually discharged through the LA's Schools Finance function, working with schools on scenario planning and vacancy management in order to reduce the likelihood that redundancies are required; although given the potential level of funding change that may occur, some of these costs may be unavoidable.
- 6.1.6 As part of the NFF reform we will receive a small reduction in the amount of central DSG for Ongoing Responsibilities (e.g Admissions, Servicing of Schools Forum) - this will be dealt with through the Education Services Review which pre-empted these funding changes.
- 6.1.7 The DFE has also set out that from 2020-21 they intend to begin a national reduction in LAs' levels of central DSG for Historic Commitments (e.g. contribution to combined budgets, termination of employment costs, equal pay – back pay). Although they have yet to set out the scale or the speed of the reductions, this is likely to have financial and staffing implications that we will need to plan to address as further detail becomes available.

6.2 Legal implications

- 6.2.1 s 48(1) of the School Standards and Framework Act 1998 requires Local Authorities (LA)s to maintain and publish schemes connected with the financing of maintained schools. Regulations made under the Act (Schools Finance and Early Years Regulations 2015 and

² For a number of factors within the NFF, the funding for LAs is based upon historic cost – our ability to fund the extra 0.5% will depend on the extent to which our future costs are higher or lower than the historic funding.

the Schools and Early Years Finance (England) Regulations 2017) specify the functions which the LA is and is not required to delegate to schools, and the factors which the LA considers when delegating funding and the consultation requirements. A scheme maintained by the LA may be revised in whole or in part, the LA is required to take into account guidance issued by the Secretary of State (Schools Revenue Funding 2018-2019 operational Guide-December 2017) in respect of the provisions that the Secretary of State regards as appropriate for inclusion into any revised scheme. The LA is required to consult the governing body and head teacher of every school maintained by the authority and to submit the proposals for approval to the School's Forum.

- 6.2.2 Public authority decision makers are under a duty to have due regard to 1) the need to eliminate discrimination: 2) advance equality of opportunity between people who share a protected characteristic and those who do not: 3) foster good relations between persons who share a relevant protected characteristic and people who do not (public sector equality duty - s 149(1) Equality Act 2010). The applicable protected characteristics are disability, gender reassignment; race, religion or belief, sex; sexual orientation, pregnancy or maternity.
- 6.2.3 Decision makers must be consciously thinking about these three aims as part of their decision making process with rigour and with an open mind. The duty is to have “due regard”, not to achieve a result but to have due regard to the need to achieve these goals. Consideration being given to the potential adverse impacts and the measures needed to minimise any discriminatory effects.

7 Other implications

7.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / LAA (or Coventry SCS)?

- 7.1.1 A clear and transparent financial infrastructure is key to ensuring that schools can focus on improving educational outcomes.
- 7.1.2 We also want to ensure that the financial relationship between the City Council and the schools it maintains is clear and transparent, and this is set out in the Fair Funding Scheme of Delegation.

7.2 How is risk being managed?

- 7.2.1 The consultation document is sent to all relevant stakeholders within the city.
- 7.2.2 The City Council has a statutory responsibility to ensure maintained schools can balance their budget, and the Education Funding Agency (EFA) has a statutory responsibility to ensure Academies are setting balanced budgets. The City Council also has a moral obligation to support all Coventry's children and young people.
- 7.2.3 Any potential school deficit or long term sustainability issues will be reported back to the City Council as early as possible to ensure plans are put in place for balanced budgets. This will include liaison with the ESFA where the school is an academy and the problem is brought to our attention.
- 7.2.4 The Updated Fair Funding Scheme of Delegation will enable schools and City Council officers to clearly understand and uphold the financial responsibilities of each organisation.

7.3 What is the impact on the organisation?

7.3.1 The proposals will continue the theme of mirroring the National Funding Formula protection mechanism and allocations in schools, as well as per pupil funding stability in schools as provided by the Minimum Funding Guarantee.

7.3.2 If as a consequence of implementing some of the proposals there is the need to make staffing structure changes then full consultation will be undertaken with both Coventry City Council staff and the trade unions in accordance with city council policies.

7.4 Equalities / EIA

The DfE carried out an Equality Impact Assessment on the significant changes introduced by the National Funding Formula for 2018-19 and 2019-20. The details of this EIA can be obtained via the link below:

<https://www.gov.uk/government/publications/national-funding-formula-for-schools-and-high-needs-equalities-impact-assessment>

The proposals included in this report are the result of the National Funding Formula changes therefore the DfE equality impact assessment should equally apply to Coventry.

7.5 Implications for (or impact on) the environment

None

7.6 Implications for partner organisations?

None

Report author(s):

Name and job title:

Christopher Whiteley
Lead Accountant (Business Partner)

Directorate:

Place (Finance)

Tel and email contact:

Tel: 024 7683 2665

Email: christopher.whiteley@coventry.gov.uk

Enquiries should be directed to the above person.

Names of approvers: (officers and members)	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Councillor K Maton	Cabinet Member for Education	-	07/12/18	10/12/18
Gail Quinton	Deputy Chief Executive	People	07/12/18	11/12/18
Kirston Nelson	Director of Education & Skills	People (Education)	07/12/18	10/12/18
Barry Hastie	Director of Finance and Corporate Services	Place (Finance)	07/12/18	10/12/18
Rachael Sugars	Finance Manager	Place (Finance)	07/12/18	10/12/18
Jeannette Essex	Head of SEND and Specialist Services	People (Education)	07/12/18	11/12/18
Elaine Atkins	Solicitor	Place (Legal)	07/12/18	11/12/18
Sarah Lal	Senior Human Resources Manager	People (HR)	07/12/18	10/12/18

This report is published on the council's website: <http://democraticservices.coventry.gov.uk>

Fair Funding Consultation 2018/19 - Summary of Responses

1 Introduction

- 1.1 This Appendix provides a summary of responses received to the consultation paper that was issued to all schools and other stakeholders on 5th November 2018. All responses that were received have been analysed and the results are summarised in this paper.
- 1.2 A total of 5 responses were received, with 3 of those received from groups and therefore representing multiple stakeholder views.

Respondent	Responses Received
Primary	4
Secondary	0
Special	0
Early years	0
Other	1
Total	5

- 1.3 The results and comments are summarised below. Some of the responses included further detail relating to connected issues within specific schools, and some responses highlighting concern in relation to overall funding levels and in relation to employee pay and conditions. These raise general concerns, but do not relate specifically to the proposals and so have not been included in full in this report. The full responses can be made available on request.

2 RESULTS

2.1 Proposal 1 – Fair Funding Formula options

- 2.1.1 A decision exists for 2019/20 as to whether Coventry continues to use the local funding formula to mirror the National Funding Formula protection levels as closely as possible, or moves away from that position, instead providing all schools with the same per pupil % increase in funding vs 2018/19 allocations.

- 2.1.2 We asked stakeholders for general comments on this proposal. All respondents also put forward a view as to which formula option was their preference.

Sector	Option A	Option B
Primary	3	1
Secondary	0	0
Special	0	0
Early Years	0	0
Other	0	1
Total	3	2

Respondents	General Comments
Primary (4)	<p>Option 1: We choose to receive funding that "mirrors" the NFF protection levels. We would not want to receive a consistent per pupil increase.</p> <p>Option 1: Please continue to use the local funding formula to mirror the National Funding Formula protection levels as closely as possible.</p> <p>Option 2: I support option B as all schools would then be protected.</p>
Other (1)	<p>Option 1: On reflection we are in agreement with proposal 2</p>

2.2 Proposal 2 – De-delegated Services

2.2.1 De-delegated services must be approved annually. We will be seeking approval at Schools Forum in autumn 2018 in relation to 2019-20 de-delegated services. This proposal set out the information will be shared with the Schools Forum.

2.2.2 We asked stakeholders for general comments on this proposal.

Respondents	General Comments
Primary (4)	Agree: De-delegation should continue for the services listed. Agree: Please continue with the pooling arrangements as in 2018-19.
Other (1)	Agree: We agree how it works now and we would suggest that it continues.

2.3 Proposal 3 – Minimum Funding Guarantee approach

2.3.1 The Local Authority retains the ability to set the level of the Minimum Funding Guarantee (MFG) protection for schools in 2019/20, although the appropriate MFG % will be linked to decisions on proposal 1. This proposal requests approval to apply for a series of exemptions to the MFG.

2.3.2 We asked stakeholders for their view and for general comments on this proposal.

Sector	Agree	Disagree	Blank or N/A
Primary	4	0	0
Secondary	0	0	0
Special	0	0	0
Early Years	0	0	0
Other	1	0	0
Total	5	0	0

Respondents	General Comments
Primary (4)	Agree: I support the option which matches my preference in proposal 1. Agree: We agree with the MFG level of support and to the Exemptions. Agree: Agree with going forward with the disapplications.
Other (1)	Agree: We agree with this proposal.

2.4 Proposal 4 - Commissioned High Needs Places

2.4.1 This proposal requests that ongoing funding is agreed to support 10 additional special school places being commissioned at Tiverton Special School in 19/20, and references the current provision pressure in both the statutory age and Further Education sector.

2.4.2 We asked stakeholders for general comments on this proposal.

Sector	Agree	Disagree	Blank or N/A
Primary	3	0	0
Secondary	0	0	0
Special	0	0	0
Early Years	0	0	0
Other	1	0	0
Total	4	0	1

Respondents	General Comments
Primary (4)	Agree: Additional spaces should be funded if at all possible. Agree: We agree to the funding to support the extra 10 special places at Tiverton. We consider that the increasing number of children with SEN in Coventry, needs extra provision to be made available for Coventry Pupils.
Other (1)	Agree: We are pleased that the LA is developing and proposing for 10 additional places at Tiverton.

2.5 Early Years National Funding Formula

2.5.1 New statutory guidance recommends that local authorities should pay early years providers on a monthly basis. The LA is working towards meeting this requirement and proposes to introduce a monthly payments from April 2019.

2.5.2 We asked stakeholders for general comments on this proposal.

Sector	Agree	Disagree	Blank or N/A
Primary	1	0	3
Secondary	0	0	0
Special	0	0	0
Early Years	0	1	0
Other	1	0	0
Total	2	1	3

Respondents	General Comments
Primary (1)	Agree: We accept that monthly funding to private early years providers may assist with their cash flow and would be agreeable to the proposed changes.
Other (1)	Agree: We agree to the proposal and also suggest that early years providers should be paid on a monthly basis anyway.

2.6 Fair Funding Scheme of Delegation

2.6.1 This section covers some minor changes that are being made to the Fair Funding Scheme of delegation to add additional detail and amend some references to other sections within the document.

2.6.2 We asked stakeholders for general comments on this proposal.

Respondents	General Comments
Primary (4)	Agree: We support these changes. Agree: Happy with the changes outlined.

2018-19 De-delegated Services and amounts

2018-19 De-delegated Amounts			
	Primary	Secondary	Total
Free school meal eligibility	15,743	1,818	17,560
Licences/subscriptions	0	0	0
Maternity	533,416	64,985	598,401
Trade Union facility	114,098	0	114,098
School Improvement*	208,738	25,430	234,169
EMAS (new arrivals fund)	303,338	22,569	325,907
Behaviour support services	0	0	0
Total	1,175,333	114,802	1,290,135

* Coventry Education Improvement Strategy commissioning pot