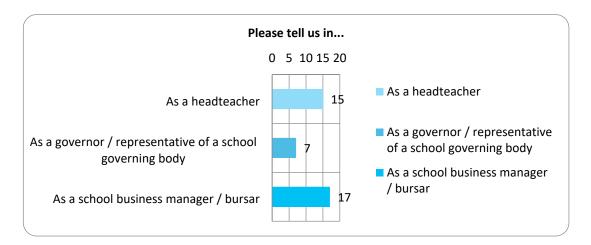
The Findings

The formal consultation generated 39 responses, all of which were received by completion of the online questionnaire at https://letstalk.kent.gov.uk/servicestoschools There were no postal responses received.

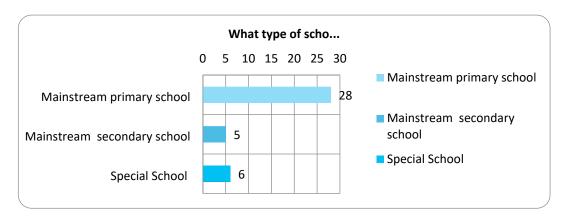
There were 798 visits to the consultation page with 501 participants interacting with the page (such as downloading a document or clicking on links), and the consultation document generated 39 responses.

Chart 1: Stakeholder Groups:



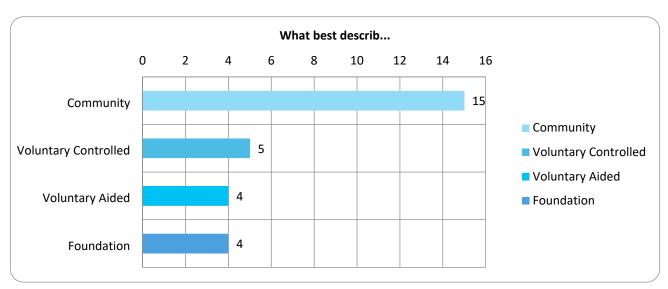
15 headteachers, 17 business managers/ bursars and 7 governor/ representatives of a school governing body responded to the consultation.

Chart 2: Type of school:



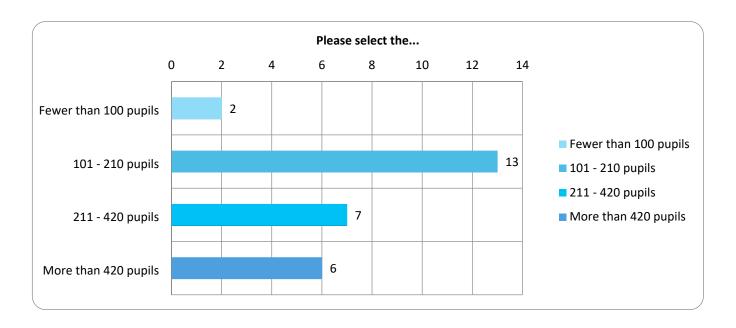
The majority of respondents 28/39 (71.8%) were mainstream primary schools. 5/39 (12.8%) were secondary schools and 6/39 (15.4%) were special schools.

Chart 3: Category of school:



The majority 15/39 (38.5%) responses came from community schools, 5/39 (12.8%) came from voluntary controlled schools, 4/39 (10.3%) from voluntary aided schools and 4/39 (10.3%) came from foundation schools. There were no responses from Academies as they received funding directly from the DfE and this consultation does not affect them.

Chart 4: School size



The majority of responses 13/39 (33.3%) came from schools with 101-210 pupils, the fewest number of responses 2/39 (5.1%) from schools with fewer than 100 pupils. It is unclear whether the size of the school has affected their response, due to the relatively low respondent rate. Themes have been identified from the responses given which may give more insight. However, the extent to which these can be validated and seen to reflect the views of all Kent stakeholders is limited.

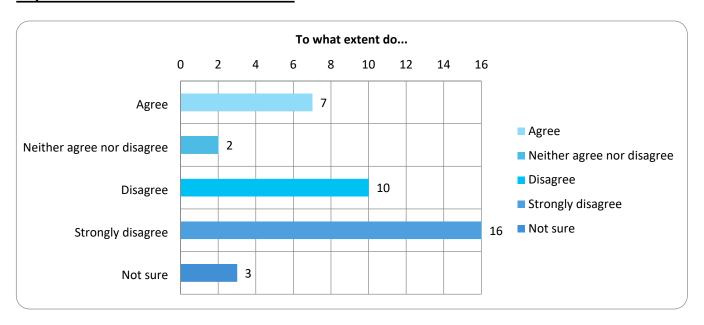




The highest percentage of respondents came from West Kent- Maidstone, Tonbridge and Malling and Tunbridge Wells with 22/39 (56.4%) of respondents.

Consultation Findings

Chart 6: To what extent do you agreed/ disagreed with the proposal to create a school improvement and intervention fund?



The majority 26/39 (66.6%) disagreed/ strongly disagreed with the proposal to fully fund the School Improvement and Intervention Services via de-delegates funds. It is worth noting that all 5 secondary schools which responded disagreed/ strongly disagreed.

6 responses were received from 4 special schools. 4/6 (66.6%) disagreed/ strongly disagreed, 1/6 (16.6%) was unsure and 1/6 (16.6%) neither agreed nor disagreed.

Respondents were asked to express why they had selected disagree or strongly disagree to the proposal. We have identified four themes:

- cost pressure on schools budget and cuts
- value for money
- quality/level of services
- paying more for less service

Respondent 1 - "The pressures on schools budgets are already great as you are aware, putting this expectation on school budgets means that leaders will potential have to reduce support as essential costs e.g. energy bills or bare bones staffing mean there is not enough to seek the support needed for the most vulnerable schools."

Respondent 2 - "More and more demands on school budgets."

Respondent 6 - "Yet more cuts for schools, try cutting members expenses."

Respondent 7 - "On an individual school basis it does not represent value for money; a school could procure independent advice on school improvement at considerable reduced c9ost than the £25 per pupil being proposed. Especially if the school is not currently experiencing problems."

Respondent 8 - "The cost to the school would be £10,487 for this. For 2 SI 1/2 day visits this does not represent good value for money. Whilst we understand that this also covers your statutory duties we do not think it fair that this element is passed to schools. LA must be funded on some level for this core duty."

Respondent 9 - "£25 per pupil in primary is too much for what we receive. That equates to £9000 per year for our school. I could buy in 18 days of a consultant at £500 a day for that cost."

Respondent 12 - "The costing is heavily weighted towards primary / special schools. The cost per pupil far exceeds the actual cost of proving the service."

Respondent 14 - "Whilst we understand the reason for these proposals this is not value for money. We could use the additional cost to buy targeted support where needed and accept LA support would be reduced to a statutory minimum."

Respondent 15 - "Paying more for no additional services."

Respondent 19 - "We would be paying double compared to the 2023/24 budget and will be receiving a lesser service and access to services that we do not regularly use such as Headteacher recruitment (in the last 30 years we have only had 3 headteachers)."

Respondent 20 - "The cost to the service would significantly increase by 93% in comparison to 2023 – 2024 budget. Schools would receive in reduction in services."

Respondent 22 - "I believe that the model should be based, where needed, on school-to-school support, using the expertise already within local authority schools. Whilst some money

would be required for the it would be less, and in many cases (I can only speak for myself) would be something that we would offer as part of our own staff's CPD. It is something we already are establishing in Canterbury (across LA and academy schools) and a model that makes more sense. Creating silos - in the LA or MATs - can only be negative. Education is about collaboration and not competition."

Respondent 23 - "Schools are already poorly funded and more money needs to go directly to schools. In addition, for my context and school, a reduction in direct income would limit the already limited improvement work we can do. Allow schools to commission the work relevant to them."

Respondent 24 - "The school would be paying double compared to 2023 - 24 budget and will be receiving a lesser service and access to services that we do not regularly use such as HT recruitment (in the last 20 years the school has had 3 HTs). You are trying to make a funding formula fit all schools. Special schools are special for a reason, we support those with the greatest need and are very successful at it. one size does not fit all."

Respondent 29 - "£8000 would be significant if we only had two morning visits per year and had to pay for training."

Respondent 30 - "School Improvement has no impact with two visits a year."

Respondent 31 - "Whilst KCC want to reduce their financial liabilities, Schools are under significant pressure already with their budgets and cant afford to take on additional financial responsibility. Schools should be able to choose which costs they want to be de-delegated."

Respondent 32 - "The previous services was not satisfactory and this has financial implications for our school. Improvement and Intervention is also not anticipated to be a problem for the school."

Respondent 34 - "If you hold on to £25 a pupil for school improvement, that suggests that we get £5250 worth of support from our SIP each year. I would argue this, as I do not believe that 2 visits per year, and the occasional telephone conversation/email is the best use of £5250, and I do not believe that the impact of these visits warrant that amount of money."

Respondent 35 - "A sum of £1,944,149 is proposed, £24.97 per pupil. £1,944,149 is a significant amount of money, but there is no attempt to clarify how this sum is determined, e.g. on past experience in providing these services, nor is it clear what categories of costs this sum would cover e.g. inhouse labour, outsourced services etc. Such information would have provided confidence to schools that the costs are justified and credible."

Respondent 36 - "As an outstanding school we receive minimal support but under the proposals we would have to pay significantly more than the average primary school due to our size. We would prefer to buy in our own school improvement services including statutory moderation. Thereby paying only for what we need rather than paying for what other schools need."

Respondent 39 - "Can schools not be charged as and when the School Improvement and Intervention Services are used. If we all have to contribute towards this what happens to the funding if it is not used in any one year."

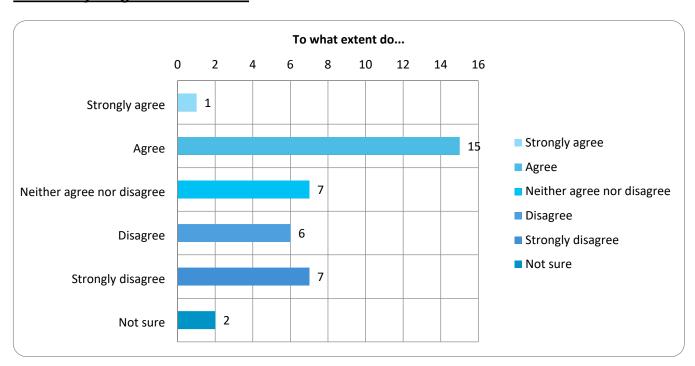


Chart 7: To what extend agree/ disagree with proposals for funding of the moderation of end of key stage assessments:

16/39 (41%) respondent agreed/ strongly agreed with the funding proposal for moderation at the end of key stage assessment. 13/39 (33.3%) disagreed/ strongly disagreed.

Respondents were asked why they have selected disagree/ strongly disagree with our proposals for the funding of moderation of end of key stage assessments. There were few comments, but the themes are common with school improvement - pressure on school budgets, value for money, and no additional services for the cost.

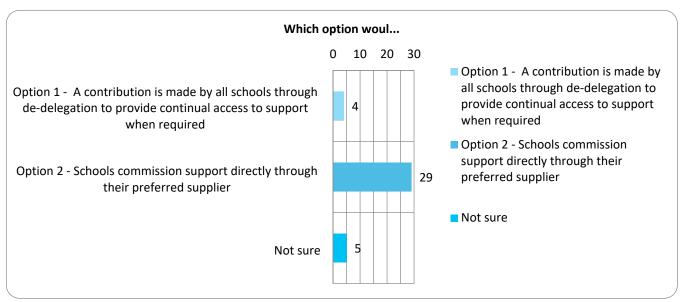
Respondent 2 - "More and more demands on school budgets."

Respondent 9 - "£3 a pupil seems a small amount but it still equates to £1000 a year for the school to have KS2 sats monitored. I do not see how this is value for money for us."

Respondent 15 - "Paying more for no additional services."

Respondent 21 - "We currently complete the end of key stage statutory assessments as this is a mandatory process. However, the impact on improving outcomes for pupils does not equate to what the school pays for this service. All of our pupils are working at significantly lower levels than mainstream and therefore the process of assessment does not provide any additional findings. Therefore the proposed additional £3.18 per pupil has no cost benefit for us as a school."





The majority, 29/39 (74.4%) of respondents selected option 2, Schools to commission support directly through their preferred supplier.

Respondents were asked to explain why they had selected option 2. Four themes were identified:

- selection of providers choice for schools
- cost effectiveness/ good financial management
- · schools' responsibility for recruitment
- infrequency of expenditure

"If schools already have an existing HR contract they can work with a trusted provider."

"Continual access to a service a school should only expect to have to use once every 5-10 years seems unnecessary. If headteacher turnover was higher than this then no doubt the Governing Body would become quite adept at recruitment. Therefore recruiting independent consultants when required would seem a more cost effective measure."

"Hopefully HT recruitment happens only every 5 - 10 years, it would therefore make better financial sense for schools to commission the type and level of support they need, when they need it. The annual cost of option 1 to our school would be £1,352 pa. If we didn't need to re recruit for a HT over 10 years we would have contributed £13.5k to the fund. At a time when money is extremely tight for schools this is not good financial management."

[&]quot; May not have the best people in current HR provision."

[&]quot;Schools are responsible for their own recruitment."

"As it does not happen regularly we are paying into de delegation and not getting the benefit. It would be cheaper to buy in when needed."

"We think that the appointment of a HT in our experience is infrequent and so the service that is needed can be purchased as required."

"Option 1 is the equivalent of an insurance policy taken out in case of the need to recruit a headteacher. It is a bit of a catch 22 but I would prefer to fund as we go."

"This make scene."

"It would seem better value to have a level of support required at the time rather than pay an annual fee during years when the service is not required."

"Schools should commission support when needed not pay every year for something they do not need."

"Having just replaced a Headteacher we are hoping not to have to use this service again in the near future. Governors felt the process would have operated more seamlessly if the whole process was managed through one supplier."

"Headteacher recruitment does not have a high turnover of need. Therefore, I would prefer to keep the savings from this de-delegation cost and only use the funds when actually needed."

"Governing bodies have the time to prepare for this and it should be something that happened infrequently. They should be free to explore the options for supplier and choose the one that best meets their needs."

"Other, possibly "free", sources of support and advice. Allow schools to commission their own work as and when it is needed."

"Schools can shop around for good value, take recommendations from other schools"

"The hope is that this wouldn't be accessed too regularly and the governors are volunteers so would need support when they needed."

"Headteacher recruitment is not often."

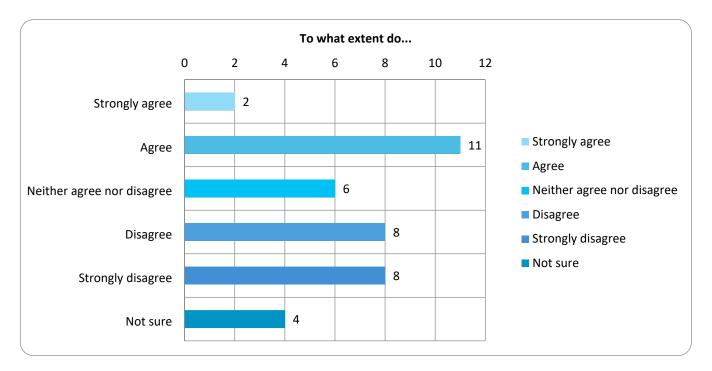
"This should be a one off cost in the main over a period of time. Schools should have flexibility over the support selected especially if it is not compulsory to include HR support. It looks like the costs of the de-delegation is high in comparison to the actual costs needed."

"Headteacher recruitment, in most schools, is infrequent. Within the context of crippled budgets, escalating needs and ineffective local SEND, I feel it unreasonable to expect schools to pay £600 per year towards HT recruitment in other schools. It will be more cost effective to pay for support individually every 4-15 years."

"We pay for what we need and can manage our budget accordingly."

As a large secondary school with various contacts we would prefer to commission our support directly.

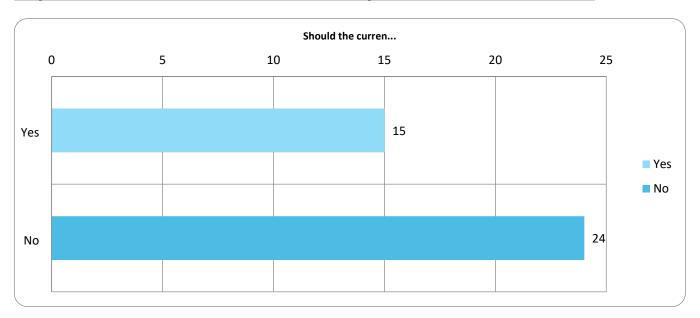
Chart 9: To what extent do you agree / disagree with the proposal to create a dedelegated Redundancy Fund?:



13/39 (33.3%) selected agree/ strongly agree to the proposal to de-delegate Redundancy Fund and 16/39 (41%) selected that they disagree/ strongly disagree with the proposal. There were also 10/39 (25.6%) respondents who selected not sure or neither agree nor disagree. consultation.

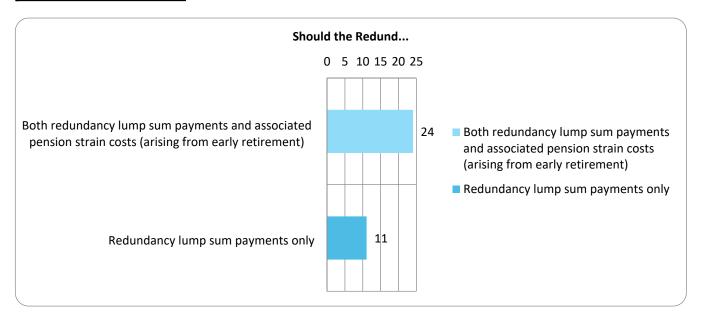
Respondents were also asked if the current criteria for schools to access funding from the local authority for redundancy costs should be amended to include a further exception, such that only schools that cannot afford the redundancy costs can access the fund.

Chart 10: Should the current criteria for schools to access funding from the local authority for redundancy costs be amended to include a further exception, such that only schools that cannot afford the redundancy costs can access the fund?:



The majority, 24/39 (61.5%) of responses did not support including an affordability criterion to the existing eligibility criteria for accessing the redundancy fund.

<u>Chart 11: Should the Redundancy Fund support both redundancy lump sum and pension strain costs?</u>:



The majority 24/39 (61.5%) of respondents said that both redundancy lump sum payments and associated pension strain costs should be covered by the Redundancy Fund. It is worth noting that 4 respondents didn't answer this question.

Respondents were then asked to add any other comments they had about the Redundancy Fund proposals, including the eligibility criteria. Four themes have been identified:

- STLS employers (Special schools)
- Financial necessity for schools in financial difficulty
- Schools should bear the costs themselves, as only they have oversight of their management decisions
- Further information, consideration and consultation required.

Respondent 3 - "Page 9 on the consultation, it states that this is an all or nothing approach. My understanding is that this would be effective from 1/4/25. The STLS SLA ends on the 31/8/25. Will this mean that the STLS employers (special schools) will be responsible for all the redundancy costs of all STLS staff? The current STLS consultation has as option 1, the end of the STLS. If this is not made an exception this may place SLA holding special schools at financial risk."

Respondent 8 - "At a financially hard for schools redundancy could regrettably very well be a financial necessity."

Respondent 9 - "I do not understand why schools share responsibility for paying other schools' redundancy or early retirement costs. We have no oversight of the management that has caused these to occur or the circumstances where redundancy or early retirement has been granted. In either scenario it is £2000 or £1000 a year to cover someone else's decisions."

Respondent 12 - "I feel this need further consideration as the LA is the employer for maintained schools and cannot pass the responsibility and associated costs without further consideration and consultation."

Respondent 19 - "How can we answer the above question (14) when we do not agree with the additional funding for this support. We believe all schools should be offered this support, particularly as it is the schools in financial difficulties that would be leaning on this service in terms of redundancy impacts."

Respondent 21 - All maintained schools that should be offered this support especially as it will be schools requiring the schools in financial difficulty that will require the service most.

Respondent 22 - "I'm not sure about this area as I question the extent to which the issue arises from schools remaining in the LA and having funding issues; funding issues being exacerbated by top slicing and poor management of funds. I think more data and explanation is required of how often and why schools access the funding before I would feel happy making a decision"

Respondent 23 - "In principle the idea is good, especially considering this area of need could increase in maintained schools."

Respondent 24 - "How can we answer this question (second Q13), when we do not agree with the additional funding for this support. We believe that all schools should be offered this support, particularly as it's the schools in financial difficulties that would be leaning on this service in terms of redundancy impacts. Again, you are asking closed questions - this makes this an unreasonable questionnaire."

Respondent 27 - "Schools should see this coming and so should accept responsibility for associated costs."

Respondent 31 - "Redundancies should only occur if school budgets are under pressure and in that case, schools couldn't afford the redundancy costs."

Respondent 35 - "A sum of £519,788 is proposed, £6.04 per pupil. It is not clear how this sum is determined: it is higher than the cost identified in Table 5 for each of the three years from 2021 to 2024, but lower than the £884,614 forecast for 2024/25. More information setting out the logic would have provided confidence to schools that the costs are justified and credible."

Respondent 39 - As long as the redundancy costs are genuine for those schools in financial difficulties and not because of mismanagement of their budget. Personally, I think all schools should pay this and those in financial difficulty.

Alternative suggestions and comments:

Respondents were asked if they had any alternative suggestions to the proposals in the consultation document. No specific proposals were received, rather general comments were made. The following themes were identified:

- Schools can commission independent providers more cost effectively. Cut your cloth according to the budget.
- Budget schools can't afford the proposals
- MAT system encourage schools to academise so they have greater control and oversight of their budgets
- School-to-school support should be at the fore of LA thinking
- Quality assurance is needed of LA provided services

Here are the responses:

Respondent 7 - "School should be given the option to see whether these service could be sourced more cost effectively through independent providers."

Respondent 9 - "If money is tight we need to cut our cloth accordingly. If the government funds moderation to the tune of £39000 we should spend this much on moderation. Not £290000. Why should schools fund a pot of £270000 for head teacher recruitment? It simply cannot cost that much each year - that is between £500 to a £1000 per year for a typical school. The sums just do not add up."

Respondent 19 - "Encourage schools and support towards a MAT system to ensure schools receive and allocate their funding direct from the DfE. This would encourage schools to have a better oversight of their spending."

Respondent 20 - "Support schools towards a MAT system to ensure provisions receive and allocate the funding direct from DfE. This would encourage schools to have greater oversight of their expenditure."

Respondent 22 - "School-to-school support should be at the fore - I'm confused why it isn't. The LA has very many excellent schools still as part of it, why does it not make more use of this? I strongly believe that support and best practice should come from current teaching staff and leaders. I also believe that the reviewing of a school should be the same in KCC as it is with the DfE and an academy. This is the time for the LA to show that a vibrant authority is the match - or better than - the move to MATs. To do this it needs to be agile and foster independence in it's school - some of this feels like an exercise in securing money to ensure that KCC jobs are maintained. The biggest issue I have with MATs is the paying of vast amounts of money to people with little/no accountability who go from school to school to spread/share/enforce ideas - when schools already have teachers, middle and senior leaders (not to mention incredible non-teaching staff) who could do this better and relate to the day-to-day lives of the people they support. Please, as an LA, celebrate and advertise the success of your schools, use those that are doing well to support those that need it and make collaboration the thing that the LA is known for - not a MAT-lite model that takes more than it gives and has little impact/no impact on the improvements of very many schools."

Respondent 23 - "Allow schools to commission their own work."

Respondent 24 - "Encourage schools and support towards a MAT system to ensure schools receive and allocate the funding direct from DfE. This would encourage schools to have better oversight of their spending."

Respondent 29 - "We understand that there is a challenging financial landscape but there should be some quality assurance about bought in and LA services to ensure school standards don't slip. Is there going to be a culture of an inconsistent level of high standards for pupils and staff development. Are we benching against National?"

Respondent 32 - "There are many cost savings that can be made in relation to buildings maintenance that KCC oversee. We have experienced plenty of times where short cuts are taken to save money but in the long term, they have cost more because its been a short term fix. Contractors only quote for the minimum request and then gain the contract but not for the actual work that is needed. Schools should be funded for the number of classes, not the pupil numbers. A class of 28 has the same costs as a class of 30. Based on the way pupil funding is currently calculated which is on one day per year gives an unrealistic picture. Pupil numbers are updated online every day and funding could be adjusted more regularly."

Respondent 35 - "The Governing Board recognises the financial challenges facing Kent CC, but also note that all schools face an ever increasing challenge of balancing budgets. This is against a background of ever-increasing costs across a range of services, for example energy, at the same time as the needs of the most vulnerable children become more complex and challenging, in addition to the proportion of these children increasing. The past two years have been particularly difficult and the Governing Board notes that schools have been called upon the absorb unfunded additional costs directly as a result of unilateral decisions by Kent CC. The most notable example is to raise remuneration for non-teaching staff by above inflation increase for the past two years, most recently by 9% plus. Whilst understanding the rationale put forward by Kent CC to de-delegate school funds, which seems to be driven by inconsistent and variable national policies, as well as issues at Kent CC, Kent CC needs to clearly demonstrate that the current proposals are justified and represent value for money. Unfortunately, the case made by Kent CC in the Consultations Paper is not wholly clear and in parts lacks sufficient substantiation. In the absence of more information regarding the costs

proposed by the Consultation Paper we are not in position to determine what could be done to meet these costs in the future. As noted certain elements of the proposal make sense, but others clearly show little added value for a school such as ours."

Respondent 39 - "I think that schools should take on the costs themselves. For this consultation we are expected to pay into the overall pot but may hardly every use the funds. I would also like some clarification on what happens to the pots of money if they are not used especially since we don't yet know the budget position for schools now that labour is in power."

<u>Impact on schools of the proposals</u>

Respondents were also asked to tell us about how the proposals laid out in the consultation document may impact their school / unit. Unsurprisingly, the responses highlight the choices schools would need to make – reduce staff, fewer resources, difficulty balancing their budgets, but support in less expensive ways, and increased workloads.

Respondent 2 - "We are already struggling to set a manageable budget and this will further impact on this."

Respondent 3 - "Page 9 on the consultation, it states that this is an all or nothing approach. My understanding is that this would be effective from 1/4/25. The STLS SLA ends on the 31/8/25. Will this mean that the STLS employers (special schools) will be responsible for all the redundancy costs of all STLS staff? The current STLS consultation has as option 1, the end of the STLS. If this is not made an exception this may place SLA holding special schools at financial risk."

Respondent 8 -"Put is in a precarious financial situation. We are forecast a 0.5% increase in income next financial year with support staff salaries increasing by nearly 10%, contracts and goods costs have and continue to increase by 5 - 10% (despite the drop in inflation). This is not a tenable position for a school. The proposals here would mean we get a lessor service which costs us an additional £7k+.pa If the further proposals for the following year are followed that would be an additional £17.5k on top of this. Not sustainable."

Respondent 9- "If government funding to education increases then schools can afford money to be top-sliced to the LA. If money decreases and rolls fall, then we have to be really efficient with our financial resources - and schools can buy in support in less expensive ways than through the LA."

Respondent 10- "School budgets are already tight so if having to spend more money on delegation, it will impact on teaching and staff resources for the children."

Respondent 11 - "There is clearly a funding impact - in particular the proposals for phase 2 - 2026/2027. We are unsure why the cost for primary schools seems to be disproportionate to that of secondary schools. With the proposed changes to SEN funding there is huge pressure on school budgets, the impact of this we feel will be especially felt in primary schools and perhaps especially with increasing SEND within our school."

Respondent 12 - "It would detrimentally affect classroom teaching and learning as less resources would be available. This could, in turn, affect results and achievement."

Respondent 13 - "Keeps it local and funds managed locally."

Respondent 14 - "This would increase our de-delegation costs by 80% in 2025/26 when our school budgets are already severely stretched. This proposal stems from the council having been slow in transferring the costs of services from itself to schools but we are not being offered any additional funding to meet these costs."

Respondent 17 - "Already depleted funds and resources, following third round of redundancies in the last 4 years. Falling rolls, less support staff, greater work load for staff in post, all mean a negative impact on children."

Respondent 19 - "Our de-delegation costs would be double under this proposal which will mean we will have less money to spend elsewhere. Our three year budget (April 2024 onwards) was very limiting and had no cushion for unexpected increases in costs."

Respondent 20 - "The de-delegation costings will double under these proposals which will result in less money to spend elsewhere. The school's three year budget from April 2024 onwards is limiting and has no capacity for any unexpected increase in costs."

Respondent 22 - "The suggestions (looking forwards) of an increase to £40 (or similar) would be significant and is unjustified. Any move towards paying for HR is not required in schools that do there own, and I feel strongly that it is for us to decide on provision for this. We already have issues with being an LA school and not being kept up-to-date with policies that we should be given - so I have no interest in closer working with HR Connect".

Respondent 23 - "A further reduction in income. c£7000 that could be used elsewhere."

Respondent 24 - "Our de-delegation costs will be double under this proposal which will mean we will have less money to spend on the students in this special. You are effectively giving us no choice (as the alternatives are closed questions with additional funding requirements from the school no matter what) for services we don't use to fill the gap in provisions for other schools. This is simply unacceptable and is very similar to the long abandoned government policy of negative revenue support grant (because it would never work and would not be tolerated) where Local Authorities would effectively be penalised for doing a good job by funding moving across the sector to those in financial trouble."

Respondent 25 - "As a small school our budget is already extremely tight. Charging separately for each of these services would add pressure of around £5K in the first year, and I feel that there would be significant drift towards adding charges for more and more services. Ultimately this would lead to a poorer experience for the children in school as the curriculum spend would need to be cut in order to meet costs."

Respondent 26 - "This is an increased cost that our school will find hard to pay."

Respondent 27 - "If the SEN High Needs up is cut completely, we will have to make cuts in staffing."

Respondent 29 - "Concerns schools may have less school improvement and intervention support."

Respondent 30- "Impact on budget"

Respondent 31 - "It would have significant financial implications."

Respondent 32 - "We would have to find an extra approx. £10K in our budget - and you are proposing further changes that would add another £14K. This will increase as we move to 7FE."

Respondent 33 - "Whatever is chosen / decided, more of the costs will be covered by the schools."

Respondent 34 - "Further reduce funding with little impact."

Respondent 35 - "Imposing these cost on the school at a time of extreme financial challenge will only make that challenge more difficult. As a school we have sought over the past few year it protect our core asset, the teaching, and non-teaching and support staff which are critical to delivering the quality of education that our community rightly expects, as we believe does the national Government."

Respondent 36 - "These additional proposed costs will push the school budget into a deficit position which will ultimately cost the LA more."

Respondent 39 - "Obviously this will be more funding being taken away so any reduction in funding is not good."

Respondent were asked if they had any other comments:

"Can some consideration be given to affordability when creating these proposals."

"I need to know that the LA is taking steps for the good of schools, and not the good of the LA. I'm not convinced from these proposals that this is always the case. It also read, despite assurances, as if the LA will simply go to the SoS if the forum doesn't give them what they want. The council should also be more proud of the schools it still has as part of it, and work with them for the benefit of all, not view them as something that it needs to treat as equal to academies. Why do you not shout more about the successes of LA schools and put the question out there of whether it is a better system than the fragmentation we currently see? Countless trust teams are removing vast sums from schools, it is not a system to be followed."

"Many schools made their own decision on whether to academise or not. If they have chosen to step outside and don't benefit from something that those still part of the LA do, then that was their choice"

"This questionnaire is not balanced or open and will lead to skewed results based on closed questions"

"Contributing to scenarios that we will probably not be using - not a good use of our money."

"Complicated read at times and 28 pages takes some focus."

We welcomed views on our equality analysis and whether there was anything we should consider relating to equality and diversity.

"These proposals will unreasonably impact on students with protected characteristics in our special school if you remove funding from us for services we do not use to give to students in other schools without these protected characteristics. I suggest these proposals would put you in breach of the legislation".

"One of the greatest concerns that we have as Governing Boad is the impact of these and other changes on the provision of education for SEND and other similar children. These proposals, if enacted, may adversely affect the school's ability to meet this provision."