

Minutes of Meeting

Tuesday 11 December 2018 1pm at NASUWT, Send
Approved by members at their meeting on 10 Jan 2019

Present

School and academy members:

Rhona Barnfield (Chair)	Howard of Effingham School	Academy member
Kate Keane (Vice Chair)	Ewell Grove Infant and Nursery School	Primary Head
Donna Harwood- Duffy	Dorking Nursery School	Nursery school head
Joanne Hastings	Ottershaw CE Infant and Junior Schools	Primary Head (items 1-4 (part))
Clare McConnell	Bisley CE (A) Primary	Primary head
Tess Trewinnard	Wonersh and Shamley Green CE Primary	Primary head
Jo Luhman	Kings International College	Secondary head
Justin Price	Freemantles School	Special school head
Geoffrey Hackett	Stepgates Community Primary	Primary Governor
Eric Peacock	Thorpe C of E Primary	Primary Governor
David Barter	The Winston Churchill School	Secondary governor (substitute)
Annette Crozier	Manor Mead and Walton Leigh Schools	Special sch governor
David Euridge	Reigate Valley and other PRUs	PRU member
Matthew Armstrong-Harris	Rodborough	Academy member
Ben Bartlett	Hinchley Wood School	Academy member
Kate Carriett	George Abbot School	Academy member
Sir Andrew Carter	South Farnham Primary	Academy member
Elaine Cooper	Horsell Village School	Academy member
Stephanie Gibson	Tandridge Learning Trust	Academy member
Ruth Murton	Thamesmead School	Academy member
Seb Sales	Connaught Junior School	Academy member
Tim Stokes	Carwarden House Community School	Special academy member

Non school members

Sian Bath	Private, voluntary & independent nursery providers
Joe Dunne	RC Diocese of Arundel and Brighton
Jonathan Gambier	Guildford Diocese (C of E)
Tamsin Honeybourne	Teaching union member of Education Joint Cttee
Jayne Dickinson	East Surrey College (Post 16 provider) (items 1-6)
Andrea Collings	Family Voice Surrey

Local Authority Officers

Liz Mills (LM)	Director–Education, Lifelong Learning & Culture
Lynn McGrady (LMcG)	Head of Finance for Schools (clerk to Forum)
David Green (DG)	Senior Principal Accountant (Schools Funding)
Susie Campbell	QA and Professional Standards Development

manager (SEMH)

Julie Smyth and Paul Smith, of HR, attended to present item 6a Martin Beard and Sarah Lynagh from GLF schools, attended to answer questions on item 8.

1 Results of Chair and Vice Chair nomination process

Rhona Barnfield had been nominated as Chair, and Kate Keane as Vice Chair. Both were declared re-elected.

2 Welcome, Introductions and Apologies for Absence

The Chair welcomed Justin Price (new member).

Apologies for absence had been received from:

Katie Aldred	Bagshot Infant	Primary head
Fred Greaves	Oakwood School	Secondary governor
James Malley	Therfield School	Academy member
Nick Trier	Teaching union member of Education Joint Cttee	

3 Declarations of interest

The Chair declared a possible interest in item 9 (growing schools) as one of the academies in her MAT was increasing PAN.

4 Minutes of previous meeting (28 September 2018) and matters arising

Accuracy

Add Tess Trewinnard and Stephanie Gibson to list of attendees at 28 September meeting.

Matters arising: school funding consultation (item 4).

Ben Bartlett wanted secondary heads' concern, as raised at the previous meeting, to be formally minuted about lack of transparency of the autumn funding consultation process, and in particular of the proposed transfer from schools block to the high needs block. He considered that the Schools Forum had given its verdict on various proposals and the council had subsequently decided on a different direction. He suggested that the council might have decided on the outcome before the consultation and, if so, that should have been stated in the consultation.

Kate Keane advised that primary phase council had asked for a letter to be sent to the LA on the same issue.

LM had discussed schools' concerns over the consultation with the Director of Children's Services. She would aim for next year's consultation paper to be available to the Forum before the end of the summer term.

LM noted that tension was likely to persist between central and local government over high needs funding levels.

Members suggested that council members should write to the Secretary of State about the need for increased high needs block funding. LM gave a summary of lobbying by the council in the autumn term:

- The Leader and Chief Executive had met with some Surrey MPs and several had subsequently written to the Secretary of State on the issue;
- There had been other meetings with Surrey MPs (who included several cabinet members);
- The Director of Children's Services had appeared at the Parliamentary Education Select committee and his contribution had been reported in the press,
- The Director of Finance and Julie Stockdale had attended a London wide meeting on high needs funding at which the NAO had been represented;
- There had been direct representation to DfE in response to a recent consultation on managing DSG overspends (see item 6 below);
- LMcG was on the DfEs Children's service working group, which was to discuss SEN funding that week.

Early years funding consultation (item 5)

Sian Bath noted that a restructure of the early years service was under way which might affect how the "centrally retained" 5% was used. She would want to revisit that issue following the restructure.

LM advised that no decision had yet been made on that restructure. An update would be provided at a future meeting. **Action for LM**

5 Centrally provided Schools block services

a) Central Schools Services DSG block (CSSB)

LMcG explained that funding for former retained Education Services Grant (ESG) functions, covering both maintained schools and academies, had been moved into DSG when ESG had ceased. This funding had never been in individual schools' budgets but was now part of DSG and allocations required Schools Forum approval.

DSG covered only part of the cost of these functions and the council funded the remainder. In 2019/20 some movement was proposed between DSG funded services and LA funded services, in order to make the funding easier to explain to others. This affected education welfare and finance but it did not change the total funding for either service or the total cost of retained ESG services to be met from DSG.

The central block also included some other services which had always been DSG funded (mainly school admissions). Surrey's total CSSB allocation had reduced by around £80k from 2018/19 to 2019/20 and consequently a reduction in Admissions funding was proposed.

The Forum agreed the proposed expenditure from the Central Schools Services block.
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b) Maintained schools levy 2019/20

Prior to 2017 local authorities and academies had received “general Education Services Grant” (at £77/pupil in 2016/17) to fund a range of services which were the LA’s responsibility for maintained schools but were the responsibility of individual academies or MATs. From September 2017 the grant had ceased (both for LAs and academies) but LAs had been allowed to make deductions from maintained schools’ budgets (the “levy”) to fund these services. MATs may similarly have to topslice individual schools to fund these services.

As more schools converted to academies, the LA had had to make savings as the same levy rate per pupil generated less income. Savings of £180,000 had been required. In fact savings of £310,000 had been identified by various services, allowing the proposed levy to be reduced from £37.96/pupil to £35.98/pupil for 2019/20.

In particular

- Costs of teachers’ pensions administration had been reduced through greater income due to more academies buying back;
- Some of the costs of asset management had been capitalised (which would mean the council bearing the borrowing costs).

Babcock 4S services would largely be transferring in house from April 2019 and it would be possible to provide more information on individual services in future.

Maintained school representatives approved the proposed levy of £35.98/pupil without a vote.

Thanks were expressed to those services which had identified savings.

6 High needs SEND update

Overall budget and DfE consultation

LM noted that DSG deficits were growing nationally. LMcG drew attention to a recent DfE consultation which had proposed tighter monitoring of LAs’ DSG deficits, requiring action when deficits exceeded 1% of DSG (rather than 2% as at present). The DfE was only interested in overall deficits. Surrey had never yet had an overall DSG deficit (just a high needs deficit) but might well have an overall deficit of around 1% of DSG (and perhaps a little higher) by the end of 2018/19. DfE was suggesting that one option was for LAs to set aside or “park” current deficits and deal with them at a later date. External auditors were still looking at the issue. Surrey’s Director of Finance had responded to the consultation, emphasising that “parking” of deficits was not a solution to the inadequacy of high needs funding, and that it was inappropriate for the DfE to assume transfers of funding from schools when they are facing their own challenges. LMcG to ask whether Surrey’s response could be shared. (Attached as an annex to these minutes)

There appeared to be concerns expressed by the MHCLG regarding financial difficulties facing many LAs which appeared to be driven by SEND. The 2014 Children’s Act had led to an increase in EHCP numbers. DfE was bidding for more funding as part of the spending review, It was important to provide

evidence of how additional funding would be used, how services could be provided differently, and of outcomes.

The DfE proposals were for deficits on DSG as a whole, and it was disappointing that DfE seemed to anticipate LAs making transfers between blocks rather than sufficient funding being put into high needs nationally.

LM advised that a potential pressure of £30m (recently quoted in BBC news) had been reduced to around £20m. The number of new EHCPs in the autumn term of 2018 was 40% higher than in the same term of the previous year.

One member suggested that 69 LAs were asking for block transfers, and asked whether that might mean a chance of additional government funding for high needs. LM noted that a large number of LAs had applied to transfer DSG to high needs in 2018/19 and only some had been successful. One LA had had to have an advance of next year's DSG. If the DfE proposals were implemented, LAs would have to produce a plan for DSG costs to be sustainable within three years. LMcG noted that Surrey's consultation response had stated that producing a recovery plan was unrealistic. She thought DfE might recognise a funding crisis.

Surrey SEND consultation and strategy

LM advised that the consultation had deliberately been on principles because the LA wanted to co-produce the detailed solutions, although she recognised concerns from schools that they hadn't been asked the "right questions". The strategy did not propose a funding reduction; indeed funding would increase.

Members asked whether the council would be signing off the detailed proposals in March.

Justin Price supported the principles, suggesting that there was capacity in the system to help.

LM advised that the consultation principles had been discussed with primary council, primary quadrant meetings, secondary and special phase councils, SENCO networks and at workshops for SENCOs. She appreciated the support of these groups.

The consultation would close on 4 January and the Cabinet would make decisions on the proposals at the end of January.

Funding to expand Educational Psychology capacity for statutory assessment had already been approved. The additional capacity would be in place from January.

Work was continuing on SEND place planning, and there were plans for 350 extra specialist places to be available for Sept 2019 and Sept 2020, in order to accommodate EHCP growth and pupils coming up for new placements. Proposals for capital spending were to be ratified on 18 December. Demand over the next 20 years was being considered. The aim was to consider what needed to be different and some of the answers would come from co-production.

Better management of contracts would include closer monitoring of attendance in specialist provision, which was also important for safeguarding, and also monitoring impact. Members welcomed the commitment to more tracking of outcomes, suggesting that pupils in some NMIs were not well served. One member argued that OFSTED had found that Surrey wasn't good at measuring outcomes for looked after children or children with SEND, and that there should be more emphasis on the best outcome for the children rather than on simply reducing the proportion of pupils in NMI placements.

The FE representative noted that the internship programme had already been in place for 3-4 years in Surrey colleges (ie it was not new). She expressed concern about messages in recent communications from Surrey. LM responded that Surrey had a strong relationship with its colleges.

LM advised that capacity was being created to audit EHCPs. She agreed that some EHCPs didn't support measurement of outcomes. The graduated response model was partly a response to this. The LA was investing in systems to record and share outcomes, based on those already used by some other LAs. These would be available both to the LA and to practitioners, both for children with EHCPs and children on SEND support.

One member cited the number of tribunals as evidence that parental choice was not being met. She asked for information on outcomes from NMIs and colleges **(Action LM)**

LM agreed that parental preference should drive provision. 100 children had not been offered a place because of insufficient capacity and this was one of the drivers for the capital fund bid.

LM advised that NMI schools were being asked to sign a contract including provision of information on outcomes and safeguarding. The LA refused to place pupils in schools which did not sign, except where a tribunal required it. There was a programme of 1:1 discussions with NMIs.

Proposed changes to SEN places in academies and colleges for 2019/20

The LA proposed to increase the number of SEN places in academies and colleges where demand existed and the outcomes were good. For academies and colleges the number of places had to be pre-agreed with the ESFA as funding was paid directly by ESFA.

LM confirmed that the extra places were being provided in schools and colleges where there was high demand and high satisfaction. Sufficiency planning was intended to be for the long term. The post 16 rep noted that all Surrey colleges were good or outstanding on SEN.

The cost of the additional places would be met from existing high needs DSG. The proposals were not a bid for additional funding.

DG confirmed that the place change proposals were for information and consultation not for decision.

LM recalled that almost half of the high needs block was spent on independent and non maintained sector placements, If some of this could be

released it could make a difference and could go further for all children. Funding was being locked into the statutory end of the system. SEND home to school transport (costing £32m) was another example of this.¹

One member suggested that while he was keen to provide extra places, the Surrey Pay proposals made it almost impossible.

LM responded that work was needed on the way in which SEND was funded in all categories and how to use resources in the best way possible.

LM to bring sufficiency planning data to the Jan meeting. **Action: LM**

6a Schools pay review 2019/20

Julie Smyth and Paul Smith presented this item.

Proposals to align Surrey Pay rates for school and non school staff were overdue. Consultation had commenced with the trade unions on 15 November and all business managers had received copies of the proposals on 21 November.

Members welcomed the rises because staff deserved them and recruitment could be challenging, but they noted that schools with the most challenging pupils had the highest ratio of support staff to pupils. Thus the pay proposals created challenges when those same schools were being asked by the LA to expand. Furthermore the pay review was to be implemented from 1 April 2019, whereas any funding review would take longer.

Paul Smith advised that pay for the two lowest grades had to increase because of the national minimum wage and this had had some impact on those grades above. Much of the additional cost was due to increases for the lowest grades. The proposals had been challenging because of the additional cost pressure for the council, which was in a challenging overall financial position. But recruitment and retention was an issue, and there was high turnover in the first year of employment, partly attributed to lack of a clear salary pathway. 2019/20 was a transition year in which staff just moved onto the next nearest pay point.

LM emphasised the need for decision making on the review to recognise its impact and to avoid unintended consequences.

Members suggested that:

- Some schools would no longer be able to accept or meet the needs of the most needy and vulnerable pupils;
- Nursery schools had a particularly high proportion of support staff;
- The increases would lead to further cutbacks in teaching assistant support;
- Among mainstream schools, those with high adult: pupil ratios would be particularly affected, including those with high SEN and high deprivation, particularly those which were also small;

¹ But outside DSG

- The proposals were untimely and had meant school business managers had had to rework their draft budgets after they had been considered by governors.

One member noted that criticising the council was not helpful, as the council was obliged to implement central government pay policies (eg the living wage). The problem was that the government is not funding these costs.

One member drew attention to the proposed reduction in redundancy payments. Paul Smith replied that that only affected voluntary severance.

Members expressed concern that the proposals meant that the HLTA grade would overlap the lower part of the teachers' main scale, that that didn't reflect differences in qualification requirements and could discourage people from training as teachers and could create recruitment difficulties. There were already too few people training to be teachers. LM emphasised that the LA sought to avoid unintended consequences and noted the need to look at possible impact of the changes on schools and pupils.

Members asked whether affordability had been part of the Surrey Pay review remit, and whether the proposals would still go forward if the majority of headteachers argued that they were not affordable. The aim was to reach a collective agreement with unions, but that agreement would require approval by the council, including consideration of the financial impact. When making its decision the council would be aware that the proposals had a significant cost. The increasing level of the minimum wage had led to pay scales being compressed nationally; it was not just a Surrey effect. The LGA was lobbying central government for a fairer deal.

One member expressed disappointment that pay had not been more closely linked to performance management, eg to the national standards for teaching assistants. He would have liked to offer teaching assistants a performance management system in line with that offered to teachers. It was confirmed that progression through the pay range was subject to performance and the wording around this could be reviewed.

One member asked that the January meeting should consider the outcome of the consultation and what funding the council may be able to provide.

The Chair urged members to respond to the consultation.

7 STIPS (Specialist teachers of inclusive practice)/Traveller service update

Susie Campbell clarified that the proposals for the service to support CAMHS work would be in addition to its current behaviour support work and not instead.

David Euridge thought the proposals were very constructive and hoped to be able to collaborate to support them.

Susie noted that both STIPS and outreach were needed.

Susie noted that the parliamentary select committee for women and equality were currently reviewing outcomes for GRT pupils. She had been asked to provide evidence because of the large GRT population in Surrey. National reviews have indicated low outcomes for this group.

8 Merstham Park school transitional funding request

This item was on the agenda to allow consideration of further information requested by the Forum at the last meeting. The school was asking for vacancy funding for one year only.

One member questioned the level of reserves quoted in the paper.

Clarification: the revenue reserves of GLF Schools MAT at 31 August 2017 were £3.4m The net current assets were £5.781m as stated at the meeting. The difference is largely made up of unspent capital funds of £2.3m as stated in the notes to the balance sheet.

The £2m GLF surplus (at August 2018) was spread across 30 schools.

Another member questioned why Surrey had agreed expansions of other local schools, suggesting that secondary pupil numbers repeatedly fell below Surrey's expectations. She suggested that the LA had a moral duty to help if the low numbers at Merstham Park were due to expansions agreed by Surrey in other schools. LM commented that the forecasts were accurate to 1% overall across the county but local variations could be greater. Following discussions at secondary phase council, there were to be sessions for headteachers to contribute local intelligence to the place planning process, There was scope for further refinement to the current process. It was understood that expansion had been necessary in other schools because of delays in opening Merstham Park and that the expansions in other schools could only be agreed if they were permanent.

Merstham Park School had used some of its teaching staff to support local primary schools and had used existing staff to provide ISPSB support, but the scope for savings in staff was limited. 180 places had been offered and the actual takeup (76) had not been known until the end of May², too late for staffing decisions. Local perceptions over the Chart Wood building programme had not helped.

The Chair noted that while other secondary schools had vacancies, the impact was much greater when, as here, a school had only one year group.

Members asked why the DfE did not fund vacancies in new free schools. Sarah advised that the DfE saw 120 as a minimum viable number for secondary schools and that while they provided funding for resources and leadership costs they did not fund vacancies and saw that as an LA issue. They had supported a request to Schools Forum.

Vacancy funding was provided when primary schools expanded (eg 1 form entry to two). Vacancy funding in the case of falling rolls was only provided for a small number of secondary schools. The Chair noted that in a small school most costs were driven by class numbers.

² Note-the vacancy funding bid was only for the difference between 76 places and 120, not 180.

One member suggested that the vacancies could be used for unplaced pupils missing education. But another suggested that this would be too challenging for such a small school.

DG advised that the Forum could consider a lower level of support than that asked for in the paper, if they wished.

The Forum rejected the proposed vacancy funding by 4 votes to 11 (voting limited to schools, academies and early years members).

9 Local funding formula issues

Growing schools

DG reminded the Forum that in 2019/20 DfE would allocate growing schools fund using a formula, from which Surrey expected to receive £3m less than it had historically allocated for the purpose. A further reduction of £1m was expected in 2020/21. The proposed growing schools budget for 2019/20 cost £623,000 more than the estimated DfE allocation, after allowing for average pupil number funding for schools extending age range and falling rolls funding. An underspend of £1.8m was forecast on the 2018/19 growing school budgets and DG proposed that £623,000 of that underspend was used to support the 2019/20 budget. This would avoid the need to change growing schools funding criteria in 2019/20, though a review might still be required in 2020/21.

However, DG still proposed to reduce vacancy funding for eligible classes in primary schools from 100% (or 95%) of net basic entitlement to 90%. This would apply only to new classes from September 2019 and would yield negligible savings in 2019/20, but savings would grow in future years.

A lump sum allocation of £100,000 for pre-opening costs was proposed for wholly new presumption free schools. One such school was scheduled to open in Horley in September 2020 and the LA had been asked to specify the support available to it. The level proposed was similar to the additional funding provided for the previous wholly new primary school.

Detailed criteria for growing schools funding were set out in annex A of the paper.

The Forum

- Noted the current estimates for growing schools funding for 2018/19;
- Agreed the proposed criteria for growing schools funding for 2019/20 (apart from vacancy funding for Merstham Park secondary school, see item 8);
- Agreed the provisional growing schools budget for 2019/20;
- Agreed the use of an estimated £623,000 of 2018/19 underspend to supplement the estimated 2019/20 DfE growing schools allocation;
- Supported the proposed methods for the use of average pupil numbers for schools changing age range;
- Agreed the proposals for advance funding of pre-opening costs for wholly new primary schools;

- Supported the proposed change in the basis of funding rates for vacancies in new classes not already committed.

Falling rolls

DG presented the Forum with detailed proposals for the phasing out of falling rolls funding for small secondary schools. In 2019/20 it was proposed that only schools which actually received falling rolls funding in 2018/19 (or would have done had they met the OFSTED criteria) would receive funding, and that they would receive half of the amount which they would have received under the 2018/19 calculation method. The estimated cost should not exceed £442,000, but estimates were still being updated based on October 2018 census data. Updated estimates would be provided for the next meeting.

The Forum agreed the proposed basis of falling rolls funding

Minimum funding guarantee (MFG) variations

DG asked the Forum to support two further applications to DfE for minimum funding guarantee variations.

One school had ceased to operate as a split site school from September 2018 DG therefore sought to remove the split site funding from September 2018 without it being compensated for by increased minimum funding guarantee (which required DfE approval of a variation).

Downs Way Infant and St Mary's CE Primary schools had merged from September 2018 by expanding St Mary's and closing Downs Way. In these circumstances the minimum funding guarantee and ceiling of the merged school was based on per pupil funding of the continuing school. DG proposed that the average per pupil funding for the predecessor schools should be used, to avoid the choice of continuing schools affecting future funding, or funding affecting the choice of continuing school when a different choice would be better for other reasons,. In this case using the average was beneficial to the merged schools, but he saw it as a valid principle for the future. It only mattered if the continuing school was on minimum funding guarantee or ceiling; this one was expected to be on the ceiling.

DfE expected the Forum to be consulted,

The Forum supported both proposed variations.

10 Schools Forum issues

Items for next meeting (Thursday 10 January 2019)

To include

- DSG funding settlement (expected mid December) and pressures against the DSG blocks;
- SEND outcomes.
- Update on schools pay review.

11 Any other business (if agreed by Chair in advance)

Universal school to school support offer

The Vice Chair reminded the Forum that after the last meeting there were to be separate discussions as to how the universal offer was to be funded, including possible use of existing de-delegated school improvement funding. Funding for school improvement was de-delegated only from maintained primary schools and so if this funding was used to support the universal offer, how could it be ensured that maintained primary schools were not subsidising other sectors? In particular this could mean the smallest schools paying for others.

Funding was needed to cover the period before the 89p/pupil de-delegation for the universal offer took effect (in 2019/20).

LMcG agreed to look at what might be left over from the intervention fund in time for the next meeting. LM suggested that information could be shared on the amount spent from the intervention fund by type of need, but that it was important that schools receiving funding were not named because of the nature of the needs which the fund supported,

One member argued that a lot of schools were already collaborating without the need for central co-ordination.

Meeting ended 4.00pm

ANNEX Surrey response to DfE Consultation on proposed new arrangements for reporting DSG deficits

The DfE's proposals can be summarised as:

- The requirement for a report outlining a recovery plan from all LAs having an overall cumulative DSG deficit of 1% or more at the end of 2018/19;
- The recovery plan should demonstrate how LAs will bring in-year spending in line with in-year resources within three years. However, LAs may leave some or all of the accumulated deficit to date outstanding. This will require an explanation and evidence to support this action.

In recognising the pressures on high needs budgets to be a DSG issue, this consultation is very welcome. We would support the separate reporting of DSG deficits in the interests of providing transparency on a significant and sensitive issue. However, there is a need for the DfE / MHCLG to gain agreement with LAs' external audit firms about the correct treatment rather than this being left to individual discretion. Furthermore, though welcome, these actions can only be a stepping stone to a proper funding level as this is the only sustainable solution. Tightening up the rules on deficits and permitting the 'parking of deficits' fail to address the underlying problem of growth in demand significantly exceeding available funding.

Overspends on the high needs block are significant and growing, to the point where they threaten the financial stability of local authorities. Although Surrey has never had a net DSG deficit, the pressures on the high needs block are likely to lead to a net DSG deficit of at least 1% (£8m) by March 2019. A request to the Schools Forum to support a transfer of £3.1m (0.5% of schools block) to the high needs block was refused and a disapplication request has been submitted to the Secretary of State.

The consultation is focused on overall DSG deficits and there seems to be no explicit expectation that the high needs block should be able to consume its own costs within the DSG. Indeed, transfers from the schools block appear to be an acceptable and continuing part of any recovery plan if they are supported locally. Surrey schools have already transferred £24.5m to the high needs budget in the last five years, with early years contributing a further £7m. Having to draw money from schools is unsatisfactory at a time when schools are facing their own financial challenges.

The consultation reinforces the point that there is no legal requirement for LAs to top-up a ring-fenced grant from non-ring fenced revenue reserves. However, LAs have statutory responsibilities to provide core services and where there is no local schools' support for transfers from the schools block, LAs have no option but to provide from their own revenue funds or fail to deliver these services.

The consultation implies a default position whereby accumulated deficits are recovered within three years. The scale of the pressures on high needs

budgets and the extent of actions that would be required cannot resolve the situation within this time period without a significant increase in funding. Therefore, the requirement for LAs to produce a full recovery plan in these circumstances is not helpful.

I hope the DfE will feel able to respond to these concerns.

Leigh Whitehouse

Executive Director of Finance for Surrey County Council
7 December 2018