



**Information Governance Team**

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10 January 2023

Dear Sir/Madam

**Freedom of Information Act 2000 (FOIA)**

**Request ID: FOI470003152**

Thank you for your request for information relating to Dedicated Schools Grant and SEND performance indicators.

You have requested the following information:

**1. Please provide the council's response to the DLUHC consultation / survey on the removal of the current statutory override on Dedicated School Grant deficits (i.e. removing the ringfence of DSG deficits that means they do not have to be funded from available reserves)**

Please see attached document.

**2. What is the current forecast in-year underspend/overspend outturn on the Dedicated Schools Grant for 2022/23 (i.e. the forecast outturn for the end of the financial year, applying only to 2022/23 budgets)?**

The current DSG forecast underspend for 2022/23 is £2.6m.

**3. What is the current forecast cumulative position on the Dedicated Schools Grant by the end of 2022/23 (i.e. the forecast cumulative surplus or deficit by the end of the financial year)?**

The forecast DSG reserve position at the end of 2022/23 is £8.5m.

**4. What is the forecast level of reserves by the end of 2022/23 for those reserves that have**

**the capacity to be used to cover any Dedicated Schools Grant deficit?**

Zero.

**5. Please state if the council's Special Education Needs and Disabilities (SEND) provision is covered by a safety valve agreement, a Delivering Best Value arrangement, or any other agreement with the national government**

No.

**6. Please provide a list of the council's Key Performance Indicators (or similar targets) in 2022/23 concerning SEND, including the 2021/22 benchmark for those KPIs, any annual or quarterly targets/benchmarks in 2022/23 and the performance against those targets/benchmarks to date**

We can confirm that we hold this information and it is accessible to you via the Government website, please use the following link:-

<https://www.gov.uk/government/collections/statistics-special-educational-needs-sen>

We therefore do not have to provide the information as per Section 21 of the FOIA.

**7. Please list the staff roles within the council's SEND team (those staff employed by the council to manage and deliver SEND eligibility and provision)**

Senior Lead – SEND  
SEN Assessment & Provision Manager

**8. Is performance against these KPIs (as referred to in question 6) considered in the pay, bonuses or performance management of any SEND staff/management? Please provide details.**

No.

The supply of information in response to a FOI/EIR request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane,

Wilmslow, Cheshire, SK9 5AF or email [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours faithfully

**Information Governance**

# Dedicated Schools Grant (DSG) Information Gathering

## Dedicated Schools Grant (DSG) Information Gathering

### Introduction

You are reporting on behalf of: **Coventry City Council**

Local Authority

Coventry City Council

DSG Intervention Programme

Not applicable

Class Type

MD

ONS Code

E08000026

Region

West Midlands

In 2020, the Department for Levelling Up, Housing and Communities (DLUHC, then MHCLG) introduced a statutory override that separated local authorities' Dedicated Schools Grant (DSG) deficits from their wider finances. The effect of the override is that local authorities do not need to make provision from their general reserves to cover their DSG deficits. This statutory override is due to end at the end of 2022/23.

This survey is designed to help DLUHC understand the impact of the DSG deficit statutory override ending at the end of the 2022/23 financial year. Whilst participation in the survey is voluntary, we would value your input on this matter and do not foresee this being an ongoing exercise. The returns will be used for DLUHC policy development purposes and there are presently no plans to publish the data collected. Please note, however, that the information you provide could be the subject of a request under the Freedom of Information Act.

You should exercise accurate, professional judgement when submitting your returns. Your submission does not require certification but you should agree your return with your Section 151 Officer (or a suitable senior delegate in their absence).

Please submit your response through **DELTA by 11pm on Friday 19 August**. We cannot accept returns after the closing deadline. You must hit submit on completing the form otherwise your return will not be counted.

Please read the guidance carefully and use the contact details below if you have any queries.

For general enquiries relating to this survey email:

[careandreform2@levellingup.gov.uk](mailto:careandreform2@levellingup.gov.uk)

For DELTA enquiries:

[dluhc.digital-services@levellingup.gov.uk](mailto:dluhc.digital-services@levellingup.gov.uk)

or else raise calls via the DLUHC Service Desk at:

<https://digital.dclg.gov.uk/jira/servicedesk/customer/portal/4/group/18>

### Section A: Data Questions

## Question 1: What is your total cumulative DSG balance as at 31 March 2022?

Please enter your latest year-end outturn estimate inclusive of any Safety Valve contributions if applicable to your authority. Your estimate should be consistent with definitions used in the Revenue Account (RA), Revenue Outturn (RO), Section 251 Budget and Section 251 Outturn data collections. Please report any reserve using a positive value and any deficit as negative, in millions to the nearest thousand pounds (up to 3 decimal places).

We have displayed some of your authority's latest available published estimates as at 31 March 2022 from the 2021/22 RA and 2021/22 Section 251 budget releases (missing returns shown as blanks). You should provide an up-to-date estimate as at 31 March 2022 based on outturn data where possible, taking account of any reserve/deficit you may have in your General Fund and, where used, DSG adjustment account.

2021/22 RA  
(£m)  
(Line 1013)

£ 2.848 m

2021/22 S251 budget (£m) (Line 1.9.3)

£ 0.00 m

Latest Estimate (£m)

£ 5.927 m

## Question 2: What is your total projected cumulative DSG balance as at 31 March 2023 and, if available, projections for 31 March 2024 and 31 March 2025?

Please enter your latest year-end projections inclusive of any Safety Valve contributions if applicable to your authority. Your projections should be consistent with definitions used in the Revenue Account (RA) and Section 251 Budget data collections. Please report any reserve using a positive value and any deficit as negative, in millions to the nearest thousand pounds (up to 3 decimal places).

We have displayed your some of your authority's latest available published estimates as at 31 March 2023 from the 2022/23 RA (missing returns shown as blanks). You should provide up-to-date projections for what you assess to be your authority's most likely balance (e.g. central scenario planning assumption), based on your best available data. You should take account of any projected reserve/deficit in your General Fund and, where you intend to use, DSG adjustment account. If you are unable to provide projections for 31 March 2024 or 31 March 2025, please leave these cells blank (do not enter zero).

DSG reserve(+)/deficit(-) (£m)  
31 March 2023

2022/23 RA (Line 1013)

£ 2.848 m

Appropriations to(+)/from(-) DSG adjustment account (£m)

2022/23 RA (Line 897)

£ 0.000 m

Dedicated schools grant reserves projection at 31 March 2023

£ 5.927 m

Dedicated schools grant reserves projection at 31 March 2024

£ m

Dedicated schools grant reserves projection at 31 March 2025

£ m

Please rate your confidence in these projections

Low

### Question 3: What is your general fund other earmarked and unallocated reserves balance as at 31 March 2022?

Please enter your latest year-end outturn estimates. Your estimates should be consistent with definitions used in the Revenue Account (RA) and Revenue Outturn (RO) data collections. Please report any reserve using a positive value, in millions to the nearest thousand pounds (up to 3 decimal places). You should also report the proportion of your total other earmarked and unallocated reserves you deem available for dealing with acute pressures.

We have displayed your authority's latest available published estimates as at 31 March 2022 from the 2021/22 RA (missing returns shown as blanks). You should provide an up-to-date estimate as at 31 March 2022 based on outturn data where possible.

#### 2021/22 RA Figures

Other Earmarked  
Financial  
Reserves  
(Line 1015)

£ 74.989 m

Unallocated  
Financial  
Reserves  
(Line 1016)

£ 10.277 m

Total Other Earmarked  
and Unallocated Reserves  
(Sum of 1015 and 1016)

£ 85.266 m

#### Latest estimate

Other Earmarked  
Financial  
Reserves

£ 74.989 m

Unallocated  
Financial  
Reserves

£ 10.277 m

Total Other  
Earmarked  
and Unallocated  
Reserves

£ 85.266 m

Percentage of Total Other Earmarked and Unallocated Reserves deemed available for acute pressures (%)

0.0 %

Total Other Earmarked and Unallocated Reserves deemed available for acute pressures

£ 0.000 m

## Question 4: What is your projected general fund other earmarked and unallocated reserves balance as at 31 March 2023 and, if available, forecasts for 31 March 2024 and 31 March 2025?

Please enter your latest year-end projections. Your projections should be consistent with definitions used in the Revenue Account (RA). Please report any reserve using a positive value, in millions to the nearest thousand pounds (up to 3 decimal places). For 31 March 2023, you should also report the proportion of your total other earmarked and unallocated reserves you deem available for dealing with acute pressures.

We have displayed your authority's latest available published estimates as at 31 March 2023 from the 2022/23 RA (missing returns shown as blanks). You should provide up-to-date projections for what you assess to be your authority's most likely balance (e.g. central scenario planning assumption), based on your best available data. If you are unable to provide projections for 31 March 2024 or 31 March 2025, please leave these cells blank (do not enter zero).

### Latest published data (2022/23 RA)

<i>Other Earmarked Financial Reserves (Line 1015)</i>	<i>Unallocated Financial Reserves (Line 1016)</i>	<i>Total Other Earmarked and Unallocated Reserves (Sum of 1015 and 1016)</i>
£ 46.390 m	£ 10.277 m	£ 56.667 m

### 31 March 2023 latest projection

<i>Other Earmarked Financial Reserves</i>	<i>Unallocated Financial Reserves</i>	<i>Total Other Earmarked and Unallocated Reserves</i>
£ 46.390 m	£ 10.277 m	£ 56.667 m

Percentage of Total Other Earmarked and Unallocated Reserves deemed available for acute pressures (%) *Total Other Earmarked and Unallocated Reserves deemed available for acute pressures*

0.0 %	£ 0.000 m
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### 31 March 2024 latest projection

<i>Other Earmarked Financial Reserves</i>	<i>Unallocated Financial Reserves</i>	<i>Total Other Earmarked and Unallocated Reserves</i>
£ m	£ m	£ m

### 31 March 2025 latest projection

<i>Other Earmarked Financial Reserves</i>	<i>Unallocated Financial Reserves</i>	<i>Total Other Earmarked and Unallocated Reserves</i>
£ m	£ m	£ m

Please RAG rate your confidence in these projections

Medium
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## Question 5: What is the minimum level of Unallocated reserves you require to be held for 2022/23?

Please enter the minimum level of Unallocated Financial Reserves (Line 1016 in the 2022/23 RA) your authority's policy requires to be held in 2022/23. Please report your figure in millions using a positive value to the nearest thousand pounds (up to three decimal places).

Unallocated Financial Reserves - Minimum level 2022/23

£ 10.276 m

### Question 6: Please briefly describe your minimum reserves policy

Provide a brief narrative to describe your policy on the minimum amount of reserves that must be held in your general fund. (Please do not use more than 500 characters).

The Council does not have a defined policy on the minimum amount of unallocated reserves. The current level is approaching 5% of net revenue spend which falls within acceptable tolerances.

### Question 7: Have you earmarked general fund reserves in order to reduce/offset a DSG deficit when the statutory override ends on 31 March 2022/23?

Please select Yes or No

Yes  No

### Question 8: Not applicable

### Question 9: Not applicable

### Question 10: Not applicable

Section B: Assessment of Financial Sustainability and Risk

### Question 11: If the DSG deficit statutory override ends at the end of 2022/23:

i) Will this have a direct, adverse impact on the wider financial sustainability of your local authority (e.g. in terms of risk to service delivery or draw down of reserves)?

No

ii) If the DSG deficit statutory override ends at the end of 2022/23, what is the likelihood of this leading directly to your authority needing to issue a Section 114 notice?

Before 31 March 2023

Very Unlikely

Between 1 April 2023 and 31 March 2025

Very Unlikely

iii) If the DSG deficit statutory override ends at the end of 2022/23, what is the likelihood of this leading directly to an adverse impact on wider service delivery across your authority?

Before 31 March 2023

Very Unlikely



Between 1 April 2023 and 31 March 2025

Quite Likely

**iv) If you have answered Quite Likely or Very Likely to Question 11iii), select up to three service areas you expect to be most adversely affected by the ending of the statutory override.**

- Education Services
- Highways and Transport Services
- Children's Social Care
- Adult Social Care
- Public Health Services
- Housing Services (GFRA only)
- Cultural & Related Services
- Environmental & Regulatory services
- Planning & Development Services
- Central Services
- Other services including Fire

**v) If you have answered Quite Likely or Very Likely to Question 11iii), please provide a brief narrative detailing the adverse effects of ending the statutory override on wider service delivery.**

Please do not use more than 500 characters.

Continued EHCP demand growth, cost growth, and projected below inflation increases in HNB DSG will result in an unsustainable financial position for all LAs. In the absence of a statutory ring-fence of the DSG HNB we would need to react to the deficit with and safeguard the Council's financial position by reducing spend on other areas of spend. These savings are likely to be made primarily from related services Education & Childrens, but could necessitate reductions across all areas.

## Question 12: Are you in favour of an extension of the DSG deficit statutory override?

Do you feel that the statutory override should be extended beyond the end of the 2022/23 financial year?

Please select

Yes

## Question 13: For how many years do you feel the override should be extended?

If you have answered 'Yes' to Question 12, how many years do you feel the statutory override should be extended for after the financial year 2022/23?

Please select an option from the list provided.

Longer than 3 years

## Question 14: Please provide a brief explanation of your answer to Question 12 (and if applicable Question 13) on whether or not you think the statutory override should be extended and for how long.

Please do not use more than 500 characters

Until statutory changes set out in the Green Paper are implemented, system demands are unlikely to reduce placing all LAs at risk of in-year deficits and exhaustion of HNB reserves within the next 3 years. This action may force LAs to cease non-statutory preventative interventions, which would be counter-productive and 'fly in the face' of the Government's direction of travel, triggering the safety valve for many. Any change in financial policy should support not undermine Government policy.



## Section C: Wider Questions on DSG

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### **Question 15: What more do you think could be done to support local authorities in relation to DSG pressures?**

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Please list up to three measures you would see as most beneficial. Please do not use more than 150 characters for each suggestion.

Suggestion 1

Accurate funding assessment for new burdens. E.g. reflection of extended 19-25 age range & proper mainstreaming of grants (TPS).

Suggestion 2

Legal framework around advocacy for parental preference, tribunals etc. Cost of external provision.

Suggestion 3

Green paper policy plans evidencing how changes will address the financial issues so that LA's can begin to plan for the impact.

### **Question 16: If you would like to provide some brief, additional commentary on the status of your DSG balance and the statutory override, please do so here.**

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If you wish to submit some additional comments, you can do so here. Please do not use more than 750 characters.

Although we currently have a DSG balance this is not sustainable. We are holding some resource to fund additional special school places that will come online in the next 3 years, plus we continue to see significant in-year increases in demand and cost which will exceed the projected DSG increases. Instead of just ringfencing the problem, the policy issue needs to be resolved so that the system can operate sustainably. As school budgets are squeezed further and OfSTED judgements continue to penalise inclusive practice, the support ordinarily available for children with additional needs will continue to constrict. Perverse system incentives also need to be removed, e.g. the journey of children who are routed to expensive external placements.

### **Question 17: Has your submission been checked by your Section 151 office or suitable senior delegate. Note that your submission does not require certification on DELTA.**

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Yes