

**LGSS Audit & Risk Management Service**  
**Internal Audit Report**  
**The Administration of Pupil Premium – 2014/2015**

Client	Children, Families and Education
Issued to	Anne Birch Assistant Director Learning, Skills and Education; Andrew Cheal, Deputy Assistant Director, Learning Skills and Education.
Date	January 2015
Lead Auditors	Janette Lynn
Status of report	Final Report
Internal Audit Opinion	Substantial Assurance
Audit Committee Date	26 February 2015

# Executive Summary

## Assurance Summary

<i>Risk</i>	<i>No</i>	<i>Limited</i>	<i>Moderate</i>	<i>Substantial</i>	<i>Full</i>
Policies and procedures are not in place for the calculation and allocation of pupil premium to schools, including targeting those pupils entitled to this funding.					
Schools do not target monies at the correct children or target at the correct children but ineffectively.					
Governing Bodies and NCC do not monitor that monies are spent on those children entitled to support and that balances are accrued due to non spending.					
Specific monitoring does not take place in relation to Looked After Childrens' Pupil premium allocations and their use.					
<b>Overall</b>					

### Note

*All Internal Audit reports are available on a confidential basis to Senior Management and the Audit Committee as a matter of course. The main points of this report and the overall assurance level will be summarised for the Audit Committee in a report that is made available within the public domain.*

### 1. Background to the review

The thematic audit of "Pupil Premium Administration" was completed as part of the 2014/2015 annual audit plan agreed with the Director of Children, Families and Education.

Governing Bodies and Headteachers have responsibility for ensuring that this funding is used in order to raise standards in schools and to "close the gap" between Pupil Premium children and their peers both in their school and nationally.

It should be noted that:

- the “DfE Guidance Pupil Premium 2014 to 2015 conditions of grant – terms on which PPG is allocated, section 8 ” states that the grant must be spent for the purposes of the school and gives schools the freedom to use Pupil Premium funding as they see fit i.e. Pupil Premium funding is not earmarked to these pupils, the exception to this is the Pupil Premium funding for Looked After Children;
- there is no standard method to be followed or records that must be maintained;
- Schools must however have sufficient evidence to demonstrate how this funding has been allocated and spent within the budget and how it has been used to support pupils and raise standards;
- OFSTED are now focusing more closely on these aspects when inspecting schools.

The audit brief therefore also included looking at the use of Pupil Premium monies for Looked After Children (LAC). LAC Pupil Premium allocations have, since April 2014 been delegated to schools and paid to them each term. For the summer and autumn term schools received this allocation automatically however from January 2015 the funding will only be paid to schools if the school has submitted a Personal Education Plan which has been approved by NCC. This new method of allocation had been planned for the autumn term but it has taken time to establish this new system both in schools and the central review and feedback processes.

A sample of fifteen schools were chosen to take part in the audit. These included:

- schools that had reported an exceptionally high level of Pupil Premium funding at year end;
- schools that had reported that they had no Pupil Premium funding left at year end;
- the remaining schools were chosen at random to provide a cross section of schools across the county both in size of school, geographical area and pupil profile.

The audit focused on the administrative systems used by schools to record the funding, its use, pupil progress and governance arrangements for monitoring and reporting.

The performance of pupils in schools is subject to alternative reporting i.e. Raise on Line, OFSTED Dashboard and data collated by BIPI for the CFE directorate.

The results of all schools visited have been collated to form the basis for this report to provide feedback to appropriate officers within the Council and to schools.

## **1.1 Key Risks**

Key risks identified at the start of the audit were:

- Policies and procedures are not in place for the calculation and allocation of Pupil Premium to schools, including targeting those pupils entitled to this funding;
- Schools do not target monies at the correct children or target at the correct children but ineffectively;
- Governing Bodies and NCC do not monitor that monies are spent on those children entitled to support and that balances are accrued due to non spending;
- Specific monitoring does not takes place in relation to Looked After Childrens' Pupil Premium allocations and their use.

## **1.2 Objectives**

The objectives of the review were therefore to:

- Assess the controls and procedures in place for the allocation of Pupil Premium funding to schools;
- Assess whether schools had appropriate records in place to track the use of this funding in their accounts and any balances;
- Assess whether systems were in place to record the interventions and support provided to Pupil Premium and Looked after Children;
- Assess whether Governors took an active part in monitoring the use of Pupil Premium Funding and received appropriate reports from School Management on the level of funding, how it was being used, balances held, and its impact on pupil progress.

## **2. Internal Audit Opinion, Main Conclusions and Good Practice**

Internal Audit's approach for the completion of this review was to visit each school. Discussions were held with the Headteacher, the Business Manager/Bursar and other appropriate staff in the school e.g. Deputy Heads, Inclusion Managers and in four schools a governor attended the meeting.

The findings of the audit were summarised in a short report which has been provided to each school to provide feedback to the Governing Body.

This report brings together the findings of all 15 school visits to provide an overall assurance opinion, indentifying trends in compliance and recommends appropriate actions to strengthen controls and governance.

All schools had their own individual approach to how they administered and used the funding. The audit did not therefore consist of detailed testing against key standards, the approach was for schools to discuss and demonstrate what they were doing. They were checked against broad criteria e.g. were records in place of the interventions and support for a pupil premium child – the format of this was not tested against a standard.

## 2.1 Main conclusions

Based on the completion of our fieldwork we are giving **substantial assurance** for Pupil Premium Administration.

### **Risk 1 Policies and procedures are not in place for the calculation and allocation of Pupil Premium to schools, including targeting those pupils entitled to this funding;**

#### **Finance**

Procedures were in place within Schools Finance to record funding received from the DfE and then passported to schools. Reconciliations were completed periodically to ensure that all Pupil Premium funding had been paid to schools.

All schools had records of their funding and how this was spent. In most schools this was by using a dedicated cost center(s). Many schools had improved their financial analysis in 2014/2015 to ensure that all staffing and non staffing costs were now held together on the cost center to improve budget monitoring. In many schools this had not been the case in 2013/2014.

A number of schools also held additional analysis on spreadsheets to provide further details.

Only five of the fifteen schools recorded the actual costs per pupil. This level of detail can provide evidence that the funding is being targeted at these pupils and also increased focus as schools can compare what has been spent and what impact it has achieved when compared to the progress a pupil is making.

Costing per pupil also serves to identify pupils that are high or low recipients of Pupil Premium. Schools have the flexibility to spend the funding as they choose unless the pupil is a LAC in which case the proposed spend has been submitted and approved and should not be changed. There should in all cases be a method of review and challenge to ensure that it is being channelled effectively and that there is reasoned judgement in the allocation per pupil.

## **Reporting to Governors on Finance**

Governing Bodies received information on the funding, expenditure and balances held. As stated above, although schools were able to easily produce financial monitoring reports, these were not always presented to Governors. In two schools only verbal reports were provided. In one school, because the pupil premium budget was split across several cost centers it was not easy to see the full picture.

In all schools the Governing Bodies had been notified of the predicted year end balances and the confirmation of these at the end of the year.

### **Risk 2 Schools do not target monies at the correct children or target at the correct children but ineffectively;**

#### **Records of how the funding was targeted**

There is no prescribed way in which schools must record the use of pupil premium monies for individual pupils. Good practice would be that you should be able to identify easily the interventions and support provided for each pupil and also any associated cost.

Schools held records in a variety of formats: "class" provision maps, on "activity" lists e.g. music, trips, uniform, or by intervention lists. A number of schools had then assimilated this data into a central "one look" record so they could view for a specific pupil premium child all of the interventions and support they had received together with their results in key areas. This "one look" record varied from an A4 sheet of paper manual record to a complex spreadsheet, or a software package.

A few schools did not use this method and information was recorded in different formats in different files e.g. class records, provision maps or subject intervention records, trip / breakfast club / uniform / other activity records etc but this information was not collated into a master record for each pupil. Testing proved that these schools were able to provide details to the auditor for pupils that were in the test sample as they located this information in the relevant files. However this was in part because the member of staff was aware of what interventions the pupil had received. There was not a clear audit trail by pupil that could be viewed by school management, governors or OFSTED inspectors and the school was reliant on the members of staff remembering what the pupil had received.

Schools should therefore consider carefully how robust their systems are and how easy it is to access information on pupil premium and all children in the school.

The quality of record keeping in schools was substantially better in 2014/2015 than in 2013/2014. Three of the schools visited who co-

incidentally had high Pupil Premium carryforwards had little or no records by pupil relating to 2013/2014. All of these schools have had changes in Headteacher since April 2014 and they and / or colleagues have all taken steps to address this in 2014/2015.

All Headteachers were aware that as the level of Pupil Premium funding has increased substantially so must the level of supporting evidence.

Testing was completed to see what systems and methods were used to record details for Pupil Premium children and detailed testing of two pupils and up to two Looked After Children in each school was completed.

All schools were able to provide details of the interventions and support provided.

### **Identifying pupils needs**

In order to assess the most appropriate support required for the pupils, information was sourced by schools from teachers, parents, guardians, the pupils themselves and other professionals, such as social workers and counsellors.

Discussions were held between school staff, parents and the pupils themselves who were asked what they were good at, what their aspirations were and what support they felt they would benefit from.

### **How the funding was used**

The most common use of the funding was interventions in key subject areas – language, literacy and numeracy. This was delivered by teachers / HLTAs or TAs. In some schools the staff were employed as “specialists” engaged purely to work with Pupil Premium children.

Headteachers, governors and staff in schools were aware of the Sutton Trust report which highlighted the need for such staff to be appropriately trained in order to be effective. Many schools therefore used part of the Pupil Premium budget for staff training.

### **Evaluating the impact of interventions**

The frequency of monitoring pupils’ progress in key areas varied, examples of frequency were monthly, 6 weekly or termly.

One school recorded this on its “one look” spreadsheet and RAG rated the impact of the intervention against each child’s progress.

One secondary school had a “progress room” where all children across year groups were displayed and using colour coding their progress was monitored

in key subjects. The Senior Management team reviewed each pupil's progress regularly and the pupils' colour coding and positions on the board were amended accordingly. This provided a useful tracking system.

Other schools had reports in various formats e.g. word files, spreadsheets or system generated reports to demonstrate that progress was regularly monitored.

Although the concentration was primarily in key subjects, support was also provided for other areas to improve the well being of the pupil e.g. behaviour support and counselling, increasing confidence, communication skills and self esteem. There was also evidence that these interventions were reviewed and evaluated. As behaviour improved and pupils self esteem increased this meant they were more confident and contributed more in class.

### **Engagement with parents/carers**

Working with families and the home environment was seen as a key way in which pupils' behaviour and well being could be influenced. Most, but not all schools had a Parent Support worker. The salaries of Parent Support workers were often funded from the Pupil Premium budget. However the Parent Support Workers often work with all children and not exclusively with Pupil Premium children so in some cases it may be more appropriate to only charge a proportion of the costs to this area.

Schools also encouraged parents to help their children and provided resources which could be used at home. This also enabled parents to access learning themselves e.g. Reading Eggs, Literacy Box, other literacy resources and Numicon. One school was funding through a community project adult literacy classes – this was seen as beneficial as it would then enable the parents to support their children throughout their education.

The work of school staff with families was seen as a way in which to identify issues with pupils home environment and to assist them in overcoming these barriers to learning as without interventions the pupil was not ready and willing and able to learn.

Schools should consider how the work of the Parent Support Workers could be evaluated in order to ensure that this funding was being used effectively.

### **Before and after school clubs**

There was quite a contrast to schools' attitudes to breakfast clubs. In one school with over a hundred Pupil Premium pupils only three attended the breakfast club, all other attendees were paid for by parents. In other schools there was positive discrimination for Pupil Premium children where they were given priority to attend. In one school they operated a breakfast club

which was exclusively for Pupil Premium pupils and run by staff for three days a week.

Where schools did operate Breakfast clubs (either themselves or through arrangements with a provider) this was considered to be a successful service which improved attendance and well being. In one school breakfast club staff were also responsible for checking pupils appearance before attending school - thus pupils were on time, well fed, settled and felt confident as they were smart and attired correctly for the day. Many schools also ran nurture groups before school started.

After school clubs were promoted and in one school there was positive discrimination and pupil premium children were allocated places first. In many schools the reasons that these clubs were supported by pupil premium funding was that they focused on exercise and health benefits or provided good opportunities for schools to gain confidence and improve communication skills eg. Football, drama and dance clubs etc.

In two of the schools pupils who attended these clubs completed simple questionnaires – to measure their own satisfaction levels. Were they benefitting from this? As a measure of evaluating if best intentions were being delivered the questions were pitched to provide feedback on how involved the pupil was in the activity i.e. did they just attend or did they enjoy taking an active part in activities? This was more appropriate than simply relying for feedback from the provider who has a financial interest in the pupil attending.

Some schools took the view that they automatically funded all trips and / or clubs and music lessons and promoted this entitlement. In other schools this was on request or when identified by the school / parent support worker i.e. it was not an automatic entitlement but was dependent on how the needs of the pupil were assessed, thus supporting value for money criteria - what is the best use of the funding in order to improve the pupil's performance?

It is essential that schools therefore consider how the use of the funding will deliver benefits and improve performance and evaluate these to ensure that these are effective and they are obtaining value for money.

### **New ideas for the use of Pupil Premium**

Headteachers stated that not all Pupil Premium children come from families where support is required, nor was their performance necessarily below target. Some were on target or exceeded targets. Many felt it was challenging to identify what provision if any, should be made for these pupils.

All schools have to publish how they are using the Pupil Premium funding and what the anticipated impact will be. This should provide ideas for schools and enable them to review their own provision. There are also a number of

reports that identify the most effective use of Pupil Premium money – by the Sutton Trust, OFSTED and a search on the internet locates many documents and presentations often by OFSTED inspectors or the National Pupil Premium champion which give guidance to schools. The Pupil Premium national prizes website also gives examples of good practice.

A selection of the many sources of information available:

**Seeking out excellent practice in other schools**

**[http://apps.nationalcollege.org.uk/closing\\_the\\_gap/index.cfm](http://apps.nationalcollege.org.uk/closing_the_gap/index.cfm)**

**Using the Education Endowment Foundation toolkit**

**<http://educationendowmentfoundation.org.uk/toolkit/>**

**<http://www.ofsted.gov.uk/resources/pupil-premium-how-schools-are-spending-funding-successfully-maximise-achievement>**

**OFSTED update July 2014**

**<http://www.ofsted.gov.uk/resources/pupil-premium-how-schools-are-spending-funding-successfully-maximise-achievement>**

**<http://www.ofsted.gov.uk/resources/pupil-premium-update>**

**Pupil Premium Awards website**

**<http://www.pupilpremiumawards.co.uk/>**

In addition to this NCC commissioned a project with “Achievement for All” this summer where seventeen schools took part in a project to identify innovative ways of raising standards using Pupil Premium funding. Feedback on this project was provided to schools at the Annual Inclusion Conference on 14 November 2014. Not all Headteachers in the sample were aware of the project. However three schools had made their own arrangements and had purchased support from Achievement for All consultants to review their current Pupil Premium use and its effectiveness.

A selection of overheads from the conference:

**<http://www.northamptonshire.gov.uk/en/councilservices/educationandlearning/special-educational-needs-disability-support/local-offer/pages/school-inclusion-network.aspx>**

**[Closing the Gap - Reporting to Governors on progress of Pupil Premium pupils.](#)**

All Governing Bodies received reports from Headteachers on the progress that Pupil Premium children were making. These varied in both format and frequency. Some schools used their own design and format others used the

OFSTED analysis and challenge tool kit, Raise on line, and / or OFSTED Dashboard.

Frequency varied from monthly, termly to annually, when Raise on Line or similar reports were presented. Comparisons used were between each class, each year group, key stages, county and national statistics with one school presenting this information in graphs which aided comparisons.

Reports should be easy to interpret and compare with comparative data placed in close proximity.

### **Publication of Information on Pupil Premium**

Schools are required to publish each year the amount of funding received, its intended use and the impact expected of this. Details for the previous year should include the outcomes i.e. what has been achieved.

Some of the schools visited had not updated their websites to show 2014/2015 funding at the time of the visits as they were waiting to present results for 2013/2014 to the Governing Body before updating the website.

It was noted that some schools had updated 2014/2015 and had erased all information on 2013/2014 when doing so. One school's website had not been updated since 2011/2012.

Schools recorded the impact in varying ways, most commonly in broad statements though a few did place actual statistics of pupil performance on their website and provided comparisons between their FSM pupils, their other pupils and national statistics.

<https://www.gov.uk/what-maintained-schools-must-publish-online>

The above link provides guidance on Pupil Premium details that must be published.

### **Risk 3 Governing Bodies and NCC do not monitor that monies are spent on those children entitled to support and that balances are accrued due to non spending**

All schools had systems in place for the finance of Pupil Premium to be monitored and reports were presented to Governors.

Forecast and year end balances were also reported to governors, including those schools where excessive balances were held. Governing Bodies should ensure that they monitor the spending and also challenge Headteachers if balances are being accrued.

The analysis of school balances to the Schools Forum in July 2014 identified that schools held balances of £1.3m for Pupil Premium. Forum members asked for those schools reporting high balances to be contacted by Schools Finance to confirm if the figures reported were correct and the reasons why there had been such significant underspends.

Twelve schools were contacted by Schools Finance. Schools Finance reported back to the October 2014 Schools Forum the findings and that two of the schools had failed to respond. Further checks are being completed. These two schools were included in this audit.

Schools Forum have also consulted with schools on the reporting of Pupil Premium balances at the end of 2014/15 with a proposal to have more detailed breakdown of the budget so that FSM Pupil Premium and other Pupil Premium balances are separately identified. Feedback from the consultation was discussed at the Forum meeting on 2 December 2014 and a revised SB1 form agreed.

**Risk 4 Specific monitoring does not takes place in relation to Looked After Childrens' Pupil Premium allocations and their use.**

**Procedures to be followed to trigger funding**

All schools are required to state on the "Personal Education Plan" (PEP) for a Looked After Child how they intend to use the Pupil Premium funding and its associated cost.

From April 2014 the budget allocation of £1,900 per annum per LAC was delegated to schools. Funds are transferred to schools each term after the PEP has been reviewed and approved by the NCC Virtual School staff. Interim arrangements were in place for the summer and autumn term allocations.

Many of the PEP forms were initially rejected due to insufficient details being provided, this corresponds to the findings in this audit and the details in this report. The audit took place during the early stages of this new process and this may therefore be why these weaknesses were identified. From January 2015 funding will only be allocated to schools if a PEP has been completed correctly and provides sufficient detail of the provision and resources to be used.

**Details of provision and costings**

In the fifteen schools visited the Pupil Premium section of the PEPs for LAC children was tested. Not all schools had a LAC so the total number of records reviewed was sixteen. Of these, two had not been finalised, as pupils had only recently joined the school.

One of the PEPS was in excess of six months old, previous date was in November 2013 . Although a review of the PEP had commenced in June 2014 it had not been completed. One of the explanations for this was that the adoption process was in place and it had been anticipated that this would be concluded shortly. This had in fact not been concluded until October 2014. Schools should be aware that adoption processes can be protracted and the updating of the PEPs should not be delayed whilst court proceedings are in progress.

Due to the timing of this audit in October / November 2014 only four out of the sixteen were completed using the September 2014 form, twelve were on the September 2013 forms.

It was noted that on both versions of the forms schools were not always quantifying or providing sufficient details of the support and / or resources to be provided with the Pupil Premium funding. Generic phrases were used including “extra tuition for science, 1:1 support, extra tuition or whatever x sees fit, revision guides, books, trips, school clubs, residential, protective behaviours”.

The September 2013 PEP form asked schools to review the Pupil Premium spend, the 2014 PEP form requires schools to forecast spending and then confirm actual spend.

Schools also did not provide details of spending for the initiatives. One stated £1,900 i.e. the allocation, but did not break this down between the separate items stated on the form.

For only four of the twelve PEPS that had been completed and finalised were costings available in the school for the support and resources detailed. In only one of these had the school entered the total cost on the PEP form.

### **Review and monitoring of PEPs by the Virtual School**

Central records stated that a PEP for a pupil in two schools had not been accepted by NCC but the staff in these schools stated that they were not aware of this.

The Virtual School Headteacher confirmed that since September 2014 a Quality Assessment process has been introduced for scoring information submitted on the PEP forms that are submitted. They are then recorded as approved or not on the One system and Carefirst.

## **2.2 Good Practice**

Areas of good practice are listed at Appendix 1.

## **2.3 Main recommendations**

For each of the issues identified we have made suggested recommendations in the accompanying action plan. When schools comply with the advice given, this will positively improve the control environment and aid the Authority in its ability to effectively manage its risks.

#### **2.4 Acknowledgement**

We would like to take this opportunity to thank all members of staff whom we contacted during the course of this review for their time and assistance.

## Findings and Management Responses

Risk Level	Key findings	Recommendations	Management Comments / Agreed actions	Timescale / Owner
<p>1.</p> 	<p>There were a variety of ways in which schools evaluated the impact of interventions, but this was not evidenced in all schools. In some schools this was measured by pupil performance only.</p> <p>There is a risk that schools continue with interventions and or support that is not effective in delivering better outcomes if evaluation does not take place and changes made.</p>	<p>Schools should be advised of the ways in which interventions can be reviewed and evaluated to confirm if these are effective in raising standards.</p>	<p>To be advised to schools by newsletters / training / seminars</p>	<p>Senior School Improvement, Manager, Virtual School Head, Leadership and Governance Manager</p> <p>28 February 2015</p>
<p>2.</p> 	<p>Schools had a variety of ways in which they recorded the use of Pupil Premium funding and pupil records.</p> <p>Not all schools could access this information in “one view” point as records were held in several files and locations and not consolidated in one system.</p> <p>There is a risk therefore that monies may not be used to the best effect if all of these details cannot easily be reviewed.</p>	<p>Schools should be advised to review their records for Pupil Premium pupils to ensure that they have robust records in place that will enable them to easily review a pupil to see what interventions they have received and what outcomes this has achieved e.g. a “one view” where all data can be easily reviewed.</p>	<p>To be advised to schools by newsletters / training / seminars</p>	<p>Senior School Improvement, Manager, Virtual School Head, Leadership and Governance Manager</p> <p>28 February 2015</p>

Risk Level	Key findings	Recommendations	Management Comments / Agreed actions	Timescale / Owner
<p>3.</p> 	<p>Schools provided reports to Governors in varying formats and timings. In some schools this may be linked to the resources available. i.e. small village school with a Headteacher v large primary school with Headteacher, deputy and an administrator that dealt exclusively with Pupil Premium.</p> <p>There is a risk that schools may not make sufficient progress if data is not provided or Governing Bodies could be misled by the information provided.</p>	<p>Guidance should be provided to Headteachers on the type of reports to be provided, their content and the minimum frequency of these.</p> <p>Guidance should also be provided to Governing Bodies of how to review and challenge the information provided.</p>	<p>To be advised to schools by newsletters / training / seminars</p>	<p>Senior School Improvement, Manager, Virtual School Head, Leadership and Governance Manager</p> <p>28 February 2015</p>
<p>4.</p> 	<p>The information published on school websites did not always meet the DfE guidance criteria i.e. 2013/2014 details had been erased in some cases and schools did not always provide specific details on the outcomes achieved i.e. publish results.</p>	<p>Guidance should be provided to schools on the information that should be displayed on their website and what periods it should cover. Guidance should also be provided on how schools should demonstrate the impact i.e. results etc</p>	<p>To be advised to schools by newsletters / training / seminars</p>	<p>Senior School Improvement, Manager, Virtual School Head, Leadership and Governance Manager</p> <p>28 February 2015</p>

Risk Level	Key findings	Recommendations	Management Comments / Agreed actions	Timescale / Owner
<p>5.</p> 	<p>Sixteen LAC PEPS were checked, four were on the September 2014 form and twelve on the September 2013 form.</p> <p>Some of these did not sufficiently state on the LAC PEPs:</p> <p>a) The quantify of the support to be provided e.g. number of hours</p> <p>b) who would provide this e.g. teaching staff or support staff</p> <p>i.e descriptions such as “1:1 reading support” were provided.</p> <p>Another weakness in the sample of PEPS was that they did not include specific details for the resources to be purchased:</p> <p>c) descriptions were vague eg revision guides / books</p> <p>i.e the titles were not stated or the quantities</p>	<p>The Virtual School Head should advise schools that they must provide:</p> <ul style="list-style-type: none"> <li>- specific details of the quantity of support that will be provided and by whom;</li> <li>- specific details of resources provided;</li> <li>- details of the associated costs of staffing and resources.</li> </ul>	<p>To be advised to schools by newsletters / training / seminars</p>	<p>Virtual School Head</p> <p>28 February 2015</p>

Risk Level	Key findings	Recommendations	Management Comments / Agreed actions	Timescale / Owner
	<p>Schools also did not provide sufficient details on the proposed and actual spend:</p> <p>d) There was insufficient detail on the PEPs of the costs relating to the support or resources to be provided to the LAC.</p> <p>There is a risk therefore that schools are not using their full allocation of LAC PP funding on the correct pupils or providing the correct resources if they are unable to provide details of these.</p>			

## **Appendix 1 – Areas of Good Practice**

### **Good practice identified**

#### **Finance**

- ✓ Procedures were in place to ensure that all Pupil Premium Funding was delegated to schools and periodic reconciliations to confirm this were completed by the Principal Accountant;
- ✓ All schools could identify in their accounts the Pupil Premium funding and how it was being used;
- ✓ Schools either had dedicated cost centre(s) to achieve this and or had recorded the funding and expenditure on spreadsheets;
- ✓ Most schools had calculated the costs of the interventions and support for each pupil;
- ✓ Governing bodies were advised of the level of Pupil Premium Funding when setting the budget for the year;
- ✓ Financial Monitoring reports for Pupil Premium Funding were available showing the budget and expenditure to date and balances held;
- ✓ Year end balances of pupil funding were reported to Governors;
- ✓ Schools Forum had monitored the level of Pupil Premium balances reported and where these were exceptionally high were challenging schools on this;
- ✓ Schools publicised to parents the advantages of registering for Free School Meals and the benefits this would bring i.e more funding to the school and increased support and or resources for pupils;
- ✓ For LAC NCC had introduced measures to require schools to state their forecast and actual spend of Pupil Premium funding.

#### **Pupil Records**

- ✓ Records were in place to record the interventions and support provided to Pupil Premium pupils;
- ✓ Progress of Pupil Premium children in key areas was monitored;
- ✓ Interventions were reviewed.

#### **Governance**

- ✓ All schools had a designated senior member of staff and a governor responsible for overseeing Pupil Premium;
- ✓ Governors completed visits to review Pupil Premium records and for support provided to these children;
- ✓ Governors minutes recorded that they discussed the use of Pupil Premium funding and challenged Headteachers on the impact this was having;
- ✓ There was evidence that Governors had sharpened their focus on Pupil Premium, this was now a standing item on the agenda of most Governing Body meetings and / or on Governor Committee meetings;
- ✓ Reports on progress of the Pupil premium children were provided to Governors, comparing their performance with that of other pupils.

Extract from

Presentation by John Dunford, National Pupil Premium Champion, 31 January 2014

“Using the Pupil Premium to narrow the gap: policy and practice”

Examples of evidence seen during the audit is in red:

Ofsted: successful approaches

- ▶ **PP funding ring-fenced to spend on target group**  
  
Clear accounting for allocations and spending in schools.  
Spend per pupil recorded in some schools but not all.
- ▶ **Maintained high expectations of target group**  
  
Pupils given targets and progress monitored.  
Frequency of monitoring varied between schools.
- ▶ **Thoroughly analysed which pupils were under-achieving + why**  
  
Regular review of pupil progress.  
Evaluation of interventions and support.  
Reported progress to Governors – frequency and detail varied.
- ▶ **Used evidence to allocate funding to big-impact strategies**  
  
Reviewed best practice advice – Sutton Trust Report and Toolkit.  
Evaluation of interventions.  
Review of interventions after set period to see if being effective, if not then discontinued.
- ▶ **High quality teaching, not interventions to compensate for poor teaching**  
  
Specialist staff to support pupil premium children – newly recruited or existing staff earmarked for this provision.  
  
Performance Management - pupils named in the performance management assessments i.e. staff would be judged by targets achieved by specific pupils
- ▶ **Used achievement data to check interventions effective and made adjustments where necessary**  
  
Evaluation of interventions and support.  
Each pupil’s interventions graded by how effective they were.  
Review of interventions after set period to see if being effective, if not discontinued.

▶ **Highly trained support staff**

Staff supporting pupil premium children were attending training or receiving training in school.

Presentations to staff highlighting the need to support Pupil premium children, the impact of interventions to raise pupil performance and what was being achieved.

▶ **Senior leader with oversight of how PP funding is being spent**

All schools had a senior member of staff assigned to pupil premium and a governor who reviewed pupil premium funding, its use and impact.

▶ **Teachers know which pupils eligible for PP**

Lists provided to teachers.

Photos provided to staff.

Progress charts in one school.

▶ **Able to demonstrate impact**

Reports presented to Governors on progress made by pupils – frequency and content varied.

Evaluation evidence on file for interventions – some schools systems were more robust than simply using progress statistics.

One school had a grid – Named Teaching Assistant v pupil v progress in each subject.

▶ **Involve governors**

Governor with assigned responsibility.

Pupil Premium was a standing agenda item at Governors meetings.

Reports provided on use of funding, and its impact.

## Appendix 2 – Level of Assurance

Internal Audit gives an overall opinion on the level of assurance provided by the controls within the area audited. The level of assurances are defined below:

### Level of Assurance      Definition

Full Assurance	There is a sound system of control designed to address the relevant risks with controls being consistently applied.
Substantial Assurance	There is a sound system of control, designed to address the relevant risks, but there is evidence of non-compliance with some of the controls.
Moderate Assurance	Whilst there is a basically a sound system of control, designed to address the relevant risks, there are weaknesses in the system, that leaves some risks not addressed and there is evidence of non-compliance with some of the controls.
Limited Assurance	The system of control is weak and there is evidence of non-compliance with the controls that do exist which may result in the relevant risks not being managed.
No Assurance	There is no system of internal control. Risks are not being managed.

## Findings and recommendations

### Prioritisation key

When assessing findings and recommendations reference is made to the Risk Management matrix which scores the impact and likelihood of identified risks.

For ease of reference, we have used a colour code system to prioritise our findings and recommendations, as follows:

	<p>Significant internal control weakness requiring priority action by School Management and/or the Governing Body. Such a control may be a legal requirement, or there may be the possibility of fraud or significant financial loss.</p> <p>The action is critical to the system of internal control and should be implemented immediately.</p>		<p>A modification or addition to the School's internal controls, necessary to safeguard assets and ensure the accuracy and reliability of records. Additionally matters that could be classified as red will be classified as amber if the sums of money involved are not material and the matter relates to a technical issue only.</p> <p>The action has a significant effect on the system of internal control and should be implemented as a matter of priority.</p>		<p>A more minor modification of current systems to further improve the School's internal controls.</p>
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