

LANCASHIRE SCHOOLS FORUM
Date of meeting 20 October 2020

Item No 7

Title: Recommendations of the High Needs Block Working Group

Appendix A refers

Executive Summary

On 29 September 2020, the High Needs Block Working Group considered a number of reports, including:

- Schools Budget Outturn, School Balances and Clawback 2019/20 – Update report
- High Needs Block Monitoring 2020/21;
- High Needs Block Funding 2021/22;
- HNB Indicative Commissioned Place Numbers 2021/22;
- Financial transparency of local authority maintained schools and academy trusts: Government consultation response;
- Scheme for Financing Schools in Lancashire;
- Coronavirus (COVID-19) catch-up premium;
- School funding: exceptional costs associated with coronavirus (COVID-19) for the period from March to July 2020;
- Schools Finance Schools Visits.

A summary of the information presented and the Working Group's recommendations are provided in this report.

Recommendations

The Forum is asked to:

- a) Note the report from the High Needs Block Working Group held on 29 September 2020;**
- b) Ratify the Working Group's recommendations.**

Background

On 29 September 2020, the High Needs Block Working Group considered a number of reports. A summary of the information presented and the Working Group's recommendations are provided below.

1. Schools Budget Outturn, School Balances and Clawback 2019/20 – Update report

During the summer term 2020 cycle of meetings a report about the Schools Budget outturn position for 2019/20 was presented to each of the three Forum working groups and the Schools Forum. This information indicated that:

- The Schools Budget outturn position at 31 March 2020 was an overspend of some £1.593m;

Further detailed analysis of the outturn position at 31 March 2020 has now been produced.

Overall Outturn Position by Funding Block

The Schools Budget outturn position at 31 March 2020 was an overspend of some £1.593m. The table below provides a breakdown of this position by each funding block.

Block	Budget	Actual	Variance Under (-) Over (+) Spend
	£m	£m	£m
Schools Block	741.989	738.020	-3.969
Early Years Block	77.858	76.022	-1.836
High Needs Block(HNB)	113.639	121.247	7.608
Central Schools Services Block (CSSB)	6.17	5.959	-0.211
	939.656	941.249	1.593

There was a significant overspend on the High Needs Block, which was partially offset by underspends on other funding blocks, which brought the overall year end budget to a position that was broadly in line with expectations when the 2019/20 Schools Budget was set by Schools Forum and Cabinet in January 2019.

The 2019/20 outturn report presented to the Forum in July 2020 noted that the £1.593m overspend had been met from the DSG Reserve, leaving a closing balance on the reserve of £11.151m.

Detailed budget monitoring tables were provided for the Working Group along with a commentary on key issues. For the HNB, it was noted that:

- The High Needs Block outturn position for 2019/20 shows an overspend of £7.608m
- The overspend in this block is despite transfers of circa £4.181m from other funding blocks, and reflects the significant cost and demand led pressures faced by the High Needs Block in 2019/20;

- Budget monitoring for the High Needs block shown in the appendix provides data on variances for individual budget lines as at 31 March 2020; with many overspent due to increased demand;
- The most significant overspend related to the Out County - Specialist provision budget line, where expenditure is over £5m above budget. Members will be aware that work is ongoing to enhance the SEND provision and capacity that is available in the Lancashire maintained sector, including the development of ARMS provision at mainstream primary and secondary schools and the establishment of additional special school places in the county;
- Members also noted that the government recognised the funding pressures facing the High Needs Block, and made additional funding available from 2020/21. The impact of this additional funding on the High Needs Budget will continue to be monitored and further reports provided to the Forum.

The Working Group:

- a) Noted the report;**
- b) Requested additional information on a couple of specific areas rating to:**
 - **the significant rise in out-county expenditure in 2019/20 (over £5m) and the number of children that were placed in independent provision;**
 - **any update on the development of special educational needs units attached to mainstream schools, particularly in the secondary sector.**

2. High Needs Block Monitoring 2020/21

Due to the cost and demand led pressures on the High Needs Block budget, arrangements were introduced from 2018/19 to provide the Forum with termly budget HNB monitoring.

Summer term 2020/21 data had now been obtained and monitoring and analysis was provided for members, including notes on variances. It was noted that the missing WPN figure from the Note 4 on the variances in connection with Further Education & Post 16 was 50.37.

The HNB budget is currently forecasting a circa £2.4m underspend at 31 March 2021.

It was noted that in constructing the original 2020/21 HNB budget, almost £12m was set aside to mitigate the demand and cost led pressures that were anticipated in HNB expenditure during the course of the year.

The yearend underspend is an estimate of the full year forecast, based on the circa £3.7m additional expenditure that has occurred in the summer term 2020. There remains significant concern around the ongoing financial pressures facing this block despite the current monitoring position, as forecasting based on summer term data is uncertain due to COVID-19 implications and the demand and costs could continue rise beyond the growth provision that was able to be included in the budget.

The Working Group:

- a) Noted the report.**

3. High Needs Block Funding 2021/22

This report provides information on 2021/22 funding announcements for HNB

The National Funding Formula for High Needs

The national increase in high needs funding, from 2020/21 to 2021/22, will amount to £730m, which equates to circa 10%.

The high needs NFF will ensure that every local authority receives an increase of at least 8% per head of population, with some authorities receiving up to 12% more than this year.

For 2021/22, DfE have also incorporated the teachers' pay grant and the teachers' pension employer contribution grant amounts within the formula by increasing the basic entitlement factor value to £4,660 for special schools, and through an additional factor in the formula that will enable local authorities to receive funding equivalent to the teachers' pay and pension grant they will receive in 2020/21 for AP settings, and to the teachers' pension supplementary fund they will receive. Initial thoughts in Lancashire are to increase the school specific payments in special school and PRU formulae to distribute this funding. It was also confirmed that pay and pensions grant allocations were expected for nursery schools.

The basic structure of the high needs national funding formula is not changing for 2021/22.

The basic entitlement factor numbers will be updated for the December DSG allocations using the latest school census data, as in previous years.

The hospital education element will also be uplifted by 8%, in line with the funding floor.

In addition to regular data updates in the high needs NFF, DfE have also updated the Income Deprivation Affecting Children Index (IDACI) factor in the 2021/22 formula to use the latest available 2019 data.

Schools Block Transfer

Local authorities will continue to be able to transfer up to 0.5% of their schools block to other blocks of the Dedicated Schools Grant (DSG), with schools forum approval.

No proposals have yet been developed for any schools block transfer, but schools and the forum will be consulted if any proposals are brought forward, particularly if there is any headroom available in the schools block budget.

Central School Services Block (CSSB)

Central schools services funding in 2021/22 will increase by 4% for the ongoing responsibilities that local authorities continue to have for all schools.

In line with the process introduced for 2020/21 to withdraw funding over time based on the commitments local authorities entered into before 2013/14, funding for historic commitments will decrease by 20%.

Lancashire Position

Information was shared with the group about provisional 2021/22 allocations for all DSG funding blocks, which indicated that Lancashire may receive a HNB increase toward the upper end of the DfE's range

It was emphasised that actual DSG allocations in Lancashire, to be published in December 2020, could be lower than those in the provisional notification from the DfE, dependant on pupil data from the October 2020 school census, but our HNB allocation appears to be at the top end of the allowable increases.

Members considered the initial DfE information for 2021/22 and commented that it would be helpful if Inclusion Service colleagues could attend future meetings provide the opportunity to discuss SEND and AP strategies and the financial consequences in more detail ahead of deliberations around the High Needs Block budget for 2021/22.

The Working Group:

- a) **Noted the report;**
- b) **Asked that the Chair of the Working Group formally invite Dr Sally Richardson, Head of Inclusion Service, to the next HNB meeting.**

4. HNB Indicative Commissioned Place Numbers 2021/22

As part of the process agreed with the Schools Forum earlier this year, the county council wrote to all Lancashire special schools and PRUs at the end of the summer term 2020 with an early notification of the indicative number of places we expect to commission in 2021/22.

Each special school and PRU was notified of the indicative number of places likely to be commission at the school in the 2021/22 school budget, for September 2021 onwards.

It was emphasised that this figure had been calculated based on the agreed methodology for each sector and did not include any adjustments that may be proposed by the county council in response to any specific requirements or requests relating to individual schools

The commissioned places methodology agreed for each sector is slightly different for special schools and PRUs:

- The special school methodology is based on the number of places included in the summer term 2020 redetermination;
- The PRU methodology is calculated on the average of the previous 3 PRU census points.

The correspondence acknowledged that this was the first time the county council had written out to schools in this way at the end of the summer term and that there was additional forecasting uncertainty associated with COVID-19, including the collection of data used for the summer term 2020 redetermination.

The purpose of writing out to schools with the indicative figure before the end of the summer term 2020 was to provide schools with an early indication of the likely commissioned place figure for planning purposes and to provide an opportunity for individual schools to have discussions and make any representations with the relevant services.

A copy of the indicative commissioned place number for each special school and PRU for 2021/22, based purely on the calculation methodology was provided for members.

Schools were asked to make any representations about their indicative commissioned place numbers for 2021/22 to the relevant services and to make sure that any discussions are concluded by 16 October 2020, if possible, so that revised commissioned place numbers can be included in the 2021/22 budget setting process.

Members are asked to note that specifically and only for pre-16 places, the additional place top up funding arrangements will continue to operate in 2021/22, where the actual number of pre-16 pupils at each redetermination is greater than the number of places commissioned on the budget forecast. This means that if the actual number of pupils at an establishment goes above the number of commissioned places additional funding will be allocated to the school for the extra places, as well as any top-up relating to the needs of the individual child.

Contact has been received for a number of special schools and PRUs about their actual commissioned place numbers for 2021/22, and these are being considered by the relevant services.

Services are considering representations received from some special schools and short stay schools about proposed increased commissioned place numbers. It was anticipated that updated commissioned place numbers would be available for the Forum at the October meeting.

PRU representatives reported that the correspondence was received on the final day of the summer term, which had caused some distress, particularly for those schools where initial calculations showed a reduction in places. It was acknowledged that the place calculation for special schools and PRUs used data from the summer term census, so the timescale for issuing correspondence in the summer term was extremely tight.

Wider issues about PRU funding were considered under a separate item.

The Working Group:

- a) **Noted the report.**

Subsequent to the meeting, some increases have been agreed by the Service to commissioned place numbers for short stay schools, but at the present time, the Inclusion Service have not recommended any changes to commissioned place numbers in special schools beyond the places calculated on the agreed methodology. Appendix A includes the current commission place proposals for 2021/22.

5. Representations from Lancashire Short Stay Schools

Correspondence to the Forum and LCC officers has been sent by Lancashire Short Stay Schools. The letter makes representations about the financial impact on Short Stay Schools due to Coronavirus and some wider issues about the PRU funding, including the commissioned place methodology.

PRU representatives highlighted that the Coronavirus situation had put the schools in an extremely vulnerable position financially. Having the mainstreams effectively closed for nearly six months has meant that the Short Stay Schools have had no medical panel referrals, no respite and interventions and no permanent exclusions. Examples of the impact on individual PRUs was shared with the group. The impact this would have on termly budget redeterminations and the overall financial position of short stay schools was stressed.

Colleagues also highlighted the impact that the 3 term census average had on the calculation of commissioned place numbers at the schools, as the autumn term census is always a low point in the year for exclusions, with numbers in PRUs rising rapidly after that point.

Member's thanked PRU colleagues for setting out the issues being encountered and also expressed their support for the work being undertaken in Lancashire Short Stay Schools.

In response to the letter, officers proposed that for the autumn term 2020 PRUs would be funded on the higher of October 20 and October 19 census data, to mitigate the impact that COVID-19 may have had on PRU NORs.

This proposal matched the protections provided to PRUs in the summer term 2020 and also mirrored the protections already agreed by the Forum for early years providers in the autumn term 2020.

It was also proposed that a similar protection methodology operated for special schools in autumn 2020 redeterminations in order to provide a consistent approach.

The Group noted that the additional costs of this protection were not yet known as this can only be calculated when the October 2020 census data is available, but the risk would need to be underwritten by the DSG reserve.

Other matters in the correspondence were more strategic in nature, and the LCC Cabinet was due to consider a report about an Alternative Provision Strategy for Lancashire on 1 October 2020. The report proposed the establishment of an Alternative Provision Governance Group to consult with the sector and support the implementation of the Alternative Provision Strategy. PRU headteachers were being nominated to sit on this group.

The other matters raised in the correspondence could be considered as part of the emerging AP strategy, which could then be used to inform any proposed changes to the wider funding structure of AP in Lancashire

The Working Group:

- a) Noted the report and the correspondence from PRU headteachers;**
- b) Supported the proposed protections for PRUs to base autumn term 2020 redeterminations on the higher of October 20 and October 19 census data, to mitigate the impact that COVID-19 may have had on PRU NORs;**
- c) Supported the extension of this autumn term 2020 redeterminations methodology to special schools;**
- d) Noted that the additional costs of this protection were not yet known but that the risk would need to be underwritten by the DSG reserve;**

- e) **Welcomed the establishment of the Alternative Provision Governance Group to consult with the sector and support the implementation of the Alternative Provision Strategy;**
- f) **Welcomed the appointment of PRU headteachers to sit on this group.**

6. DSG Historic Commitments: Emotional Health and Wellbeing Commissioned Early Help Service Performance Update

A report elsewhere on the agenda provided information on DfE School Funding announcements for 2021/22. This included confirmation that the historic commitments element of the Central School Services Block (CSSB) will decrease by a further 20% from April 2021.

DfE announcements were clear that DSG Historic Commitments allocations will continue to reduce to zero across future years.

Initial modelling of the impact of this reduction in Lancashire suggests that we may be able to protect the existing levels of DSG 'combined budget' contributions for 2021/22, as follows:

- Emotional Health and Wellbeing Service - £200k
- MASH - £150k

This will be subject to Schools Forum approval in January 2021, as part of the Schools Budget setting process.

In order to aid Forum consideration of these allocations, a report was provided from the Emotional Health and Wellbeing Commissioned Early Help Service providing a Performance Update for the previous year

The Working Group:

- a) **Noted the report;**
- b) **Agreed to be aware of this report when considering the DSG 'combined budget' contributions as part of the budget setting process for 2021/22**

7. Financial transparency of local authority maintained schools and academy trusts: Government consultation response

In July 2020, the DfE published their response to the consultation on financial transparency of local authority maintained schools and academy trusts.

The DfE had proposed a number of initiatives aimed at greater alignment of maintained school and academy accountabilities and financial transparency and members. However, the Government's response was delayed by the snap general election in December 2019 and then by COVID-19.

A government response to the consultation has now been published and indicates that most of the proposals contained in the original consultation document will be introduced in various stages over next couple of years, some with minor alterations to those first suggested. It was confirmed that proposal 5, about imposing minimum requirements of a three-year audit cycle on schools will not be implemented in light of issues raised by a number of consultation respondents. .

Further details on each of the proposals and the Lancashire implications were provided in the report, including a summary of timings and next steps.

In summary:

- **Proposal 1:** DfE will publish names of LAs on gov.uk if they fail to comply with deadlines for returns to the Department. It was noted that some returns were reliant on submissions from school partners;
- **Proposal 2a:** DfE will collect the number of schools with suspended budgets and notices of financial concern through the existing DSG assurance statement signed by the LA Chief Financial Officer (CFO) at the end of the financial year. In Lancashire there is currently one school with delegation suspended plus 7 operating under a Financial Notice of Concern (NOC), representing about 1.4% of maintained schools.
- **Proposal 2b:** DfE will add a new section to the DSG assurance statement that captures the amounts that LAs have recovered from investigating fraud.
- **Proposal 3:** DfE will make a directed revision to LAs' schemes for financing schools to make it a requirement for maintained schools to provide LAs with three-year budget forecasts. The scheme consultation has been issued in Lancashire, but schools are already asked to submit 3 year budget forecasts.
- **Proposal 4a:** DfE will make schools append a list of Related Party Transactions (RPTs) to their response to the question in the Schools Financial Value Standard (SFVS) about their arrangements for managing RPTs. In addition, DfE will insert additional columns into the CFO Assurance Statement, so that the number of RPTs and value for each can be disclosed. This will impact on 2021-22 SFVS returns.
- **Proposal 6a:** DfE will make a directed revision to LAs' schemes for financing schools, requiring schools to submit a recovery plan to their maintaining authority when their deficit rises above 5%. Arrangements are already more robust in Lancashire requiring all schools in deficit to submit a recovery plan, but amendments are proposed to the SIFD categorisations using the 5% trigger.
- **Proposal 6b:** DfE will collect information on the number of recovery plans in each LA through the DSG annual assurance return from the CFO. Lancashire is historically below national/regional comparators on the number of schools in deficit, but will keep this under review
- **Proposal 6c:** DfE will formalise the approach to working with LAs and include a request for high level action plans from some LAs. This will be achieved by:
 - Sharing published data on the school balances in each LA.
 - Using this data and evidence-based requests from LAs to ensure support is focused where it is needed.
 - Requesting high level action plans from LAs in which the number or proportion of school revenue deficits over 5% is above a certain level.
- **Proposal 7:** DfE will require all LA maintained schools to publish annually on their websites the number of individuals (if any) earning over £100K in £10K bandings. This requirement is effective from 1 January 2020 and has been highlighted in the governors core agenda and /fair exchange.
- **Proposal 8.** DfE will require LA maintained schools to publish a link to the schools financial benchmarking website, where the Consistent Financial Reporting (CFR) statement of income, expenditure and balances is already published. This is a change from the original proposals and has been highlighted in the governors core agenda and /fair exchange.

As previously discussed with the Forum, the School Finance service intend to operate a local 'Financial Health Check Services' for schools and will begin by creating a pilot service that can be trialled at a small number of schools. Further information will be provided in due course.

The Working Group:

- a) **Noted the report;**
- b) **Noted that information had been provided to schools where implementation of the DfE requirements was imminent;**
- c) **Noted that further information would be provided to schools and the Forum on other requirements and local proposals.**

8. Scheme for Financing Schools in Lancashire

In August 2020, the DfE issued a 12th update to Statutory Guidance on schemes. An extract of the scheme updates introduced by the latest guidance was provided in the report.

The Authority has reviewed the Lancashire scheme and introduced the relevant amendments. A revised draft Lancashire Scheme can be viewed [here](#), with amendments to the existing scheme shown as tracked changes.

Two of the three sections that have changed are revisions that are 'directed' by the Secretary of State, following earlier consultations. These relate to:

- *Section 4.3: Submission of financial forecasts;*
- *Section 6.5: Planning for deficit budgets.*

The third section included in the revised guidance relates to *Section 12: Insurance*. These amendments had already been made in Lancashire to the local scheme update that was approved by the Schools Forum and published in July 2020. Hence, no further changes to the Insurance section of the Lancashire scheme are proposed.

As required by regulations, the county council issued a consultation with maintained schools on the proposed scheme amendments. A letter was distributed on the Schools Portal in early September 2020, seeking views by 9 October 2020.

Any responses received will be reported to the Forum on 20 October, when maintained school members will be asked to formally approve the revised scheme.

No consultation responses have been received to date.

The Working Group:

- a) **Noted the report.**

9. Coronavirus (COVID-19) catch-up premium

In July 2020, the Government have announced a £1b Covid catch-up package for the 2020/21 academic year. This funding is additional to other funding increases from Government related to National Funding Formula (NFF) uplifts.

Catch-Up Premium

Allocations from a £650 million catch-up premium, one part of the overall £1b Covid catch-up package, will be based on the number of pupils and paid once a term over the 2020/21 academic year.

Special, AP and hospital schools will be provided with £240 for each place for the 2020 to 2021 academic year, with the funding being paid in 3 tranches.

Headteachers can decide how best to use their schools' premium allocation to tackle the impact of lost teaching time on their pupils, but are encouraged to spend it on evidence-driven approaches including small group or one-to-one tuition, support over the summer, or additional support for great teaching.

National Tutoring Programme

Although all children have had their education disrupted by the coronavirus (COVID-19) outbreak, the Government believe that it is likely that disadvantaged and vulnerable groups will have been hardest hit. That is why, alongside the universal catch-up premium, DfE have launched a £350 million National Tutoring Programme to provide additional, targeted support for those children and young people who need the most help.

The programme will comprise of at least 3 parts in the 2020 to 2021 academic year, including:

- a 5 to 16 programme that will make high-quality tuition available to 5 to 16-year olds in state-funded primary and secondary schools from the second half of autumn term 2020;
- a 16 to 19 fund for school sixth forms, colleges and all other 16 to 19 providers to provide small group tutoring activity for disadvantaged 16 to 19 students whose studies have been disrupted as a result of coronavirus (COVID-19);
- a reception year early language programme that will make training and resources available at no-cost to schools where additional targeted support for oral language would be particularly beneficial.

In discussions, it was confirmed that place numbers in special schools catch up premium calculation included both pre and post 16 places.

Nursery school representatives highlighted that this funding was not being made available to early years providers, which would have an impact on the sectors ability to respond to the pandemic.

The Working Group:

- a) **Noted the report.**

10. School funding: exceptional costs associated with coronavirus (COVID-19) for the period from March to July 2020

Information has previously been shared with the Forum in connection with DfE guidance around 'School funding: exceptional costs associated with coronavirus (COVID-19) for the period from March to July 2020'. A claim form was also made available by the DfE, allowing schools to submit claims for eligible additional COVID-19 expenditure.

The Guidance indicated that there were 3 agreed cost categories against which schools could make a claim. The option was available for schools to submit a claim for other costs that

must be justified. There were also claim limits and conditions associated with the claims processes.

The DfE have processed the first batch of school claims relating to the exceptional COVID-19 costs. These payments cover claims made under the three standard categories and that did not exceed the claims limit.

DfE are giving further consideration to claims for other costs.

For maintained schools, the LA has processed journals/pro-payments and payments will be issued in September. ESFA will pay academy claims directly.

122 maintained schools received a payment in this round, totalling circa £600k.

The DfE have indicated that a second window will be made available but claims will only be allowable relating to costs for summer term 2020.

The Working Group:

- a) Noted the report.**

11. School Finance - School Visits

During the COVID pandemic School Finance have continued to deliver a traded service to schools, but now access school systems remotely and meet with school colleagues virtually.

Even though schools are fully open from September 2020, the service is continuing to operate virtually and a continuation of this approach has been recommended by the county council's Corporate Emergency Response Team. However, a small number of schools had requested the resumption of face-to-face visits and the views of the working group were sought.

Members expressed appreciation for the continued high level of service they had received from finance officers throughout the COVID-19 situation and supported the continuation of the remote service during the pandemic as the most sensible approach, especially given the tighter restrictions that were not being implemented due to rising COVID-19 cases. Comment was made that other services, for example Speech and Language support, would be more beneficial on a face to face basis, but the finance support had worked well as a remote offering.

The Working Group:

- a) Supported the continuation of the virtual service offering from Schools Finance as the default position.**

Appendix A

Indicative Commissioned Places 2021/22 – October 2020

Special Schools

Sch No	School No	Places Pre 16	Places Post 16	Total
00131	Wennington Hall School	54	0	54
00133	Bleasdale School	24	10	34
00134	Royal Cross Primary School	21	0	21
00139	Hillside Specialist School and College	83	12	95
01130	Morecambe And Heysham Morecambe Road School	158	0	158
01131	The Loyne Specialist School	77	40	117
02130	Great Arley School	100	0	100
02131	Brookfield School. Poulton-Le-Fylde	70	0	70
02132	Thornton Cleveleys Red Marsh School	73	21	94
04133	Kirkham Pear Tree School	80	20	100
06131	Moorbrook School	46	0	46
06134	Acorns Primary School	74	0	74
06135	Sir Tom Finney Community High School	121	52	173
07130	Moor Hey School - A Specialist Mathematics And Computing College	110	0	110
07131	The Coppice School	56	8	64
08135	Hope High School	73	0	73
08136	Kingsbury Primary School	79	0	79
08137	West Lancashire Community High School	71	35	106
08138	Elm Tree Community Primary School	106	0	106
09130	Chorley Astley Park School	173	0	173
09131	Mayfield Specialist School	99	23	122
11130	Oswaldtwistle White Ash School	109	0	109
11131	Broadfield Specialist School For Sen (Cognition And Learning)	110	37	147
12134	The Rose School	72	0	72
12135	Holly Grove School	113	0	113
12136	Ridgewood Community High School	118	34	152
13133	Pendle View Primary School	128	0	128
13134	Pendle Community High School And College	100	37	137
14580	Tor View Community Special School	160	35	195
14132	Rawtenstall Cribden House Community Special School	88	0	88
		2746	364	3110

PRUs

Sch No	School No	Places
01141	Stepping Stones School	32
07141	Golden Hill Leyland Centre	50
01149	Chadwick High School	70
02143	Mckee College House	130
09145	Shaftesbury High School	120
06141	Larches House School	110
11142	Oswaldtwistle School	95
08147	The Acorns School	65
12504	Coal Clough Academy	140
		812