



**Information Governance Team**

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15 January 2026

Dear Sir/Madam

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

**Request ID: FOI774356094**

Thank you for your request for information relating to Average Independent Special School Fees by Primary Need 2024/25.

You have requested the following information:

**Please provide the following information regarding your expenditure on Independent and Non-Maintained Special School (INMSS) placements for the financial year 2024/2025 (or the most recent full financial year available, e.g., 2023/24).**

**For each of the DfE Primary Need Codes listed below, please provide:**

**- The Total Number of placements currently funded in INMSS.**

148.

**- The Average Annual Cost (fee) per placement.**

£65,716.

**- The Average Annual Cost (fee) per placement for that specific primary need type.**

Please see table below.

**Categories Required (based on standard DfE Census Codes):**

**- ASD (Autistic Spectrum Disorder)**

**- SEMH (Social, Emotional and Mental Health)**

- SLCN (Speech, Language and Communication Needs)[4]
- MLD (Moderate Learning Difficulty)
- SLD (Severe Learning Difficulty)
- PMLD (Profound & Multiple Learning Difficulty)
- PD (Physical Disability)
- HI/VI/MSI (Hearing/Visual/Multi-Sensory Impairment)
- pLD (Specific Learning Difficulty)

Primary Need	Student Count	Average cost £
ASD	51	69,982
MLD	10	70,320
MSI	See below	76,186
PMLD	See below	61,133
SEMH	71	63,509
SLCN	8	58,329
SLD	5	63,406
SPLD	See below	23,506

With regards to the total numbers of children who are recorded as MSI, PMLD and SPLD, the Council considers this information is exempt under section 40 (2) of the FOIA.

The information you have requested includes figures which are below five, where disclosing these figures may lead to these pupils to be identified. This exemption covers the personal data of third parties (anyone other than the requester) where complying with the request would breach any of the principles in the Data Protection Act.

The Council considers that this information meets the definition for personal data set out in Section 3(2) and 3(3) of the Data Protection Act 2018 (DPA) as:

*(2) personal data means any information relating to an identified or identifiable living individual (subject to subsection (14)(c))”*

*(3) “Identifiable living individual” means a living individual who can be identified, directly or indirectly, in particular by reference to –*

- (a) an identifier such as a name, an identification number, location data or an online identifier, or*
- (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.”*

Section 40(2) of the FOIA states that personal data relating to third parties (i.e. a party other than the person requesting the information) is exempt information if it is the personal data of a third party (i.e. not yourself ) and one of the conditions in section 40(3A B) or 40(4A) is satisfied.

Section 40(2) is an absolute exemption not subject to the Public Interest Test.

If a specific primary need is not included in the above table, then there were no students with that primary need attending INMSS funded by Coventry City Council during the reference year.

**Additionally, please clarify if placements for pupils with a primary diagnosis of ADHD are recorded within your system under the 'SEMH' category or separately. If recorded separately without exceeding the cost limit, please provide this as a distinct line item.**

ADHD is not recorded as a specific need it would usually fit with SEMH but not always as it could be co morbidity with various areas of need.

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**