

This document is to help groups of individuals collate views before submitting their response to the high needs funding consultation via: <https://consult.education.gov.uk/funding-policy-unit/high-needs-funding-reform-2/>

**Any responses submitted in this form via the consultation mailbox will not be accepted unless special arrangements have been discussed.**

## **Overall approach**

**1. In designing our national funding formula, we have taken careful steps to balance the principles of fairness and stability. Do you think we have struck the right balance?**

- Yes
- **No**

Please explain your reasoning and any further evidence we should take into account:

**It is difficult to explicitly state yes or no to this**

**We welcome the proposal that no local authority will face a reduction to current spending.**

**We believe that a new High Needs funding system must be sufficient to support the needs of the young people both currently in the system as well as those young people who will access it in the future. The system must therefore be flexible to respond to changes in need.**

**Further guidance is required on how the funding system will allow for new schools/provision and how will this be funded. Will there be future growth funding as in current years to support demand and increasing cost pressures?**

## **Formula factors**

We are proposing a formula comprising a number of formula factors with different values and weightings.

We ask respondents to bear in mind with each question on this page that we are redistributing funding. Any money that we put into one factor will have to come from another factor. We have indicated what we think is the right proportion or amount for each factor.

**2. Do you agree with the following proposals?**

**Historic spend factor – to allocate each local authority a sum equal to 50% of its planned spending baseline**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**We are concerned that if the baseline is taken from 2016-17 it will not reflect local decisions and increases in costs for 2017-18.**

**The High Needs budget pressures experienced by the majority of local authorities is showing no signs of slowing down and therefore it is important that the current historic**

**spend factor, updated for decisions taken locally in 2017-18 is included in the NFF formula.**

**We are unable to comment whether the 50% proposal appears to be right as there doesn't appear to be any evidence/basis for why the amount is set at 50%?**

### **Basic entitlement – to allocate to each local authority £4,000 per pupil**

- Allocate a higher amount
- This is about the right amount
- Allocate a lower amount

Please explain your reasoning and any further evidence we should take into account:

We think that this should be set at £10k per pupil to reflect the current costs of those pupils already in Special School provision.

### **3. We propose to use the following weightings for each of the formula factors listed below, adding up to 100%. Do you agree?**

#### **Population – 50%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**It is difficult to comment if 50% is the appropriate or not. We do agree that a population factor is required.**

#### **Free school meals (FSM) eligibility – 10%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**As above it is difficult to comment if the percentage is appropriate or not.**

### **Income deprivation affecting children index (IDACI) – 10%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**As above - it is difficult to comment if the percentage is appropriate or not.**

### **Key stage 2 low attainment – 7.5%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**As above**

### **Key stage 4 low attainment – 7.5%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**As above**

### **Children in bad health – 7.5%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**Children not in good health – how often is this information updated. We have been informed it is only every 10 years so a significant time lag so would question the inclusion of such a factor and the apportionment**

### **Disability living allowance (DLA) – 7.5%**

- Allocate a higher proportion
- The proportion is about right
- Allocate a lower proportion

Please explain your reasoning and any further evidence we should take into account:

**We are concerned about the use of Disability Living Allowance (DLA) in the High Needs formula as DLAs are self-referred so in our view this is not a sufficient measure.**

### **Funding floor**

**4. Do you agree with the principle of protecting local authorities from reductions in funding as a result of this formula? This is referred to as a funding floor in the consultation document.**

- Yes
- No

Please explain your reasoning and any further evidence we should take into account:

**Given national pressures on High Needs funding it is unlikely that any LA could manage with lower levels of funding than they currently receive, so we fully support the principle of a floor that results in no LA losing funding from these proposals.**

**The key question is will there be any growth funding available to meet the increasing demand for all local authorities faced with such pressures.**

**5. Do you support our proposal to set the funding floor such that no local authority will see a reduction in funding, compared to their spending baseline?**

- Yes
- No

Please explain your reasoning and any further evidence we should take into account:

**Yes as above**

**Local budget flexibility**

**6. Do you agree with our proposals to allow limited flexibility between schools and high needs budgets in 2018-19?**

- Yes
- No

Please explain your reasoning and any further evidence we should take into account:

**We believe the additional requirement to now get the majority of schools approval is unnecessary and adds additional bureaucracy at a time of diminishing LA resources. We believe that until the hard NFF is introduced in 2019-20, the transfer of funds between blocks should remain a Forum decision without the need to undertake a costly all school consultation.**

**7. Do you have any suggestions about the level of flexibility we should allow between schools and high needs budgets in 2019-20 and beyond?**

We are developing our proposals on the level of flexibility to allow in the longer term. We will consult fully on our proposals at a later stage, but would welcome any initial comments now.

**If LAs are funded appropriately, there is no need for continued flexibility**

**Further considerations**

**8. Are there further considerations we should be taking into account about the proposed high needs national funding formula?**

## **Equalities analysis**

The question below refers to the equalities impact assessment published with the consultation.

**9. Is there any evidence relating to the 8 protected characteristics identified in the Equality Act 2010 that is not included in the equalities impact assessment and that we should take into account?**