

Report to Schools Forum

Title: NFF and High Needs Consultation March 2017

Date: 21 March 2017

Author: Janaki Try, Senior Accountant CSC&L

Contact officer: Janaki Try 01296 383063
jtry@buckscc.gov.uk

Schools affected: All schools

1. Purpose of this report

1.1. This report sets out the results of the National Funding Formula and High Needs consultation, conducted in March 2017.

2. The results of the Consultation

2.1. There were 5 responses, 4 from Primary Schools and 1 from a Secondary School. The results are set out below:



INVESTOR IN PEOPLE



For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Summary	All schools				Primary				Secondary			
	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank
No. of Primary = 4. No. of Secondary = 1												
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?	4	0	1	0	3	0	1	0	1	0	0	0
2. Do you support our proposal to set the primary to secondary ratio in line with the current national average of 1:1.29, which means that pupils in the secondary phase are funded overall 29% higher than pupils in the primary phase?	2	2	1	0	2	2	0	0	0	0	1	0
3. Do you support our proposal to maximise pupil-led funding, so that more funding is allocated to factors that relate directly to pupils and their characteristics?	3	1	1	0	2	1	1	0	1	0	0	0
4. Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors (deprivation, low prior attainment and English as an additional language)?	2	3	0	0	2	2	0	0	0	1	0	0
5a. Do you agree with the proposed weightings for Deprivation - pupil based at 5.5%	3	2	0	0	3	1	0	0	0	1	0	0
5b. Do you agree with the proposed weightings for Deprivation - area based at 3.9%	2	3	0	0	2	2	0	0	0	1	0	0
5c. Do you agree with the proposed weightings for Low prior attainment at 7.5%	2	2	1	0	2	1	1	0	0	1	0	0
5d. Do you agree with the proposed weightings for English as an additional language at 1.2%	4	1	0	0	3	1	0	0	1	0	0	0
6. Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?	3	0	2	0	2	0	2	0	1	0	0	0
7a. Primary: Do you agree with the proposed lump sum amount of £110,000 for all schools?	3	1	1	0	3	1	0	0	0	0	1	0
7b. Secondary: Do you agree with the proposed lump sum amount of £110,000 for all schools?	3	0	0	2	2	0	0	2	1	0	0	0
8a. Primary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?	3	1	1	0	3	1	0	0	0	0	1	0
8b. Secondary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?	1	1	1	2	1	1	0	2	0	0	1	0
9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?	3	2	0	0	2	2	0	0	1	0	0	0
10. Do you agree with the principle of a funding floor that would protect schools from large overall reductions as a result of this formula? This would be in addition to the minimum funding guarantee.	4	1	0	0	4	0	0	0	0	1	0	0
11. Do you support our proposal to set the floor at minus 3%, which will mean that no school will lose more than 3% of their current per-pupil funding level as a result of this formula?	4	1	0	0	4	0	0	0	0	1	0	0

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Summary No. of Primary = 4. No. of Secondary = 1	All schools				Primary				Secondary			
	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank
12. Do you agree that for new or growing schools the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?	4	1	0	0	3	1	0	0	1	0	0	0
13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5% per pupil? This will mean that schools are protected against reductions of more than 1.5% per pupil per year	4	1	0	0	4	0	0	0	0	1	0	0
14. Are there further considerations we should be taking into account about the proposed schools national funding formula?	3	0	2	0	2	0	2	0	1	0	0	0
15. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?	2	1	2	0	2	0	2	0	0	1	0	0
16. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?	5	0	0	0	4	0	0	0	1	0	0	0
17. Are there further considerations we should be taking into account about the proposed central school services block formula?	2	2	1	0	2	1	1	0	0	1	0	0
18. 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?	1	0	3	1	1	0	2	1	0	0	1	0

Comments.

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Primary - Comments

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?

Response: Yes

I particularly agree with the comments surrounding the 3% funding floor.

2. Do you support our proposal to set the primary to secondary ratio in line with the current national average of 1:1.29, which means that pupils in the secondary phase are funded overall 29% higher than pupils in the primary phase?

Response: None

3. Do you support our proposal to maximise pupil-led funding, so that more funding is allocated to factors that relate directly to pupils and their characteristics?

Response: Unsure

Although there must be consideration to how changing the lump sum would affect smaller schools.

4. Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors (deprivation, low prior attainment and English as an additional language)?

Response: Yes

The f40 model appears to provide a fairer funding formula which avoids double counting of pupils.

5a. Do you agree with the proposed weightings for Deprivation - pupil based at 5.5%

Response: None

5b. Do you agree with the proposed weightings for Deprivation - area based at 3.9%

Response: None

5c. Do you agree with the proposed weightings for Low prior attainment at 7.5%

Response: Unsure

The f40s proposal of 3% and 2% seems low. There must be reliable data upon which to make these judgements and the current assessment system doesn't allow for this consistency.

5d. Do you agree with the proposed weightings for English as an additional language at 1.2%

Response: None

6. Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?

Response: None

7a. Primary: Do you agree with the proposed lump sum amount of £110,000 for all schools?

Response: Yes

We are a small school and need a minimum of £120k

I believe that the f40 model would provide a fairer system, weighted on size of school.

Response: No

It needs to be higher to give small schools the security they need

7b. Secondary: Do you agree with the proposed lump sum amount of £110,000 for all schools?

Response: None

Comments.

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Primary - Comments

8a. Primary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?

Response: None

8b. Secondary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?

Response: None

9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?

Response: None

10. Do you agree with the principle of a funding floor that would protect schools from large overall reductions as a result of this formula? This would be in addition to the minimum funding guarantee.

Response: None

11. Do you support our proposal to set the floor at minus 3%, which will mean that no school will lose more than 3% of their current per-pupil funding level as a result of this formula?

Response: None

12. Do you agree that for new or growing schools the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?

Response: None

13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5% per pupil? This will mean that schools are protected against reductions of more than 1.5% per pupil per year

Response: None

14. Are there further considerations we should be taking into account about the proposed schools national funding formula?

Response: Yes

The removal of the ESG will have a big impact on schools and this must be considered when applying the NFF.

15. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?

Response: None

16. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?

Response: None

17. Are there further considerations we should be taking into account about the proposed central school services block formula?

Response: None

18. 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?

Response: None

Comments.

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Secondary – Comments

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?

Response: Yes

I share F40's over-arching concern that there are 'outcomes that none of us really anticipated'. A Redistribution has simply created different winners and losers. It is unacceptable that in Bucks, the losers are, on the whole, those schools who serve disadvantaged communities. The 'winners' are the grammar schools whose numbers of children eligible, for example, for free school meals are woefully small. The quantum must be increased otherwise it is simply an exercise in redistributing unfairness. A needs based model would be helpful, as F40 point out. However, F40 fundamentally misunderstand the nature and purpose of pupil premium.

2. Do you support our proposal to set the primary to secondary ratio in line with the current national average of 1:1.29, which means that pupils in the secondary phase are funded overall 29% higher than pupils in the primary phase?

Response: Unsure

I support F40's call for evidence based decision.

3. Do you support our proposal to maximise pupil-led funding, so that more funding is allocated to factors that relate directly to pupils and their characteristics?

Response: None

4. Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors (deprivation, low prior attainment and English as an additional language)?

Response: No

Disagree with F40 here. Prior attainment is the key factor here. 'JAMS' are an unvalidated concept, created by politicians and with no basis in evidence. It is therefore unwise to base policy on what might benefit this group - if such a group exists. The other accepted ways of identifying 'additional needs', while not perfect, have some basis in evidence. How are JAMS identified? F40 accepts the term apparently unquestioningly.

5a. Do you agree with the proposed weightings for Deprivation - pupil based at 5.5%

Response: None

5b. Do you agree with the proposed weightings for Deprivation - area based at 3.9%

Response: None

5c. Do you agree with the proposed weightings for Low prior attainment at 7.5%

Response: No

This should be significantly higher. PA is the key factor in future attainment

5d. Do you agree with the proposed weightings for English as an additional language at 1.2%

Response: Yes

As F40 say, definitions of eligibility are key to this. How long should this be paid?

6. Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?

Response: Yes

A technical question. F40 offers help.

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Secondary – Comments

7a. Primary: Do you agree with the proposed lump sum amount of £110,000 for all schools?

Response: None

7b. Secondary: Do you agree with the proposed lump sum amount of £110,000 for all schools?

Response: Yes

Should be differentiated across phases.

8a. Primary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?

Response: Unsure

Issue of small schools is highly politicised and related to local geography. Local flexibility would shift the political battles away from central government.

8b. Secondary: Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?

Response: None

9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?

Response: Yes

Problem in many areas is growth of free schools. The inability of LAs to control adequately their pupil numbers is at odds with their legal requirement to provide school places.

10. Do you agree with the principle of a funding floor that would protect schools from large overall reductions as a result of this formula? This would be in addition to the minimum funding guarantee.

Response: No

Given the focus on winners and losers, there must be this kind of protection, particularly as the losers are often schools serving disadvantaged students.

11. Do you support our proposal to set the floor at minus 3%, which will mean that no school will lose more than 3% of their current per-pupil funding level as a result of this formula?

Response: No

Huge losses would, locally be sustained by schools least able to support them.

12. Do you agree that for new or growing schools the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?

Response: None

13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5% per pupil? This will mean that schools are protected against reductions of more than 1.5% per pupil per year

Response: No

MFG should be higher i.e. restrict losses to less than 1.5% per pupil in any year. Given the funding challenges faced by all, the notion of further loss because of 'fair funding' changes is unacceptable morally.

14. Are there further considerations we should be taking into account about the proposed schools national funding formula?

Response: None

For each of the following DfE National Funding Formula consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Secondary – Comments

15. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?

Response: No

Schools should be able to choose central services, depending on the effectiveness of those services

16. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?

Response: None

17. Are there further considerations we should be taking into account about the proposed central school services block formula?

Response: No

In addition - F40 should be calling for alignment of funding to national priorities e.g. reducing the gap between groups of students/promoting attainment of children from poorer families. What evidence is there that the proposals have achieved these goals? Given the apparent losses to be suffered by schools serving disadvantaged communities, some of the proposals will actively work against these goals.

18. 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?

Response: Unsure

F40 could have added quite a lot here! Disappointing that they have nothing to say. Locally, the impact is clear - disadvantaged children, of them in protected groups, will be some disadvantaged. Our response, as an LA, should make this point.

For each of the following DfE High Needs Funding Reform consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Summary	All schools				Primary				Secondary				
	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank	
No. of Primary = 4. No. of Secondary = 1													
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?	4	0	0	1	3	0	0	1	1	0	0	0	0
2a. Do you agree with the following proposal: Historic spend factor - To allocate to each local authority a sum equal to 50% of its planned spending baseline	2	2	0	1	2	1	0	1	0	1	0	0	0
2b. Do you agree with the following proposal: Basic entitlement - To allocate to each local authority £4,000 per pupil	3	1	0	1	3	0	0	1	0	1	0	0	0
3. 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.	3	1	0	1	3	0	0	1	0	1	0	0	0
4. 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?	3	1	0	1	3	0	0	1	0	1	0	0	0
5. Do you agree with our proposals to allow limited flexibility between schools and high needs budgets in 2018-19?	3	0	1	1	2	0	1	1	1	0	0	0	0
6. Do you have any suggestions about the level of flexibility we should allow between schools and high needs budgets in 2019-20 and beyond?	1	0	3	1	1	0	2	1	0	0	1	0	0
7. Are there further considerations we should be taking into account about the proposed high needs national funding formula?	2	0	1	2	2	0	1	1	0	0	0	0	1
8. 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?	2	1	1	1	2	0	1	1	0	1	0	0	0

For each of the following DfE High Needs Funding Reform consultation question areas, do you broadly agree with the draft F40 response to the consultation?

Secondary – Comments

Note: no comments from Primary Schools

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?

Response: Yes

Lack of alignment to legislation is a concern, as F40 points out. If not taken into account, major beneficiaries will be solicitors.

2a. Do you agree with the following proposal: Historic spend factor - To allocate to each local authority a sum equal to 50% of its planned spending baseline

Response: No

Best just to disagree? 50% seems arbitrary. Should be linked to national goals e.g. inclusion. Should be incentive for LAs to consider better models of provision. Bucks needs to consider the affordability and desirability of its segregated system of special schools.

2b. Do you agree with the following proposal: Basic entitlement - To allocate to each local authority £4,000 per pupil

Response: No

Agree with DFE here.

3. 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.

Response: No

Again, lack of overarching principle apparent here. Does the DFE want to encourage inclusion? If they protect LAs, then they cannot encourage change.

4. 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?

Response: No

Promote principled change through phased reduction of funding.

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

Response: None

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

Response: None

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

Response: Unsure

There is a need to consider a) legislation b) fundamental direction of travel. If the DFE, in line with legislation, wishes to promote inclusion, then LAs should be given incentives to move from segregated (expensive) provision.

8. 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?

Response: No

Needs more detailed scrutiny of legislation and link to the principles of that legislation i.e. that children are fundamentally entitled to have their needs met

F40 believe there should be higher proportion on population and a lower proportion on other formula factors listed below, adding up to 100%. Do you agree?

Summary	All schools				Primary				Secondary			
	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank	Yes	No	Unsure	Blank
No. of Primary = 4. No. of Secondary = 1												
a. Population - 50%	1	2	0	2	1	1	0	2	0	1	0	0
b. Free School Meals (FSM) Eligibility - 10%	2	2	0	1	2	1	0	1	0	1	0	0
c. Income Deprivation Affecting Children Index (IDACI) - 10%	1	2	0	2	1	1	0	2	0	1	0	0
d. Key Stage 2 Low Attainment - 7.5%	1	2	0	2	1	1	0	2	0	1	0	0
e. Key Stage 4 Low Attainment - 7.5%	1	2	0	2	1	1	0	2	0	1	0	0
f. Children in Bad Health - 7.5%	2	2	0	1	2	1	0	1	0	1	0	0
g. Disability Living Allowance - 7.5%	2	2	0	1	2	1	0	1	0	1	0	0

Note: no comments from Primary or Secondary Schools.