

Response ID ANON-6NX3-5M7K-K

Submitted to **Schools national funding formula - stage 2**

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Introduction

A What is your name?

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C Response type

Please select your role from the list below::

Local authority representative

Please select your organisation type from the list below::

Local authority

Organisation name::

Telford & Wrekin Council

Local authority area: :

Telford and Wrekin

D Would you like your response to be confidential?

No

Reason for confidentiality::

Page 2 - 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?

No

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

The proposal that no school will see a per pupil reduction in funding or more than 3% - for ever! - is unfair to all other schools and inconsistent with the operation of the funding system to date, i.e. the operation of the MFG. It undermines the principle of a consistent national funding formula and seems primarily designed to protect London schools.

2 Do you support our proposal to set the primary to secondary ratio in line with the current national average?

Yes

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

In the absence of any 'compelling reason' for this ratio to be any particular figure, the use of the average of LA decisions is reasonable. However the DfE could model the costs of delivering primary and secondary education and use this to inform future funding, i.e. a needs based funding formula.

3 Do you support our proposal to maximise pupil-led funding?

No - you should keep the balance between pupil-led and school-led funding in line with the current national average

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

Increasing pupil led funding makes schools funding more sensitive to movements in numbers on roll. With a system moving to a more lagged basis (academy budgets are lagged by three terms compared to maintained schools at two terms) this is of questionable logic. By making individual school budgets potentially more volatile from one year to the next, it also makes running an individual school's budget more difficult. This of course could potentially be 'smoothed' if schools are part of a MAT (for instance), but behind the rhetoric around more 'pupil led' funding is a general question regarding whether the significant decrease in individual schools autonomy in most MATs (compared to most maintained schools) financially and otherwise, is actually a good thing.

Page 3 - pupil-led factors

4 Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors?

No – allocate a lower proportion to additional needs

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

Before entering into further distributional changes, it would be helpful to analyse the expected impact of this. In recent years a large amount of additional funds have been allocated to educational disadvantage, via the parallel funding system of pupil premium. It seems rather odd to continue with this parallel tracks approach, particularly as the annual increases in pupil premium have stopped for several years and yet a further increase in disadvantage funding is proposed in the main national funding formula. It also highlights the lack of overall logic in a system that provides more deprivation funding to primary schools compared to secondary schools from pupil premium and yet proposes the opposite distribution in the national funding formula. As both derive from the DfE this is an odd outcome to say the least and highlights the lack of any coherent approach to school funding - other than the overriding policy priority to reduce local authority involvement.

5 Do you agree with the proposed weightings for each of the additional needs factors?

Deprivation - FSM - Deprivation - pupil based at 5.5%:

The proportion is about right

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

Please see question 4 response - no particular view on the precise weighting but we would welcome more focus on impact before changing the current pattern of funding.

Deprivation IDACI - Deprivation - area based at 3.9%:

The proportion is about right

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

Please see question 4 response - no particular view on the precise weighting but would welcome more focus on impact before changing the current pattern of funding.

LPA - Low prior attainment at 7.5%:

The proportion is about right

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

Please see question 4 response - no particular view on the precise weighting but would welcome more focus on impact before changing the current pattern of funding.

EAL - English as an additional language at 1.2%:

The proportion is about right

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

Please see question 4 response - no particular view on the precise weighting but would welcome more focus on impact before changing the current pattern of funding.

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

Comments::

We agree with the principle of keeping this as a factor and are a little surprised that the data is not available to track pupil movements term by term.

Page 4 - school-led factors

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

Primary lump sum - Primary:

This is about the right amount

Secondary lump sum - Secondary:

Allocate a higher amount

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

It is difficult to believe that the core costs of a secondary school are not higher than a primary school and therefore a higher amount for the secondary sector seems a fairer approach.

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

Primary sparsity - Primary:

This is about the right amount

Secondary sparsity - Secondary:

This about the right amount

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

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

Comments:

In principle, using lagged funding would seem to be a reasonable approach - as long as local authorities retain the ability to distribute this funding in real time.

Page 5 - funding floor

10 Do you agree with the principle of a funding floor?

No

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

This has never been in place before. The principle of the MFG was always to provide time for schools to transition to lower funding. It seems extraordinary to think that a school - in a national funding formula system - will be permanently better funded simply for historical reasons. Isn't this a large part of what the NFF was meant to be addressing? Why is it 'unmanageable' for such schools to reduce their costs to the level of all other schools? And why were such reductions perfectly possible in a system with LAs playing a significant role, but not with a national funding formula?

11 Do you support our proposal to set the funding floor at minus 3%?

No – the floor should be lower (i.e. allow losses of more than 3% per pupil)

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

Please see above - the basic principle of a floor is wrong.

12 Do you agree that for new or growing schools (i.e. schools that are still filling up and do not have pupils in all year groups yet) the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?

No

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

Please see above - the basic principle of a floor is wrong.

Page 6 - transition

13 Do you support our proposal to continue the minimum funding guarantee at minus 1.5%?

Yes

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

Schools are now used to this scale of potential losses and it seems to strike a reasonable balance between allowing budgets to reduce but mitigating the pace of large reductions. This system should be retained without the proposed funding floor, not alongside it.

Page 7 - further considerations

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

Comments::

There should only be a national funding formula at school level if there is clear evidence about what is an appropriate level of funding for a school, given the context of size, demographics etc. If such evidence exists it does not inform the DfE's funding policy, given the issues about contradictory policies on deprivation funding, the unjustifiable floor proposal, etc described in our response above. In this situation, a continuation of local funding discretion would at least provide alternative models and thus an evidence base to assess the impact of different funding policies. It would also allow some local democratic input, which the DfE seems determined to eliminate from the school funding system.

Page 8 - central school services block

Page 9 - central school services block

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

Yes

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

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?

Yes

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

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

Comments::

It should include funding for all statutory services, not just those that apply to academies as well as maintained schools. As currently proposed, DfE schools (i.e. academies) will continue to get free services from the DfE, such as the EFA's provision of budget information, consolidation of academy accounts, etc. Equivalent local authority schools (i.e. maintained schools) have to pay for these services through de-delegation. Whilst it is not surprising that the DfE should favour its own schools, it hardly represents fair funding.

Page 10 - equalities analysis

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?

Comments::