

## Response ID ANON-2CXQ-1DXN-S

Submitted to **High needs funding reform - stage 2**

Submitted on **2017-03-22 15:26:06**

### Introduction

#### A What is your name?

**Name:**

Tim Davis

#### B What is your email address?

**Email:**

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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?**

Yes

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

Whilst there is no definitively right balance, the approach taken seems reasonable.

### Page 3 - formula factors

#### 2 Do you agree with the following proposals?

**To distribute 50% of the planned spending baseline on the basis of historic spending - Historic spend factor - To allocate to each local authority a sum equal to 50% of its planned spending baseline:**

The proportion is about right

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

**Basic entitlement - To allocate to each local authority £4,000 per pupil - Basic entitlement - To allocate to each local authority £4,000 per pupil:**

This is about the right amount

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

#### 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% - Population – 50%:**

The proportion is about right

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

Overall, for this and subsequent questions about the formula factors, the logic behind the weighting etc seems reasonable.

**Free school meals (FSM) eligibility – 10% - Free school meals (FSM) eligibility – 10%:**

The proportion is about right

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

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

The proportion is about right

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

**Key stage 2 low attainment – 7.5% - Key stage 2 low attainment – 7.5%:**

The proportion is about right

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

**Key stage 4 low attainment – 7.5% - Key stage 4 low attainment – 7.5%:**

The proportion is about right

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

**Children in bad health – 7.5% - Children in bad health – 7.5%:**

The proportion is about right

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

**Disability living allowance (DLA) – 7.5% - Disability living allowance (DLA) – 7.5%:**

The proportion is about right

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

## **Page 4 – 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.**

No

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

Whilst allowing time for LAs to adjust to lower funding seems reasonable, we do not agree with the principle of a floor, locking in higher funding than for other LAs

**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?**

No

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

Please see above.

## **Page 5 - local budget flexibility**

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

No

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

It has always been the case that the main flexibility for high needs has been the ability to move funds between the schools block and the high needs blocks. The other blocks (early years and the new central school services) are too small, and/or the rules too restrictive to allow much realistic ability to move funds. In the current funding climate for most LAs it is hardly likely we will be able "transfer funds into their high needs budgets from sources other than their DSG allocation". As these 'other sources' are presumably general un-ringfenced LA funding, to do so would in practice simply increase the pressure on the LAs overall budget. In T&W, as elsewhere, this is already under great pressure to continue to deliver statutory duties - most notably children's safeguarding and adult social care. National government has recently recognised the pressure on adult social care by allocating additional funding. And as stated in the document, the vast majority of movement is from schools block to high needs, not vice versa. The consultation does not make it possible to understand how the proposed requirement for mainstream school approval of future transfers will work. It appears that there is proposed to be a 'dual approval' system comprising both the schools forum and "a majority of primary and/or secondary schools and academies (with transfers confined to the primary and secondary elements of the schools block as agreed by phase)". What is the purpose of the schools forum in this process if a majority of schools (not just forum members) is required? In general, what is lacking in this 'reform' process is any attempt to understand and predict the likely growth in high needs and thus the likely amount of funds required. The DfE has set up a system which on the one hand extends the right to funding to 25, sets the gatekeepers of these rights as tribunals, but leaves LA without much flexibility to respond to the demand for resources thus generated, a demand that is generated by factors (including DfE policies) that are outside LA control.

**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?**

**Comments box:**

In the context described above, the existing system should be retained, i.e. full flexibility between the schools and high needs blocks. This would of course cut across the DfE objective of a national funding formula at school level for mainstream schools - but it is also one of the reasons why this is the wrong policy. A national funding formula at LA level, but with local flexibility to deploy the funding allocated would be a better option.

**Page 6 – further considerations****8 Are there further considerations we should be taking into account about the proposed high needs national funding formula?****Comments - please explain your reasoning and any further evidence we should take into account::**

As noted above, there are several connected issues. The proposals regarding the first of these, the basis for distributing the national sum available for high needs, are generally reasonable and the principle of a national formula is also welcome. However, the reduction in local flexibility leaves LAs managing a system in which on the one hand national government is keen to ensure that parents voice is significant, backed up by the tribunal system, but denies LAs the main existing element of flexibility to respond to this resulting pressure on resources

**Page 7 – equalities analysis****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?****Comments - please explain your reasoning and any further evidence we should take into account::**