

Wiltshire Schools Forum
High Needs National Funding Formula Consultation Stage 2

(Closing Date 22nd March 2017)

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:

Wiltshire is strongly of the view that to allocate 50% of the funding based on historical spend does not support the principle of fairness. The use of the historical spend factor will perpetuate historical patterns of spend. If a national formula is thought to be the fairest way to allocate funding then there needs to be a clear direction of travel towards that national funding formula albeit with a protection mechanism such as a minimum funding guarantee (MFG) and/or a funding floor, to reduce turbulence.

Wiltshire is also strongly of the view that the funding within the high needs block is insufficient to meet the need. This has an impact on the principles of fairness and stability.

2. We are proposing a formula comprising a number of formula factors with different values and weightings. Do you agree with the following proposals?

Historic Spend Factor – to allocate to each local authority a sum equal to 50% of its planned spend 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:

The use of the historic spend factor perpetuates historic patterns of spend which are acknowledged in the consultation document as not being fair and which are not based on need. The principle of stability should be achieved through a mechanism such as the MFG through which it can be demonstrated that there is a clear direction of travel towards the fair distribution of funding.

Basic Entitlement – to allocate to each local authority £4,000 per pupil

Allocate a higher amount

The amount is about right

Allocate a lower amount

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

The figure used for the basic entitlement should be linked to what is calculated to be the de-minimis level of funding for each child in a special school regardless of any additional need. This should be linked to the similar calculation for mainstream schools and has yet to be evidenced by DfE in the proposed NFF.

Question 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%**
- **Free School Meals eligibility 10%**
- **IDACI 10%**
- **KS2 low attainment 7.5%**
- **KS4 low attainment 7.5%**
- **Children in bad health 7.5%**
- **Disability Living Allowance 7.5%**

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:

Wiltshire is of the view that a higher proportion of funding should be based on population. The biggest driver of demand is initially going to be the numbers of children within any one area. Children should receive support regardless of the area in which they live or the prior attainment of pupils in an area.

Free School Meal 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:

Wiltshire is of the view that a higher proportion of funding should be allocated based on population. If a measure of deprivation is to be used then Wiltshire would support the use of a pupil based measure rather than an area based measure and would therefore prefer FSM

to IDACI as an indicator. If FSM data is to be used Wiltshire would support proposals for the DfE to develop methods of removing the need for parents to need to apply for free school meals and this should now be an automatic entitlement for all that are eligible. Because of the universal free school meal entitlement at KS1 it is felt that FSM data currently understates the amount of funding that should be attracted through this measure.

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:

Wiltshire does not support the use of IDACI data to allocate funding. As a rural authority IDACI does not target funding sufficiently towards small pockets of deprivation and therefore underfunds

KS2 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 with the NFF for schools Wiltshire has concerns about the use of low prior attainment data as a proxy for SEN. Wiltshire has a high proportion (93%) of pupils in good and outstanding schools and so would not attract significant funding from this measure despite continuing to need to support pupils with SEN.

KS4 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 with the NFF for schools Wiltshire has concerns about the use of low prior attainment

data as a proxy for SEN. Wiltshire has a high proportion (93%) of pupils in good and outstanding schools and so would not attract significant funding from this measure despite continuing to need to support pupils with SEN.

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:

Wiltshire has concerns about the use of this data which is based on the 2011 census and therefore not based on current need. The data is also subjective as it relies on individual families to make the returns in the census.

Disability Living Allowance 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 stated above Wiltshire would want to maximise the amount of funding allocated on a population basis rather than through a multitude of additional measures.

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 the funding floor in this document.

Yes

No

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

Wiltshire supports the use of a funding floor in the case of high needs funding as high needs budgets are under significant pressure across all authorities. As a low funded authority

Wiltshire is seriously concerned to find itself on the funding floor for a high needs formula.

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 – see response to Q4 above

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 think that the high needs block should be funded sufficiently well not to require continued subsidisation from the schools block. We also have concerns about the impact that any movement between blocks in 2018-19 may have on baselines for 2019-20 and the implementation of the hard formula.

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?

See response to Q6. It is Wiltshire's view that the high needs block needs to be sufficiently well funded to meet the needs of pupils within an area and not reliant on historical levels of funding and/or cross subsidisation from other blocks.

8 Are there further considerations we should be taking in to account about the proposed high needs national funding formula?

Wiltshire's main concern is the level of funding within the high needs block. High needs budgets are under considerable pressure across the country and by simply redistributing the existing quantum of funding these pressures will continue – the national funding formula

needs to be a fair way of distributing adequate levels of funding across local authority areas rather than simply reallocating insufficient funding. Without additional funding the core principles of fairness and stability cannot be achieved in any of the funding blocks.

- 9 Is there any evidence relating to the eight protected characteristics as identified in the Equalities Act 2010 that is not included in the Equalities Analysis Impact Assessment and that we should take in to account?**

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