

**Wiltshire Schools Forum**  
**Schools National Funding Formula Consultation Stage 2**

**(Closing Date 22<sup>nd</sup> March 2017)**

**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? (Pages 7-15)**

Yes

**No**

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

Wiltshire welcomes the consultation and the proposal to move towards a funding system that is fair and not based on historical spending patterns. Wiltshire also welcomes the fact that the proposed formula shows an increase in funding for Wiltshire as a whole. However as a low funded authority we have strong concerns that a new “fairer” formula only increases funding for Wiltshire in a full year by 2.4% and that there are schools within Wiltshire, already a low funded authority, that will lose funding under the new proposals. Under the proposals 29 out of 231 schools in Wiltshire will lose funding and a further 3 will see no change at all in their funding compared with 2016-17 levels. This means that in a low funded authority 14% will see their funding reduced or unchanged.

Wiltshire does not agree that the right balance between fairness and stability has been reached. The emphasis on stability is understandable to a degree to prevent large swings in funding, however it continues to perpetuate historical allocations through the proposed implementation of the 3% floor.

The key concerns from a Wiltshire perspective are:

1. The proportion of weighting given to AEN rather than basic entitlement funding
2. The 3% funding floor

Wiltshire also supports the concerns raised by the F40 group in its own response, in relation to the continued use of averages within the proposed formula, and associated lack of evidence for the individual funding factors, and also the overall quantum for funding the NFF and assumptions in relation to the ability to make spending cuts.

**Proportion of weighting given to AEN rather than basic entitlement funding**

This is further examined in the response to Q4 and Q5 below.

As a low funded authority Wiltshire has consistently taken the view that funding should be distributed to maximise the resources allocated to all pupils within the County’s schools. This enables head teachers and governing bodies to have improved predictability of funding as the largest proportion of funding is based on pupil numbers.

Wiltshire would also argue that there is an element of double counting in the emphasis on AEN factors, particularly in relation to deprivation as this is also covered by Pupil Premium Grant.

The emphasis on the use of prior attainment as a proxy for additional needs also represents

a perverse incentive within the system.

Wiltshire is concerned that schools are facing significant cost pressures over the next few years and that the emphasis on allocating funding through AEN indicators will leave schools insufficiently funded through the basic entitlement to meet cost pressures that apply across the whole school. Cost pressures faced by schools include:

- Apprenticeship Levy (0.5% of maintained schools annual pay bill, but not for VA&Foundation, and academies with pay bill >£3m)
- Support Staff Employers Pension contributions (1% p.a. for next 3 years)
- Teachers Pension contributions (expected to increase from 16.4% to 18%)
- RPI currently sitting at 2.6% for all non-pay expenditure (Highest rate since Oct 2014)

### **3% Funding Floor**

One of the key principles set out in Stage 1 of the consultation, supported by Wiltshire, was that pupils of similar characteristics should attract similar levels of funding wherever they are in the country (allowing for the area cost adjustment). The proposed 3% funding floor “locks” in some of the historical differences for those schools which have been better funded for several decades. Equally the cost of this protection limits the redistributive impact and will result in the continuation of different funding levels for pupils across the country. Stability for schools in funding is important, but not at the expense of never reaching a fair formula and outcome.

It is important that if a funding system is going to be fair, simple, transparent and gets funding straight to schools that need it then any protection built in to the system needs to support moving towards those objectives. The funding floor means that historical unfairness will be perpetuated.

### **Proposed Solution**

Wiltshire would offer the following solution to the concerns raised above:

1. Increase the proportion of funding allocated through the basic entitlement to ensure that sufficient funding is allocated for all of the pupils in a school
2. Take out the double funding element for deprivation as this is met through Pupil Premium Grant (PPG)
3. Remove the proposed 3% funding floor and allow the Minimum Funding Guarantee (MFG) to support schools losing funding.

## **2. Do you support our proposal to set the primary to secondary ratio in line with the current national average? (Pages 16-17)**

We have decided that the secondary phase should be funded, overall, at a higher level than primary, after consulting on this in stage one. We are now consulting on how great the difference should be between the phases.

The current national average is 1:1.29, which means that secondary pupils are funded 29% higher overall than primary pupils.

Yes

No – the ratio should be closer (i.e. primary and secondary phases should be funded at more similar levels)

No – the ratio should be wider (i.e. the secondary phase should be funded more than 29% higher than the primary phase)

**None of the above**

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

Wiltshire recognises the need for differential funding between primary and secondary schools. Over recent years the ratio in Wiltshire has been:

2014-15 – 1:1.24

2015-16 – 1:1.25

2016-17 – 1:1.25

2017-18 – 1:1.25

This would suggest that the impact of the proposed ratio will not be material in Wiltshire however we are concerned that the proposed ratio is not evidenced within the proposals and is simply set at the current national average. Without any detail on what the differential is based on then it is difficult to demonstrate that the objectives of transparency and fairness are being achieved.

Wiltshire would support the work done by the F40 group that states the amounts and relative weightings need to be evidence based with reference to actual costs and factors such as:

- Teaching group sizes.
- Teacher contact time, including an allowance for planning, performance and assessment (PPA).
- Teaching assistant time.
- Absence e.g. sickness, maternity etc.
- Leadership costs.
- Non-class staff costs.
- Resources.
- Exam fees (Key Stage 4 only).

When this has been calculated the ratio will be what it is.

### **3. Do you support our proposal to maximise pupil-led funding? (Pages 17-18)**

We are proposing to maximise the amount of funding allocated to factors that relate directly to pupils and their characteristics, compared to the factors that relate to schools' characteristics. We propose to do this by reducing the lump sum compared to the current national average (see question 7 on the lump sum value).

Yes

**No - you should further increase pupil-led funding and further reduce school-led funding**

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

No - you should increase school-led funding compared to the current national average

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

Wiltshire agrees that the formula should maximise the amount of funding allocated through pupil led factors. In the responses to future questions in this consultation we will outline our concerns about the balance between the proposed pupil led factors. The table below illustrates the difference in the weightings of the factors between the current Wiltshire formula and the proposed NFF. As stated in Q1 above, as a low funded authority Wiltshire has taken the approach to maximise the amount of funding allocated through the basic per pupil entitlement.

	% of overall budget	
	National	Wiltshire
Basic per-pupil funding	72.5	83.45
Additional need factors	18	6.23
School led funding	9.5	10.32

Note that these weightings do not include PPG. When the deprivation element of PPG is included the proportion of funding schools receive through additional needs factors increases even further.

It is Wiltshire's view that the relatively high proportion of funding allocated through AEN factors goes against the principles of a funding system that is fair and supports every child wherever they are in the country.

### **Pupil-Led Factors**

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 are the right proportions for each factor.

#### **4. Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors? (Pages 20-21)**

Of the total schools block funding, 76% is currently allocated to basic per-pupil funding (AWPU) and 13% is allocated to the additional needs factors (deprivation, low prior attainment and English as an additional language).

The formula will recognise educational disadvantage in its widest sense, including those who are not eligible for the pupil premium but whose families may be only just about managing. It increases the total spent on additional needs factors compared to the funding explicitly directed through these factors in the current system.

We are therefore proposing to increase the proportion of the total schools block funding allocated to additional needs factors to 18%, with 73% allocated to basic per-pupil funding.

Yes

No – allocate a greater proportion to additional needs  
**No – allocate a lower proportion to additional needs**

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

It is vital that the basic level of funding allocated to all schools is adequate for the school to staff and operate sufficiently. The additional needs funding should be as the name suggests, additional. If the DfE can clearly evidence that additional funding needs to be targeted at the AEN factors, this should not be at the expense of the basic entitlement funding which is intended to provide a core baseline of funding for all pupils and is imperative to achieving a fair, balanced and equitable funding formula.

As shown in the response to Q3 Wiltshire currently allocates a higher proportion of funding through the basic entitlement than the proposed NFF. This reflects a clear and consistent approach from the Wiltshire Schools Forum that limited resources need to “follow the child” and that funding allocated through the basic entitlement should therefore be maximised. Cost pressures currently being experienced by schools are relevant to the whole school rather than just those pupils with additional needs and therefore whole school funding is important. Those cost pressures would include:

- Apprenticeship Levy (0.5% of maintained schools annual pay bill, but not for VA&Foundation, and academies with pay bill >£3m)
- Support Staff Employers Pension contributions (1% p.a. for next 3 years)
- Teachers Pension contributions (expected to increase from 16.4% to 18%)
- RPI currently sitting at 2.6% for all non-pay expenditure (Highest rate since Oct 2014)

The impact of increasing the weighting of AEN factors, coupled with the proposed values for school led factors, is to reduce the amount distributed via the basic pupil amount. This is a major cause of reduction in funding to some Wiltshire schools. In some cases this shortfall is not made up by funding allocated through AEN factors. The impact of the NFF proposals on the basic per pupil entitlement for Wiltshire schools is as follows:

<b>‘Per Pupil’ funding</b>	<b>2014-15</b>	<b>2015-16</b>	<b>2016-17</b>	<b>Proposed NFF</b>	<b>Reduction per pupil</b>
Primary (KS1 & KS2)	2,912.12	2,989.50	2,984.65	<b>2,711.64</b>	<b>-£273.01</b>
Secondary (KS3)	3,739.55	3,838.91	3,832.69	<b>3,797.29</b>	<b>-£35.40</b>
Secondary (KS4)	4,562.50	4,683.72	4,676.13	<b>4,311.59</b>	<b>-£364.54</b>

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

**Deprivation - pupil based at 5.5% (Pages 21-25)**

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:

See answer to Q4 above.

Wiltshire is concerned that there is an element of double funding of deprivation through pupil premium as well as through FSM indicators within the formula. This becomes more of a concern as the proportion of funding allocated based on FSM indicators increases. Clarity is required between the differences as to what the deprivation funding in the main funding formula and pupil premium are supposed to support.

What is the evidence for the higher rate of funding for FSM Ever6 for secondary pupils compared with primary age pupils? Is there evidence for these rates or are they based on current averages?

Parents with children in infant year groups do not always apply for free school meals because of the universal infant free meal. Schools with these year groups are being underfunded for their pupil needs as a result and to allocate more funding via this route will make that unfairness worse.

### **Proposed Solution to under funding of pupil led deprivation**

Regardless of the issue of double counting with PPG, 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.

### **Deprivation - area based at 3.9% (Pages 21-25)**

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 believe that the IDACI model works well for large rural postcode areas as the area is too large to achieve a homogenous population. Whilst Wiltshire does not currently use IDACI data in its local formula, a review of the data and experience of other local authorities shows the impact of reviews of IDACI data on individual schools which can bring about step changes in funding. This suggests that the objectives of stability and predictability are not met through use of IDACI or other area based data

### **Proposed Solution**

Wiltshire would propose that a single, pupil led source of data for deprivation funding is used. The current proposed methodology is complex and does not support the proposed principles for the NFF.

Wiltshire would also propose that if PPG is to continue then a single census should be used to calculate funding for deprivation and PPG.

### **Low prior attainment at 7.5% (Pages 25-27)**

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 allocation of 7.5% of funding through prior attainment measures. National changes in assessments have resulted in data volatility which seriously undermines confidence when using to allocate funding and impacts on the objectives of predictability and stability. 93% of pupils in Wiltshire are in good or outstanding schools and the emphasis on prior attainment will draw funding away from an already low funded authority. These pupils are still required to make progress and by drawing funding away from these good and outstanding schools there is a risk that they become coasting schools.

**English as an additional language at 1.2% (Pages 27-28)**

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 questions the balance between the factors allocated for primary and secondary. Wiltshire has previously supported the weighting of funding towards pupils in primary schools. What is the evidence for the significant differences in rates between primary and secondary pupils?

The current formula in Wiltshire uses EAL1 data rather than EAL3.

The weightings are a proportion of the total schools budget.

**6. Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond? (Pages 28-29)**

We have decided to include a mobility factor in the national funding formula, following the first stage of consultation. This will be based on historic spend for 2018-19, while we develop a more sophisticated indicator. We would welcome any comments on potential indicators and data sources that could be a better way of allocating mobility funding in future.

For Wiltshire the main issue for mobility is in respect of schools that have a high proportion of service children where whole regiments can be transferred in and out and the mobility

factor needs to provide sufficient funding to keep a stable staff in school. This will be a particular issue for Wiltshire with large changes proposed for the Salisbury Plain area. Historically Wiltshire has recognised the need to provide funding to support the stability in structure of a school that may experience large turnover of pupils and also to recognise the additional needs that service pupils often have that are not recognised by the proposed AEN factors. Service families do not trigger deprivation funding and may have good prior attainment

### **School-Led Factors**

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 are the right amounts for each factor.

#### **7. Do you agree with the proposed lump sum amount of £110,000 for all schools? (Pages 29-31)**

This factor is intended to contribute to the costs that do not vary with pupil numbers, and to give schools (especially small schools) certainty that they will receive a certain amount each year in addition to their pupil-led funding.

##### **Primary**

Allocate a higher amount

This is about the right amount

**Allocate a lower amount**

##### **Secondary**

**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:

Wiltshire does not agree with the principle that the lump sum should be set at the same value for primary and secondary. Primary and Secondary schools will have different levels of fixed and core costs and these should be reflected in differential lump sum values. Currently the lump sum values in Wiltshire are set at £85,000 for a primary school and £175,000 for a secondary school.

It should be noted that the current allowable lump sum had the biggest single impact on secondary schools in Wiltshire when the current funding arrangements were put in place as Wiltshire had previously set a higher value. The reduction to £110,000 would compound that impact.

For primary schools in a rural authority the lump sum and the sparsity factor are closely linked. It is the view of Wiltshire Schools Forum that setting the lump sum at £110,000



would provide sufficient support to small primary schools without the need for a sparsity factor. If a sparsity factor is to be included then the proposed lump sum is considered to be too high.

The proposed change to the lump sum would result in additional funding being directed through the school-led factors by £3m rather than through the pupil-led factors.

### **Proposed Solution**

Wiltshire would propose:

- Increase the lump sum for Secondary schools
- Keep the proposed lump sum for primary at or below the proposed £110,000 figure
- Increase the proportion allocated through the basic entitlement
- Remove the proposed sparsity allowance

### **8. 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? (Pages 31-33)**

We have decided to include a sparsity factor to target extra funding for schools that are small and remote. We are proposing that this would be tapered so that smaller schools receive more funding, up to a maximum of £25,000 for primary schools and £65,000 for secondary schools.

#### **Primary**

Allocate a higher amount

This is about the right amount

Allocate a lower amount

#### **Secondary**

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:

See also the answer to Q7.

Wiltshire does not agree with the inclusion of the proposed sparsity factor. Whilst we agree with the need to support small rural schools, we do not believe that the current proposal for a sparsity factor is the right tool to achieve that outcome. Wiltshire has a number of small schools that would meet the criteria for pupil numbers but the majority of them do not meet the criteria for distance. Wiltshire is a rural authority with many school village schools but it is not necessarily a sparse County.

The impact of the proposed sparsity factor, therefore, is to allocate very different funding to schools that may, in every other respect, be similar ie, small village schools.

A real example would be two schools in Wiltshire currently each with 48 pupils on roll, one for which pupils will need to travel an average of 2.09 miles from its nearest alternative and another school with 48 pupils for which the average distance is 1.87 miles from the nearest alternative. Under the proposals one school could receive £25,000 more than the other but it would be difficult to argue that it would cost an additional £520 per pupil to educate pupils in that school due to pupils having to travel more than 2 miles to an alternative school when in all other respects the schools would have similar costs.

There is also the danger that schools will move in and out of an entitlement to the sparsity factor from year to year. For example if a school fluctuates between, say, 148 on roll and 152 what would be the impact.

Similarly if the cohort of pupils changes slightly and therefore the average distance to travel moves between 1.99 miles and 2.01 miles there would also be instability of funding for those schools. There is evidence of this within Wiltshire which would have a detrimental impact upon funding for individual schools.

The sparsity factor as currently proposed would cost £820,000 in Wiltshire. If that funding were added to the basic entitlement it could represent an additional £13 per pupil across all schools rather than being targeted at a small number of schools. If distance and number on roll thresholds were applied, as proposed by the NFF, then the amount payable could be as low as £543,000, a reduction of £9 per pupil available for funding through the formula.

It is our view that the lump sum should be used to support small rural schools. The proposed value for primary schools of £110,000 already represents an increase in school led funding of £25,000 on the current local formula. The lump sum for secondary should be increased as noted in the response to Q7.

There may be a case for a sparsity factor in counties where schools might genuinely be sparsely located but the current factor does not address the funding needs of the larger group of small rural schools.

**9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term? (Pages 34-37)**

The growth factor will be based on local authorities' historic spend in 2018-19. For the longer-term we intend to develop a more sophisticated measure and in the consultation we suggest the option of using lagged pupil growth data. We will consult on our proposals at a later stage, but would welcome any initial comments on this suggestion now.

Wiltshire would not support the use of lagged pupil growth data on a long term basis and would support a full review of how growth in existing and new schools is to be funded. Clear and consistent criteria are required.

Use of lagged numbers cannot reflect the significant pupil growth that will occur in Wiltshire as a result of the Army Rebasing Programme which will see significant numbers of service families relocating to Wiltshire. There will need to be a methodology to take in to account forecast growth based on evidence.

## **Funding Floor**

### **10. Do you agree with the principle of a funding floor? (Pages 37-39)**

To ensure stability we propose to put in place a 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 (see question 13).

Yes

**No**

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

Wiltshire does not support the proposed 3% funding floor and is of the view that the -1.5% per pupil per year MFG should be sufficient protection for schools that lose funding under the proposed formula. It is our view that the proposed 3% funding floor will perpetuate historical differences in funding and will mean that funding is not sufficiently redistributed to schools and local authority areas that should gain under the proposed NFF.

The application of a funding floor does not enable the model to achieve the stated objectives of fairness or transparency or to get funding directly to schools who need it.

### **11. Do you support our proposal to set the funding floor at minus 3%? (Pages 37-39)**

This will mean that no school will lose more than 3% of their current per-pupil funding as a result of this formula.

Yes

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

No – the floor should be higher (i.e. restrict losses to less than 3% per pupil)

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

Wiltshire does not support a funding floor

The MFG mechanism provides stability to schools and if the NFF identifies schools that have been considerably better funded for many years then this funding should be removed over time and re-distributed accordingly.

MFG should be sufficient protection to allow change over a period of time. This floor locks in past inequities. In fact, new schools in 'floor areas' are likely to attract new floor funding so it will be perpetuated.

### **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? (Page 43)**

**Yes**

No

We believe that, to treat growing schools fairly, the funding floor should take account of the fact that these schools have not yet filled all their year groups.

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

Wiltshire agrees that new/growing schools may require additional protection. At a local level this is currently dealt with through the pupil growth fund.

### **Transition**

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

The minimum funding guarantee protects schools against reductions of more than a certain percentage per pupil each year. We are proposing to continue the minimum funding guarantee at minus 1.5% per pupil per year.

**Yes**

No – the minimum funding guarantee should be lower (i.e. allow losses of more than 1.5% per pupil in any year)

No – the minimum funding guarantee should be higher (i.e. restrict losses to less than 1.5% per pupil in any year)

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

Wiltshire supports the continuation of the MFG. However, it is disappointing that in a currently low funded authority there are schools that would be subject to MFG under the new proposals

### **Further Considerations**

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

Yes, there are many issues that need to be taken in to account. These include:

##### **Education Services Grant (ESG)**

The removal of the ESG will have an impact on all schools, whether maintained or academy. Academies will have costs which were supported by the ESG which they will need to fund from their General Annual Grant and local authority cuts are likely to lead to additional charges to maintained schools. This is another cost which schools across the country will have to bear without additional resources.

##### **Movement between blocks**

Wiltshire Schools Forum is concerned that the high needs block continues to be

underfunded and that this has a potential impact on the schools block.

### **Schools Forum and Local Expertise**

There is no clarity in the consultation about the ongoing purpose of the Schools Forum. The members of Schools Forums and locally elected Councillors have a considerable number of combined years of experience of the management of schools and education. They work in the local area and understand the needs of their communities. This is a huge resource of local expertise about what works locally and supports children locally. By moving to a funding formula managed from the centre, this local expertise could be lost.

There are still significant areas of the NFF and of the HNB funding that will require local authority input, yet the removal of the major element of funding for schools is likely to lead to this becoming a marginalised area of work, especially without a Schools Forum. This in turn could lead to a loss of the relevant officer expertise to understand split sites, other exceptional arrangements and the changes to the school landscape and the impact on the MFG. Any fairness that starts with the National Funding Formula will quickly ebb away, leaving schools in local areas unfairly funded compared to their neighbouring schools (let alone schools in other parts of the country). Clarity about how this is to be managed in future is needed very shortly.

The EFA currently does not attend local schools forum meetings but we would consider that this would be important moving forward in order that the EFA has an understanding of local issues including growth funding, PFI and split sites as well as any unintended consequences of the funding mechanism.

### **Capacity of EFA to consider local issues**

Following on from above, we question the ability and capacity of the Education Funding Agency to be able to properly consider all the data it uses and to work with schools to apply the necessary local knowledge to a national funding formula. This is what LAs do all the time in the management of their local formula. It is difficult enough to manage at a local level: doing so at a national level will be a considerable challenge. An example of this is that the EFA currently send local authorities lists of data that looks out of step as part of the APT process. This is the type of work the EFA will need to look at in future and we doubt that they have the capacity or local understanding to do this type of work).

### **Review Mechanism**

The NFF is not something that is done once and just applied every year ad infinitum. Yet this is the way that it appears at present. There must be a rational process for reviewing, adding or subtracting from the formula and the NFF does not provide that as it currently stands.

### **Auto-registration for free school meals**

Wiltshire supports the F40 view that there ought to be auto-registration for free school meals. Parents with children in infant year groups do not always apply for free school meals because of the universal infant free meal. Schools with these year groups; which are the building blocks for a child's future education path are being underfunded for their pupil needs as a result and to allocate more funding via this route will make that unfairness worse. As a minimum, f40 believes that the DfE should be developing 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.

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

Yes

No - a higher proportion should be allocated to the deprivation factor

**No - a lower proportion should be allocated to the deprivation factor**

No - there should not be a deprivation factor

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

There is some logic to using a deprivation factor as part of the allocation of the central schools block in order to reflect levels of need for services such as Education Welfare. It is difficult to comment on whether 10% is the “right” amount.

As a rural authority Wiltshire does not support the use of IDACI data to allocate deprivation funding.

**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

No - allow losses of more than 2.5% per pupil per year

No - limit reductions to less than 2.5% per pupil per year

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

Wiltshire would agree with the need to limit reductions to central schools services block although the rationale behind 2.5% is unclear. Should the limit be aligned with the MFG within the NFF?

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

Paragraph 5.22 refers to the ability of the LA to recycle money that is no longer needed for historic commitments into schools, high needs or early years in 2018-19. Clarity is required as to how this will be taken into consideration against a move towards a ‘hard’ national funding formula for schools i.e. if funding is moved into the schools block in 2018-19 is there a danger it will be “lost” when the hard funding rates are introduced from 2019-20?

The consultation states that the department will “set out our long-term intention for funding released from historic commitments at a later point”. We would request this guidance as early as possible as it is likely to influence Schools Forum decisions on where best to recycle

this funding as and when it becomes available.

**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?**

DRAFT