

Response ID ANON-XYDA-G13J-B

Submitted to **High needs funding reform**

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Introduction

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C Response type

Please select your role from the list below::

Other

Please select your organisation type from the list below::

Representative body

Organisation name::

Havering Schools Forum

Local authority area::

Havering

D Would you like your response to be confidential?

No

Please give your reason for confidentiality::

Principles for a reformed funding system

1 Do you agree with our proposed principles for the funding system?

Yes

Please provide any further comments::

A funding system that supports opportunity

The funding system alone may not necessarily support opportunity; it is the funding that the system delivers that will make a difference. Havering has always been one of the lowest funded authorities in London and educational excellence will be difficult to achieve if funding is inadequate.

A funding system that is fair

A fair funding system is not necessarily achieved through a formula based on objective measures. It is true that all funding will be on the same basis but local authorities with larger numbers of children with high needs may not receive sufficient to meet their costs.

A funding system that is efficient

Agreed

A funding system that gets funding to the front line

As mentioned above funding need to be adequate to achieve educational excellence.

A funding system that is transparent

Support from the DFE would be welcome in negotiating with providers on the costs of placements to reduce extremes of local variation to achieve transparency.

A funding system that is simple

Funding systems should not be overly simplistic.

A funding system that is predictable

Although it is agreed that pupils' current provision should not be disrupted, local authorities such as Havering that have received very low levels of High Needs funding need an immediate increase that reflects the increasing costs of a growing population.

Distributing high needs funding to local authorities

2 Do you agree that the majority of high needs funding should be distributed to local authorities rather than directly to schools and other institutions?

Yes

Please provide any further comments::

3 Do you agree that the high needs formula should be based on proxy measures of need, not the assessed needs of children and young people?

No

Please provide any further comments::

It is not possible to respond to this without first seeing some financial modelling. In Havering the numbers of pupils with high needs is increasing and any reduction in current funding would lead to an overspend of the High Needs Block.

Formula design

4 Do you agree with the basic factors proposed for the formula?

Yes/No - Basic entitlement:

Disagree

Yes/No - Population:

Agree

Yes/No - Child health:

Disagree

Yes/No - Child disability:

Disagree

Yes/No - Low attainment at key stage 2:

Disagree

Yes/No - Low attainment at key stage 4:

Disagree

Yes/No - Deprivation - free school meal eligibility:

Disagree

Yes/No - Deprivation - income deprivation affecting children index:

Disagree

Yes/No - Adjustments - for "imports/exports":

Agree

Please provide any further comments::

We agree that there should be a factor that recognises increases in pupil population albeit on a lagged basis. For the other factors it is difficult to respond without first seeing some financial modelling and knowing the weighting that will be used for each factor. We are unsure about the reliability of the data to be used for the factor "Children in bad health". We would suggest that if FSM is to be used as a proxy measure for deprivation it should be EVER6 rather than a FSM count at a single census point.

We also note that using, as a low attainment factor, the pupils who do not attain 5 A*-G GCSEs there will be less data than using pupils who do not attain 5 A*-C GCSEs. Although this targets funding to a smaller group we have a concern that there could be a perverse incentive for some groups of children to underachieve. Using an age range of 0-18 for the population factor does not reflect LA responsibilities for students up to the age of 25.

5 We are not proposing to make changes to the distribution of funding for hospital education, but would welcome views as we continue working with representatives of this sector on the way forward.

Please provide your comments::

Agreed that funding should reflect costs but the funding system should also recognise that costs of the provision may change due to local restructures.

6 Which methodology for the area cost adjustment do you support?

general labour market methodology

Please provide any further comments::

Managing a smooth transition

7 Do you agree that we should include a proportion of 2016-17 spending in the formula allocations of funding for high needs?

Yes

Please provide any further comments::

It is difficult to assess the impact of this without knowing the weighting that will be applied. A tapering of this element may be appropriate so that LAs that are poorly funded could move more quickly to the new funding allocations.

8 Do you agree with our proposal to protect local authorities' funding through an overall minimum funding guarantee?

Yes

Please provide any further comments::

Changes to the way high needs funding supports mainstream schools

9 We welcome views on what should be covered in any national guidelines on what schools offer for their pupils with special educational needs and disabilities.

Please provide any comments::

We would welcome more consistent guidelines of what schools are expected to provide for SEN themselves.

10 Do you agree with the proposed changes to the funding of special units in mainstream schools?

Disagree

Please provide any further comments::

The effect of this proposal would be that pupils attending special units or additionally resourced provision would receive element 1 through the schools block at the relevant AWPU. Although it would be an advantage to secondary schools because of a higher AWPU it would be a disadvantage to primary schools and may act as a disincentive to them agreeing to manage special units or additionally resourced provision (ARP). It would also mean that high needs pupils would be funded differently to those in special schools which be counter to achieving greater inclusion. The number of places in an ARP should continue to be above a school's PAN rather than absorbed within it.

11 We welcome examples of local authorities that are using centrally-retained funding in a strategic way to overcome barriers to integration and inclusion.

Please provide any comments::

Havering has been reviewing its special units and additionally resourced provisions (ARPs) attached to mainstream schools and encouraging greater take up. This strategy recognises that some of the lower level need of children placed in special schools would be better met in a mainstream ARP particularly for children with ASD. This will free up places in special schools that have greater expertise in the provision for children with more complex needs rather than placing them in more expensive out of borough provision. The LA has identified some capital funding to support the development of these provisions.

12 We welcome examples of where centrally-retained funding is used to support schools that are very inclusive and have a high proportion of pupils with particular types of special education needs, or a disproportionate number of pupils with high needs.

Please provide any comments::

In Havering there is a process whereby a calculation is made of whether or not the first £6,000 in schools is met through the notional SEN budget for the number of children with statements/EHC plans. If not then an additional allocation is made. E.g. 10 children should be supported at £6,000 each by the school, if the notional SEN allocation is less than £60,000 then it is topped up.

Changes to the way high needs funding supports independent special schools

13 Do you agree that independent special schools should be given the opportunity to receive place funding directly from the Education Funding Agency with the balance in the form of top-up funding from local authorities?

Agree

Please provide any further comments::

This will bring independent schools in line with other providers. Clarity is needed on the mechanism to be used for funding this. Also, there should be an effective mechanism for monitoring unfilled places.

Changes to the way high needs funding supports post-16 providers

14 We welcome views on the outline and principles of the proposed changes to post-16 place funding and on how specialist provision in further education colleges might be identified and designated.

Please provide any comments::

It is agreed that the funding of post 16 provision in colleges should be simplified. Further clarity is required on the mechanism for funding this.

Equality analysis

15 We welcome comments on the equalities impact assessment.

Please provide any further comments::