

Pendragon Primary School's Response to the High Needs Funding Consultation Questions



The following are the responses of Pendragon Primary School to the 9 questions of the High Needs Funding Formula Consultation Stage Two.

Our responses are in blue. You can use them to respond to the consultation if you wish. Responses must be completed by 22nd March 2017. You can make your response by following this link:
<https://consult.education.gov.uk/funding-policy-unit/high-needs-funding-reform-2/>

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
- This formula does not deliver sufficient funding to meet the needs of the children in Cambridgeshire.
- Any new High Needs funding system that is introduced must be sufficient to support the needs of the young people it is supposed to.
- Equally the funding system will need the flexibility to respond to growth and changes in need.

2. Do you agree with the following proposals?

- **Historic spend factor - To allocate to each local authority a sum equal to 50% of its planned spending baseline**
 - **Allocate a lower proportion**
 - Danger that this could “lock in” historic spend based on previous levels of spending rather than on actual level of need.
- **Basic entitlement - To allocate to each local authority £4,000 per pupil**
 - **This is about the right amount**

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%**
 - **Allocate a higher proportion**
 - Having looked at various proxy indicators at a local level in Cambridgeshire, population size has always best reflected actual level of need of children. Other factors considered below have not reflected levels of need accurately in Cambridgeshire.
- **Free school meals (FSM) eligibility – 10%**
 - Allocate a lower proportion
 - See above
- **Income deprivation affecting children index (IDACI) – 10%**
 - Allocate a lower proportion
 - See above

- **Key stage 2 low attainment – 7.5%**
 - Allocate a lower proportion
 - See above
- **Key stage 4 low attainment – 7.5%**
 - Allocate a lower proportion
 - See above
- **Children in bad health – 7.5%**
 - Allocate a lower proportion
 - See above. Issue is exacerbated by the fact that the national data set is only updated every ten years, meaning data is very out of date.
- **Disability living allowance (DLA) – 7.5%**
 - **Allocate a lower proportion**
 - See above

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.

- Yes
- Given national pressures on High Needs Funding it is unlikely that any LA could manage with lower levels of funding than they currently receive.

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
- However there is a concern that the baseline may not reflect the latest position due to local decisions taken to move funding for 2017/18 budget.

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

- No.
- There should be no need for this flexibility if the High Needs Block is adequately funded to safeguard infrastructure and provision for pupils. Currently this flexibility has been necessary to maintain provision as the High Needs Block funding has not been adequate to meet children's special educational needs. A proper national formula should resolve this by funding High Needs adequately.

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 above

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

- See above

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?

Although the Impact Statement states the Department have deliberately not included an SEN or disability factor due to a lack of reliable data and because this would over-incentivise identifying SEN or disabilities, they have instead used the low prior attainment indicator which is expected to help schools supporting pupils with SEN in mainstream provision (by supporting the school not the pupil). Again, in a small school, this will have a disproportionate effect and would therefore disadvantage a pupil with a disability.