

NATIONAL SCHOOL FUNDING FORMULA 2014/15

Comments from Schools Consultation

Q1: PRIMARY SECONDARY FUNDING RATIO

- 1.1 Primary school budgets are already constrained – particularly in small schools and this would have a seriously detrimental impact.
- 1.2 As long as we are only moving to an average ratio of the similar type of local authority in our family.

Q2: PRIMARY SECONDARY FUNDING RATIO

- 2.1 We do not accept the basic premise that Secondary Schools need higher funding per pupil than Primary Schools. Provision of well-funded quality education in early years is more cost effective than intervention in later years and more beneficial for the child.
- 2.2 However if this argument is not accepted we believe a phased introduction over 5 years is preferable to a condensed and less manageable loss of funding for primary schools.

Q3: SCHOOL LUMP SUM VALUES

- 3.1 Such formulas and values need to be applied across all school systems as special schools require core funding in order to successfully deliver an effective special school system. Currently the lump sums are not paid to special schools even though they have set maintenance costs and require bursars much as small schools do. This is an inequity and instability in the system.
- 3.2 I agree in principal with a lower lump sum but would like to see a higher lump sum for the larger Primary.
- 3.3 We strongly believe that it is more equitable, for the reasons outlined in q2, for the lump sum to be based on pupil numbers rather than whether the school is a Primary or a Secondary.
- 3.4 Primary school budgets are already constrained – particularly in small schools and this would have a seriously detrimental impact.
- 3.5 Please note that whilst national funding formula does not allow it, we feel that there should be differentiated amounts for very large primaries.
- 3.6 National average Lump Sum (Primary) is £95,000. It would be preferable to move to this value as this will have less of a lasting impact upon primary schools. Alternatively, could the LA pursue the DfE to devise a 'range' for the lump sum based upon a formula that reflects pupil's numbers and other factors (to account for larger primary schools).

Q4: PRIMARY LUMP SUM

- 4.1 I agree the changes should be phased over 5 years but disagree there should be a uniform lump sum of £75,000.
- 4.2 Definitely NOT less than 5 years.
- 4.3 We strongly believe that it is more equitable, for the reasons outlined in q2, for the lump sum to be based on pupil numbers rather than whether the school is a Primary or a Secondary.
- 4.4 Primary school budgets are already constrained – particularly in small schools and this would have a seriously detrimental impact.
- 4.5 Definitely NOT less than 5 years.
- 4.6 Definitely NOT less than 5 years.

Q5: SECONDARY LUMP SUM

- 5.1 We strongly believe that it is more equitable, for the reasons outlined in q2, for the lump sum to be based on pupil numbers rather than whether the school is a Primary or a Secondary.
- 5.2 Primary school budgets are already constrained – particularly in small schools and this would have a seriously detrimental impact.

Q6: SPARSITY FUNDING

- 6.1 The proposed sparsity factor does not properly assist rural schools. There are rural schools with greater than 105 pupils that are nevertheless disadvantaged.
- 6.2 The lack of external funding will result in negative impact and unfair distribution of the “one pot of money.”
- 6.3 A more equitable funding formula would be based solely on pupil numbers.
- 6.4 One cannot ignore the rural nature of our county. Rather than fund any small school irrespective of size and position it would be better and fairer to pupils of larger primaries to identify strategic schools (travel to next school more than 15 mins by car) and subsidise only those. The issues are not just fairness but quality of education, teacher movement (not much in small schools thus expensive teachers) and breadth of opportunity.

Q7: SPARSITY FUNDING PHASING

- 7.1 We disagree with the concept of sparsity funding since it is not effective in compensating all small rural schools. See answer to Q6.
- 7.2 As a small school taking away a phased introduction of sparsity funding does not compensate for the withdrawal of £6000 lump sum.

- 7.3 Not unless there is external dedicated extra funding from the government.
- 7.4 One cannot ignore the rural nature of our county. Rather than fund any small school irrespective of size and position it would be better and fairer to pupils of larger primaries to identify strategic schools (travel to next school more than 15 mins by car) and subsidise only those. The issues are not just fairness but quality of education, teacher movement (not much in small schools thus expensive teachers) and breadth of opportunity.

Q8: PRIMARY SPARSITY FUNDING

- 8.1 This demand diminishes the pot available for the remaining schools. Small schools should be evaluated and costs minimised through links with larger schools. A set figure should be established below which they are untenable.
- 8.2 Because of the negative financial impact on other more viable schools.
- 8.3 Expensive teacher costs also applies to many other schools especially where standards are high and social mobility is low. Many people move to Herefordshire and stay. Compare my secondary school's staffing profile.
- 8.4 The basis of the formula used is flawed. A small school of less than 105 children should not be unduly rewarded for having more experienced teachers when a small school of greater than this number is not.
- 8.5 An unviable school should not be propped up at the expense of other small schools.
- 8.6 This is completely unsustainable.
- 8.7 One cannot ignore the rural nature of our county. Rather than fund any small school irrespective of size and position it would be better and fairer to pupils of larger primaries to identify strategic schools (travel to next school more than 15 mins by car) and subsidise only those. The issues are not just fairness but quality of education, teacher movement (not much in small schools thus expensive teachers) and breadth of opportunity.
- 8.8 Yes for necessary schools as part of a strategy.

Q9: PRIMARY SPARSITY FUNDING

- 9.1 As above – but this is the best model of those proposed.
- 9.2 We do not believe that small 28 pupil primary schools should be funded at the detriment of more financially viable schools.
- 9.3 For the reasons given in answers to questions 6, 7 & 8.
- 9.4 There isn't sufficient funding – has a negative impact on every other school and their pupils. Cutting the lump sum down across all schools would be "robbing peter to pay back paul."

Q10(a): PRIMARY SPARSITY MODEL A

- 10.1 As above – inefficient allocation of funds.

- 10.2 We do not believe that small 28 pupil primary schools should be funded at the detriment of more financially viable schools.
- 10.3 We as a governing body prefer the financial reasoning of “Model C” below.
- 10.4 A Primary school of 105 pupils should not necessarily be classed as a small school, sustaining 4 classes.
- 10.5 This is the more expensive option and is to the detriment of all schools in Herefordshire. We feel that we should not be funding spare capacity in other schools and the money should go directly to the children who have taken school places.
- 10.6 No -Option C offers consistency with recent funding.
- 10.7 Schools should be able to see figures used to calculate the sparsity funding.
- 10.8 The same reason as above; until there is external national funding the negative impact on bigger schools who are already affected by the proposed funding will lose out even more. It would affect larger schools to a greater degree.
- 10.9 Prefer Option C below.

Q10(b): PRIMARY SPARSITY MODEL C

- 10.10 Need to know that untenable small schools will be addressed.
- 10.11 We do not believe that small 28 pupil primary schools should be funded at the detriment of more financially viable schools.
- 10.12 The sparsity factor might be relevant to schools that have a number on roll of greater than 70.
- 10.13 The same reason as above; until there is external national funding the negative impact on bigger schools who are already affected by the proposed funding will lose out even more. It would affect larger schools to a greater degree.
- 10.14 70 pupils is barely sustainable the small school subsidy should be set at 105 max.
- 10.15 Pupil numbers.

Q11: SECONDARY SPARSITY FUNDING

- 11.1 No comment.
- 11.2 Prefer A.
- 11.3 Same comments apply to ‘small’ secondary’s versus large perhaps even more so.

Q12: FUNDING THE COST OF SPARSITY

- 12.1 As explained in earlier answers, we do not agree in principle with the sparsity funding model but if it is implemented then phasing is preferable.
- 12.2 We agree that primary schools should fund primaries, and secondary schools should fund secondaries.
- 12.3 There is no additional external funding so all children and young People lose out.
- 12.4 I believe that it is a benefit to fund small schools as long as they have greater than 70 pupils but at the same time small secondary schools should not be subsidised. Therefore the subsidy should be taken from the whole education budget before splitting into phases.
- 12.5 Not sure – was not completely secure with either argument.
- 12.6 Where sparsity is to be funded it should be top sliced.

Q13: SECONDARY PRIOR ATTAINMENT FUNDING

- 13.1 NB: Having checked with the DfE, the wording of the above paragraph should read:

“That the funding allocation for secondary prior attainment be amended from £355 per pupil not achieving level 4 in Maths AND English to £148 per pupil not attaining Maths **AND/OR** English so that expenditure is maintained at the same level as 2013/14?”

Q14: NOTIONAL SEN BUDGET

- 14.1 Please see comments in later section on matrix.
- 14.2 Based on the fact that low attainment is not always an indicator of SEN.
- 14.3 We refer to the consultation document, firstly, section 2.2 Prior Attainment is referred to as a proxy measure for SEN. It seems to assume that if a student is working within a level 3 that they automatically have SEN. I can see some logic in this but there’s a big difference between a low 3c and a high 3a. Some students may not necessarily be SEN but simply under-achieved. Isn’t Ofsted’s message about over-identification of SEN being contradicted? This crops up again in 5.2 and 5.31 with the students referred to as “low attainment”. Will any additional funding for these students be taken from SEN funding to balance the books? This is also mentioned again and both SEN and prior attainment are linked together in the funding proposals (9.6).
- 14.4 As long as there is something in place for more than 1 statemented child arriving in your school, particularly mid year when you haven’t budgeted for the additional spend.
- 14.5 As long as there is something in place for more than 1 statemented child arriving in your school, particularly mid-year when you haven’t budgeted for the additional spend.
- 14.6 The previous system of SEN funding which was related to need and the number of pupils with needs seemed fairer.

- 14.7 The funding formulae is arbitrary and not based on need.
- 14.8 As long as there is something in place for more than 1 statemented child arriving in your school, particularly mid year when you haven't budgeted for the additional spend.

Q15: CAPPING GAINERS TO FUND LOSERS

- 15.1 This proposal seems to go against a national instruction. The national funding formula has been designed to ensure budgets are allocated consistently, national standards are met and funding is targeted to the appropriate areas. If the Local Authority decides to top slice schools who are entitled to specific funding, these schools will not see the benefit of their targeted funding. This is especially relevant to educational establishments in poorer areas who have been allocated specific monies to deal with deprivation.
- 15.2 I would expect the capping figure of -1.5% reduced over the 5 years.
- 15.3 This may delay the inevitable for very small schools (50 or less) and deprive funding for larger 'small' schools (70>)
- 15.4 Either scheme is a fudge!
- 15.5 Capping, if it takes place, should take an increase in pupil numbers into consideration.

Q16: DE-DELEGATION

- 16.1 We are aware of the amount that is retained to pay for these services; however, we do not know how this money is spent and therefore cannot make an informed response.
- 16.2 We would appreciate, however, the financial data for each of the above parameters.
- 16.3 In light of DfE consultation take this out of the equation.
- 16.4 Trade union facilities can be accessed independently. I cannot see the need for the county to retain facilities.
- 16.5 Cost of trade union facilities should be at the discretion of the school- not pupil focused.
- 16.6 Schools should decide themselves: LMS.

Q17: HIGH NEEDS ASSESSMENT MATRIX

- 17.1 This was really clear. Thank you
Only one suggestion relating to 'reading ages' section of last column. For very young children who do not have physical/sensory impairments and other areas that would 'score' on this chart it would take until 7/8 years to be able to grade a reading age which is 4 years below just because of how/when children learn to read and how this can be assessed. Whereas for example, a 10 year old being 4 years below would be able to be assessed as such. I think this element could be considered in relation to younger children who may have specific difficulties in this area otherwise we could be waiting for children to be old enough to meet a criteria thereby losing out on precious early time to make improvements.
- 17.2 The high needs matrix is an excellent approach to funding of SEN which we welcome but in the current form there are many gaps. BCSS has now carried out a full exercise on matching pupils against the matrix and identified the following:
- **Weighting:** Communication and Interaction: these represent a vast spectrum of needs which at the highest level can be high need and complex requiring high staffing and professional expertise / specialist equipment etc. to address. This area is also one of the most common across all schools and the weighting should recognise this. The range needs to be further broken down so you can have low level weighted as 2 and high level as 4.
 - **Classifications and descriptors:** There are vast gaps within the Physical Disability / Medical conditions section. There is no reference to the management of complex medical needs – i.e. Epilepsy or syndromes which require complex medical support through medication and management. The descriptors provided focus on physical characteristics. There is also a huge gap in terms of mental health issues. Some of our most vulnerable and complex pupils have mental health issues which present in a range of ways and need high level support and intervention to support effectively.
 - **Physical and sensory areas** – severity is viewed very much in terms of whether or not the pupil uses a wheelchair/ hearing aids/ vision aids i.e. equipment. For pupils with SLD it is often very difficult to get an accurate diagnosis/ measure of their vision/ hearing. However their functional vision/ hearing may be extremely limited (i.e. how they actually use their distance senses to function effectively and learn from the environment.) Many pupils with PMLD will have cortical visual impairment and/ or sensori-neural hearing loss i.e. the physical structures for seeing and hearing are intact but the systems for processing visual and auditory information do not 'connect' so learning through these channels is severely limited. If you are looking at visual/ sensory impairment as a 'lone' indicator this may not be significant but when combined with a learning disability as well the impact on access to learning is massive. A child with impaired distance senses may be physically able to walk but may be terrified of doing so because they cannot make sense of the world around them. In order for that child to access the learning environment safely they may need an adult to help and encourage them to move from one place to another therefore independent mobility is virtually impossible.
 - **ASD** – Many children on the autistic spectrum do not have a diagnosis. This makes it very difficult to effectively assess their needs.

- **ESBD** - High anxiety levels have a severe impact on a child's ability to learn. There is not enough emphasis on behaviours and emotional / social disturbances and delayed development resulting from disability and mental health issues. Such children and young people demonstrate very challenging behaviours often harming self and others – but there is no intent to be 'disrespectful' in such. They require specialist support and management that will be high end cost but the factors contained in the current matrix do not reflect this cohort.
- **Social skills** – For many children with SLD this manifests itself in the child being very 'hard to reach.' It takes a massive amount of time/ effort input to break through into the child's world, form relationships and eventually encourage them to explore the world beyond themselves.
- **Learning behaviours** – Many pupils with learning behaviours have a very personalised learning style.
- **Cognition and Learning** - No levels or measurement scales identified. Gradation within the matrix – insufficient to meet range of needs but agree it should not be too complex.
- **Specific learning difficulties** - This section of the funding matrix form only refers to dyslexia. The descriptors do not refer to pupils with dyspraxia, dyscalculia, dysgraphia, attention deficit disorder or attention deficit hyperactivity disorder (ADD or ADHD) and Asperger's Syndrome. These are generally accepted now under the 'Specific learning difficulty' definition.

It is impossible to compartmentalise pupil needs i.e. sensory + physical + communication + ESB + Cognitive. As soon as you have one identified need then that will impact on all other areas e.g. a child with profound hearing loss with obviously impact heavily on communication/ emotional/ social and learning behaviours.

The process of testing this matrix out took 3 hours and we only managed 4 pupils in that time. We used their Statements of SEN as well as school based evidence for the process. This clearly indicates that the timescale set for implementation of the final agreed process is unachievable. You mention 'caution' in the approach to SEN funding throughout the paper – the process needs to be refined then introduced in a phased approach – much as for mainstream and the PRUs who will not have this in place for another year.

- 17.3 There must be fairness in the approach.
- 17.4 It is a reasonable basis but doesn't take account of the setting a student is in.
- 17.5 If a child is in a large mainstream class behaviours will be different to those displayed in small SEN focused class.
- 17.5 Weighting doesn't always correspond to level of need in school. Therefore, there needs to be a mechanism in place to discuss specific cases where it is felt that greater financial support is required.
- 17.6 Q (b) – it was thought the weighting of communication and interaction should be the same as emotional, social and behavioural development as quite often the second factor arises due to the first one.

- 17.7 A lot of work has gone into this matrix, looking at all levels of need. It a fair system however it will need close monitoring so all children with additional needs have a fair and accurate funding.
- 17.8 Weighting doesn't always correspond to level of need in school. Therefore, there needs to be a mechanism in place to discuss specific cases where it is felt that greater financial support is required.
- 17.9 Weighting doesn't always correspond to level of need in school. Therefore, there needs to be a mechanism in place to discuss specific cases where it is felt that greater financial support is required.

Q18: HIGH NEEDS ASSESSMENT CATEGORY WEIGHTINGS

- 18.1 Communication and Interaction – which includes ASD – is a very broad spectrum and most if not all schools will have pupils with such diagnoses or conditions. The matrix needs to reflect the different levels of need that are encompassed in this too broad a category. Perhaps split out for low level at 2 but high level at 4 – where needs can be complex and challenging requiring high levels of staffing / expertise / input from other agencies and often specialist equipment including ICT.
- 18.2 Emotional, Social and Behavioural Development needs should be weighted at 4 to reflect the growing challenges in this category.
- 18.3 I appreciate the need to differentiate but Communication and Interaction should be equated to ESBD.
- 18.4 Much time has been spent looking at the weightings so it is a fair analysis of need. It does however need monitoring so children of similar needs access the correct levels on the matrix across all settings.
- 18.5 Weighting doesn't always correspond to level of need in school. Therefore, there needs to be a mechanism in place to discuss specific cases where it is felt that greater financial support is required.
- 18.6 Weighting doesn't always correspond to level of need in school. Therefore, there needs to be a mechanism in place to discuss specific cases where it is felt that greater financial support is required.

Q19: HIGH NEEDS FUNDING TARIFF

- 19.1 Yes although ranges in other authorities are much wider.
- 19.2 These ranges will only ensure effective provision for the children and young people if there is an effective and robust system and process for the allocation. There is insufficient information on how this will be applied and not enough time between now and April 14 for this to be implemented.
- 19.3 There is also no detail on the process of appeal which will need to be independent and timely – the risk being that staff and expertise are lost due to inappropriate funding in place

- 19.4 Once the local offer is published we will be able to make an informed decision, therefore the answer is currently no. We do not know the tariffs, our SENCO has asked for clarification and we await a response.
- 19.5 If this still continues to be affordable following the whole moderation and assessment process as described. Final amounts might differ following inclusion of actual pupil numbers.
- 19.6 The enhanced funding system used in special schools has met the needs of complex and challenging children, this allow those children who fell below the enhanced funding level to have their needs met more appropriately. However this needs close monitoring across settings.

Q20: TARIFF FUNDING IMPLEMENTATION

- 20.1 At this stage we do not know the practical implications of this change, i.e. currently we provide statement review paperwork, what impact will the change have on this procedure? Consequently we not know whether the time scale is appropriate.
- 20.2 The timing is too short for special schools. There is no effective plan for the assessment and agreement of funding levels in place – or any detail on the appeal process should there be disagreements.
- 20.3 The sooner the process is set in motion the better. The schedule allows schools the appropriate time scales to ensure all children are assessed and placed on the matrix.

21. ADDITIONAL COMMENTS

- 21.1 Thank you to everyone who has contributed to this. What a huge amount of work in such a complicated scenario. Most importantly, it looks fair and that is not easy to achieve, so again, thank you.
- 21.2 Special Commissioned Places: We are concerned that there is no increased provision within the (Leominster) locality for female students at key stage 3 with emotional and behavioural high needs. It does not appear from the consultation paper that Brookfield is increasing places to take this into account.
- 21.3 We welcome a review of SEN funding and the matrix approach but there are weaknesses as highlighted in the current proposals.
- 21.4 There are risk factors that have not been addressed such as loss of expertise / potential redundancy costs should funding be reduced/ protection factors.
- 21.5 Special school funding is tied to pupils and needs so there is no room for error.
- 21.6 There needs to be confidence that when the LA commissions places the school is paid appropriately for the number and levels of need. This is not currently the case for BCSS with 109 pupils and only 103 being funded appropriately.
- 21.7 Assessment process - Our annual reviews have begun and we have not had any indication regarding the assessment process identified in the documentation. The annual reviews

provide a suitable opportunity for us to review pupil's statements and overall developments/ needs. If representatives for the funding matrix are not attending meetings how can they effectively assess the pupils? Also we have not been informed about when the process for assessment begins for our pupils and the deadline is December 2013.

- 21.8 When testing the funding matrix we identified that all of the statements we reviewed were out of date. This therefore provided an unreliable assessment of that individual. Also the format for all of the statements were different, this made it difficult for us to assess using the matrix.
- 21.9 Review of pupil statements - who is going to review all of the pupils statements? Already we have identified that many statements are out of date, this has huge implications on the assessment process and would take a considerable amount of time to do.
- 21.10 The assessment guidelines are open for interpretation and could lead to inaccurate assessments if not conducted by individuals who are familiar with the young person. Will our own observations of the pupils be taken in to consideration? When will parents/ other professionals be involved in the assessment process?
- 21.11 We are a growing school with a split site for which we receive no extra funding. This has huge implications on our financial budget.
- 21.12 In the documentation it talks about the local authority provisions. Last year we had no SALT provisions for a large percentage of our pupils and currently we cannot accurately say how this has impacted on our pupil's speech and language abilities. The new funding matrix does not take into account the impact of external provision to our pupil's development, especially when they are not consistently provided.
- 21.13 Low prior factor for EYFS – this still needs to be clarified ASAP as we are not now using the 78+ points. What will the proportion be, using the New EYFS Profile assessment. The current system of scoring (1, 2, 3) suggests that 34 points average. Will 34 points be the indicator for low prior attainment? (x3 for East Ross cluster)
- 21.14 The fixed lump sum should be based on the same formula for all schools – that of pupil numbers rather than the phase of school.
- 21.15 As always Mr Green has done a sterling job in producing this complex but well thought out consultation document. Thank you.
- 21.16 We feel that there should be a review of school provision across the whole of the Local Authority.
- 21.17 We feel that Jo Davidson should write to the government about the detrimental effects of the opening of free schools in Herefordshire. Central government should be supporting the actions of the LA in closing schools which are not viable.
- 21.18 Whilst the national funding formula is designed to make funding more equitable across all schools, large schools are still funded poorly compared to others.

MALCOLM GREEN

7th October 2013