

High Needs Block Consultation Questions

- 1. In designing the 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. We think that using the historic spend further exacerbates historic inconsistencies and builds on unfair distribution. Examples where this may be the case are some Authorities identifying more pupils requiring an EHC plan that would be having their needs well met in other LA areas at SEND support, some LAs using High Needs Block for funding activity that other LAs have not, and specifically SEN Transport.

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

- a. Historic spend factor – to allocate to each authority a sum equal to 50% of the planned spending baseline.**

No – as stated above we think there should be a clean baseline and a benchmarking exercise undertaken to ensure fair starting point in 2018. We think there should be more clarity on what factors should be covered by ‘historic’ and which should not be counted to ensure fairness. Population growth should be reflected in terms of average percentage of population that are identified as needing EHC assessment and plan and more specialist provision to avoid historic inconsistencies.

- b. Basic entitlement – to allocate to each LA £4k per pupil**

We are currently unsure about this – confused by references to 4k, 6k and 10k. We felt the proposed new system is more complicated than current....!

- 3. We propose to use the following weightings for each of the formula factors listed below, adding up to 100%. Do you agree?**

- a. Population – 50%**
- b. FSM eligibility – 10%**
- c. IDACI – 10%**
- d. KS2 low attainment – 7.5%**
- e. KS4 low attainment – 7.5%**
- f. Children in bad health – 7.5%**
- g. DLA – 7.5%**

We think it should be a balance of 50% population and then the other 50% on FSM and IDACI weighted more at FSM eligibility which is annual and less at IDACI which is every 5 years. **Want to look at other responses to this.**

- 4. Do you agree with the principle of protecting LAs from reductions in funding as a result of this formula? (Funding floor)**

Not where there have been inconsistent practices such as some LAS using HNB to fund SEND transport etc. We felt some factors should be removed – hospital education, SEND transport for example.

5. Do you support our proposal to set the funding floor such that no LA will see a reduction in funding, compared to their spending baseline?

As above

6. Do you agree with our proposals to allow limited flexibility between schools and high needs budgets in 2018/2019?

Yes, although in an ideal world there shouldn't be a need for flexibility, and this can cause challenges in budget setting. Need criteria to ensure consistency and oversight by Schools Forum.

7. Do you have any suggestions about the level of flexibility we should allow between schools and high needs budgets in 2019/2020 and beyond?

Needs to be limited as it could complicate position further. A degree of flexibility could support schools working together more effectively. We questioned where the resource would come from for managing and overseeing this.(QA)

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

Timescale for further consultation on AP funding could impact on High Needs Block. This should be done in tandem.

Clarification on 'full time' post 16 and ensuring parity.

Support for a proportion of students up to 25 should be built into the HNB.

9. Is there any evidence relating to the 8 protected characteristics as identified in the Equality Act 2010 not included in the Equality Impact Assessment that should be taken into account?

No