

**MINUTES OF THE SCHOOLS FORUM MEETING
TUESDAY 12 APRIL 2016**

Schools Members:

Headteachers:

Special (1)	*Martin Doyle (Riverside),	
Children's Centres (1)	*Julie Vaggers (Rowland Hill),	
Primary (7)	*Angela McNicholas (OLM)	(A) Cal Shaw (Chestnuts)
	*Dawn Ferdinand, (The Willow)	Fran Hargrove (St Mary's CE)
	*Julie D'Abreu (Devonshire Hill)	Nic Hunt (Weston Park)
	*Will Wawn (Bounds Green)	
Secondary (2)	*Helen Anthony (Fortismere)	*Tony Hartney (Gladesmore)
Primary Academy (1)	*Sharon Easton (St Paul's and All Hallows)	
Secondary Academies (2)	Elma McElligott (Woodside)	(A) Michael McKenzie (Alexandra Park)
Alternative Provision	(A) Dawn McLean	

Governors:

Special (1)	Michael Connah (Riverside)	
Children's Centres (1)	*Melian Mansfield (Pembury)	
Primary (7)	Asher Jacobsberg (Welbourne)	(A) Andreas Adamides (Stamford Hill)
	*John Keever (Seven Sisters)	(A) Michael Cunningham (Muswell Hill)
	(A) Laura Butterfield (Coldfall)	*Lorna Walker (Rokesly Infants)
	*Zena Brabazon (Seven Sisters)	
Secondary (3)	Imogen Pennell (Highgate Wood)	
Primary Academy (1)	VACANT	
Secondary Academies (2)	Marianne McCarthy (Heartlands)	

Non School Members:-

Non – Executive Councillor	(A) Cllr Wright
Professional Association Representative	*Niall O'Connor
Trade Union Representative	*Pat Forward
14-19 Partnership	(A) Rob Thomas – Herbie Spence attended
Early Years Providers	*Susan Tudor-Hart
Faith Schools	*Geraldine Gallagher
Pupil Referral Unit	*Gordon McEwan

Observers:-

Cabinet Member for CYPS	*Cllr Ann Waters
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Also attending:

LBH Assistant Director, Schools and Learning	*Rory Kennedy
LBH Assistant Director, Quality Assurance, Early Help & Prevention	*Gill Gibson
LBH Finance Manager (Schools and Learning)	*Steve Worth
LBH Head of Finance - Child, Adults and Schools	*Katherine Heffernan
LBH Acting Head of Governor Services	*Carolyn Banks
Haringey Clerk (minutes)	*Jonathan Adamides-Vellapah

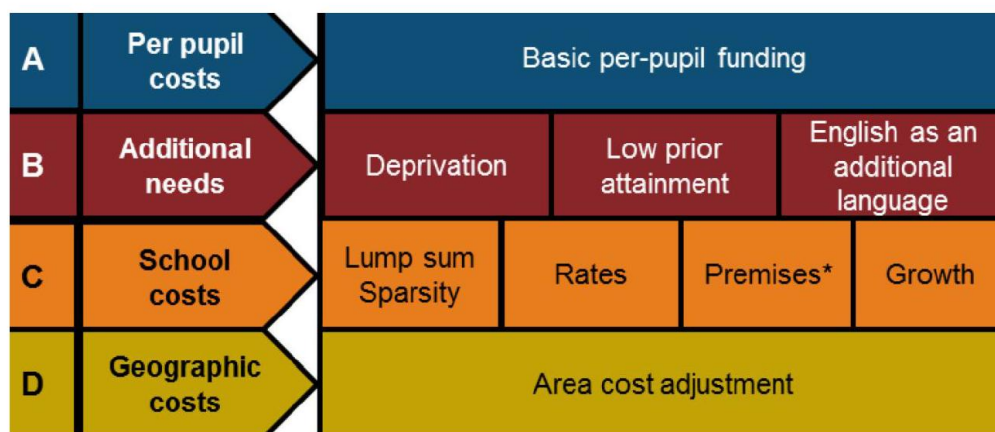
* Members present

A Apologies given

TONY HARTNEY IN THE CHAIR

MINUTE NO.	SUBJECT/DECISION	ACTION BY
1	CHAIR'S WELCOME The Chair welcomed everyone to the meeting.	
2.	APOLOGIES AND SUBSITITUTE MEMBERS	
2.1	Apologies: Noted.	
2.2	Substitutions: Herbie Spence for Rob Thomas.	
2.3	Resignations: None.	
2.4	New members: None.	
3.	DECLARATION OF INTEREST	
3.1	None.	
4.	NATIONAL SCHOOLS FUNDING FORMULA	
4.1	Steve Worth introduced the paper and noted that: <ul style="list-style-type: none"> • The Department of Education (DfE) launched the Schools Funding Reform consultation with the National Funding Formula for Schools and the High Needs Block (item 5 on the agenda) • The consultation is in two parts. Part one deals with high level principals and overall design with a response deadline of the 17 April 2016. Part two will looks at the specific formula weighting. • Haringey Council will be responding separately and is encouraging all schools, headteachers and governing bodies to respond • The changes will come into effect in 2017 but with a minimum funding guarantee and locally agreed variations allowable during a two-year transition period • The formula from 2019-20 will be a hard formula with no local discretion. 	
4.2	The forum noted that: <ul style="list-style-type: none"> • There are no details as yet about the values and relative weightings 	

Overall Design of the Formula



The factors used will be:

- Per pupil costs (equivalent to the Age Weighted Pupil Unit – AWPU)
 - Basic Funding for each primary pupil (key stages 1 and 2)
 - Basic Funding for each stage 3 pupil
 - Basic Funding for each stage 4 pupil
- Additional Needs
 - Socio-Economic Deprivation
 - Low Prior Attainment
 - English as an Additional Language
- School Factors
 - Lump sums
 - Sparsity
- Premises Costs
 - Rates, PFI costs and other specific exceptional premises costs, based on actual costs
- Area Cost Adjustment
 - To reflect the relative costs of running schools in expensive areas of the country such as London

However, the forum noted that for Haringey, there are a number of factors that will not be included:

- Looked after children
- Mobility
- Post 16 factor.

4.3 The forum noted that estimates suggest that the final loss could be as much as 10%, but with the minimum funding guarantee providing transitional protection.

The forum discussed the models proposed and agreed that the hybrid method for the Area Cost Adjustment would be the preferred option.

The forum discussed the practicalities of how top-slicing would operate and the impact on services that the borough would provide. The question was raised on how the Schools Forum would look in the future, given the funding and the move towards acadamisation.

4.4	<p>The forum reviewed the questions and proposed answers. In summary each question was reviewed and amendments suggested. The amendments were noted by Katherine Heffernan to incorporate into a revised paper for circulation. The forum agreed where possible to prefix the responses with a yes/no, add examples and clarify where needed.</p> <p>Noted. The revised response is attached as appendix: 1 as the consultation closed on Sunday 17 April 2016 and was circulated to members after the meeting.</p>	
4.5	<p>The following summary was noted following the discussions of each question:</p> <p>Q= IDACI funding formula, can it be challenged? A=This is being considered along with deprivation and how these will impact Haringey in calculations for funding.</p> <p>Q1 – Agreed</p> <p>Q2 – Agreed there needs to be local accountability and flexibility to meet sudden changing circumstances, should be maintained. Haringey has evolved the local funding formula and this should continue. Other points raised:</p> <ul style="list-style-type: none"> • Should 'Haringey' be removed to make the response wider reaching? • Haringey does have good collaboration, school to school support, involved governors that contribute to good relationships and accountability • Should references be made to the London Councils response? • There will be impacts in Haringey particularly and a response may draw reference to this • Fairer funding is the common thread and could be reflected. <p>Q3 – There could be a case at each level and at each stage, but the rationale would have to be compelling. The over simplification should not be used as a way to reduce funding.</p> <p>Q4 – Revise wording to make clear deprivation, and free schools meals making clear that some households are not eligible. This has to reflect the cost of living as a factor. There are also families who have no recourse to public funds and are therefore not eligible.</p> <p>Q5 - add DfE low prior attainment factor and no baseline EYFS.</p> <p>Q6 – note that two levels of funding should be considered for the first few years and reduced later.</p> <p>Q7 – agreed.</p> <p>Q8 – agreed.</p>	

	<p>Q9 –schools should continue to receive full funding and as this is calculated externally a national formula cannot replace this.</p> <p>Q10 – need clarity on the term split site and what the detailed definition will be.</p> <p>Q11 – agreed.</p> <p>Q12 – agreed, but what does this mean about exceptional factor?</p> <p>Q13 - agreed but it must reflect current spend.</p> <p>Q14 – agreed and the answer should include what is happening in Haringey at present.</p> <p>Q15 – question raised on what does historic mean here? There needs to be more work done to look at the actual need, but the two years is a good starting point.</p> <p>Q16 – reorder the response to give the reason as to why accepting the hybrid model.</p> <p>Q17 – mention LAC as important part of schools emerging duties.</p> <p>Q18 – Agreed that this is a no and mobility has to be included. Expand on the answer to include the movements caused by relocation due to housing and other factors i.e domestic violence etc.</p> <p>Q19 – agreed that this is a national issue and not part of the DSG.</p> <p>Q20 – This is a firm no.</p> <p>Q21 – Yes, but we need to know the detail to manage the transition.</p> <p>Q22 – reference should be made to the area cost adjustment should be applied.</p> <p>Q23 – agreed.</p> <p>Q24 – Yes the other factors include, costs of academy conversion. The forum noted that there are strong working partnerships with the borough and should be maintained.</p> <p>Q25 – review response and add in about the working with academies and what the hard formula will mean for working with all schools. Need further clarity.</p>	
	<p>RESOLVED:- That members agreed the forum’s response to the consultation on the National Schools Funding Formula, subject to the discussed amendments.</p>	

5.	FUNDING THE HIGH NEEDS BLOCK	
5.1	<p>Steve Worth introduced the paper and noted that the forum was consulted at this stage: No clear cut proxy measure – one factor and the current level of spend and in general a formula and a MFG, recommendations from a review by ISOS</p> <ul style="list-style-type: none"> • The High Needs Block (HNB) provides funding for special schools and units, alternative provision, hospital education, placement and top up funding for children and further education students with special educational needs • DfE research by the ISOS shows that the current system does not reflect the need and varies across the country • The consultation therefore proposes that the HNB becomes formula driven on a range of proxy indicators and not linked to EHCPs 	
5.2	<p>There are a range of proposed factors, which include:</p> <ul style="list-style-type: none"> • An indicator of low attainment • Two indicators relating to children’s health using Disability Living Allowance and census data on children not in good health • Two indicators relating to FSM and IDACI • A factor to reflect the local specialist provision which will be funded by the HNB • A related issue on of the LA is a net importer or exporter of children with needs • An area cost adjustment • There may be put in place a minimum funding guarantee to smooth the transition. 	
5.3	<p>The design of the formula is expressed below</p> <div data-bbox="288 1350 1321 2105" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Figure 1: Proposed design of high needs funding formula</p> </div>	

	<p>The ISOS made 17 proposals, which were translated to three broad categories:</p> <ul style="list-style-type: none"> • Improvements in the way funding is allocated, using a greater element of the formula funding • Clear communication about how the system should work • Proposals to enable better (and by implication., more consistent) decision-making by LA commissioners and setting, school and college SEN co-ordinators. <p>The proposals are underpinned by seven principles, that a funding system that is fair, efficient, transparent, simple and predictable, and which prioritises ‘the front line’ and ‘supports opportunity’.</p>	
5.4	<p>The forum reviewed the questions and proposed answers. It was agreed to circulate the revised response and this is attached as Appendix: 2. The following was noted in summary of the discussion:</p> <p>Q1 – consider adding 18 – 25 point and bring out and consider adding references to the families act and deprivation factors. Q2 –consider adding references to partnership working, hubs top up levels and making clear the needs of the children may be unmet. Q3 – At the transition stage more funding may be required and this does not really reflect all the needs i.e autism, needs which may develop over time, with the child. Q4 – this should reflect that each plan is individualised and should reflect the need required to support the child. The ECHP is not available in all settings i.e Nursery. The proxy is that needs are met however, there is a distinction between the additional needs and the real needs. Q5 – agreed. Q6 – agreed. Q7 – agreed. Q8 – agreed and add clarity to putting more money in. Q9 – Please email suggestion to Katherine Heffernan asap. Q10 – agreed, need clarity on the 10k? Q11 and Q12 – the wording needs to be revised and can references be added highlighting early help and how nurseries are affected. Q13 – This should be funded nationally and ask who funds the top-up? Q14 – will be reviewed by Steve Worth.</p> <p>In general the forum noted that clear yes and no answers may not always be appropriate in answering the questions, and examples/references should be provided where possible.</p>	
	<p>RESOLVED:- That members agreed the forum’s response to the consultation on Funding the High Needs Block, subject to the discussed amendments.</p>	
6.	<p>ANY OTHER URGENT BUSINESS None.</p>	
7.	<p>DATE OF FUTURE MEETINGS</p> <ul style="list-style-type: none"> • 19 May 2016 	

	• 30 June 2016	
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The meeting closed at 6.30 pm

TONY HARTNEY

CHAIR

Schools National Funding Formula - Forum Response

Appendix: 1



Question 1

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

Proposed response.

The Forum agrees with the principles but believes it is important to get the balance between them correct, for example the fairest system will not be the simplest. In particular it is vital that the costs associated with deprivation and area cost differentials are given sufficient weight.

However although we agree with these principle we do not feel that they can only be delivered at a national level. Moreover there are important features of a good funding system that are not included in this list including:

- A system that fosters collaboration and partnership between schools
- Is flexible and responsive to changing needs and specific circumstances
- Has mechanisms for ensuring accountability and builds wide support for the funding decisions reached.

We are also concerned that many schools will be losing funding at a time of significantly increasing costs. This could seriously impair the sustainability of some schools and reduce the ability of all schools to continue to deliver good educational outcomes to the detriment of pupils and society.

We therefore call on government to level up the funding so that no school in the country experiences a drop in funding as a result of the National Funding Formula.

Question 2

Do you agree with our proposal to move to a school-level national funding formula in 2019-20, removing the requirement for local authorities to set a local formula?

No. We do not agree with the removal of local flexibility.

By involving a wide range of school headteachers and governors the current arrangements provide greater accountability and encourage the development of good collaboration between schools. They are also more flexible and responsive to local needs. The flexibility to allocate funding locally has enabled Haringey schools to achieve hugely improved outcomes, and we are wary about the risk of levelling down rather than levelling up.

All local authorities face different challenges and funding will be best allocated by those who understand those challenges. In the case of Haringey our local factors, such as very diverse communities in terms of social background and ethnicity; cost of living; and the number of languages spoken in the borough are all important and will still need to be taken into consideration. We believe local flexibility is the best mechanism for doing so given the diversity of educational landscapes across the country.

The flexibility allowed by the current system has been important in achieving great results for children and so we disagree with the significant weakening of the LA role in the school system as it will fracture the system, remove incentives for early years and for primary and secondary schools to come together to consider the best ways of using resources across the system in order to enable the best outcomes to be delivered.

Question 3

Do you agree that the basic amount of funding for each pupil should be different at primary, key stage 3 and key stage 4?

No we do not agree.

We believe that this proposal does not sufficiently differentiate between the different key stages, in particular reception age children require additional staffing and key stage 1 children more supervision than key stage 2 pupils. We therefore recommend a differential at each educational stage.

We know that the weightings are not being consulted on at this stage but the comparative values allocated to each stage must be evidence based and firmly linked to the true costs of providing education to that stage.

Moreover we believe that simplification should not be the paramount consideration in devising a formula and certainly should be used where it would tend to reduce funding.

Question 4

a) Do you agree that we should include a deprivation factor?

b) Which measures for the deprivation factor do you support?

- Pupil-level only (current FSM and Ever6 FSM)
- Area-level only (IDACI)
- Pupil- and area-level

Yes we strongly agree that we should include a deprivation factor.

We also believe that both pupil and area level measures should be used.

We know from our local experience that although there is a high level of correlation between the two factors there are some important differences and the multiplier effect

of having many children from deprived backgrounds must be captured in the formula. The area measure tends to capture more persistent deprivation which has a longer lasting education impact.

However we are extremely concerned that the bandings for both IDACI and FSM are not keeping pace with actual living costs and income. This is especially problematic in London where as a result of high living costs poor families in London may have incomes that appear high in the national context but which are barely sufficient resulting in significant impacts on their children's education and life chances.

A full review of the income thresholds needs to be carried out and consideration given to the development of a methodology that takes into account income levels, regional disparities and/or housing costs.

We would also like consideration to be given to children living in families with no recourse to public funds being included in this measure despite their not being eligible for free school meals.

Question 5

Do you agree we should include a low prior attainment factor?

Yes we strongly support the inclusion of this factor.

Where children have low attainment in their previous setting (early years or primary) it is even more important that their next setting is able to provide sufficiently intensive support to enable them to make rapid progress, otherwise their potential is missed. Some of our settings take children with very low prior attainment and achieve great added value and we would not wish to see this jeopardised.

However we have concerns about how this will be maintained for primary schools in future given the changes to the baseline and the Early Years Foundation Stage profile data. We would appreciate more information from the DfE about this in the next stage of consultation.

Question 6

a) Do you agree that we should include a factor for English as an additional language?

b) Do you agree that we should use the EAL3 indicator (pupils registered at any point during the previous 3 years as having English as an additional language)?

Yes We strongly support the inclusion of an EAL factor.

From the options given we would support the EAL3 indicator.

However we believe that the consultation report is right in stating that some pupils require 'sustained support over a longer period of time and that three years should be the minimum period of funding. We would prefer a two tier approach with a higher level of funding for the first three years and a lower level thereafter.

Question 7

Do you agree that we should include a lump sum factor?

Yes, this is an important element of funding particularly for smaller schools.

The national formula should however be clear about what the lump sum covers. It should be subject to the Area Cost uplift and to the Minimum Funding Guarantee.

Question 8

Do you agree that we should include a sparsity factor?

Yes. Although as a London Borough this is not relevant to our formula we recognise its importance for very small schools in remote areas.

Question 9

Do you agree that we should include a business rates factor?

Yes. We agree with this proposal.

Rates are based on individual assessments of premises and are largely outside of a school's control. Under the current system schools receive the exact figure they require and this should continue.

We do not believe that this can be replaced by a formula.

Question 10

Do you agree that we should include a split sites factor?

Yes we agree with this. However in the second round we believe there should be more information about the definition of a split site and a clear explanation of what costs this is intended to cover.

Question 11

Do you agree that we should include a private finance initiative factor?

Yes, but only where costs are inescapable and outside an individual school's control.

Question 12

Do you agree that we should include an exceptional premises circumstances factor?

Yes, but only for truly exceptional circumstances over which an individual school has little control.

Question 13

Do you agree that we should allocate funding to local authorities in 2017-18 and 2018-19 based on historic spend for these factors?

- Business rates
- Split sites
- Private finance initiatives
- Other exceptional circumstances

We agree that in 2017-18 and 18-19 historic spend would be an appropriate basis for initial allocation; however there should be a mechanism for additional funding (or claw back) where actual costs are significantly different.

Beyond this period we believe that business rates should continue to be funded on the basis of actual cost and the other factors kept under regular review.

Question 14

Do you agree that we should include a growth factor?

Yes – we strongly support the inclusion of a growth factor.

Haringey and many other authorities have experienced high levels of growth in the primary phase in recent years and are projecting secondary phase growth in the near future. A growth factor is in our view is essential to ensure the costs of this are fully funded.

Question 15

Do you agree that we should allocate funding for growth to local authorities in 2017-18 and 2018-19 based on historic spend?

This does not seem to us to be a good long term solution but we accept it may be an appropriate starting point in the next two years. However there should be a process for authorities who experience a sudden change in the pace or level of growth. This is particularly important in areas earmarked for development in the London plan (or other regional plans.)

Beyond the transition period there is no reason to suppose that future growth needs will follow historic patterns. We strongly urge the department to carry out further work to identify suitable measures for capturing growth.

Question 16

a) Do you agree that we should include an area cost adjustment?

b) Which methodology for the area cost adjustment do you support?

- general labour market methodology
- hybrid methodology

Yes we strongly agree there should be an area cost adjustment.

We favour the hybrid methodology.

We strongly support an area cost adjustment and in particular the hybrid methodology.

An area cost adjustment is essential to safeguard that financial sustainability of schools in high cost areas of the country. It should be based as closely as possible on the actual costs experienced by providers of education. For this reason we favour the hybrid methodology as it includes a proportion based on local teacher salaries (which is the stronger cost driver in any school.)

A specific concern for Haringey is that while some aspects of our labour market have Outer London characteristics our teachers labour market is strongly linked to Inner London. If this is not reflected in the area cost adjustment there is a high risk that schools will not be able to afford to recruit and retain high quality teaching staff, putting in jeopardy the huge improvements in educational outcomes we have achieved.

We also strongly recommend that an area cost adjustment is applied to grants such as the pupil premium. Without this the value of such grants are reduced in high cost areas such as London.

Question 17

Do you agree that we should target support for looked-after children and those who have left care via adoption, special guardianship or a care arrangements order through the pupil premium plus, rather than include a looked-after children factor in the national funding formula?

Yes we agree this proposal. However increasing the LAC rate in the pupil premium should not be funded by reducing the DSG.

We would add that the area cost adjustment should also apply to this funding.

Question 18

Do you agree that we should not include a factor for mobility?

No, we do not agree this proposal.

We support the inclusion of a mobility factor and one without the current 10% threshold.

We know from local experience that although there is some correlation with deprivation and EAL it is not a complete correlation. We also know that mobility does cause schools significant cost pressures.

We know that schools experience a range of costs associated with pupil mobility including administrative costs and also the need for additional support to settle pupils into a new school. We also know that generally families do not choose to move and so in many cases pupil mobility is associated with other stresses for children such as family breakdown, domestic violence or bereavement, impoverishment and housing insecurity.

Question 19

Do you agree that we should remove the post-16 factor from 2017-18?

We agree that post 16 funding should not come from the Dedicated Schools Grant but adequate transitional arrangements should be made for the current beneficiaries.

Question 20

Do you agree with our proposal to require local authorities to distribute all of their schools block allocation to schools from 2017-18?

No we do not agree this proposal.

Haringey Schools Forum has concerns about this proposal. Firstly it is concerned that by effectively ring fencing the schools budget which is the least volatile element of the DSG it will become harder to manage pressures that arise in the high needs and early years blocks. It also breaks an important link in the system – in areas where schools are less inclusive and accepting of children with special then costs rise in the high needs block and funding transfers are required while the converse is true in areas where all schools play their part in supporting high needs children.

Question 21

Do you believe that it would be helpful for local areas to have flexibility to set a local minimum funding guarantee?

Yes. We believe this is a helpful flexibility.

As we stated in our response to Question 1, we are concerned that many schools will be losing funding at a time of significantly increasing costs and ask the government to level up the funding to minimise the need for a minimum funding guarantee. Even so given that there will be inevitable changes we support the freedom to set a local minimum guarantee to help schools manage the transition and maintain responsiveness to local needs.

Question 22

Do you agree that we should fund local authorities' ongoing responsibilities as set out in the consultation according to a per-pupil formula?

No. We think a per pupil formula would be an over simplification. As a minimum we believe that the Area Cost adjustment must be applied to this funding. Moreover many of the factors that apply at the school level such as deprivation and area costs also apply at the local authority level (and mobility may be even more significant at LA level.) A simple per capita formula does not reflect these variations in cost.

We believe that local authorities should be fully funded for continuing statutory responsibilities and are concerned that there will not be sufficient funding remaining from the Education Services Grant to enable this.

Question 23

Do you agree that we should fund local authorities' ongoing historic commitments based on case-specific information to be collected from local authorities?

Yes. We agree. This would seem to be the only reasonable way to deal with this in the light of the changes to the central block. It is very important that authorities are fully funded to carry out their responsibilities.

Question 24

Are there other duties funded from the education services grant that could be removed from the system?

The Schools Forum does not wish to see the important role of the Local Education Authority diminished. We are proud of the strong partnership that the LEA and all schools (including academies) have built together in Haringey and the huge improvements in educational outcomes that have been delivered as a result. We believe that the LEA should be supported and fully funded to meet all its duties.

In addition we are concerned that the proposed conversion of all schools to academy status will place an additional burden on local authorities. Adequate funding should be made available to cover this.

Question 25

Do you agree with our proposal to allow local authorities to retain some of their maintained schools' DSG centrally – in agreement with the maintained schools in the schools forum – to fund the duties they carry out for maintained schools?

We are concerned that the reduction in the Education Services Grant will lead to a further squeezing of school budgets and would not want the DfE to use this proposal as an opportunity to cost shunt. However we welcome the opportunity for schools to continue to work in partnership with the LEA and would suggest that similar arrangements could be made for academies who wish to contribute to their local community of schools on a voluntary basis.

It is also not clear how this will be dealt with following the implementation of the 'hard' funding formula and would like further explanation of this from the DfE.

Appendix: 2

High Needs Block Consultation - Forum Response



Question 1

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

Response.

Yes, we agree with the principles proposed but would like to see an additional one about promoting inclusion. We believe it is important to get the balance between the principles correct, for example the fairest system will not be the simplest.

We are also concerned that the introduction of a formulaic approach and the desire to avoid perverse incentives could lead to a failure to recognise the true level of need. A formulaic approach could lead to significant disruption and we support strong transitional arrangements.

As with the National Funding Formula we are concerned that there will be insufficient funding in the system to adequately meet demand, particularly as the proposals will not permit movements from the Schools Block. We support the continuation of the local flexibility to move money between blocks.

Question 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, we agree with this proposal. The local authority retains responsibility for meeting the needs of children and young adults with special needs and must have the funds to discharge this duty. Given the proposed use of proxy factors these will be a better, but still inaccurate, approximation at LA rather than school level.

This approach will also facilitate co-operative working between local authorities.

Question 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?

Yes, but we are concerned that without a direct measure of high need the use of proxies will only be a rough approximation of the actual need and cost and will leave children's needs unmet.

We believe significant research should be undertaken on the High Needs Block funding methodology during the transition period.

The use of a formula will lead to a reduction in funding for some LAs and we support calls to provide sufficient funds to level up allocations.

Question 4

Do you agree with the basic factors proposed for a new high needs formula to distribute funding to local authorities?

Yes, these are all factors that have some bearing on local need but as stated in our reply to question 3 they can only give a rough approximation of the actual need and cost.

Question 5

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

We agree with this for the short term but consideration should be given to funding this nationally rather than from local HNBs.

Question 6

Which methodology for the area cost adjustment do you support?

We strongly support an area cost adjustment and in particular the hybrid methodology. An area cost adjustment is necessary to ensure that schools receive the funding they require. It should be based as closely as possible on the actual costs experienced by providers of education. The general labour market methodology is based on average wages payable in the local area while the hybrid methodology includes a specific proportion based on local teacher salaries. The General Labour Market methodology is particularly disadvantageous to outer London authorities such as Haringey which are required by the national Teachers Pay and Conditions agreement to pay teachers on the Inner London pay scale. For this reason, we strongly support the hybrid methodology which is the fairest way to assess the true cost of educational provision. Academies in the area have generally maintained the same pay agreements as maintained schools.

Question 7

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

Yes, we strongly support this proposal. All LAs will be committed in the short term to particular patterns of spend and this needs to be recognised in the funding allocations.

Question 8

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

Yes, we strongly support this as existing patterns of provision will continue for some time but draw attention to our response to Question 3 on the need to provide funds to level up allocations.

Question 9

Given the importance of schools' decisions about what kind of support is most appropriate for their pupils with SEN, working in partnership with parents, we welcome views on what should be covered in any national guidelines on what schools offer for their pupils with SEN and disabilities.

It is important to emphasise the need for a school to clearly set out its local offer on its website.

Question 10

We are proposing that mainstream schools with special units receive per pupil amounts based on a pupil count that includes pupils in the units, plus funding of £6,000 for each of the places in the unit; rather than £10,000 per place. Do you agree with the proposed change to the funding of special units in mainstream schools?

The current methodology assumes £4k as the contribution in respect of the main education costs of a pupil. We need to see the Stage 2 funding proposals before we can accurately assess the impact of this suggestion. One benefit of the proposed change is that the £4k, a national figure to which no area cost adjustment is applied, would in future reflect local costs. We would like to see the application of an area cost adjustment extended to all high need place-led allocations, including the £6k discussed here and the £10k allocations for special school and alternative provision places.

Question 11

We therefore welcome, in response to this consultation, examples of local authorities that are using centrally retained funding in a strategic way to overcome barriers to integration and inclusion. We would be particularly interested in examples of where this funding has been allocated on an "invest-to-save" basis, achieving reductions in high needs spending over the longer term. We would like to publish any good examples received.

We retain funding to support the early help agenda. Early investment in families reduces the future cost of intervention both for schools and the local authority and benefits the whole community of Haringey schools. This is a good example of how schools, the schools forum and the local authority can co-operate in using the current flexibility for the advantage of the local community.

Question 12

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

Haringey has recently moved funding from secondary school lump sums to create a fund for secondary schools to recognise these schools that are more inclusive. Initially this is fund allocated on the proportion of pupils with statements and plans to overall roll but will in future reflect only those proportions in Year 7.

Question 13

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

No unless arrangements can be put in place that would safeguard the budgets of local authorities in which these schools are located. If place funding for independent special schools is implemented then this needs to be dealt with at the national level rather than through the HNB of the authorities in which they are located.

Question 14

We welcome views on the outline and principles of the proposed changes to post-16 place funding (noting that the intended approach for post-16 mainstream institutions which have smaller proportions or numbers of students with high needs, differs from the approach for those with larger proportions or numbers), and on how specialist provision in FE colleges might be identified and designated.

We welcome the proposal of further consideration by the DfE on this issue. It makes sense to try and align the funding methodologies of pre and post 16 pupils and students. We also welcome that further consideration is being given to finding suitable proxy factors to use for high needs among the post 16 population; however, our earlier comments about the limitation of proxy factors also apply here.