

Proposed Responses to Consultation on NFF for Schools and Central Services

Dfe Consultation questions	Proposed Response for Haringey Schools Forum
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?	Yes with the exception of Lump Sum as it affects small schools significantly
2. Do support our proposal to set the primary to secondary ratio in line with the current national average of 1:1.29, which means that pupils in the secondary phase are funded overall 29% higher than pupils in the primary phase?	Yes
3. Do you support our proposal to maximise pupil-led funding, so that more funding is allocated to factors that relate directly to pupils and their characteristics?	Yes
4. Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors (deprivation, low prior attainment and English as an additional language)?	Yes.
5. Do you agree with the proposed weightings for each of the additional needs factors?	We have some concerns about the balance between using Free School Meals and IDACI. For a metropolitan borough like Haringey, the threshold for free school meals eligibility at around £16k per annum will fail to pick up tranches of families above the threshold who may be just about managing. In other parts of the country, that same FSM threshold may be a better determinant of deprivation, as the value of £16k in Inner London will not be so much, compared to less expensive parts of the country. This is

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	<p>why Haringey has put more weight on IDACI, than on FSM (around 60:40), whereas the proposed NFF would produce a more equal contribution (50:50). We would prefer the balance to be weighted to IDACI.</p> <p>Moreover, we are puzzled why the value of IDACI bands C and D are identical. Given that these are different levels of deprivation, we would expect there to be more funding for the higher level of deprivation.</p>
<p>6. Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?</p>	<p>Mobility is about turnover of pupils. The October census identifies pupil-level information. It should be possible to identify levels of turnover (excluding natural joiner and leaver yeargroups), year-on-year, to produce a %age turnover. Schools with high levels of turnover (ie above a certain percentage) would attract additional funding.</p>
<p>7. Do you agree with the proposed lump sum amount of £110,000 for all schools?</p>	<p>A reduction of the lump sum is prejudicial to smaller schools because small schools means £110,000 is a higher proportion of their budget, compared to other schools.</p>
<p>8. Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary schools and up to £65,000 for secondary, middle and all-through schools?</p>	<p>Haringey is not affected and does not wish to comment.</p>
<p>9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?</p>	<p>This proposal is clearly for administrative convenience to avoid collecting pupil planning assumptions (which may happen or may not) and adjusting a national formula at a local level. Lags in providing growth funding is a problem e.g. sixth form funding lags by one year, so if you expand you are a year behind in the funding to pay for it. It is therefore prejudicial to growing schools in the short term in terms of cash flow. This might lead to short-term deficits which local authorities or the EFA may have to support through supplementary cash advances or</p>

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	licenced deficits.
10. Do you agree with the principle of a funding floor that would protect schools from large overall reductions as a result of this formula? This would be in addition to the minimum funding guarantee.	Yes.
11. Do you support our proposal to set the floor at minus 3%, which will mean that no school will lose more than 3% of their current per-pupil funding level as a result of this formula?	Yes, and we would urge Ministers to make this permanent.
12. Do you agree that for new or growing schools the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?	Yes.
13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5% per pupil? This will mean that schools are protected against reductions of more than 1.5% per pupil per year.	We would urge Ministers to quantify the rising cost pressures on schools as a result of external factors: pension costs, pay awards, national insurance contributions, apprenticeship levy. In practice 1.5% loss for a school with a stable roll may amount to much more than that in reality. The MFG should not just be the headline rate from previously, but the rate that Ministers are comfortable that schools can sustainably bear.
14. Are there further considerations we should be taking into account about the proposed schools national funding formula?	We welcome the inclusion of an Area Cost Adjustment factor, which should be a feature of all funding allocations to schools. Again, as per our answer in question 13, we would urge Ministers to quantify the rising cost pressures on schools as a result of external factors: pension costs, pay awards, national insurance contributions, apprenticeship levy. In practice 1.5% loss for a school with a stable roll may amount to much more than that in reality. The MFG should not just be the headline rate from

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	previously, but the rate that Ministers are comfortable that schools can sustainably bear.
15. Are there further considerations we should be taking into account about the impact of the proposed schools national funding formula?	Again, as per our answer in question 13, we would urge Ministers to quantify the rising cost pressures on schools as a result of external factors: pension costs, pay awards, national insurance contributions, apprenticeship levy. In practice 1.5% loss for a school with a stable roll may amount to much more than that in reality. The MFG should not just be the headline rate from previously, but the rate that Ministers are comfortable that schools can sustainably bear.
16. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?	Yes. It is important to acknowledge deprivation levels in funding schools and local authorities.
17. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?	Yes, but the practicalities of this will be different in different authorities. Where historic commitments are unwinding this may be straightforward to absorb, but where Schools Forum has agreed to support educational elements of services that have relied on DSG funding, the reductions will merely create financial difficulties elsewhere in the system.
18. Are there further considerations we should be taking into account about the proposed central school services block formula?	Some relaxation of the rule that the centrally retained funding is no more than the year before should be considered for the Admissions service and, indeed, other on-going commitments. The Local Authority will undertake this function on behalf of all schools and there may be fluctuations in costs associated with appeals or growing pupil numbers. To cap the funding in cash terms for this service does not recognise the practicalities of managing this service.

Proposed Responses to Consultation on NFF for High Needs

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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?	Yes, in so far as proxy indicators for High Needs can produce a reliable estimate of need.
2 We are proposing a formula comprising a number of formula factors with different values and weightings. Do you agree with the following proposals? <ul style="list-style-type: none"> • Historic spend factor – to allocate to each local authority a sum equal to 50% of its planned spending baseline • Basic entitlement – to allocate to each local authority £4,000 per pupil 	Yes.
3 We propose to use the following weightings for each of the formula factors listed below, adding up to 100%. Do you agree? <ul style="list-style-type: none"> • Population – 50% • Free school meals eligibility – 10% • IDACI – 10% • Key stage 2 low attainment – 7.5% • Key stage 4 low attainment – 7.5% • Children in bad health – 7.5% • Disability living allowance – 7.5% 	Yes, in so far as proxy indicators for High Needs can produce a reliable estimate of need.
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 this document.	Yes
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.
6 Do you agree with our proposals to allow limited flexibility between schools and high needs budgets in 2018-19?	Yes
7 Do you have any suggestions about the	It is difficult to reconcile the hard

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level of flexibility we should allow between schools and high needs budgets in 2019-20 and beyond?	National Funding Formula principle with local flexibility. Clearly, there will continue to be links between schools block and high needs block funding where local initiatives are, for instance, trying to promote integration. It would be preferable to leave some flexibility for LAs to pursue such plans if there is local agreement to do so. This might be achieved through a form of de-delegation that applies to all schools (academies included).
8 Are there further considerations we should be taking into account about the proposed high needs national funding formula?	The same cost pressures affecting mainstream schools will impact on special schools and unit and it is those costs which the High Needs Block has to provide for in the combination of place and top-up for pupils. It is welcome that there is a protection of the HNB on a cash basis, but overall there needs to be enough resource in the system to meet need.
9 Is there any evidence relating to the eight protected characteristics as identified in the Equality Act 2010 that is not included in the Equalities Analysis Impact Assessment and that we should take into account?	No.