

High needs funding formula and other reforms – Government consultation Stage One

Question 1

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

There is concern that the scale, pace and the ambition to ensure that the funding allocation is simple will mean that the funding system will not be fair or efficient. LA's need to be able to minimize turbulence to schools whilst the changes are phased in and this may not be possible. The use of proxy indicators will mean that the allocation will not adequately take into consideration low incidence high cost provision.

Without seeing any modelling or details of the impact of the proposed changes it is difficult to assess whether it will meet any of the 7 principles.

The reduced timescale for responding and the timing of the consultation have made it very difficult to adequately consult with schools and other partners.

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, so that the local authority and health partners can continue to commission education, health and care provision for 0-25 year old children and young people with SEN and disability in line with the SEN Reform.

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?

The high needs formula should be based on a combination of proxy indicators and historic costs – as a small authority Halton needs to ensure it has sufficient resources to meet the needs of all its pupils with high needs, in particular those with the most complex high cost needs. If the correct indicators are not used then it is likely that the allocations will not be fair and will not reflect need.

Question 4

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

Yes, but the key concern in Halton is that as a small authority proxy indicators may not deliver sufficient funding to secure low incidence high cost provision.

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.

This proposal is supported on the basis that the distribution of funding is reviewed annually so that it is appropriately allocated. Halton is also concerned about the costs of independent hospital provision and would want this considered in future consultation.

Question 6

Which methodology for the area cost adjustment do you support?

Hybrid

The hybrid model is supported provided it takes into consideration other regional costs such as the excessive cost of water in the North West.

The unfairness exists because under current law, regional water companies can develop distinctly different water charging tariffs. The North West's water company, United Utilities, introduced a method of charging called "site area charging" and stands at a particularly high rate compared to other regions. These differences are unavoidable for schools in the North West of England because the water market is closed to competition. Even with the water market opening up to competition in 2017, the wholesale charges and tariffs will still be unavoidable. Partial deregulation in 2017 is expected to only allow some competition and not affect these charges.

The data highlights that each year, the North West spends around £16 million more of its

schools budgets on water and sewerage charges when compared to the South East despite having almost identical numbers of pupils and 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 provided that the majority of funding is distributed on the basis of historical spend.

Question 8

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

Yes we support MFG but again it needs to be based on our actual spend and not on our allocated spend.

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.

Schools will be responsible for the identification of need. This will involve teachers undertaking training to be able to identify and plan for need. For low incidence SEN Intervention schools should support pupils through Quality First Teaching and further differentiation.

Schools will be expected to fund additional advice and guidance e.g. educational psychologists and ensure parental and family involvement in addressing any identified need. Schools should also fund reasonable adjustments to remove barriers to their building and the curriculum.

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?

No this proposal is not supported – the primary per pupil rate in Halton is less than £4,000 and therefore would reduce the funding available to the resource provision units.

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.

Many pupils with ASC were previously placed in expensive independent provision outside the borough. The redesignation of Ashley school with an extended age range has enabled the borough to meet the need of these pupils within their local community and to reduce costs. Ashley has now been recognised for its good practice nationally and internationally since its redesignation.

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.

Secondary aged pupils with a hearing impairment no longer wished to attend a specialist HI unit but requested provision within a mainstream setting with support. In consultation with the secondary HI academy we agreed to apply to remove the funding from the school and invest in a second specialist teacher to strengthen our support for pupils with HI across the borough.

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 this proposal is not supported

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.

As there are a number providers with small numbers we do not consider that this proposal is appropriate it could however be applied to FE colleges.