

## **Autumn 2018 Consultations – Combined Responses Analysis (Presented to the Schools Forum 5 December 2018)**

This report provides the comments, which have accompanied responses to the autumn 2018 consultations. These have been copied verbatim where possible. Please note that responses that set out specific matters relating to an individual identifiable setting have been adjusted (or removed) so that the comment can be presented to a public meeting.

### **Primary & Secondary Schools Block**

- Reference Question 1:
  - “I firmly believe we should mirror the DfE’s NFF when calculating formula funding to avoid problems when the hard NFF is finally introduced.”
  
- Reference Question 2:
  - “I strongly agree that funds should be diverted from the Schools Block to the High Needs Block. Mainstream schools are coming under increasing pressure and finding it extremely difficult to provide appropriate support to SEND pupils. I firmly believe more alternative specialised SEND provision is needed in Bradford. The need to fund additional support for high needs pupils is having a detrimental impact on mainstream school budgets.”
  - “Schools with low numbers of SEND pupils do miss out despite the moral obligation we have to do this.”
  - “There does not seem to be a coherent strategy addressing the HNB shortfalls in funding and without that, change will not come about. All schools are facing serious funding issues. Therefore saying No, will hopefully raise the plight of this underfunded area in the press and at Westminster – leading to an increase in funding. What about ‘HNB schools’ surplus – if they have any?”
  - “We have some concerns in this area. The ability to transfer £2m to the High Needs Block follows from setting the NFF and MFG at 0% for 2019/20 instead of potentially applying a positive 0.5%. This has a significant impact on our funding. However, we appreciate the significance for Bradford as a whole of the pressures on High Needs funding, together with the links with the Schools Block, and therefore, see that there is little real alternative to the proposal. However, over £9.3m is allocated to supporting an MFG of 0% together with £1.5m supporting the MFL so many schools (50% of secondary schools) are receiving additional funding outside the standard NFF calculation. Potentially if the MFG were made slightly lower (ie slightly negative) then more funds may be available to transfer to the High Needs Block for all to be able to access based on need.”
  
- Reference Questions 4 & 5:
  - “A cash flat scenario for schools in the light of 1 – 3% pay rises will impact negatively on our children – therefore more money would be helpful!”
  
- Reference Question 6:
  - “Subject to affordability”.

- Reference Question 7b:
  - “We would expect consideration to be given to schools that have old buildings that generally have higher maintenance and cleaning costs plus potentially less efficient heating costs”.
  
- Reference Question 7c:
  - “The notional SEN calculation is approximately 13% of our DSG budget and obviously as such has to cover some of the mainstream class teachers who provide differentiation in the classroom, as well as specific SEN teaching support staff costs. However, either with or without an EHCP, the school is expected to have received the first £10k of any SEN assessment for a student (ie £4k per pupil plus £6k from the notional SEN). We would never actually receive as much as that for one student; based on funded example, the highest funded pupil would receive £7,972, which is £2k lower than the £10k theoretical figure. An application for an EHCP can take some time to come through and there is always a lag in time during which time we have to provide support from our own resources, reducing funding available for other students”.
  
- Reference Question 9:
  - “I don’t strongly disagree – but believe 2 or 3 solid options need to be put forward before Forum before a ‘blanket’ agreement. Perhaps the triggers should be lowered to 85%? Not a strong disagreement – but unsure of the ‘90% trigger’.”
  
- Reference Question 10:
  - “Due to decreasing numbers of maintained schools, economies of scale become less effective”.
  - “Why no mention of the SIFD/exceptional circumstances fund, school reorg fund? Has this money been spent can it just roll over if not spent? The Union Facilities and Health and Safety - will the fund contain a % increase or like the proposed schools budget be cash flat and the same as last year?”
  - “We strongly object to paying any contribution to the Trade Union Health and Safety Rep time as we have not received a visit from a TU H&S Rep since February 2016 nor have we received any other H&S support from them. In fact, we consider that we should be due a refund on these charges for the last 3 years ie 2016/17 to the current year. This would certainly help pay for support in this area. We also wonder what the LA’s responsibility is in this if something goes wrong since we are being charged for a support service (and therefore an independent viewpoint which we have always previously welcomed) that we are not receiving. Whilst we agree that the support for the provision of Trade Union facilities time can be very helpful, we consider the level of charge for the schools to be excessive, particularly as we already provide time for trade union staff in school to attend meetings, training etc.”
  
- General Comments:
  - “Section 4.4 on page 10 of the consultation refers to a number of academies having higher “baselines” In terms of actual funding received due to specific agreements with the EFSA, but that these additional amounts are excluded for the purposes of comparisons in Appendix 1. It is difficult to see how we can properly assess the proposals and impact on schools and therefore, the fairness of funding treatment if we don’t have the full information.”

## Early Years Single Funding Formula

- Reference Question 1:
  - “The concerns here are the timings involved in getting health involved to access an EA1 for the child.”
  
- Reference Question 3:
  - “It is a concern that the funding rate will not be in line with the rate of inflation as settings will have increased overheads including mandatory staff wage rises in line with national minimum wage increase.”
  - “The rate does not cover the cost of the support these children and families need going forward. We will be reviewing our intake and sustainability model and reducing the amount of places we offer.”
  
- Reference Question 4:
  - “It is a concern that the funding rate will not be in line with the rate of inflation as settings will have increased overheads including mandatory staff wage rises in line with national minimum wage increases. The actual cost of delivering the foundation stage is much higher and continues to rise so why is the base rate not rising with it?”
  - “Would prefer to maintain the current base rate of £4.12, rather than continue to see a year on year reduction, however small.”
  - “We would like to see a protected base rate for schools that are outside of areas of deprivation. We are a setting that depends upon base rates funding allocation and received very little additional monies. Whilst we appreciated the needs in settings in areas of deprivation, we would want to see our settings by ability by a similar scheme to the new DFE per pupil minimum floor in the section 251 budget. The fact that we are in a setting that does not benefit from additionality means that some of these questions are difficult to answer, as the impact of supplements could adversely affect our ability to continue with Nursery provision.”
  - “The base rate needs to be as high as possible. The base rate is insufficient to provide high quality sustainable early education. The financial support available to provide support to children with high needs is wholly inadequate.”
  - “Since the value was set in 2016 the minimum wage/living wage has increased significantly and the level of funding is insufficient to cover the cost of employing quality staff to deliver an effective service.”
  - “The base rate should be higher and there should also be consideration given to non-contact time, particularly for those children with SEND where more documentation, record keeping and meetings are required in order to meet the child’s needs effectively.”
  - “Consideration needs to be given to increasing costs, e.g. staff costs, rent, cost of food, insurance, as each year these increase and the single funding formula has remained the same or in some cases has even reduced. Settings cannot deliver a good or outstanding service without an appropriate level of funding. A ‘cost of living’ uplift should be included each year to ensure that funding at least remains proportionately at the same level, as currently value is decreasing each year as other costs go up.”

- “Either a higher funding rate or simply the ability to charge parents the difference is needed. Our parents would be happy to do this if they know that so much is subsidised by local authorities. We cannot continue on this basis going forward.”
- “This is too low considering inflation over the years, cost of delivering quality childcare and maintaining sustainability. These proposals are disappointing, they do not support sustainability, delivery of quality and the national inflation rates. We need to be able to charge more, top up, the offer needs promoting to parents in a different way so we can continue to deliver it successfully. A change in your terminology and remove the “free” wording from the funded hours. Other authorities have such as Leeds, York etc. ”
- Reference Question 6:
  - “This rate will not cover the cost of delivering adequate care to the children let alone the outstanding care that every setting should be aiming for. Our setting prides ourselves on the care we provide and the low staff to child ratios. This will not be able to continue with a lower rate of funding.”
  - “Anything that impacts on early funding is problematic, we do not want to see this reduce.”
  - “Yes, we agree with the need for this element, but again believe that it is insufficient.”
  - “The mean deprivation, SEND and EYPP rates should be used to uplift the base rate for all providers. Unless you improve the rate this is insufficient to maintain the support and quality needed.
- Reference Question 7:
  - “There MUST be allowances made for children who require additional support.”
  - “ Further supplements would not be necessary if the base rate was sufficient.”
  - “NO supplements just either increase the rate or give the ability to charge top ups.”
- Reference Question 8:
  - “The idea is good but we fail to see how this will work in reality with the level of funding currently offered.”
  - “The principles in Annex 2 are sound, but the increasing need across the sector is causing concern. It is hard to see how provision will be adequate whilst retaining base funding.”
  - “ I’m afraid I’ve not had to deal with SEND funding but my concern is that the monies available are going down and the staffing is already down and already I have concerns. It seems to me that Nursery Nurses and SENCOs are being asked to do more and more on less and less, ditto most SEND workers. WE have only two Access and Inclusion Officers where we used to have five. We are now having to book appointments to see them, often after nursery hours. I have referred a child to the Health Visitor and about three weeks on am still waiting for anyone, and that includes a Nursery Nurse, to go and visit - I don’t get this when you already have a Nursery Nurse and SENCO expressing concern from the nursery where the child attends and is best known. It would be so much quicker to let us, as previously, pass on our concerns direct. Also it has to lead to an EA1! which may not be appropriate for all children and

referring via the Health Visitor in my calculation leads to a months delay – that’s just so far! In other words, the children will be the ones that are disadvantaged here.”

- “We don’t feel that there is currently sufficient information regarding a holistic early years SEND fund and more detail is required as to how this would work.”
- “This is already a difficult process. We understand there is not enough funding to support this. It reads well and looks like you are all set to put this in place without our opinion. Therefore, we will have to see how it works in practice.”

### **High Needs Funding Model**

- “My view is that the needs of individual students need to be accurately identified and then resourced. The exercise needs to be “needs led”. The briefing notes indicates that “capping” arising out of a Whitehall-perceived need to “damp” changes to funding as we move to the National Funding Formula will result in Bradford being £12.4m worse off than if there were no “damping”. I wish to register my strong objection to “capping” and “damping” - and more especially when this exercise results in Bradford being underfunded by £12.4m. Patently the needs will be there but there will not be the resources to meet those needs. Is the expectation that, in the long run, damping and capping will be removed where after the special needs of youngsters in Bradford will be fully met? If this is the case then it is those pupils with special needs in the immediate period and medium term who are being discriminated against. This is not acceptable.”
- “We have some issue with regard to the fairness of allocations of high needs funding, which are similar to those raised in the previous year. Using the DSP units attached to mainstream secondary schools as an example, the DSP units receive elements 1 & 2 (ie approx. £4k + “notional” £6k) as part of the normal per pupil funding allocation for all schools, but then also receive a further £6k per pupil for place, ie effectively a total of £16k per place funding. However it looks as though any top up from the Range funding would provide the same top-up as we as a mainstream school would receive for the same Range allocation but we would only be in receipt of effectively £10k place funding (although also we would never actually receive as much as the notional £6k). Our student would therefore, be substantially disadvantaged. This effective “double” funding is also in addition to the substantial amount of small setting protection that DSPs will receive.

Will any changes to the way the Ranges model is working take into account the full level of place funding already being received by DSPs? Although we can see that the ESFA high needs operational guidance indicates that the additional £6k place funding should be provided to these units, it does not dictate the top-up funding which is subject to LA decisions.

We are struggling to provide appropriate learning for some SEN students with complex needs and although we are aware of significant pressures on high needs budgets, we would just like to ensure that our students receive a fair share of available funding.

Additional charges for top-up for short term placements for students without an EHCP from September 2018 will also add to our costs. It is often difficult to get an EHCP in place and there can be delays in the process during which time we have to provide for the student and if placements are for a short period of time they do not necessarily have an equivalent saving in school costs.”