

**Wirral Schools Forum  
Consultation on High needs funding reform 7 March to 17 April 2016  
Draft response**

**Question 1**

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

Wirral Schools Forum agrees with the principles described.

In addition the Forum noted that principles must reflect need, promote improved outcomes and be able to respond to changes – in particular the predicted increase in numbers over the next decade.

The funding review will create uncertainty in schools and in the support of our most vulnerable young people. It is important that the pace of change is manageable and for the LA and schools to be able to plan for any changes as soon as possible.

The Forum endorses the collective view that this consultation has been poorly timed.

**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 – Local Authorities are the commissioners of high needs provision and have the statutory responsibilities for assessment and securing provision.

**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 where possible. The formula must deliver the funding necessary to meet needs. Proxies should be supported by evidence and weightings and values that are reasonable.

Locally Free School Meals and Prior Attainment provide good proxies for levels of Low Cost High Incidence SEND in schools. However proxies may not provide such a strong match for Low Incidence High Needs SEND, in which case alternatives should be considered.

**Question 4**

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

Basic entitlement [

Population

Child health

Child disability

Low attainment at key stage 2

Low attainment at key stage 4

Deprivation - free school meal eligibility ]

Deprivation - income deprivation affecting children index [

Adjustments - for "imports/exports"

Yes – however it would be possible to use pupil census data rather than population and some data used above will be based on local assessments.

Locally Free School Meals and Prior Attainment provide good proxies for levels of Low Cost High Incidence SEND in schools

An understanding of the proposed weightings for these factors is important.

#### **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.**

Changes in High Needs Funding including the funding Hospital Schools should be considered at the same time, since there is a big crossover of needs.

Future work should identify the make-up of provision. Whilst High Needs will always have a wide variation of needs and costs, if this cannot be matched to Hospital School provision then funding centrally or regionally should be considered.

#### **Question 6**

**Which methodology for the area cost adjustment do you support?**

The Area Cost Adjustment should reflect spending pressures and must not allocate excessive resources. Previous work has indicated that the hybrid methodology reflected additional costs in schools better than the GLM methodology.

There should however be an element of fairness to this weighting, recognising differences in costs between areas and examining other regional differences, such as the additional water charges paid by schools in the North West.

#### **Question 7**

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

This element in the funding formula may help to provide some initial stability and acknowledgement of increasing pressures within High Needs. The allocation should be updated in future years.

#### **Question 8**

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

Yes, this should also be seen alongside the historic spend element.

More details would be useful, particularly around the cap – would this be a cap off all allocations or off the highest gainers?

#### **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.**

There are currently guidelines on the local schools offer that should be taken into account.

Additional national guidance would be useful for Notional SEN (£6,000) and what this should cover in schools and the expected High Needs contributions from partners particularly Health.

#### **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?**

Pupils in resourced base provision are admitted by the LA in the same way as Special Schools. There should be no differences in the place funding element.

#### **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.**

The High Needs budget includes a provision for "Exceptional Needs" within Special Schools. Whilst the demands in this area have grown, it is felt that the funding, which is governed by headteachers, has helped to maintain current provision and placements.

#### **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.**

The High Needs formula contains a 90% guarantee. Schools will not have to use more than 90% of their Notional SEN budget to meet the first £6,000 of an EHCP. Individual Pupil Funding Agreements (IPFA's) are agreed with schools to provide additional support (before a formal EHCP)

The authority has established outreach models in schools for behaviour.

#### **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?**

Yes, however places must not be empty.

**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.**

Further details are needed on this approach. Generally it was felt that the FE sector has this flexibility anyway.