

Response ID ANON-XYDA-G117-P

Submitted to **High needs funding reform**

Submitted on **2016-04-15 13:28:17**

Introduction

A Name

First name::

Dudley MBC

Last name::

B Email address

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C Response type

Please select your role from the list below::

Local authority representative

Please select your organisation type from the list below::

Local authority

Organisation name::

Dudley MBC

Local authority area::

Dudley

D Would you like your response to be confidential?

No

Please give your reason for confidentiality::

Principles for a reformed funding system

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

Yes

Please provide any further comments::

In principle

Distributing high needs funding to local authorities

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

Please provide any further comments::

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?

No

Please provide any further comments::

We do not feel that proxy measures always map across the whole spectrum of need which results in losers and gainers for local authorities funding.

Formula design

4 Do you agree with the basic factors proposed for the formula?

Yes/No - Basic entitlement:

Agree

Yes/No - Population:

Disagree

Yes/No - Child health:

Disagree

Yes/No - Child disability:

Disagree

Yes/No - Low attainment at key stage 2:

Disagree

Yes/No - Low attainment at key stage 4:

Disagree

Yes/No - Deprivation - free school meal eligibility:

Agree

Yes/No - Deprivation - income deprivation affecting children index:

Agree

Yes/No - Adjustments - for "imports/exports":

Agree

Please provide any further comments::

The factors do not map against SEND reforms or cover the whole age range of 0-25 (using 2 – 18 misses out early years and 19+), or EHCPs or Youth Offending. For under attainment – there is no reference of Progress as a measure- for SEN it is not always about absolute attainment at GCSE; GCSE is not appropriate for this sector of need. Child health – there is no proposal to use an indicator of child mortality or premature birth. DLA – will this indicator be fully appropriate and available going forward as the Personal Independence payment will apply to post 16 and DLA will only apply to under those under 16..

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

Please provide your comments::

The funding of hospital provision remains at pre 2013 historic levels with no recognition of need changes. Therefore this needs to be brought into the review and a solution established.

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

Not Answered

Please provide any further comments::

No evidence – but it would seem sensible to apply the same as agreed for the NFF.

Managing a smooth transition

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

Yes

Please provide any further comments::

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

Yes

Please provide any further comments::

Changes to the way high needs funding supports mainstream schools

9 We welcome views on what should be covered in any national guidelines on what schools offer for their pupils with special educational needs and disabilities.

Please provide any comments::

In light of the academisation agenda in the White Paper it is important as part of consistency and equity agenda to establish clear guideline and when dealing with a wide range of stakeholders.

10 Do you agree with the proposed changes to the funding of special units in mainstream schools?

Agree

Please provide any further comments::

The current process is bureaucratic. There is however the issue that the Primary Basic per pupil (approx £3k) is less than secondary (approx £4k) so not equal values if it is Basic plus £6k as opposed to £10k per place.

11 We welcome examples of local authorities that are using centrally-retained funding in a strategic way to overcome barriers to integration and inclusion.

Please provide any comments::

Speech and Language provision is provided on a part-time basis for nursery pupils – with the pupils still be registered at their home school. They are given 2 days a week S&L provision offsite. This assists with integration at the registered school and proved particularly helpful in progressing the pupils and parents ready for the post nursery provision.

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

Please provide any comments::

N/A at this stage

Changes to the way high needs funding supports independent special schools

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

Agree

Please provide any further comments::

For consistency

Changes to the way high needs funding supports post-16 providers

14 We welcome views on the outline and principles of the proposed changes to post-16 place funding and on how specialist provision in further education colleges might be identified and designated.

Please provide any comments::

No comment

Equality analysis

15 We welcome comments on the equalities impact assessment.

Please provide any further comments::

No comment