Response ID ANON-2CXQ-12ZE-Z

Submitted to **High needs funding reform - stage 2**
Submitted on **2017-03-22 21:58:33**

Introduction

A What is your name?

Name:
Russell Dyer

B What is your 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::
Southwark Council

Local authority area::
Southwark

D Would you like your response to be confidential?

No

Reason for confidentiality::

Page 2 - overall approach

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?

No

Please explain your reasoning and any further evidence we should take into account::
There are significant pressures on the high needs block in the borough. Spend is already more than allocated in recent years and with the authority being at the floor demand may have to mean reductions to high needs budgets which is likely to impact upon outcomes for children. The proposals do not recognise growing demand and demographic issues and this needs to be addressed to ensure that funding meets this need. It will be difficult to meet need without increasing funding even after allowing for efficiencies. The quantum of funding overall is insufficient in our view and budgets will continue to come under severe pressure.

Page 3 - formula factors

2 Do you agree with the following proposals?

To distribute 50% of the planned spending baseline on the basis of historic spending - Historic spend factor - To allocate to each local authority a sum equal to 50% of its planned spending baseline:

Please explain your reasoning and any further evidence we should take into account::
We support the inclusion of the factor but are uncertain that this will be sufficient.

Basic entitlement - To allocate to each local authority £4,000 per pupil - Basic entitlement - To allocate to each local authority £4,000 per pupil:

Please explain your reasoning and any further evidence we should take into account::
We support the inclusion of the factor but are uncertain that this will be sufficient.

3 We propose to use the following weightings for each of the formula factors listed below, adding up to 100%. Do you agree?

Population – 50% - Population – 50%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs,

Free school meals (FSM) eligibility – 10% - Free school meals (FSM) eligibility – 10%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs.

Income deprivation affecting children index (IDACI) – 10% - Income deprivation affecting children index (IDACI) – 10%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs.

Key stage 2 low attainment – 7.5% - Key stage 2 low attainment – 7.5%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs,

Key stage 4 low attainment – 7.5% - Key stage 4 low attainment – 7.5%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs,

Children in bad health – 7.5% - Children in bad health – 7.5%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs,

Disability living allowance (DLA) – 7.5% - Disability living allowance (DLA) – 7.5%:

Please explain your reasoning and any further evidence we should take into account::
Difficult to comment further without strong rationale linked to cost drivers. We welcome the commitment to further research into high needs outcomes and costs,

Page 4 – funding floor

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 the consultation document.

Yes

Please explain your reasoning and any further evidence we should take into account::
This is welcomed however as the borough will be on the floor this is likely to mean that demand , need and demographic pressures will not be sufficiently funded into the future. Additional funding is needed to meet need, demand and demographic pressures which would obviate the need for a funding floor.

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?

No

Please explain your reasoning and any further evidence we should take into account::
Acute demand pressures and the lack of evidence on cash savings and funding which is at the floor will inevitably impact upon outcomes. Protection should be on the basis of historic spend and an assessment of future demand not on the basis of historic spending baseline.

Page 5 - local budget flexibility

6 Do you agree with our proposals to allow limited flexibility between schools and high needs budgets in 2018-19?

No

Please explain your reasoning and any further evidence we should take into account::
Maximum flexibility is required especially given the linkages between the blocks. In practice this will be difficult given the pressure on both blocks - cash flat high needs and reducing schools block. Schools Forum should have maximum local discretion to make decisions based upon evidence and local circumstances even recognising the limited funding.

7 Do you have any suggestions about the level of flexibility we should allow between schools and high needs budgets in 2019-20 and beyond?

Comments box:
As noted above continued maximum flexibility is preferred.
A flexible relationship between blocks incentivises the priority to keep children where possible in mainstream settings where possible with some support. It also ensures close working and co-operation between settings.

Page 6 – further considerations

8 Are there further considerations we should be taking into account about the proposed high needs national funding formula?

Comments - please explain your reasoning and any further evidence we should take into account::
The Authority strongly supports the General Labour Market area cost adjustment methodology, For alternative provision the formula needs to recognise local factors such as UASC and pre 16s with complex needs. We would also like to see mid year data change in post 16 provision for import/ export to reflect changes in provision.

There needs to be assessment of changing and increasing need and provision of special school places to address that. Whilst the additional capital investment is welcomed this is likely to be insufficient to make a step change on improving outcomes and securing more cost effective provision.

Page 7 – equalities analysis

9 Is there any evidence relating to the 8 protected characteristics identified in the Equality Act 2010 that is not included in the equalities impact assessment and that we should take into account?

Comments - please explain your reasoning and any further evidence we should take into account::