

Draft Response to Consultations

Schools Block

Questions	Response
<p>QUESTION 1: Do we agree with the proposed principles for the funding system?</p> <p>Para 1.3</p>	<p>Whilst agreeing with the intention of the reforms in terms of increased fairness and transparency we are concerned that a national formula should not result in reduced schools funding for some areas like Enfield who are considered by the DfE to be relatively well funded. This would be the consequence if the national formula is introduced as a re-distribution of existing resources which will result in winners and losers.</p> <p>Despite cash protection for school funding many of our schools are already suffering serious challenges in managing budgets due to real terms cost pressures, including increases in pay and NI contributions. We have estimated that schools in Enfield will face real term cuts of between 7.5 to 10% between now and 2020. We would be very concerned about the impact of further cuts that would inevitably impact on performance and put education performance at risk.</p> <p>For this reason we call on the government to provide additional resources in order to level up funding and ensure that no local authority loses funding as a consequence of the introduction of a NFF</p> <p>Our schools also face additional costs associated with being London schools and in common with other London authorities are seeing an increasing and changing pupil population. This change has meant the Borough is facing significant challenges with increasing levels of deprivation and needs. We believe that it is important that any school funding system reflects this.</p> <p>We would comment, since the introduction of Fair Funding these principles have been the aspiration and, it is disappointed there is no recognition of the fact that needs are best assessed at the local level. The principles which have guided Fair Funding have included accountability in the use and also the performance achieved by the spending of public funds. It is unclear how the current proposals for the NFF would address the concerns and issues raised by parents and members of local communities.</p> <p>Enfield Council and the School Forums have played a key role in targeting education funding, via local formulae, to improve standards and raise attainment in local schools.</p> <p>The attainment gap between pupils receiving free school meals and other pupils at GCSE level is smaller in Enfield than England as a whole (in 2014/15 the gap for 5 A*-C at KS4 was 22% in Enfield compared to 19% in London and 28% nationally). This reflects the consistent targeting of funding to support at deprivation and low educational attainment via their local funding formulae and the expertise and support provided by the Authority to schools in tackling deprivation and improving performance.</p>

	<p>Schools Forum's view</p> <p>We support the need to further improve and move to an even fairer system, but would comment that it is important there are sufficient resources to implement the changes. We do not think it is appropriate to redistribute the existing resources, in order to increase funding for less funded areas. We would ask that it would be fairer for the resources for a new improved funding system to be levelled up rather than down. Thereby ensuring schools in Enfield and other areas continue to carry on their work to improve attainment and achievement within existing albeit diminishing resources, due to cost pressures.</p> <p>We ask for greater clarity on who would be accountable for the outcomes of any NFF. Currently, there is a democratic process by which local authorities and their Schools Forum are held to account by local communities, parents and schools for their local funding formulae to support raising of standards. Under a NFF, we would ask would the Secretary of State for Education be accountable for all schools and parents and families of pupils for the results of the formula.</p> <p>We are unable to comment further until further information with financial modelling is available using the proposed rates and weightings that will be applied as part of the new system.</p>
<p>QUESTION 2: Agree with the proposal to move to a school-level national funding formula in 2019-20, removing the requirement for local authorities to set a local formula?</p> <p>Para 1.8</p> <p>West – East – dirrent area in Enfield. The overall masks need – housing data and houses with multiple occupancy, rental, trend. Victim of our success – ahceived achievement so have not have that input. Large families – size of families. Three children or more likely to improvised. Health reduce with more chidren</p>	<p>No, we do not consider a national system will support the constant and evolving changes we are experiencing in Enfield due to the movement of the population. We believe there needs to be local flexibility to consider and address these challenges and also to be able to respond and deal with the inevitable turbulence that a new funding system will involve..</p> <p>It is disappointed there is no recognition of the fact that needs are best assessed at the local level, informed by more detailed local knowledge. It is also unclear how the current proposals for the NFF would address the concerns and issues raised by parents and members of local communities.</p> <p>Enfield Council and the School Forums have played a key role in targeting education funding, via local formulae, to improve standards and raise attainment in local schools.</p> <p>The attainment gap between pupils receiving free school meals and other pupils at GCSE level is smaller in Enfield than England as a whole (in 2014/15 the gap for 5 A*-C at KS4 was 22% in Enfield compared to 19% in London and 28% nationally). This reflects the consistent targeting of funding to support at deprivation and low educational attainment via their local funding formulae and the expertise and support provided by the Authority to schools in tackling deprivation and improving performance.</p> <p>The deprivation data currently used for funding schools masks the overall need in the population. Enfield has traditionally seen an East / West split with very high level so deprivation in the East and less</p>

	<p>so in the Western part of the Borough. When the funding currently provided for the national arrangement was distributed, this issue was not recognised and Enfield continues to be underfunded and appears will continue to do so under the new arrangements.</p> <p>The Council, the Enfield Schools Forum and schools work together to ensure that the limited resources are allocated in the best way to meet the needs of our pupils. We feel the removal of the role of the Schools Forum and local authorities for considering and then allocating funding will be detrimental and weaken the inclusive and corroborative system which currently exists. We are also concerned this will reduce overall accountability for the use of public funds.</p>
<p>S Question 3: Do we agree that the basic amount should be different at primary, key stage 3 and key stage 4?</p> <p>Para 2.6</p>	<p>We support the differential between KS3 and 4, but we do have concerns regarding the robustness of the data being suggested would be used.</p> <p>We would comment that the proposal for a single rate for KS1 and 2 may not fully address the cost of meeting the needs of pupils moving into Year 1 from Reception. Our schools experience indicates that:</p> <ul style="list-style-type: none"> • Pupils starting in Reception and moving into Year1 require greater support and therefore funding is usually subsidised by the funding provided for KS2 pupils. This does raise the question of fairness and equity; • This will create a funding issue for Infant schools as they cannot redistribute the funding as primary schools who are able to use funding provided for KS2; • If a school has a stable pupil population then funding across KS1 and KS2 is manageable as described above. However, any flux in the pupil population at individual school level will create sustainability issues for individual schools. <p>We would suggest similar to the current arrangements, a per pupil rate is provided to local authorities. The local authorities with their Schools Forum determine how the rates are applied at KS1 through to KS4 and ensure the appropriate ratio between the different key stages for their local area.</p>
<p>Question 4:</p> <p>a) Do you agree that we should include a deprivation factor?</p> <p>b) Which measures for the deprivation factor do you support?</p> <ul style="list-style-type: none"> • Pupil-level only (current FSM and Ever6 FSM) • Area-level only (IDACI) • Pupil- and area-level <p>Para 2.23</p>	<p>Yes, we support the inclusion of a deprivation indicator. Closing the deprivation attainment gap continues to be a government priority as seen through protecting the pupil premium funding over this parliament. It is vital therefore that, a NFF does not redistribute funding away from the most deprived pupils and reduce their chances of achieving as well as their peers. The key issue in Enfield is now low income households. Our local knowledge of measuring those in receipt of housing benefit and council tax support shows that the level of poor households with children in poverty hasn't reduced as being suggested by the current data published for Free School Meals eligibility (FSM). We would suggest that the claimants have simply changed from one benefit for another and this has impacted on FSM.</p> <p>From our information, we would suggest that FSM appears to be</p>

	<p>affected if the parent is in receipt Working Tax Credit. We would ask that there is a review of thresholds applied for FSM to ensure some of our most vulnerable children and young people living in poverty are not being penalised due to an imperfect system.</p> <p>In addition, the recent change in IDACI indicated an overall reduction in income deprivation affecting children in Enfield as a whole since 2010. We would suggest that this doesn't allow for the number of families living either / and private rented household and overcrowded condition. So in consequence, we also ask that the bandings used for IDACI are reviewed to reflect true levels of poverty. The last set of HMRC statistics on children in low-income families showed that, as of 31 August 2013, 25.5% of under 16s in Enfield were in a 'low-income' family ('low income' defined as less than 60% of median income) with Enfield being 10th highest out of all 33 London boroughs. The average across all London boroughs is 21.4%. This level of poverty is not borne out with the funding provided.</p> <p>We would suggest that consideration be given for a gradual linear approach to be introduced so that as the percentage of FMS at individual school level increases so does the per pupil rate applied. This was a tried and tested method in Enfield and it supported schools by ensuring levels of deprivation were recognised as part of a local funding formula. If the gradual linear approach cannot be introduced nationally, then we ask that there is flexibility for local areas to consider this.</p> <p>In the absence of any exemplifications or details of proposed rates we cannot comment any further on the financial impact.</p>
<p>Question 5: Do you agree we should include a low prior attainment factor?</p> <p>Para 2.28</p>	<p>We support the use of prior attainment as a factor. We would comment:</p> <ul style="list-style-type: none"> • With the changes to KS2 testing as to how secure the data used for funding purpose would be; • The Early Years Foundation Stage is based on teacher assessment <p>We would suggest that any indicator includes differentiation between levels of low attainments, rather than the use of one cut-off point.</p> <p>In the absence of any exemplifications or details of proposed rates we cannot comment any further on the financial impact.</p>
<p>Question 6: Do you agree that</p> <p>a) to include a factor for English as an additional language?</p> <p>b) use the EAL3 indicator (pupils registered at any point during the previous 3 years as having English as an additional language)?</p> <p>Para 2.33</p>	<p>If no alternative is available then we would support the use of EAL3, but we are concerned that this does not fully address the needs of these pupils.</p> <p>If EAL3 becomes the preferred indicator, we urge that the weighting in the final formula reflects the resources required to meet the high level of need in Enfield. There is significant costs relating to induction and ongoing literacy support.</p> <p>Research shows that it can take up to seven years to acquire</p>

	<p>academic English or full fluency, and even longer where a pupil has not had any schooling in their first language. We are concerned that only funding EAL pupils for three may not adequately reflect the needs of all EAL pupils.</p> <p>Any measure also needs to recognise the extra challenges and costs facing areas with EAL pupils that speak a range of different languages. Over 300 languages are currently spoken in London schools.</p>
<p>Do you agree Question 7: lump sum factor? Para 2.39</p> <p>Question 8: sparsity factor? Para 2.42</p> <p>Question 9: rates factor? Para 2.50</p> <p>Question 10: PFI factor? Para 2.51</p> <p>Question 11: spit site factor? Para 2.52</p> <p>Question 12: exceptional circumstances factor? Para 2.54</p> <p>Question 13: should this be based on historical spend?</p>	<p><u>Lump Sum</u> – Y_es, we would support the inclusion of a Lump sum factor but in line with our current rates. In the absence of any exemplifications or details of proposed rates we cannot comment any further.</p> <p><u>Sparsity</u> – we recognise that this is required in some areas, but would question why this is of greater value than then need to fund mobility. Research carried out by the London Councils indicates that £24.3m was distributed through the mobility factor by 65 local authorities under their local formula, compared to £14.5m of funding distributed through the sparsity indicator by just 20 local authorities.</p> <p>As has been highlighted above, Enfield has seen an acute increase in the number of families and their children living in temporary housing and this has resulted in children and young people either travelling across the borough to attend their school or having to move schools as their families move to another accommodation.</p> <p>In addition, Enfield is continuing to see an increase in the pupil population with Enfield schools facing challenges both in terms of recruiting staff and managing the issues associated with very large schools and in-year admissions. The current 10% cap for mobility is neither helpful nor appropriate for large schools and areas with transient population.</p> <p>We would suggest that if consideration is being given to a sparsity factor then this should also be extended to including mobility as a factor but without the 10% cap.</p> <p><u>Rates Factor</u> – yes we support this factor, but to allow for changes due to revaluations, it should be based on actual costs and not historic spend.</p> <p><u>PFI Factor</u> – yes we would support the inclusion of this factor to meet the costs associated with the contract but in line with local requirements.</p> <p><u>Split Site – Lump Sum</u> – Yes, we would support this factor but in line with our current rates.</p> <p><u>Exceptional Circumstances</u> – yes we support this factor but require further information on how this will be applied and agreed. In the absence of any exemplifications or details of proposed rates we cannot comment any further.</p> <p><u>Based on historical spend</u> – Whilst we would support this proposal for the Lump Sum and Split Site factors in principle, we are unsure</p>

<p>Question 14: growth factor? Para 2.56</p> <p>Question 15: on historical spend?</p>	<p>how this would need managed without periodic adjustments in funding for changes in pupil numbers or school context.</p> <p>We do not support this for the PFI, Rates and Exceptional Circumstance factor. As these factors are subject to external changes either as part of a rate revaluation, benchmarking reviews as required by the PFI contract or the need to include an exceptional circumstance for particular local circumstances.</p> <p>It is unclear how these factors would be applied as part of the whole formula for the next two years of the ‘Soft period’ and then and future years for the ‘Hard period’.</p> <p><u>Growth</u> – Yes, we would support a growth factor but this must be designed to fully address the funding shortfall schools face during periods of pupil growth. The current proposals fall short of this.</p> <p>DSG allocations are currently based on the most recent census, which means data is taken from the October of the immediately preceding financial year. This creates a lag between the pupil count used to calculate the schools block element of DSG and the actual number of pupils educated from September-April of the financial year. London Councils have estimated that London faces a £49 million shortfall in revenue funding every year as a result of this lag and we echo their call for a sustainable solution which would require additional DSG funding to meet the system’s currently unfunded pupils.</p> <p>We do not agree that funding for growth should be allocated based on historic spend.</p> <p>Enfield in common with other London authorities has faced such a large increase in demand for places over the past 7 years, that basing the formula on the previous year’s pupil numbers would not be accurate and would leave a great many places unfunded.</p> <p>Currently, the growth requirement is assessed and calculated each year and the appropriate funding earmarked from the DSG. It is unclear from the document how this annual process will managed in the future.</p> <p>Also, there is a concern to how in-year changes in the pupil population would be addressed. In Enfield, we have experienced in-year increases in the pupil population. We would ask there is sufficient flexibility for these in-year changes to be reflected in the funding arrangements and for the overall funding available be adjusted in line with pupil growth, new schools opening and changing need.</p>
<p>Question 16: Do you agree: Area cost adjustments? Para 2.61</p>	<p>There is a clear need for Area Cost Adjustments. We consider that this is essential for Enfield and other London authorities.</p> <p>Enfield Schools have reported that they are facing extreme difficulties in recruiting appropriately qualified staff to fill vacancies in</p>

<p>Methodology: General labour market or hybrid?</p>	<p>their schools. The current Workforce Census data shows that the number of teacher vacancies over the last two years have nearly doubled from 0.7% in 2015 to 1.3% in 2016.</p> <p>Schools have reported that existing staff and potential applicants are finding it difficult to manage the higher cost of living in London, so those remaining in teaching are seeking employment in other less costly areas, where there is a lower level of pupil deprivation and mobility, nor all the other challenges faced by London schools. All these factors are creating a crisis in recruitment and retention, especially as Enfield has to compete with neighbouring London authorities who provide inner London weighting and neighbouring local authorities outside London with lower cost of living and also lower levels of deprivation and challenges.</p> <p>Added to this, as a Local Authority, we are concerned with a significant number of Headteachers in Enfield are over 50 and approaching retirement. Where Governing Bodies have had to appoint a new Headteacher, they have reported that they have had difficulties and most have been unable to secure an appointment from the first round of recruitment and have spent considerable amount of additional resources to try and recruit a second or third time.</p> <p>We cannot comment on the use of the either the hybrid or General Labour market model for the Area Cost Adjustment without further information of the weightings and rates to be applied.</p> <p>However, London Council have indicated with the high level of costs associated with living London that General Labour market would be the most appropriate for London. We would still ask that information is provided with rates and weightings to be applied to enable us to consider this further.</p>
<p>Do you agree to remove: Question 17: LAC provide additional through PP plus rather than NFF</p> <p>Para 2.69</p> <p>Question 18: mobility</p> <p>Para 2.76</p>	<p><u>LAC</u> – Yes, we would support the consolidation of this factor with Pupil premium to provide <u>one transparent funding stream</u> this factor but this should not be achieved through a transfer of resources from the DSG .</p> <p><u>Mobility</u> – No, we would propose the mobility factor is retained and the 10% CAP is removed.</p> <p>Schools with pupil mobility are facing significant cost pressures for inducting and providing additional resources, as well as managing the disruption caused by a pupil joining the school outside the normal admission period. This could be due to one child or many children being admitted. We believe it is important that this factor is available and there is flexibility within the system as to how it is used by local authorities.</p> <p>We do not believe there should be a CAP of 10% on the use of this factor as it masks the size of school. The current year’s pupil data shows that there has been a 6% increase in pupil mobility from last year.</p>

<p>Question 19: post 16 – from 2017/18 Para 2.79</p>	<p><u>Post 16</u> - Yes, we would support this if protection for this change is included in the minimum funding guarantee.</p>
<p>Question 20: Do you agree with proposal to require local authorities to distribute all of their schools block allocation to schools from 2017-18? Para 3.9</p>	<p>No, we do not support this proposal as it removes local flexibility for schools, the Schools Forum and the Enfield Council to use funding to meet local needs and pressures.</p> <p>The needs of each area are likely to differ to some extent and therefore there is a clear need for local flexibility across all the resources provided through the DSG. The current flexibility between blocks has enabled us to manage growth in pupil numbers and increased demand in the High Needs block. Managing a ring-fenced stand alone High Needs block would be very problematic unless considerable additional resources were identified nationally to address the significant pressures.</p> <p>It is unclear from the documentation of how this requirement will be imposed on Multi Academy Trusts. It is important that there is a level playing field and all schools are treated in the same way and receive similar level of funding based on need and not adjusted because they are part of Multi Academy Trusts or maintained.</p>
<p>Question 21: Do you believe that it would be helpful for local areas to have flexibility to set a local minimum funding guarantee? Para 3.16</p>	<p>There is an element of unfairness to consider local flexibility when the funding itself provided has restriction in movement. The concern is the impact in 2019/20 of managing an unfair NFF by applying a local minimum funding guarantee for 2017/18 and 2018/19.</p> <p>We feel we are not in a position to comment until we have further information on the financial impact of the national proposals.</p>
<p>Question 22: Do you agree to fund local authorities' ongoing responsibilities as set out in the consultation according to a per-pupil formula Para 4.9</p> <p>Exclusions?</p>	<p>We believe that we should be funded for our ongoing statutory responsibilities. The proposals include admissions, asset management, EWS, national licenses, Schools Forum & fees to independent schools with SEN.</p> <p>We are concerned that there is a simplistic approach to the services included and those omitted because of:</p> <ul style="list-style-type: none"> • The impact on pupil attainment and will diminish local authorities' ability to support schools in need. This will consequently impact on standards and affect the life chances of children and young people. • The conflict with proposal for a local minimum funding guarantee during the 'soft' National Funding Formula and as to how this will be carried out as these duties would have been removed. <p>In additional, our view is that the move to a per pupil rate nationally could create further turbulence if the amounts are not weighted to local areas and reflect current funding levels plus an uplift for changes in the circumstances in these areas.</p>
<p>Question 23: Do you agree to fund local authorities' ongoing historic commitments based on case-specific information to be collected from local authorities</p>	<p>We support the proposal for the funding for combined services budgets such as early intervention and some of the costs related to SEN transport are transferred to the High Needs block. We consider this meets our strategy to support and provide early help and a wraparound service for our children and young people.</p> <p>We would ask that the amount transferred is based on current</p>

<p>Para 4.9</p>	<p>funding levels and outside the arrangements being proposed for the High needs block.</p> <p>We do not support the removal and cessation of non-contractual or those created after 2013 historic commitments as some of these decisions were as result of the Standards Fund grant being transferred into the DSG and outside the control of local authorities. This funding has continued to support improvement in standards.</p> <p>In addition, as part of the national requirement for schools to convert to become academies by 2022 and with the cuts being faced by local authorities, we would comment:</p> <ul style="list-style-type: none"> • There is no capacity locally to manage the impact of nationally driven change. This will include the ongoing effect of any redundancies and any deficits accumulated by schools; • local authorities will not have the resources to support the conversion process; • there needs to remove the disparity in the timing for the NFF and the requirement for academy conversion.
<p>Question 24: Are there other duties funded from the education services grant that could be removed from the system</p> <p>Para 5.20</p>	<p>We are concerned about managing the impact of some of the central support services that will not funded during the ‘soft’ years and then also on an ongoing basis. This is further complicated by the publication of the White Paper seeking all school to be converted by 2022. Any proposals need to be aligned with the various Government policies and drivers and ensure we have clarity and sufficient funding to deliver our statutory responsibilities over the next five year. This should include support provided to maintained schools for supporting schools in need and also school improvement to raise standards.</p> <p>We would require further information but would comment that any proposals take into consideration the need to include the appropriate weightings and area cost adjustments to reflect the higher costs in London.</p>
<p>Question 25: Do you agree to allow local authorities to retain some of their maintained schools’ DSG centrally – in agreement with the maintained schools in the schools forum – to fund the duties they carry out for maintained schools</p> <p>Para 5.20</p>	<p>We do not support the cuts to the Education Support Grant and have concerns about whether we will be able to fulfil our statutory duties and if this proposal is suggested to address any issue arising from this then we cannot see how this will be feasible as part of the consultation document indicates the removal of facility for de-delegation. Also, there is lack of transparency of what guidance will be provided to Multi Academy Trust on this issue.</p> <p>We believe the funding arrangements should provide clarity and transparency in the funding provided to local authorities to meet its statutory duties for all schools and also for maintained schools. This funding should be provided based on the same principles used for school funding and not be used as a balancing figure either nationally or locally.</p> <p>The funding should be calculated and the appropriate weightings and area cost adjustments included to reflect the higher costs in London.</p>

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HIGH NEEDS BLOCK

Questions	Response
<p>QUESTION 1: Do we agree with the proposed principles for the funding system?</p> <p>Para 2.10</p>	<p>Whilst agreeing with the intention of the reforms in terms of increased fairness and transparency we are concerned that a national formula should not result in reduced schools funding for some areas like Enfield who are considered by the DfE to be relatively well funded. This would be the consequence if the national formula is introduced as a re-distribution of existing resources which will result in winners and losers.</p> <p>Despite cash protection for school funding many of our schools are already suffering serious challenges in managing budgets due to real terms cost pressures, including increases in pay and NI contributions. We have estimated that schools in Enfield will face real term cuts of between 7.5 to 10% between now and 2020. We would be very concerned about the impact of further cuts that would inevitably impact on performance and put education performance at risk.</p> <p>For this reason we call on the government to provide additional resources in order to level up funding and ensure that no local authority loses funding as a consequence of the introduction of a NFF</p> <p>Our schools also face additional costs associated with being London schools and in common with other London authorities are seeing an increasing and changing pupil population. This change has meant the Borough is facing significant challenges with increasing levels of deprivation and needs. We believe that it is important that any school funding system reflects this.</p> <p>We would comment, since the introduction of Fair Funding these principles have been the aspiration and, it is disappointed there is no recognition of the fact that needs are best assessed at the local level.</p> <p>The principles which have guided Fair Funding have included accountability in the use and also the performance achieved by the spending of public funds. It is unclear how the current proposals for the NFF would address the concerns and issues raised by parents and members of local communities.</p> <p>Enfield Council and the School Forums have played a key role in targeting education funding, via local formulae, to improve standards and raise attainment in local schools.</p> <p>We are concerned that the proposed high needs national funding formula, based on proxies rather than assessed needs of pupils will not correlate with the true need and actual costs for children and young people in Enfield. As stated in the response to the School funding consultation, Enfield, as is the whole of London, is seeing an increasing and changing pupil population. This change has meant the Borough is facing significant challenges with increasing levels of deprivation and needs. We believe that it is important that any school funding system reflects this.</p>

	<p>At the same time, Enfield schools are trying to cope and manage with general costs pressures associated with being London schools, as well as the additional pressure created, due to the changes in the National Insurance contributions and the pay awards. We have estimated that schools in Enfield will face real term cuts of between 7.5 to 10% between now and 2020, due to protecting Schools Budget in cash terms. This information has also been corroborated by the Institute for Fiscal Studies.</p> <p>Schools Forum's view</p> <p>We support the need to further improve and move to an even fairer system, but would comment that it is important there are sufficient resources to implement the changes. We do not think it is appropriate to redistribute the existing resources, in order to increase funding for less funded areas. We would ask that it would be fairer for the resources for a new improved funding system to be levelled up rather than down. Thereby ensuring schools in Enfield and other areas continue to carry on their work to improve attainment and achievement within existing albeit diminishing resources, due to cost pressures.</p> <p>As the current system for funding high needs pupils has not, since 2010, been based on need and, until recently, was based on historical levels, it is difficult to comment or agree on the principles per se. Enfield, and probably like most other local authorities, has managed overspend in high needs by using the funding within the three blocks to balance the overall DSG. With the proposal for mainstream school funding to ring fence the Schools block, we are concerned that there won't be sufficient resources to manage and maintain the resources required for the high needs block.</p> <p>Enfield has seen an increase in the number of pupils with high level of need but this has not been reflected in a consistent way in the funding provided so far through the high needs block. As reported to the Schools Forum, there has been a significant increase in pupils requiring specialist provision due to the increases in the population and also the implementation of the SEND Reforms and there is a real concern how this will managed with a proposal for an inflexible lagged system.</p>
<p>QUESTION 2: Agree that majority of high needs funding should be distributed to Local Authorities rather than direct to schools and local institutes?</p> <p>Para 3.1</p>	<p>Yes, we would support this proposal. It seems appropriate for the funding to be distributed to local authorities as local authorities are responsible for both assessing individuals' SEND and for commissioning provision for to meet those needs.</p> <p>The Code of Practice January 2015 sets out a clear set of principles including that Local Authorities should ensure collaboration between education, health and social care to ensure funding is allocated equitably across the whole of the SEND population. This proposal supports the Local Authority's ability to distribute available funding equitably and transparently having a holistic overview of local needs and an ability to commission cost</p>

	<p>effectively for low incidence/high needs.</p> <p>As a Borough, we have been faced with the challenge of continuous increase in the pupil population. Due to the introduction of the Welfare Benefit Reforms and the changes around the private rented housing sector. Since 2012/13, Enfield has seen significant rise in the number of households in temporary accommodation; in 2012/13 there were 2,143 and this had increased to 2,764 in 2014/15: An increase of 29% with Enfield being 5th highest London borough with temporary households. Many of the families moving into to the borough as well as living in overcrowded conditions have children with SEND or present social, educational and mental health problems at school.</p> <p>As a local authority, our key priority has been to place pupils in borough and the Council with the support of the Schools Forum has been working with Special and mainstream schools to develop provision to address the differing needs of our pupils. This has included expanding our Special Schools, increasing the specialist units in mainstream schools and also developing a dedicated Autism Advisory Service.</p> <p>As part of this proposal, we ask that the arrangements for place funding provided to individual institutes not maintained by the EFA are reviewed. We are not sure this is an appropriate and effective use of public funds.</p>
<p>Question 3: Do we agree that the high needs formula should be based on proxy measures of need, not on the assessed needs of the children and young people?</p>	<p>Yes, in principle we recognise the need for using proxy indicators to inform a NFF. We are concerned that information available to date from the ISOS report indicates a partial fit between the five indicators and the series of measures of high needs.</p> <p>With this level of uncertainty, we would want further information on the implementation and be reassured that the proposed arrangements do reflect the true costs for meeting the needs of our children and young people.</p>
<p>Question 4: Do you agree with the basic factors proposed for a new high needs formula to distribute funding to local authorities?</p> <p>Para 3.27</p>	<p>Yes, we would, in principle, support the proposed factors, but would need more information on how there are applied, especially the use and timeliness of some of the proposed indicators. For example:</p> <ul style="list-style-type: none"> the use of free school meals eligibility (FSM) and IDACI. There is a correlation between FSM and pupils with SEN. <p>It is vital therefore that, a NFF does not redistribute funding away from the most deprived pupils and reduce their chances of achieving as well as their peers. The key issue in Enfield is now low income households. Our local knowledge of measuring those in receipt of housing benefit and council tax support shows that the level of poor households with children in poverty hasn't reduced as being suggested by the current data published for Free School Meals eligibility (FSM). We would suggest that the claimants have simply changed from one benefit for another and this has impacted on FSM.</p>

	<p>From our information, we would suggest that FSM appears to be affected if the parent is in receipt Working Tax Credit. We would ask that there is a review of thresholds applied for FSM to ensure some of our most vulnerable children and young people living in poverty are not being penalised due to an imperfect system.</p> <p>In addition, the recent change in IDACI indicated an overall reduction in income deprivation affecting children in Enfield as a whole since 2010. We would suggest that this doesn't allow for the number of families living either / and private rented household and overcrowded condition. So in consequence, we also ask that the bandings used for IDACI are reviewed to reflect true levels of poverty. The last set of HMRC statistics on children in low-income families showed that, as of 31 August 2013, 25.5% of under 16s in Enfield were in a 'low-income' family ('low income' defined as less than 60% of median income) with Enfield being 10th highest out of all 33 London boroughs. The average across all London boroughs is 21.4%. This level of poverty is not borne out with the funding provided.</p> <ul style="list-style-type: none"> • some of the other proxy suggested, similar to IDACI, are only updated at long intervals, i.e. the Health Factor and may not reflect an up to date and changing needs of the pupil population. • We do not believe that the needs of post 16 high needs pupils have been fully addressed under the proposed arrangements. The data sets being proposed do not include information on those aged between 19 to 25 years of age requiring support. <p>We would welcome further information before we are able to fully comment.</p>
<p>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 ?</p>	<p>We support the proposal for no change but would ask that the changes in the population are considered and uplift provided for increases in the pupils supported by this service.</p>
<p>Question 6: Which methodology for the area cost adjustment do you support?</p> <p>Para 3.29</p>	<p>It is difficult to comment without further information how this proposal will be applied and the financial impact.</p> <p>Similar to our response to the school funding consultation, there is a clear need for Area Cost Adjustments. Enfield Schools have reported that they are facing extreme difficulties in recruiting appropriately qualified staff to fill vacancies in their schools. The current Workforce Census data shows that the number of teacher vacancies over the last two years have nearly doubled from 0.7% in 2015 to 1.3% in 2016.</p> <p>Schools have reported that existing staff and potential applicants are finding it difficult to manage the higher cost of living in London, so those remaining in teaching are seeking employment</p>

	<p>in other less costly areas, where there is a lower level of pupil deprivation and mobility, nor all the other challenges faced by London schools. All these factors are creating a crisis in recruitment and retention, especially as Enfield has to compete with neighbouring London authorities who provide inner London weighting and neighbouring local authorities outside London with lower cost of living and also lower levels of deprivation and challenges.</p> <p>Added to this, as a Local Authority, we are concerned with a significant number of Headteachers in Enfield are over 50 and approaching retirement. Where Governing Bodies have had to appoint a new Headteacher, they have reported that they have had difficulties and most have been unable to secure an appointment from the first round of recruitment and have spent considerable amount of additional resources to try and recruit a second or third time.</p> <p>We cannot comment on the use of the either the hybrid or General Labour market model for the Area Cost Adjustment without further information of the weightings and rates to be applied.</p> <p>However, London Council have indicated with the high level of costs associated with living London that General Labour market would be the most appropriate for London. We would still ask that information is provided with rates and weightings to be applied to enable us to consider this further.</p>
<p>Do you agree Question 7: Do you agree that we should include a proportion of 2016-17 spending in the formula allocations of funding for high needs? Para 3.30</p>	<p>This proposal seems reasonable but is difficult to comment without further information how this proposal will be applied and the financial impact as a relatively low funded authority for High Needs. Enfield as an authority has high level of mobility into the Borough, it is important that there are sufficient resources to meet these additional needs.</p> <p>We are concerned that the current baseline exercise will not reflect the actual costs and not sure how then proposal will support this pressure within the context of no flexibility of moving resources between the blocks.</p>
<p>Question 8: Do you agree with our proposal to protect local authorities' high needs funding through an overall minimum funding guarantee?</p>	<p>This proposal seems reasonable but is difficult to comment without further information how this proposal will be applied but it is important to have a smooth transition and recognition that there may be some contractual arrangements in place which may require further protection. .</p>
<p>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 Para 4.8</p>	<p>It is important that there is clarity and transparency of how pupils with SEN are supported and how these are supported by the School's offer via their SEN Information Report. This sets out how individual schools support their pupils with SEND and should ensure LAs are aware of and able to utilize the provision and expertise in each school to meet the needs of the local SEND population. The school's information should be linked to the LA's Local Offer demonstrating a joined-up approach.</p>

<p>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?</p>	<p>Whilst this appears to be a reasonable way forward and would continue to support the need for inclusive strategy for pupils accessing these specialist provision. We are concerned without information on the rates and weightings used for the school funding arrangements that schools may see some reduction in funding. It is important if there is any change in funding that it remains within the local authorities high needs block.</p>
<p>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? Para 4.13</p>	<p>Wraparound care???</p> <p>Examples from London councils For example, in Croydon, maintained special schools can draw upon a centrally managed therapies budget. This gains economies of scale, but also to afford a level of provision that allows us to compete with independent provision when taken to tribunals.</p> <p>Many local authorities retain specialists to provide guidance to schools when they admit children with needs that have not been experienced for. This central expert knowledge allows funding to be used more effectively and efficiently.</p>
<p>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</p>	<p>Outreach provision???</p> <p>Examples from London councils In Barking and Dagenham, the local authority pays an additional lump sum to all mainstream schools where higher than 1.5% of their roll have statements/EHC plans. This ensures that there are appropriate incentives to encourage inclusive maintained schools.</p>
<p>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 Para 4.18</p>	<p>No, we cannot see the purpose of this proposal and would require more information before we are able to provide any further comment.</p>
<p>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</p>	<p>London Councils - response The proposal to recognise colleges that deliver specialist provision to significant numbers of students with high needs is welcomed. Many of London's local authorities have worked with their surrounding colleges to build up specialist provision to improve the Local Offer for young people and provide greater choice. We would, however, caution against transplanting the school based designation of 'unit' to further education. The designation should recognise the provision that colleges offer in helping to prepare young people for adulthood right across the curriculum and through the use of the college's entire facilities.</p> <p>The simplification to fund the majority of post-16 settings on a formulaic basis is also welcomed. We urge the Department to look at the current</p>

Para 4.26	methodology for allocating disadvantage funding specifically block 2, in addition to the process of changes to post-16 place funding. The English and maths condition of funding is putting significant pressure on disadvantage funding, leaving little room to fully meet the needs of students with support costs lower than £6,000. This creates a perverse incentive for some institutions to push costs over the high needs threshold to secure additional element 2 funding in the following years allocation.
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