

Response ID ANON-YVGW-NGKF-K

Submitted to **High needs national funding formula – proposed changes**

Submitted on **2021-03-23 15:33:28**

Introduction

1 What is your name?

Name:

Noni Csogor and Jonathan Isaacs

2 What is your email address?

Email:

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3 What is your organisation?

Organisation:

Sixth Form Colleges Association

Demographics questions

What type of organisation is your organisation?

Please select one answer :

National organisation

What is your role?

Please provide your answer in the box below:

Research and policy manager (NC), policy and membership manager (JI)

Which local authority are you based in?

Please select one answer :

Westminster

Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Historic spend factor - question 1

Do you agree that we should replace the current lump sum included in the formula calculation with an amount calculated on the basis of actual local authority expenditure, as reported by each local authority?

Unsure

Please provide any additional comments::

We agree that the Department should generally use the most recent and most robust available data for historic spend. However, 2017-18 was a historic low point in terms of 16-18 student numbers. Since then, student numbers have grown significantly, and so have numbers of students with SEND, due to demographic trends and higher numbers of students 'taking refuge' in education as a result of Covid. High Needs funding is already insufficient for most of our member colleges, who are effectively forced to use mainstream funding to support the growing number of students with needs which do not meet the High Needs threshold, especially those with mental health conditions. As such, it would be unacceptable to peg funding to a time when student numbers were at a historically low level. We would suggest that a rolling average of three years (if 2017-18 is the most recent available, then 2015-18) be used instead, and updated each year as new data comes in. It is also important to remember in making these changes and in the course of the SEND review that the level and method of determining funding are of little significance if colleges do not receive the funding. Members have made it clear that the process of obtaining SEND funding from their local authority is currently an overly bureaucratic process which is made more difficult by local authorities being mainly focused on schools and not understanding the post-16 model.

Historic spend factor - question 2

Do you think that we should increase the percentage of actual expenditure in 2017-18 included in the funding formula calculation, or leave it at 50%? Use the comments box to propose a particular increase or reduction in the percentage.

Increase the percentage

Comments::

An increase in the percentage would be welcomed by colleges. With an increase in student numbers year on year and the number of students with an EHCP also increasing it is essential that colleges are able to receive the correct amount based on up-to-date data. The number one problem with the funding formula at present is not the formula itself, but the level of funding available; as increasing the percentage will tend towards increasing the allocations of local authorities, we support this move.

Historic spend factor - question 3

To what extent do you agree that the funding formula should include factors that reflect historical local demand for and supply of SEND and AP provision? If you have any suggestions for such factors that could eventually replace the historic spend factor, please provide these in the comments box.

Agree

Comments::

While using historic spend is imperfect, (as most areas are seeing a rise in numbers of students with High Needs, and so historic spend will often understate the exact level of need) it is reflective of the direction of travel. Increasing the percentage included in the formula can mitigate some of the negative effects of using historic spend (hence our answer to question 2). It is also difficult to identify a satisfactory alternative measure which would be available and consistently calculated across local authorities; however, we are open to jettisoning historical demand factors should another measure become available. In the meantime, our answer to question 5 presents a measure which may compensate for some of the pitfalls of using historic spend.

Low attainment factor - question 4

Do you agree with our proposal to update the low attainment factors using data from 2016, and to substitute the most recent 2019 data in place of the missing 2020 attainment data?

Agree

Comments::

While some students with SEND achieve well at GCSE, in general there is a strong correlation between SEND, particularly more severe needs, and low attainment. It makes sense to continue using this factor to inform the formula, and to calculate it using double-weighted 2019 results; this is the fairest solution to the difficult problem created by the cancellation of exams in 2020. We would potentially be more cautious about using the same method (as opposed to the same number) for 2023/24 allocations, however, as this would mean triple-weighting 2019 and using a three-year average of 2017-19, giving 2019 results undue prominence.

SEND and AP proxies - question 5

If you wish to offer ideas on factors that could be added to the current formula, or that could replace the current proxies, please provide further details in the comments box below.

Please provide your answer in the box below::

Members are largely content with the existing factors used; they are not perfect proxies, but we are not aware of better proxies that are currently available on a consistent national level. Instead, we would suggest two changes to the formula and its application which are not changes to the factors:

- Introduction of an in-year growth process: ESFA currently awards institutions with much higher 16-19 pupil numbers on their ILR with additional funding, recognising the limitations of a lagged approach and the significant burden of catering for higher numbers of students than planned. While High Needs funding is of course awarded to the LA, there is no reason why all ILR data in each LA could not be aggregated to calculate actual High Needs place numbers each year, and in-year growth awarded to reflect particularly large increases. Some of our members find that they have more High Needs place numbers than anticipated every year, and the funding never 'catches up'. This would address some of the problems with using a historical spend factor discussed above.
- Abolishing the 12% growth cap on each year's allocations. Need is growing by much more than 12% in some areas, and is particularly likely to balloon post-Covid. The assumption that students' needs will never change by an inconvenient amount year-on-year is simply false. One SFCA member commented this year that they were suddenly educating five times as many students with EHCPs. The only achievement of the 12% threshold is to reduce the amount of funding available for each student in need in an affected area, effectively punishing students with SEND for being in areas with too many other students with SEND.

Equalities impact assessment - question 6

Please provide any information that you consider we should take into account in assessing the equalities impact of the proposals for change. Before answering this question, please refer to Annex C of the consultation document.

Please provide your answer in the box below::

While we understand the challenge of transforming complicated realities into proxy measures, and to the greater needs of students with severe needs and in deprived areas, we are also very aware that not all SEND students have low prior attainment or come from areas of deprivation. This is why it is so important to ensure that funding is sufficient to meet need in all local authorities and is easily accessible by the institutions who educate young people – the principles which

have guided our answers to these questions throughout.

Most important of all, however, is the comment by one of our members that “These learners are real lives; a school or college can be a sanctuary for very vulnerable children and young people and a step out of poverty to university or an apprenticeship for a prosperous lifestyle.”