

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**

We are concerned that balancing the need to offer stability, currently outweighs the formula's ability to offer fairness. This is a balance that must be achieved. The current proposal guarantees individual school's will receive a maximum of + or – 3% of their current funding. With a current variance of up to £3,000 per pupil funding from the highest to the lowest funded areas a maximum 6% shift will not close the funding gap at an acceptable rate. Cambridgeshire funding will increase to £4,064 per pupil whilst other areas who will see a reduction in funding will still attract per pupil funding of £6,303.

2. **Do you support our proposal to set the primary to secondary ratio in line with the current national average?**

We believe that this is probably about right.

3. **Do you support our proposal to maximise pupil-led funding? NO**

We are concerned that reducing school led funding in favour of maximising pupil led factors offers less certainty of funding for schools and unfairly penalises small schools. We also believe the school led funding figure should be increased to bring it in line with the current national average.

4. **Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors? NO - allocate a lower proportion to additional needs**

We are concerned that allocating a higher proportion to additional needs creates more variability and so gives less certainty of funding for school budget planning. Additional need factors are too heavily weighted, disadvantaging schools with high numbers of pupils who are just about managing. A higher proportion of basic per pupil funding would give more certainty for schools across the country and ensure schools can cater for the needs of every pupil.

5. **Do you agree with the proposed weightings for each of the additional needs factors?**

Deprivation – pupil based at 5.5% - Allocate a lower proportion.

Deprivation - area based at 3.9% - We think the proportion is about right.

English as an additional language at 1.2% - We think the proportion is about right.

We are concerned pupil based deprivation is included as an additional needs factor when additional funding is already provided through the Pupil Premium. This appears to double weight pupil based deprivation, unbalancing the fairness of the formula. Pupils from families whose finances place them just above the free school meals threshold may also need additional support yet there is no mechanism available to secure additional funding for them. Allocating a higher basic per pupil figure would ensure greater certainty for school budgets and ensure all children have access to the support they require.

6. **Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?**

We believe this data is available via the same sources that are used for current accountability measures.

7. **Do you agree with the proposed lump sum amount of £110,000 for all schools?**

Primary - Allocate a higher amount

Secondary - Allocate a higher amount

The 'one size fits all' model does not adequately recognise variability in school size to balance minimum levels of school to pupil led funding. We are concerned that small schools are not able to benefit from economies of scale in the same way that larger schools are able. In addition the focus on per pupil funding seriously disadvantages small schools and in some

instances may even challenge their economic viability. We would therefore like to see a sliding scale of lump sum funding to recognise the diseconomies of scale faced by small schools.

8. Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary and up to £65,000 for secondary, middle and all-through schools?

Primary - This is about the right amount

Secondary - This about the right amount

Although we feel these amounts are about right, we are concerned about the eligibility criteria attached to this funding. The sparsity factor does not adequately address accessibility in rural areas as the current model uses a straight line distance measurement. Closest school by shortest route available would be more accurate to address disadvantage. In addition to remoteness, sparsity funding could also be based on pupil numbers to ensure all rural schools are economically robust.

9. Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term? NO

We are concerned the growth factor will be based on a local authorities historic spend. Previously underfunded areas have understandably had less money available to invest in capital expenditure projects to deliver additional education capacity. Future growth funding should be based on a national average spend to ensure investment for the future is based on fairness. In addition, lagged pupil growth funding offers inadequate funding for areas of high growth. Future funding could be based on yearly growth projections adjusted annually according to actual figures.

10. Do you agree with the principle of a funding floor? YES and NO

In principle protecting school budgets from large overall reductions is desirable, however without making additional funding available to close the gap between the best and worst funded areas, a funding floor renders the idea of creating fairness a long term aspiration. Guaranteeing a maximum of + or – 3% gives budgetary certainty to well-funded schools by limiting any funding decrease, but further disadvantages poorly funded schools by limiting the uplift available.

11. Do you support our proposal to set the funding floor at minus 3%? NO

If more money can be found for education funding we support a maximum minus 3% funding floor. But, if more funding cannot be found then to achieve fair redistribution, a lower funding floor must be considered

12. Do you agree that for new or growing schools (i.e. schools that are still filling up and do not have pupils in all year groups yet) the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?

Yes, in order to give certainty for planning purposes. If the funding were allocated at current and not projected capacity the school cannot realise its growth in line with pupil recruitment.

13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5%? NO

We are concerned that protecting school budgets from higher losses makes redressing the balance of historical unfairness impossible without additional funding. Increases to poor funded areas need to be accelerated to address the effect of underfunding on building repair, maintenance and school resources and this is therefore not compatible with a continued funding guarantee at minus 1.5%.

14. Are there further considerations we should be taking into account about the proposed schools national funding formula?

As we have previously stated, the funding formula fails to take account of years of under-investment in some regions and fails to allocate a per-pupil premium for areas experiencing

above average pupil growth. A capital grant programme to address the impact of under-funding on buildings and equipment and a per-pupil growth factor are two initiatives that we believe could deliver the balance between stability and fairness.

15. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block? NO

We are concerned that deprivation is too heavily weighted to create fair funding. The current Pupil Premium allocates additional funding for pupils' eligible for free school meals and will continue to provide the additional funding paid on a quarterly basis to the school attended. Allocating additional funding for deprivation at a pupil level through the NFF is unnecessary and disadvantages all schools and pupils by redistributing finite resources too heavily on a single factor.

16. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20? NO - allow losses of more than 2.5% per pupil per year

We are concerned that limiting losses to a maximum 2.5% per pupil per year will not redress the inequalities in historic funding quickly enough to support struggling schools.

17. Are there further considerations we should be taking into account about the proposed central school services block formula? YES

We would like to see a sliding scale of + or – funding based on historical LEA figures, with the poorest funded receiving the biggest increase.

18. 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? NO

Although the Impact Statement states the Department have deliberately not included an SEN or disability factor due to a lack of reliable data and because this would over-incentivise identifying SEN or disabilities, they have instead used the low prior attainment indicator which is expected to help schools supporting pupils with SEN in mainstream provision (by supporting the school not the pupil). Again, in a small school, this will have a disproportionate effect and would therefore disadvantage a pupil with a disability.