

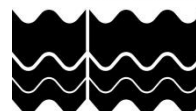
East Sussex County Council Schools Forum

Friday 19 March 2021

08.30

Remote Meeting

East Sussex
County Council



Agenda

Item	Heading	Paper	Lead	Item for
1.	Welcome and Apologies	N	Chair	Note
2.	Minutes of previous meeting 15 January 2021	Y	Chair	Approval
3.	Matters Arising and Declaration of Interests	N	Chair	Discussion
4.	EALs Budget 2022/23	Y	Beth Armstrong	Information
5.	DfE Consultation – Sparsity Factor	Y	Ed Beale	Information
	AOB – High Needs Block NFF Consultation			

Next Meeting: Friday 14 May 2021, 8.30am, Venue TBC (Remote or Wellshurst Golf and Country Club)

**Draft Item:
Outcome of EAL Consultation**

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EAST SUSSEX SCHOOLS' FORUM

MINUTES of a meeting of the Schools' Forum held remotely with Microsoft Teams on 15 January 2021

PRESENT

Hugh Hennebry - **Chair** (Uckfield College)
Sarah Pringle (Seahaven Academy)
Kate Owbridge (Ashdown Primary)
Gavin Bailey (Swale Academy Trust)
Mandy Watson (Diocese of Chichester)
Richard Preece (Saxon Mount and Torfield)
Joanna Sanchez (Diocese of Arundel and Brighton)
Tom Scully (University of Brighton Academies Trust)
James Freeston (King Offa Primary Academy)
Susan Thompson (Ditchling Primary)
Jo Foulkes (Sabden Multi Academy Trust)
Jane Johnson (Newick CE Primary)
Geoffrey Lucas (Etchingham CE Primary School)
Monica Whitehead (Claverham Community College)
Phil Matthews (Hailsham Community College Academy Trust)

Cllr Bob Standley (Lead Member for Education and Inclusion, Special Educational Needs and Disability)
Stuart Gallimore (Director Children's Services)
Mark Whiffin (Head of Finance)
Edward Beale (Schools Funding Manager)
Sarah Rice (Finance Manager – Schools)
Kirsten Coe (Principal Finance Officer)
Nathan Caine (Head of ISEND)

Rachel King (Clerk)

1 WELCOME AND APOLOGIES

- 1.1 Hugh welcomed all and thanked everyone for their attendance.
It was confirmed the meeting was quorate, recognising the apologies below.

1.2 Apologies received from:

- Richard Blakely (Harlands Primary)
- Kim Larkin (Apprentice Programme Coordinator)
- Phil Clarke (Trade Union Representative) – not present

2. MINUTES OF PREVIOUS MEETING 20 NOVEMBER 2020

- 2.1 The minutes for the meeting held were approved as a true record and will be signed by the Chair and scanned to Rachel King.

3. MATTERS ARISING AND DECLARATION OF INTERESTS

- 3.1 There were no declarations of interest and there were no matters arising.

4. DSG BUDGET 2021/2022 (Information on DSG Blocks and Approval of Early Years Block – Voting for all school forum members)

- 4.1 Ed Beale introduced this paper and outlined the information for members. Schools' Forum members were then asked to approve by voting. This was carried out using electronic 'hands up' used for ease of counting. Votes were as follows

Number of Yes	Number of No
11	0

- 4.2 Jane Johnson asked a question re Central Block, the funds being transferred to schools and academies isn't shown on Appendix A. Ed said this was because, instead of being transferred into budgets, via the schools block, it will be transferred as separate income. This was to ensure that schools and academies benefit equally and receive £52.59 per pupil. A clearer fairer way of doing it. Jane asked if it was based on pupil numbers and Ed confirmed it was. Jane then asked with the extra funds that relate to pay and pensions, does that cover the increase. Ed said that from the D of E's point of view, potentially yes. Arguably it may not always be the case but the basic per pupil amount and the minimum per pupil amount have increased to reflect the changes.

Hugh thanked Jane for her questions.

5. APPRENTICESHIP LEVY (Information)

Kim was unable to attend the meeting due to changes to team responsibilities for COVID response. This item will therefore be discussed at a future meeting.

6. ANY OTHER BUSINESS

- 6.1 Hugh raised the point that there are still two vacancies for Maintained Primary School Headteachers and also a new vacancy for a Maintained Secondary School Headteacher. (To replace Emily Beer). Hugh said he had asked Helen Key if she would be willing to come back on board to replace Emily's previous post as Helen covered while Emily was on maternity leave. Kate Owbridge said she would put feelers out for primary schools, she said she would like to see representation from other parts of the county and would also ask EIP's.

An article will be sent out via the Virtual School Bag shortly that advertises these posts.

- 6.2 Councillor Standley asked if there could be a quick update from schools to ask how everyone is managing with lockdown number three. Hugh asked for contributions from each sector. School Forum members shared a very useful update on experiences. COVID-19 - Conversation took place around what was working well and challenges that schools were facing around: opening; vaccinations; testing; laptops and additional costs. Councillor Standley thanked everyone for their input and would pass this information to MP's and other forums and ministerial briefings that he attends.

Meeting concluded at 09:56 am

Next meeting – Friday 19 March 2021 08:30am. Location TBC - Wellshurst Golf and Country Club or Microsoft Teams.

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Agenda Item 4

Briefing for Schools Forum on EALS

1. East Sussex schools receive approximately £1,104,000 annually in their budget allocation (under a formula agreed by Schools' Forum), to be used to meet their statutory obligations supporting the specific needs of EAL learners who are on the roll of local schools and academies.
2. English as an Additional Language Service (EALS) is a service that is currently run by the Local Authority from funding pooled (de-delegated) from East Sussex maintained primary schools and on a traded basis with maintained secondary schools and academies. Provision of this service is not a statutory function of the LA. There is an agreement in place for the LA to consult with all schools every two years to continue to offer this service on their behalf.
3. Following the vote by secondary maintained schools in September 2019 not to de-delegate, secondary maintained schools and academies had the option to access the service on a traded basis, all schools having been surveyed to select a preferred trading model. The commitment was for 2 years, April 2020 - March 2022, in order for the service to have adequate resource to fund a staff team of specialist EAL teachers and bilingual support officers (BSOs) and deliver a consistent high quality service without the disruption of annual consultation. There is an agreement with Schools' Forum to offer a choice of funding models to be available for schools and academies who vote not to de-delegate, every two years.
4. The LA is now consulting with schools in order to secure the potential continuation of the service for the period April 2022 – March 2024. A brief timeline of the consultation is included in Appendix 1. In summary, schools are being asked, through the survey, to indicate a preference for the model that will be available to academies, and maintained schools should they decide not to de-delegate. The choice is between:
 - **Model 1:** that enables schools to choose between buying into an advisory service with the opportunity for further buy-in of teaching or BSO support (by committing 25% of their EAL funding), or the full service of advice, specialist teaching and BSO support (by committing 100% of their funding)
 - **Model 2:** which includes the options from Model 1 and Model 3
 - **Model 3:** a subscription only service which provides access to a selection of advice, guidance, and model policy documents, and the opportunity for further buy-in of teaching or BSO support.
5. If the decision is not to de-delegate at the Schools' Forum meeting in September 2021, we will approach all maintained schools following this meeting to ask for confirmation of buy-in to the preferred model that is decided as a result of this consultation.
6. Ideally both maintained primary and maintained secondary schools will vote to de-delegate their allocated EAL funding at the Schools' Forum meeting on the 17th September 2021, enabling the continuation of a central service available for all schools. If, as happened at the last consultation, only the maintained primary schools de-delegate, and there is enough traded commitment from secondary schools and

academies, then we are confident that the service will be able to continue to deliver the current offer.

7. If there is no de-delegation from schools, then it is extremely unlikely that income from traded work will generate enough funding for the service to continue and LA will have no other choice but to move to close the service from 1 April 2022. The statutory duty to support EAL students would of course remain the responsibility of schools.
8. Over the past year, EALS managers have been contacted by schools, and the parents of schools who did not buy in to the service, asking for support. EALS have been unable to help, as schools or academies who do not commit funding upfront cannot access the service, even on a traded basis.
9. This feedback suggests that in schools that did not commit EAL funding to the service:
 - some EAL children with underlying special educational needs have not received accurate assessment of needs and appropriate interventions due to lack of access to high quality interpretation and translation
 - some EAL secondary pupils have missed out on getting a GCSE in their Mother Tongue
 - parents with siblings in both primary and secondary phases are concerned about their children in the schools where EALS cannot be accessed
 - primary school pupils that were being supported by EALS for lower levels of English find it hard to keep up when they move to secondary school and cannot access EALS support
 - schools who do not have access to EALS face real challenge when families arrive with no English, often unexpectedly mid-year, and they are not able to communicate with parents in their home languages
 - TAs in schools who do not have access to EALS often find it challenging to know how to adapt their SEN strategies for EAL pupils and require expert support to do this effectively
 - Accessing high quality translation and interpretation and specialist teaching support has posed a significant challenge for schools who did not buy in to the service.
10. In addition to being a vital service for schools to access, the continuation of the EALS is in the interests of wider Children's Services. It is the go-to service for the Virtual School in order that unaccompanied asylum seekers have access to specialist support and ISEND services and social care can buy in BSO support.
11. Prior to the pandemic, over 85% of EAL pupils supported by the service to complete Mother Tongue GCSEs and A levels gained grades 7 – 9.

12. Over the past two academic years (Sept 2018 - July 2020) evaluations consistently evidence that support from EALS makes a positive difference, with 95% of pupils, 94% of schools, and 93% of parents reporting changes for the better.
13. Below is an example of excellent support delivered by the service:

14.

Input from EALS

- Bilingual Arabic support when the family first arrived, to support orientation and positive transition into school for all three children.
- Delivery of EAL training for teachers and TAs at the primary school.
- Direct teacher support e.g. over this last year this was three hours teacher intervention per week, delivered flexibly (in-school, remotely at home during school hours, and as an after-school session for one child to fit around school remote timetable).
- Advice for subject teachers, including regular co-planning with the English teacher of the Y11 student.
- Liaison with the school careers advisor.
- Home liaison and supporting parental engagement.

Positive outcomes: academic and social

All the children have continued to improve their English language skills and are now effectively accessing the curriculum. They returned to school confidently in September 2020, having been engaged in schoolwork throughout lockdown. They have been able to access the home learning tasks. All three children have met progress targets and have excellent attendance. One of the children entered the Val Larkin dual language writing competition and won a prize. Entering the Val Larkin competition also gave the children the opportunity to see their teacher in person, meet other Arabic speaking families, and feel part of the wider EAL community, if at a distance. The whole family attended the award ceremony.

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The LA is confident that the EAL service continues to deliver high quality support to EAL children, families, and schools. It is in the interests of all that schools commit funding to the service in order that this group of learners, who are vulnerable to underachievement and social isolation, are given the very best chance of achieving their academic and social potential and progressing to being successful members of the community in adulthood.

Timeline	Activity
22 nd February – 8 th March 2021	LA consult all schools via a survey to establish the preferred trading model.
19 th March 2021	Schools' Forum paper: summarising the consultation and presenting feedback from schools who did not buy in
14 th May 2021	Schools' Forum presentation: outcome of consultation responses, preferred trading model and further information on the impact of the service on outcomes for EAL children
17 th September 2021	Schools' Forum vote: maintained schools vote on de-delegation
September 2021	Seek agreement from schools/academies for funding commitment to the preferred model (that was established in May 2021)
October 2021	Schools/academies notified if service will continue to operate from 1 April 2022

English as an Additional Language (EAL) funding in East Sussex

East Sussex schools receive approximately £1,104,000 annually in their budget allocation (under a formula agreed by Schools' Forum), to be used to meet their statutory obligations supporting the specific needs of EAL learners who are on the roll of local schools and academies. For the two-year period from April 2020 to April 2022, maintained primary schools opted to support their EAL learners by de-delegating this funding to the Local Authority to provide a centralised service. Secondary schools and academies did not de-delegate, but individually selected from the model adopted by the Schools Forum in September 2019; committing 25% of their EAL funding in order to access an advisory only service or committing 100% of their funding in order to access the full package of support. Some schools did not buy in at all thus forgoing access to the EAL service for the two-year period.

Current EAL Service

The EAL service (EALS) is a core team of specialist EAL teachers and Bilingual Support Officers (BSOs) speaking 16 of the most commonly spoken languages across the county including: Albanian, Arabic, Bengali, Bulgarian, Cantonese, Hungarian, Italian, Lithuanian, Mandarin, Polish, Portuguese, Romanian, Russian, Spanish, Thai, and Turkish. In addition, EALS employ casual staff to support further languages as required. Since April 2000 the EALS service has supported **432** pupils, speaking **52** languages, across **69 schools**. There are currently **268 open cases** (up from 240 at the time of the last consultation). Pupils access **one to three** direct hours support/week from EALS, depending on their needs. Since April 2020 EALS has received **121 new referrals**. Response time for a new referral is **two to three days**, often less. Support is usually in place within **2 weeks**.

Overview of the offer

The first year of EALS using the new model of working coincided with the beginning of the pandemic. EALS responded quickly by incorporating a blended offer into both the Advisory and Full Packages, allowing service delivery to continue uninterrupted. As with schools, the necessity to deliver support in new ways has led to many creative innovations and some real improvements to the service offer.

In addition to regular remote teaching and bilingual support sessions, innovations included:

- ✓ Family learning remote teaching and support sessions
- ✓ Three-way remote support sessions with a teacher and BSO working with students together
- ✓ Development of a suite of recorded dual-language resources including EALS Storytime videos and narrated PowerPoint presentations
- ✓ EALS Reading Month introduced in July 2020
- ✓ Celebrate your Home Language Month introduced in February 2021
- ✓ Good for EAL: Good for All CPD offer developed, aimed particularly at primary schools with fewer EAL pupils

Service development in response to Coronavirus

During the pandemic vulnerable families with EAL had additional barriers to overcome in terms of understanding the government messaging and accessing support. EALS were vital to enable families to receive the support they needed:

EALS during lockdowns

- Home language support to ensure that families understood communications from government and schools
- Schools and the local authority were supported to translate key messages into the most common languages in East Sussex
- Pupils were contacted by BSOs on the phone, on the doorstep or on videocall
- Primary pupils received the EALS weekly themed challenge sheets
- Liaison between families and schools to improve access to technology
- Online EAL teaching sessions provided by teachers and help with home learning tasks set by school
- Doorstep deliveries of learning packs, stationery, craft materials, toys & games
- Support for families with lockdown specific problems e.g. access to Universal Credit, Free School Meal vouchers and Food Banks

The service has received positive feedback regarding the support offered during these extraordinary times. Below are two of many examples of case studies showing the positive impact of EALS support:

Support package with EALS through primary de-delegation

M and A are both Bengali-speaking girls, in Y5, from different families. They attend different primary schools, with few EAL pupils attending their schools. A is quite sociable but has poor memory and feels adrift in class. M is more mature and independent but struggles with maths and has poor attendance. A's parents are unable to help with home learning. Neither girl has books at home to read.

EALS Intervention

Liaison between the families, SENCOs, and class teachers. A Bengali speaking BSO attended an attendance meeting for M. Support with technical issues accessing home learning. Packs of stationery and resources delivered to both homes. In-school teaching sessions and weekly remote learning involving teaching both girls together, focussing on reading and challenge activities. The girls also created PowerPoint presentations on their cultures for their classmates.

Positive outcomes: social and academic

The girls made friends and the parents got to know each other and still communicate. They very much enjoyed the sessions and were highly motivated. They showed improved computer literacy, English language skills, presentation skills and confidence. As a result of the intervention, the girls were confident and able to make interactive presentations to their classes on return to school. Both girls entered the Val Larkin dual language writing competition and A's family attended the prize-giving. M's attendance has improved.

Support package 100% committed EAL funding (secondary school)

C is in Y8 and was referred to EALS in November 2019. The main concern was his understanding of the language of Maths. He and his family speak Russian and he has good literacy skills in his home language.

EALS Intervention

C received weekly in class support from a Russian speaking BSO up to February 2020. He was set targets to improve his understanding of Maths vocabulary and concepts and to contribute in group and whole class work. During Lockdown he received weekly support sessions from the BSO continuing to focus on Maths but also helping him to understand other work set.

Positive Outcomes: social and academic

At the end of February 2020 C's Maths teacher commented "*C has grown in confidence this year. He still requires support but is willing to take part in class discussions. He is developing a mature attitude to his studies. He asks questions when not sure. Discipline is excellent.*"

C's Mum was concerned that over lockdown he would lose his confidence and understanding. However, with the help of regular weekly online support sessions, when he returned to school, they let her know that he had made really good progress and would be moved up to a higher Maths set.

Prior to the pandemic, 85% of EAL pupils supported by the service to complete Mother Tongue GCSEs and A levels gained grades 7 – 9.

Over the past two academic years, Sept. 2018-July 2020 evaluations consistently evidence that support from EALS makes a positive difference: 95% of pupils, 94% of schools, and 93% of parents report changes for the better.

Why EALS want to welcome more schools back in 2022

EALS managers been contacted by parents, SENCOs, TAs, and Exams Officers of schools who did not buy in to the EALS package, asking for support; EALS have been unable to help. This feedback suggests that:

- some secondary pupils have missed out on getting a GCSE in their Mother Tongue
- parents with siblings in both primary and secondary phases are concerned about their children in the schools where EALS cannot be accessed
- primary school pupils that were being supported by EALS for lower levels of English find it hard to keep up when they move to secondary school and cannot access EALS support
- schools who do not have access to EALS face real challenge when families arrive with no English, often unexpectedly mid-year, and they are not able to communicate with parents in their home languages
- TAs in schools who do not have access to EALS often find it challenging to know adapt their SEN strategies for EAL pupils and require expert support to do this effectively.

EALS share the concern of schools regarding the impact on all children of learning lost through the pandemic lockdowns; this is particularly worrying for those pupils with additional barriers to learning such as English as an additional language. The negative impact on EAL pupils and families is likely to be long lasting; EALS can play a vital role in supporting schools to meet the needs of their EAL pupils and directly supporting EAL pupils through the process of catching up and meeting their potential.

We know schools want to do the best for their EAL pupils and spend their EAL funding wisely and with the greatest impact. Committing to a package with EALS offers access to specialist support and excellent value for money.

EALS consultation on model of delivery from 2022 to 2024

EALS changed its model for delivery in April 2020, following the September 2019 Schools Forum vote and consultation with schools regarding a preferred delivery model. The model has been running successfully for a year, with the second and final year commencing in April 2021.

In order for the EAL Service to continue to exist in East Sussex beyond April 2022, we need both maintained schools and academies to set aside funding within their budgets for their EAL pupils and be willing to make a commitment to contribute an element of that funding to support the Service.

We would like to consult with you at this juncture on the preferred model to take to the Schools forum in September 2021 in order to secure funding for the two years from April 2022 to April 2024.

Following feedback from schools on the four models in the previous consultation, and considering whether the models are viable for continuation of the EALS service, EALS has produced three models for consideration, using the following criteria:

- All schools and academies to have access to the service on the same basis
- A choice of levels of service
- Both models require a two-year commitment from schools, with commitment given 6 months before the beginning of the first of the two financial years
- All schools committed to a package of support able to purchase extra service on a pay-as-you-go basis, within Service capacity
- There will be no support available from EALS for schools that do not buy in

Timeline

- 22nd February 2021 to 8th March 2021: Consultation on 3 models of delivery with all schools/academies.
- 19 March: Paper to Schools' Forum presenting consultation responses
- 14 May: Schools' Forum presenting outcome of consultation responses and preferred model
- 17 September 2021: Schools' Forum – maintained schools consider de-delegation
- September 2021: Following the School's Forum vote, seek agreement from schools/academies for funding commitment to the preferred model.
- October 2021: Schools/academies notified if service will operate from 1 April 2022

Only one of the following models will be delivered from April 2022 and the EAL service will require a minimum buy-in from schools for a period of 2 years in order to deliver a viable service.

Schools or academies who do not buy a package will not have access to any support from the service, even on a traded basis, until the 2024.

Whatever the final model, the EAL service will require a minimum level of up-front committed funding from schools to continue beyond April 2022. If this is not agreed by the end of September 2021, the service will need to close on 31st March 2022.

Model 1: Full package 100% / Advisory package 25%

Overview

In this model schools and academies can opt for two levels of service:

- 100% of their allocated EAL funding, with a two-year commitment. This offer is the same as the current offer to maintained primary schools who de-delegated their EAL funding. Schools experiencing higher levels of need at any time due to large numbers of new arrivals or pupils/families with higher levels of need will be given priority for extra support, within service capacity.
- 25% of school EAL allocation for an 'advisory' service. There is no direct teaching or BSO support included in the 25% model. Schools may request teacher or BSO interventions and the service would endeavour to source teachers and BSOs as required for purchase.

Support in *blue italics* has been added due to service development during the pandemic period.

The offer

	Advisory service 25%	Full service 100%
Access to a selection of advice, guidance, and model policy documents on czone and access to a traded service from EALS	✓	✓
Access to all EALS resource areas on the Services to Schools website	✓	✓
<i>Access to the Good for EAL: Good for All offer of training and teaching resources</i>	✓	✓
EALS newsletter issued three times a year	✓	✓
Advisory meetings/email advice for school staff, including teaching staff, SENCOs, and Exams Officers	✓	✓
Central or bespoke in-school training for individual schools or clusters	✓	✓
<i>Access to remote training and advice sessions, mentoring, co-planning sessions and Q&A drop-ins, delivered on MS Teams</i>	✓	✓
Initial Assessments of pupils, including recommendations and advice	✓	✓
Classroom observations	✓	✓
Support with home-school liaison	✓	✓
<i>The opportunity to take part in EALS events, e.g. The Val Larkin dual language Writing Competition</i>	✓	✓
New Referrals package for all new referrals Following initial assessments: <ul style="list-style-type: none"> - Bespoke intervention delivered by teachers and/or BSOs - Review of progress and access to further interventions as agreed 		✓
Extended interventions as appropriate and in liaison with school EAL Lead, for example <ul style="list-style-type: none"> ▪ Advanced learners exam preparation booster packages ▪ Focussed support on an area of language, e.g. writing, vocabulary, grammatical accuracy 		✓

<ul style="list-style-type: none"> ▪ <i>Remote support sessions with a Bilingual Support Officer to help with in-school or home learning</i> ▪ <i>Remote teaching sessions delivered by an EALS teacher with a BSO</i> ▪ <i>After-school remote family learning support sessions</i> 		
Transition interventions <ul style="list-style-type: none"> - EAL friendly Pupil Voice - Additional visits with BSO if appropriate - Parent meetings - Briefing for transition lead 		✓
Parental engagement <ul style="list-style-type: none"> - BSOs available for translation and interpreting, e.g. review meetings - Regular contact with parents including parent consultations 		✓
Mother Tongue exam package <ul style="list-style-type: none"> - Identification of candidates through assessment of speaking, listening, reading, and writing - Mock and feedback - Three sessions for the speaking exam: familiarisation, mock and actual exam - <i>Cross-County remote support sessions for candidates</i> 		✓
Mother Tongue GCSE tuition up to 6 sessions for each candidate		✓
Twice yearly planning and Review meetings with EAL Lead in school <ul style="list-style-type: none"> - Analysis of EAL register - Progress of supported pupils - Requests for CPD - Feedback and evaluation of service - Agree priorities 		✓
Pupil Ambassador programme for primary schools <ul style="list-style-type: none"> - Training for school EAL Lead on setting up package - Guidance on Ambassador-partner sessions 		✓
Support for EAL CYP with additional needs <ul style="list-style-type: none"> - Support with assessing additional needs - BSO supporting with safeguarding concerns 	✓	✓
Additional interventions on a traded basis Teacher BSO	£200 per half day £38/hr	

Model 2: Full package 100% / Advisory package 25% / Subscription

Overview

In this model schools and academies can opt for three levels of service:

- 100% of their allocated EAL funding, with a two-year commitment. This offer is the same as the current offer to pooling LA schools. Schools experiencing higher levels of need at any time due to large numbers of new arrivals or pupils/families with higher levels of need will be given priority for extra support, within service capacity.
- 25% of school EAL allocation for an 'advisory' service. There is no direct teaching or BSO support included in the 25% model. Schools may request teacher or BSO interventions and the service would endeavour to source teachers and BSOs as required for purchase.
- A flat rate subscription which gives the opportunity to trade with the Service.

Support in *blue italics* has been added due to service development during the pandemic period.

The offer

	Subscription Primary *£1000 Secondary £1500	Advisory service 25%	Full service 100%
Access to a selection of advice, guidance, and model policy documents on czone and access to a traded service from EALS	✓	✓	✓
Access to all EALS resource areas on the Services to Schools website		✓	✓
<i>Access to the Good for EAL: Good for All offer of training and teaching resources</i>		✓	✓
EALS newsletter issued three times a year		✓	✓
Advisory meetings/email advice for school staff, including teaching staff, SENCOs, and Exams Officers		✓	✓
Central or bespoke in-school training for individual schools or clusters		✓	✓
<i>Access to remote training and advice sessions, mentoring, co-planning sessions and Q&A drop-ins, delivered on MS Teams</i>		✓	✓
Initial Assessments of pupils, including recommendations and advice		✓	✓
Classroom observations		✓	✓
Support with home-school liaison		✓	✓
<i>The opportunity to take part in EALS events, e.g. The Val Larkin dual language Writing Competition</i>	✓	✓	✓
New Referrals package for all new referrals Following initial assessments: <ul style="list-style-type: none"> - Bespoke intervention delivered by teachers and/or BSOs - Review of progress and access to further interventions as agreed 			✓

<p>Extended interventions as appropriate and in liaison with school EAL Lead, for example</p> <ul style="list-style-type: none"> ▪ Advanced learners exam preparation booster packages ▪ Focussed support on an area of language, e.g. writing, vocabulary, grammatical accuracy ▪ <i>Remote support sessions with a Bilingual Support Officer to help with in-school or home learning</i> ▪ <i>Remote teaching sessions delivered by an EALS teacher with a BSO</i> ▪ <i>After-school remote family learning support sessions</i> 			✓
<p>Transition interventions</p> <ul style="list-style-type: none"> - EAL friendly Pupil Voice - Additional visits with BSO if appropriate - Parent meetings - Briefing for transition lead 			✓
<p>Parental engagement</p> <ul style="list-style-type: none"> - BSOs available for translation and interpreting, e.g. review meetings - Regular contact with parents including parent consultations 			✓
<p>Mother Tongue exam package</p> <ul style="list-style-type: none"> - Identification of candidates through assessment of speaking, listening, reading, and writing - Mock and feedback - Three sessions for the speaking exam: familiarisation, mock and actual exam - <i>Cross-County remote support sessions for candidates</i> 			✓
<p>Mother Tongue GCSE tuition up to 6 sessions for each candidate</p>			✓
<p>Twice yearly planning and Review meetings with EAL Lead in school</p> <ul style="list-style-type: none"> - Analysis of EAL register - Progress of supported pupils - Requests for CPD - Feedback and evaluation of service - Agree priorities 			✓
<p>Pupil Ambassador programme for primary schools</p> <ul style="list-style-type: none"> - Training for school EAL Lead on setting up package - Guidance on Ambassador-partner sessions 			✓
<p>Support for EAL CYP with additional needs</p> <ul style="list-style-type: none"> - Support with assessing additional needs - BSO supporting with safeguarding concerns 		✓	✓

Additional interventions on a traded basis			
Teacher	£300 per half day	£200 per half day	
BSO	£48/hr	£38/hr	

*For smaller primary schools it may be cheaper and better value to select an Advisory Package rather than a flat rate subscription.

Model 3: Subscription only

Overview

In this model schools and academies can opt for a flat rate subscription which gives the opportunity to trade with the Service.

Please note that there would need to be a significant level of buy-in for this model in order for the service to be able to deliver the full range of traded offer.

Support in *blue italics* has been added due to service development during the pandemic period.

The offer

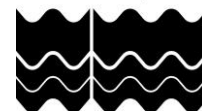
	Subscription Primary £1200 Secondary £1700
Access to a selection of advice, guidance, and model policy documents on czone and access to a traded service from EALS	✓
Access to all EALS resource areas on the Services to Schools website	
<i>Access to the Good for EAL: Good for All offer of training and teaching resources</i>	
EALS newsletter issued three times a year	
Advisory meetings/email advice for school staff, including teaching staff, SENCOs, and Exams Officers	
Central or bespoke in-school training for individual schools or clusters	
<i>Access to remote training and advice sessions, mentoring, co-planning sessions and Q&A drop-ins, delivered on MS Teams</i>	
Initial Assessments of pupils, including recommendations and advice	
Classroom observations	
Support with home-school liaison	
<i>The opportunity to take part in EALS events, e.g. The Val Larkin dual language Writing Competition</i>	✓
New Referrals package for all new referrals Following initial assessments: <ul style="list-style-type: none"> - Bespoke intervention delivered by teachers and/or BSOs - Review of progress and access to further interventions as agreed 	
Extended interventions as appropriate and in liaison with school EAL Lead, for example <ul style="list-style-type: none"> ▪ Advanced learners exam preparation booster packages ▪ Focussed support on an area of language, e.g. writing, vocabulary, grammatical accuracy ▪ <i>Remote support sessions with a Bilingual Support Officer to help with in-school or home learning</i> ▪ <i>Remote teaching sessions delivered by an EALS teacher with a BSO</i> ▪ <i>After-school remote family learning support sessions</i> 	
Transition interventions <ul style="list-style-type: none"> - EAL friendly Pupil Voice - Additional visits with BSO if appropriate 	

<ul style="list-style-type: none"> - Parent meetings - Briefing for transition lead 		
Parental engagement <ul style="list-style-type: none"> - BSOs available for translation and interpreting, e.g. review meetings - Regular contact with parents including parent consultations 		
Mother Tongue exam package <ul style="list-style-type: none"> - Identification of candidates through assessment of speaking, listening, reading, and writing - Mock and feedback - Three sessions for the speaking exam: familiarisation, mock and actual exam - <i>Cross-County remote support sessions for candidates</i> 		
Mother Tongue GCSE tuition up to 6 sessions for each candidate		
Twice yearly planning and Review meetings with EAL Lead in school <ul style="list-style-type: none"> - Analysis of EAL register - Progress of supported pupils - Requests for CPD - Feedback and evaluation of service - Agree priorities 		
Pupil Ambassador programme for primary schools <ul style="list-style-type: none"> - Training for school EAL Lead on setting up package - Guidance on Ambassador-partner sessions 		
Support for EAL CYP with additional needs <ul style="list-style-type: none"> - Support with assessing additional needs - BSO supporting with safeguarding concerns 		
Additional interventions on a traded basis	Teacher	£320 per half day
	BSO	£52/hr

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	Levels of buy-in		
	Subscription	Advisory service 25%	Full service 100%
Models offering each level of buy-in	Model 1 N/A Model 2 £1000/£1500 Model 3 £1200/£1700	Model 1 Model 2 Model 3 N/A	Model 1 Model 2 Model 3 N/A
Access to top-ups	Model 2 Teacher interventions £300/ half day BSO £48/hr Model 3 Teacher interventions £320/ half day BSO £52/hr	Teacher interventions £200/half day BSOs £38/hr	All services included. No need for top-ups
Access to a selection of advice, guidance, and model policy documents on czone and access to a traded service from EALS	✓	✓	✓
Access to all EALS resource areas on the Services to Schools website		✓	✓
<i>Access to the Good for EAL: Good for All offer of training and teaching resources</i>		✓	✓
EALS newsletter issued three times a year		✓	✓
Advisory meetings/email advice for school staff, including teaching staff, SENCOs, and Exams Officers		✓	✓
Central or bespoke in-school training for individual schools or clusters		✓	✓
<i>Access to remote training and advice sessions, mentoring, co-planning sessions and Q&A drop-ins, delivered on MS Teams</i>		✓	✓
Initial Assessments of pupils, including recommendations and advice		✓	✓
Classroom observations		✓	✓
Support with home-school liaison		✓	✓
<i>The opportunity to take part in EALS events, e.g. The Val Larkin dual language Writing Competition</i>	✓	✓	✓
New Referrals package for all new referrals Following initial assessments: <ul style="list-style-type: none"> - Bespoke intervention delivered by teachers and/or BSOs - Review of progress and access to further interventions as agreed 			✓
Extended interventions as appropriate and in liaison with school EAL Lead, for example <ul style="list-style-type: none"> ▪ Advanced learners exam preparation booster packages ▪ Focussed support on an area of language, e.g. writing, vocabulary, grammatical accuracy ▪ <i>Remote support sessions with a Bilingual Support Officer to help with in-school or home learning</i> ▪ <i>Remote teaching sessions delivered by an EALS teacher with a BSO</i> 			✓

<ul style="list-style-type: none"> ▪ <i>After-school remote family learning support sessions</i> 			
Transition interventions <ul style="list-style-type: none"> - EAL friendly Pupil Voice - Additional visits with BSO if appropriate - Parent meetings - Briefing for transition lead 			✓
Parental engagement <ul style="list-style-type: none"> - BSOs available for translation and interpreting, e.g. review meetings - Regular contact with parents including parent consultations 			✓
Mother Tongue exam package <ul style="list-style-type: none"> - Identification of candidates through assessment of speaking, listening, reading, and writing - Mock and feedback - Three sessions for the speaking exam: familiarisation, mock and actual exam - <i>Cross-County remote support sessions for candidates</i> 			✓
Mother Tongue GCSE tuition up to 6 sessions for each candidate			✓
Twice yearly planning and Review meetings with EAL Lead in school <ul style="list-style-type: none"> - Analysis of EAL register - Progress of supported pupils - Requests for CPD - Feedback and evaluation of service - Agree priorities 			✓
Pupil Ambassador programme for primary schools <ul style="list-style-type: none"> - Training for school EAL Lead on setting up package - Guidance on Ambassador-partner sessions 			✓
Support for EAL CYP with additional needs <ul style="list-style-type: none"> - Support with assessing additional needs - BSO supporting with safeguarding concerns 		✓	✓



Agenda Item 5

Report to: Schools Forum

Date: 19th March 2021

Title of Report: DfE Funding Formula Consultation - Sparsity Factor

By: Ed Beale, School Funding Manager

Purpose of Report: To update Schools Forum on the recently issued DfE consultation for the Sparsity Factor for 2022/23.

Recommendation: Schools Forum are asked to note that a consultation has been issued, by the DfE, in relation to the Sparsity factor for 2022/23

1. Background

1.1 The School National Funding Formula contains a number of funding factors, one of which is a Sparsity Factor. One of the main aims of this factor is to provide some additional funding to small rural schools.

1.2 The current criteria for schools to be eligible for this funding is:

- The average year group size is below the appropriate year group threshold. This threshold is 21.4 for primary schools, 120 for secondary schools and 62.5 for All Through Schools
- and
- For all the pupils for whom it is the nearest compatible school, the average distance (currently calculated 'as the crow flies', using straight-line distances) from each pupil's home postcode to their second nearest compatible school is equal to or more than three miles (for secondary schools) or two miles (for all other schools).

2 The Consultation

2.1 The DfE have issued a consultation that is reviewing the Sparsity factor, in preparation for financial year 22/23, with a view to broadening the reach of the sparsity factor to a greater number of small schools. The consultation is open to Local Authorities, Schools and other interested parties.

2.2 To achieve this, there are two proposals being put forward:

- To begin measuring sparsity distances by road journeys rather than 'as the crow flies' distances as this is considered to better reflect the actual distance between schools, particularly in rural locations.
- To increase the maximum sparsity factor values by £10,000 across all phases in the 2022/23 schools national funding formula (NFF).

2.3 Currently, there are only 13 Primary Schools in East Sussex who receive Sparsity funding. Under the new proposals, this would potentially increase to 36. For the Secondary Phase, there would be no change, with the two eligible schools continuing to be funded.

2.4 Appendix A is a copy of the consultation document, and it can also be found using the below link:

<https://consult.education.gov.uk/funding-policy-unit/schools-nff-changes-to-sparsity-factor-2022-23/>

2.5 Please note that the consultation runs from 2 March 2021 to 9 Apr 2021.

3 Next Steps:

3.1 The outcome will be published in the summer, and an update will then be given at Schools Forum.



Department
for Education

Schools NFF: Proposed changes to sparsity funding from 2022-23

Government consultation

Launch date 02 March 2021

Respond by 09 April 2021

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Introduction

The government remains committed to its mission to level up the education system so that every child, whatever their background and wherever they live in the country, can benefit from the great education they deserve. We are backing that commitment with the largest cash boost for schools in a decade. Core school funding is increasing by £2.6bn in 2020-21, £4.8bn in 2021-22 and £7.1bn in 2022-23, compared to 2019-20.

Alongside this funding, we know it is vital to ensure resources are directed where they are needed most by maintaining and improving the schools National Funding Formula (NFF). The introduction of the NFF in 2018-19 has already made the funding system fairer, allocating funding based on schools' and pupils' needs and characteristics – not accidents of geography and history. We continue to keep the formula under review, so that it is responsive to schools' financial challenges and evidence of their needs.

One group of schools that evidence suggests and that we have heard are facing particular financial challenges are small, remote schools. We recognise the vital role that such schools play in the rural communities they serve and that without them pupils could face long travel distances to school. We have considered ways to continue to improve how the funding system supports such schools, building on our public commitment to do more to support this group of schools and on increased funding through the NFF's sparsity factor from 2021-22. The purpose of this consultation is to seek views on how we propose to provide additional support to small, remote schools through further changes to the NFF's sparsity factor in 2022-23.

Receiving views on these proposals is particularly important in light of the government's long-term plans to move to a 'hard' NFF, where schools' budgets will be determined on the basis of a single national formula. We recognise that the move to a 'hard' NFF is a significant one, which will need to occur over enough time to ensure that this important change can be introduced smoothly. In the coming months we will launch a consultation on how we propose to move, over time, to a hard NFF. The 'soft' NFF, where local authorities design local funding formulae within certain parameters, will remain in place for 2022-23.

Who this is for

- Local authorities
- Schools
- Any other interested organisations and individuals

Issue date

The consultation was issued on 02 March 2021.

Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team on:

- SparsityFactor.CONULTATION@education.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by email: Consultations.Coordinator@education.gov.uk or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

The response

The results of the consultation and the Department's response will be [published on GOV.UK](#) in summer 2021.

About this consultation

This consultation makes a number of proposals:

- To begin measuring sparsity distances by road journeys rather than ‘as the crow flies’ distances, to better reflect the actual distance between schools, particularly in rural locations.
- To increase the maximum sparsity factor values by £10,000 across all phases in the 2022-23 schools national funding formula (NFF).

The first part of the document sets out:

- Existing support for small and remote schools in the schools NFF.

The subsequent parts of the document set out:

- The overarching aim of further increasing support to small, remote schools in the schools NFF.
- Our specific proposals to achieve this.
- The technical design of the newly proposed sparsity distance measure, by road journeys.

We would like to hear your views on our proposals.

Respond online

To help us analyse the responses please use the online system wherever possible. Visit www.education.gov.uk/consultations to submit your response.

Other ways to respond

If, for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may download a word document version of the form and email it or post it.

By email

- SparsityFactor.CONULTATION@education.gov.uk

By post

Peter Stopford
Department for Education
Sanctuary Buildings
Great Smith Street

London
SW1P 3BT

If you do need to respond by email or post, please inform us of your name, organisation and role. Please also refer to Annex E to inform us whether you want all, or any part of, a response to be treated as confidential.

Deadline

The consultation closes on 09 April 2021.

Section 1. Current support for small and small and remote schools in the NFF

The NFF recognises that small schools have unavoidable fixed costs but do not necessarily have the same opportunities as other schools to grow and increase revenue, which is largely based on pupils and their characteristics. Therefore, the NFF provides a lump sum (£117,800 in 2021-22), which is a minimum amount of funding that every school attracts irrespective of the number of pupils on roll or its pupils' characteristics. This is particularly beneficial for small schools, to guarantee a certain level of income that is not determined by size.

The NFF also recognises additional financial challenges faced by small schools in rural areas, due to such schools' particularly limited opportunities to attract more pupils, or to achieve efficiencies (e.g., shared senior leadership teams) and hold down costs compared to similar sized schools in less remote areas. In addition, such schools often play a significant role in the communities they serve and educate pupils who might otherwise have to travel unreasonably long distances to attend school. Therefore, the NFF allocates additional funding beyond the lump sum to small schools in rural areas through the 'sparsity factor'.

Eligibility for additional funding through the sparsity factor is determined by a school's size and remoteness. A school attracts sparsity funding if:

- Its average year group size is below the appropriate year group threshold. This threshold is 21.4 for primary schools, 69.2 for middle schools, 120 for secondary schools and 62.5 for all-through schools; and
- For all the pupils for whom it is the nearest compatible school¹, the average distance (currently calculated 'as the crow flies', using straight-line distances) from each pupil's home postcode to their second nearest compatible school² (the sparsity distance) is equal to or more than three miles (for secondary schools) or two miles (for all other schools).

Since the introduction of the NFF in 2018-19, the number of schools eligible for sparsity funding ('sparse' schools) has remained broadly the same. In the 2021-22 NFF approximately 1,200 schools are eligible to attract sparsity funding, 90% of which are primary schools. The number of sparse schools can change each year due to: incoming pupil cohorts living in different locations than outgoing pupil cohorts, resulting in changes to schools' sparsity distances; schools opening, closing, or changing location; or where schools' average year group sizes change.

¹ A compatible school is one that admits pupils of the same age group and gender.

² Selective grammar schools are not considered when identifying the second nearest school; faith schools are.

For 2021-22, we have increased the maximum amount that each eligible school can attract through the NFF's sparsity factor from £26,000 to £45,000 for primary schools, and from £67,600 to £70,000 for secondary schools. As a result, the total amount allocated through the sparsity factor is rising to £42m in 2021-22 – an increase of £16m, or 62%, from 2020-21. The average sparse school, across both phases, will attract almost £35,000 through the sparsity factor in 2021-22, a significant increase from £21,000 in 2020-21.

The amount each sparse school attracts through the sparsity factor is determined by its size – the smaller the school (in terms of average group size), the greater its allocation, up to the maximum sparsity factor values in 2021-22 of £45,000 for sparse primary schools and £70,000 for sparse secondary, middle and all-through schools. We calculate a sparsity weighting for each school that is eligible for sparsity funding, which sets the proportion of the maximum sparsity sum for which that school is eligible (see Annex A for a fuller explanation).

Our decision to increase the level of funding to small, remote schools in 2021-22 was driven by evidence – published data on deficits and school closures indicates that this group of schools are likely to require additional support. Such evidence has been corroborated by what we have heard about the financial challenges of such schools from stakeholders, including the National Association of Head Teachers, the Church of England Education Office and Catholic Education Service, and in response to our consultation on mandatory minimum per pupil funding levels in 2019. Our decision to prioritise a significant increase at primary phase was in recognition that almost 90% of sparse schools are primaries, and that the average sparse primary school receives less revenue funding based on pupil numbers or characteristics than a typical sparse secondary school.

Under the 'soft' NFF, the sparsity factor is currently optional in local authorities' funding formulae. Where the sparsity factor is used, its design can be changed in local formulae by setting different factor values³ (in the same way, local authorities can set different values to the NFF for the lump sum) and/or by using a different type of weighting⁴. In addition, a small number of requests have been approved to allow local authorities to provide more for very small sparse secondary schools and/or a different sparsity distance where the 'crow flies' distance significantly misrepresents a school's remoteness.

³ In 2020-21, 51 of 54 authorities with sparse schools used the sparsity factor and 43 set similar factor values to the NFF's, 38 of which set the exact same values. In local formulae, these can be set between £0 and £100k.

⁴ Local authorities can use the NFF's sparsity weighting calculation or a different weighting: a continuous taper or fixed amount (see Annex A for more information).

Section 2. Increased support for small, remote schools

To build on the increased sparsity factor values that will be introduced from 2021-22, we aim to broaden the reach of the sparsity factor to a greater number of small schools serving rural communities from 2022-23. This is to increase the support for schools that are currently not identified as being sparse in the NFF, many of which are marginally below the factor's distance thresholds, but that are likely to face similar financial challenges to those that are.

Of all primary schools that are not sparse in the 2021-22 NFF, 282 that are small (measured against the sparsity factor's size threshold) are between 0 to 0.2 miles below the distance threshold and 324 are between 0.21 and 0.4 miles below. A further 366 primary schools are between 0 and 0.4 miles away but are not currently small. Of all non-sparse secondary schools, 9 small schools are between 0 to 0.3 miles below the threshold and 12 are between 0.31 and 0.6 miles below. A further 130 secondary schools are between 0 and 0.6 miles away but are not currently small.

Therefore, 1,123 primary and secondary schools are no more than two-tenths of a mile below their respective sparsity distance thresholds in the 2021-22 NFF. Of this group, 56%, or 627, are also small, measured against the sparsity factor's average year group size thresholds, and 19% are small enough to have received the maximum sparsity factor value had they been eligible for sparsity funding. In contrast, 786 primary and secondary schools are within two-tenths above the sparsity distance thresholds, 482 of which are also small.

This data highlights that there are a significant number of schools narrowly below the distance thresholds, and more than the number narrowly above them. This demonstrates that many schools are missing out on funding through the sparsity factor despite being likely to face similar challenges to schools that are currently eligible. Our aim, to broaden the reach of the sparsity factor, would see small schools that are currently just below the distance thresholds receive greater levels of support through the NFF.

We intend to achieve this aim by improving the methodology used to identify remote schools. Our proposal is to begin measuring sparsity distances by road journeys rather than 'as the crow flies', which will better reflect the actual distance between schools and help us to identify schools that warrant extra support more accurately (more detail in Section 3). To illustrate the impact of this change, we have measured schools' sparsity distances by the road using the same data as in the 2021-22 NFF. This would have seen approximately 900 more schools become eligible for sparsity funding (see the 'sparsity consultation data tables' spreadsheet for a full list), which means 54% of total

small schools would have been eligible – up from 30% under the current distance measure.

Areas that would have seen the greatest increase in the number of sparse schools are largely those with many small schools currently close to the thresholds, and where the new measure will have more of an impact on schools' sparsity distances due to road journeys being significantly longer than 'crow flies' journeys.

Q1a. Do you support our aim to allocate sparsity funding to a greater number of small schools in rural areas?

Yes, No, Unsure.

Q1b. Do you agree to us targeting additional sparsity funding to roughly 900 more schools nationally than at present?

Target a greater number, This is about the right number, Target a lower number, Unsure.

Section 3. The design of the sparsity factor in 2022-23

To improve how we identify sparse schools in the NFF, we propose measuring sparsity distances by road journeys from 2022-23. The purpose of this is to better reflect actual journeys that pupils would be likely to take to their closest and second closest schools. This will help to identify remote schools more accurately and fairly compared to the ‘crow flies’ distance measure which can underestimate remoteness, particularly in rural areas where straight-line distances do not typically reflect actual journeys. A detailed explanation of the new distance measure is in Section 4.

While sparsity distances can only be a proxy for remoteness and additional financial challenges, we recognise the need for as accurate and fair a measure as is reasonably possible. This is to ensure that sparsity distances are a good indicator of greater need and that the schools NFF is distributing funding where extra resource is most likely to be needed. This proposal addresses comments made by some respondents in the original consultation on the introduction of the NFF, which called for a more accurate measure to reflect actual travel times.

We propose maintaining the same distance thresholds as in 2021-22: two miles for primary, middle, and all-through schools and three miles for secondaries. Therefore schools with sparsity distances calculated by the road that meet or exceed these thresholds and that are small, according to the sparsity factor’s average year group size thresholds, would be eligible for sparsity funding in 2022-23. Given road-based sparsity distances between two points are always greater than straight-line-based sparsity distances, we would see an overall increase in the number of schools eligible for sparsity funding – there are nevertheless a very small number of exceptions to this because of the way the new methodology is calculated.⁵ As in previous years, schools that are sparse one year but not the next – due to changes in methodology or changes in schools’ and/or pupils’ locations, and/or average year group size – would be protected from losses through the funding floor (or ‘minimum funding guarantee’). We also propose keeping the definition of a small school the same in 2022-23 as in 2021-22.

In addition to improving the sparsity distance measure, we propose further increasing the maximum sparsity factor values by £10,000 across all phases in the 2022-23 NFF. When coupled with the lump sum, a £10,000 increase in the sparsity factor values would mean sparse primary and secondary schools could attract up to £172,800 and

⁵ There are some exceptions that explain why a school’s sparsity distance could decrease due to the new measure. Firstly, some pupils will have different closest schools under the road measure compared to the ‘crow flies’ measure. As each school’s sparsity distance is based on *the pupils for whom it is their closest school*, changes in pupils’ closest schools will in turn affect sparsity distances. Secondly, use of Ordnance Survey datasets has enabled us to measure distances from schools’ exact property locations, rather than the centre of their postcodes as under the ‘crow flies’ measure. Therefore the new measure is not necessarily starting or ending at the exact same point as the existing one. Thirdly, a very small minority of pupil postcodes that would have been included in the existing measure will be omitted (explained in section 4).

£197,800 respectively through these two factors, before taking account of funding based on pupils and their characteristics, or any increase to the lump sum in 2022-23. This represents increases of 28% and 13% respectively to the value of the combined lump sum and maximum sparsity factors since the NFF was introduced in 2018-19, and almost exceeds the maximum lump sum that was included in local funding formulae before the introduction of the NFF. From 2023-24, further increases to the sparsity factor values, beyond the additional £10,000 increase in 2022-23, would be considered in the round alongside other factors.

Based on our illustration of the impact of these changes, measuring sparsity distances by the road and increasing the maximum sparsity factor values by £10,000, the total amount allocated through the sparsity factor would have increased by £43m to £85m. This would result in significant amounts of additional funding and support for sparse schools. This is without having an excessive impact on the increases that will be affordable to the values of factors concerning pupils' characteristics – given the additional spend represents a low proportion of the total Schools Block value in 2021-22. We think this achieves a good balance between better supporting small, remote schools, helping to ensure that pupils in rural areas have access to local provision within reasonable travel distances, while enabling us to continue to allocate the great majority of overall funding based on pupils' characteristics to direct resources to those that evidence suggests require the greatest level of extra support.

We do not propose changing local flexibilities regarding the sparsity factor, outlined in section one, in 2022-23. This is in recognition of the need to transition to a hard NFF smoothly. Furthermore, we do not propose changing local authorities' ability to make disapplication requests regarding sparsity distances in 2022-23. While local authorities would no longer need to submit requests for schools where road distances would have been significantly higher than those measured 'as the crow flies', they will be able to submit evidence to request to change the distance for a school where they believe it should be significantly higher than those that we provide by the road. We are not expecting this to be necessary, but recognise the merit in keeping the option for such requests open while moving to the new measure.

In addition, local authorities will still be able to provide more for very small sparse secondary schools as per the schools revenue funding operational guidance. We are considering how additional sparsity funding for particularly small and/or particularly remote schools, which evidently and objectively warrant greater support beyond maximum sparsity values, could be implemented in the national formula in future years, beyond 2022-23. We welcome any early views on this.

Q2a. Do you agree with our plan to measure sparsity distances by the road?

Strongly agree, Agree, Disagree, Strongly Disagree, Unsure.

Q2b. Do you agree with our plan to maintain the same sparsity factor distance thresholds as in 2021-22?

Set higher thresholds, These are the right thresholds, Set lower thresholds, Unsure.

Q2c. Do you agree with our proposed increase to the primary and secondary maximum sparsity factor values of £10,000?

Allocate a higher amount, This is about the right amount, Allocate a lower amount, Unsure.

Q2d. Do you have any further comments regarding the design of the schools NFF sparsity factor from 2022-23?

Section 4. Measuring sparsity distances by the road

This section describes the methodology that we have used to calculate sparsity distances by road journeys in more detail.

Sparsity distances are currently calculated using straight-line, or ‘as the crow flies’, distances from pupils’ postcodes to schools’ postcodes. School and pupil data, including postcodes, is provided to us through regular autumn census returns and Get Information About Schools (GIAS) (Annex B.1) and used to calculate funding allocations (Annex C). As postcodes tend to cover a number of different properties, we use postcode ‘centroids’ to set the specific points that are measured to and from in our ‘as the crow flies’ distances. Centroids are the centre of the properties within the postcode area (henceforth, when referring to distances to or from postcodes, we are referring to postcode centroids). We then, for each school, identify the pupils who live nearest to it and for whom it is compatible, and calculate the average distance to their second nearest compatible schools. This is each school’s sparsity distance.

We propose calculating sparsity distances by the shortest distance by the road from schools’ properties – not the centroid of their postcode, as at present – to pupils’ postcodes. Where schools’ properties cannot be exactly identified (see paragraph on UPRNs below), we propose reverting to measuring from schools’ postcodes to pupils’ postcodes, by the shortest road distance. We would continue to use the same school and pupil-level data as at present. This is except for the omission of some pupil-level data necessitated by the new methodology, which would have been included in the existing methodology (explained on page 15). A school’s sparsity distance would still be based on the average distance from nearest pupils’ postcodes to second nearest compatible schools. The only component we are proposing to change and seeking to improve is the method to calculate distances.

The new method involves us calculating actual distances from two points on the road network that are closest to schools’ properties or postcodes and pupils’ home postcodes. We consulted with the national mapping agency, Ordnance Survey (OS), about data to enable us to achieve this, and have used one OS dataset on addresses and one on the road network (see Annex B.1 for more information). To identify the points on the road network, we firstly have to identify schools’ and pupils’ locations on a map. To do this we cross-reference geographic data from the school census and GIAS with the OS address data.

Schools can typically be located using Unique Property Reference Numbers (UPRNs). UPRNs are a unique numeric identifier for every addressable location, which are allocated and overseen by local authorities. Use of UPRNs represents a change to the current process, enabling us to measure distances from a point on the road closest to a school’s specific site as opposed to the coordinates of their postcode centroids, which can be more or less further away from the actual school site for different schools. In a

minority of cases, UPRNs are inaccurately recorded in GIAS by schools, so we revert to use of postcodes or coordinates to locate schools. The GIAS frequently asked questions [webpage](#) includes information on how schools can check their UPRNs and correct them if necessary.

For pupils, we locate the closest building to the coordinates of their home postcode centroids. This is the same point that we measure to at present. Locating the building is a necessary additional step to enable us to determine the correct road to route from. Using pupils' postcode centroids, rather than full addresses and actual properties (as for most schools), enables us to minimise sensitivity of data used. Measuring to pupils' full home addresses would be unlikely to affect a school's sparsity eligibility (as sparsity distances are averages) and sparsity distances are proxies of remoteness, so in this case postcode centroids are sufficient and use of pupils' full home addresses would be unjustified. We have not included pupils' postcodes that contain only Welsh or Scottish addresses in the calculation of sparsity distances by the road, because their closest or second closest school(s) might be in Wales or Scotland which we are unable to calculate a road distance for. And, in few cases, we are unable to locate pupils' postcodes in the mapping database, which is likely to be because they have been taken out of service. Roughly 0.3% of postcodes are omitted for one of these two reasons.

Once we have found schools' and pupils' locations, we use the OS road network data to identify the closest access point to their locations on a road. We then calculate the shortest road distance from the nearest point on a road to schools to the nearest point on a road to pupils, excluding footpaths. We have not factored in 'no-right turns' which would have had high additional complexity for, we think, limited impact – particularly in rural areas where sparse schools are most likely to be. Furthermore, we have treated one-way roads as ones that can be accessed and travelled along from either direction. This avoids treating some schools differently in an arbitrary way by factoring in one-way streets on journeys from schools and pupils' homes but not vice versa (because that is the direction of travel the sparsity distance has been based on). We have also assessed this to have a limited impact on sparsity distances and eligibility and to be suitable given sparsity distances are a proxy of remoteness. The complexity associated with factoring in 'no-right turns' or one-way streets could have resulted in the road distance measure not being ready in time to consult on for the 2022-23 NFF. If you foresee this causing particular issues, we welcome you letting us know of these in response to question 3a which we can consider in the design of the distance measure going forward.

Once we have calculated road distances, we calculate schools' sparsity distances in the same way as now: for each school, we identify pupils for whom it is their closest compatible school (by the road), and calculate the average distance to their second nearest compatible schools (by the road). We compare these distances to the distance thresholds of three miles (for secondary schools) or two miles (for all other schools), to determine whether the school is remote.

For the purpose of this consultation we have calculated new sparsity distances by the road (see the 'sparsity consultation data tables' spreadsheet for a full list) using data collected via the autumn (October) 2019 school census. This is so that new distances, by the road, can be compared with existing distances, 'as the crow flies', which were used for 2021-22 NFF allocations. These distances are illustrative and will not inform funding allocations. Rather road distances would be recalculated for the 2022-23 NFF based on up-to-date school- and pupil- level data in the autumn (October) 2020 school census. It is possible that a school is identified as being eligible for sparsity funding in the illustrative data tables published alongside this consultation, but not in the 2022-23 NFF due to one or a number of reasons why a school's sparsity distance can change year on year outlined on page 7. Nonetheless, this is a good indication of the scale of the changes we are proposing in this consultation and how many and which schools would have been eligible for sparsity funding had we measured distances by the road in the 2021-22 NFF.

We have rigorously quality assured the methodology and outputs published alongside this consultation. Should you however identify a sparsity distance for a school that you would have expected to be significantly different by the road, we welcome you letting us know in response to question 3a.

Q3a. Do you have any comments on our methodology to calculate sparsity distances by the road?

Q3b. We welcome any additional comments about our proposals and our equalities impact assessment (Annex D), including any evidence, examples, or data of possible equalities impacts of the proposals.

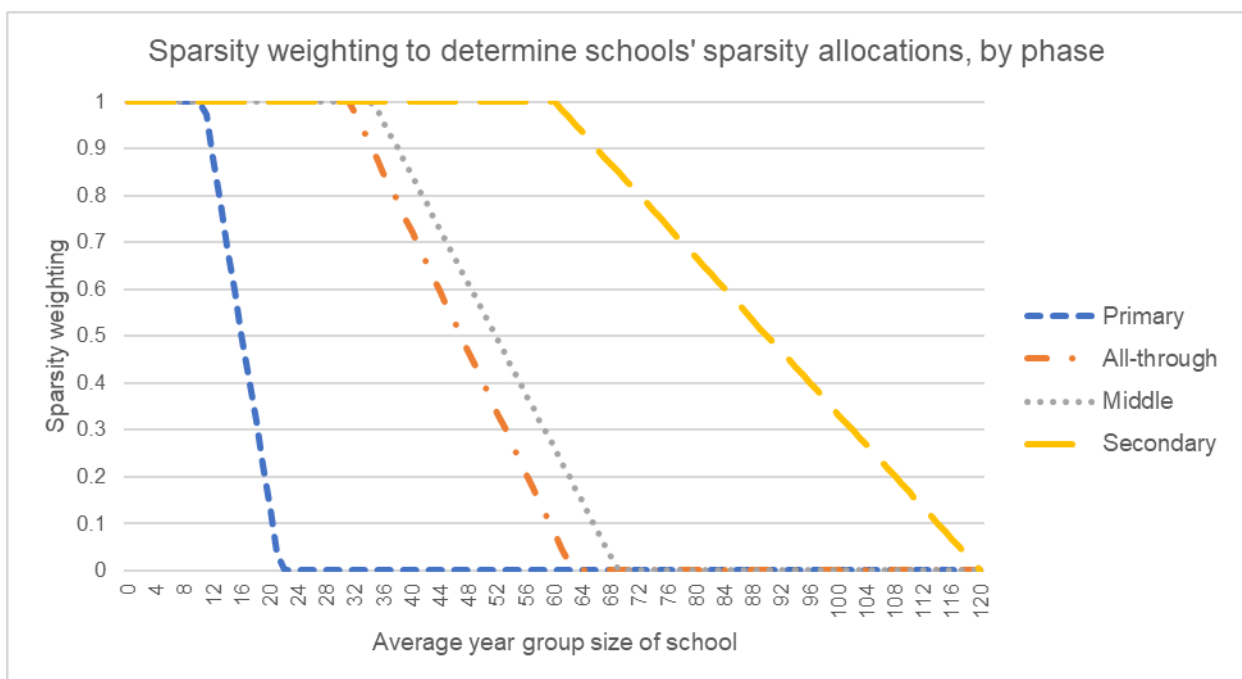
Annex

A. Sparsity factor weighting

We calculate a sparsity weighting for each school that is eligible for sparsity funding, which sets the proportion of the maximum sparsity sum for which each sparse school is eligible.

The sparsity weighting for schools with an average year group size of half the year group threshold or less is 100%. These sparse schools receive the full sparsity sum (£45,000 for sparse primaries, £70,000 for sparse secondaries, middle and all-through schools, in the 2021-22 NFF).

The sparsity weighting for schools with an average year group size greater than half the year group threshold but less than the year group threshold is between 99% and 1% (see diagram below). For example, a sparse school with an average year group size that is three quarters of the threshold attracts sparsity funding of half the maximum. The smaller a school's average year group size, the larger their sparsity weighting and proportion of the maximum sparsity sum they are eligible for.



Source: Schools block national funding formula: technical note October 2019

Local authorities can mirror the NFF's sparsity weighting calculation in local funding formulae, or use a 'continuous taper' or a 'fixed amount'. In the former, a school with an average year group size of exactly half the year group threshold would receive 50% of the maximum sparsity value, compared to 100% under the NFF's weighting. Schools with an average year group size of less than half of the year group threshold would

receive between 50% and 100% of the maximum value – the smaller the school the greater the allocation. The alternative ‘fixed amount’ weighting involves providing each sparse school the same amount through the sparsity factor. A third of local authorities that used a sparsity factor in 2020-21 opted to use one of these two weightings in their local funding formulae – half used the continuous taper, half the fixed amount.

B. Technical detail underpinning the sparsity road distance measure

B1. Data inputs

The new sparsity distance methodology has required two Ordnance Survey (OS) datasets to be used to enable distance calculations by the road. The first is 'AddressBasePlus'⁶ which enables properties to be located on a map with a variety of geographical information including UPRNs and postcodes. The second is the 'MasterMap Highways Network'⁷ which is a road network dataset which enables us to compute distances between schools and pupils via roads. Both were available under the Public Sector Geospatial Agreement (PGSA) between OS and the public sector⁸.

The new sparsity distance methodology uses the same school- and pupil- level data as at present for the 'as the crow flies' methodology. School data includes information about the school itself, e.g., its name, unique reference numbers and phase, collected via the school census, and geographic information collected via GIAS. The latter includes a school's UPRN (Unique Property Reference Number), postcode and co-ordinates (easting, northing). The former is provided to us by local authorities on behalf of maintained schools or by academy trusts on behalf of academies, and the latter is updated by schools themselves.

Pupil-level data includes anonymised information about pupils – their school year and gender – and home postcodes, all of which are collected via the school census. 'Home postcodes' are necessary to calculate distances and 'school year' and 'gender' are necessary to check for school compatibility. Using home postcodes rather than full addresses reduces the sensitivity of the data being used. Pupil-level data is taken from the regular autumn school census, provided by local authorities on behalf of schools and pupils.

Where a pupil's home postcode only includes Scottish or Welsh addresses it is omitted from the sparsity distance calculation. This is because the schools NFF calculates funding for schools in England, and pupils living in Scotland or Wales might have a closest or second closest school which is not in England, which we would be unable to calculate a distance to.

⁶ [Ordnance Survey Address Base Plus](https://www.ordnancesurvey.co.uk/business-government/products/addressbase) (<https://www.ordnancesurvey.co.uk/business-government/products/addressbase>)

⁷ [Ordnance Survey Master Map Highways Network](https://www.ordnancesurvey.co.uk/business-government/products/mastermap-highways-information) (<https://www.ordnancesurvey.co.uk/business-government/products/mastermap-highways-information>)

⁸ [Ordnance Survey Public Sector Geospatial Agreement](https://www.ordnancesurvey.co.uk/business-government/public-sector-geospatial-agreement) (<https://www.ordnancesurvey.co.uk/business-government/public-sector-geospatial-agreement>)

B2. Compatible schools

Selective grammar schools are not considered when identifying secondary pupils' second nearest compatible secondary schools because if their nearest schools were to close, they would not necessarily be able to attend the grammar school instead. Faith schools are included as they can only select a proportion of children on faith grounds when oversubscribed, so will typically be a viable alternative option.

B3. IT programme used to calculate distances

To calculate the sparsity road distances, we are using a PostgreSQL database and its associated geospatial analysis functionality. All data processing is undertaken internally and there is no third-party data sharing as part of the calculation process. We considered a third-party routing tool, such as Google Maps, but this would have required pupil postcode data to have been shared outside of the Department. Additionally it would have been a solution which we had far less control over financially or methodologically.

C. Lawful basis for collecting and using pupil data

The Department for Education (DfE) has a lawful basis for collecting and using data required to calculate sparsity distances under the Education Act 1996, School Standards and Framework Act 1998 and The School and Early Year Finance (England) Regulations 2021, for the specific and limited purpose of calculating school and local authority funding – in this case, to consult on changes to funding arrangements. The DfE's Information Charter sets the standards to be expected when DfE handles personal data.

Use of pupil-level data for this purpose should be made clear in schools' and local authorities' privacy notices, which explain how personal data is collected and used. Privacy notices should also detail how under The General Data Protection Regulation (GDPR) parents and pupils have the right to request access to information about them that we hold. More information is available at: [Data protection: how we share pupil and workforce data - GOV.UK \(www.gov.uk\)](https://www.gov.uk/data-protection-how-we-share-pupil-and-workforce-data).

Furthermore, under GDPR we were legally required to complete and receive approval for a Data Privacy Impact Assessment to assess privacy risks and liabilities when processing personal data to calculate new sparsity distances.

D. The Public Sector Equality Duty

The Equality Act 2010 identifies the following as protected characteristics for the public sector equality duty:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race (including ethnicity)
- Religion or belief
- Sex
- Sexual orientation

Under Section 149 of the Equality Act 2010, the Secretary of State is under a duty to have due regard to the need to:

a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;

b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, in particular the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it, in particular the need to:

- tackle prejudice, and
- promote understanding.

Consideration of the protected characteristics identified in the Equality Act 2010

This is an assessment, pursuant to the public sector equality duty, of the potential impact of these proposals. The Equality Act 2010 identifies eight protected characteristics, as set out above.

Our provisional assessment of the impact of these proposals on each protected characteristic is set out below. We have assessed the impact on children most likely to be affected by these proposals, within each protected characteristic, which is those living in rural areas. We will continue to collect data on the impact of these proposals, including quantitative data and from feedback received in response to this consultation, to build on this assessment.

- **Age:** no impact of these proposals is considered likely in relation to this protected characteristic. Sparsity funding will continue to be allocated fairly across all phases and we are proposing to increase the maximum sparsity factors by the same amount across all phases.
- **Disability:** these proposals are likely to have a positive impact on this protected characteristic. This is because sparsity funding will continue to support the viability of small schools in rural areas, which in turn helps to mitigate the risk of pupils having to travel unreasonably long distances to their next closest school. Access to local education is beneficial for all children, and is likely to be particularly so for pupils for whom long travel distances to school would be additionally challenging due to disabilities (e.g., physical disabilities).
- **Gender reassignment:** no impact of these proposals is considered likely in relation to this protected characteristic.
- **Pregnancy and maternity:** these proposals are likely to have a positive impact on this protected characteristic because access to local education mitigates the risk of having to travel long distances to a school, which could be particularly challenging for those who are pregnant or on maternity leave.
- **Race:** these proposals are likely to have more of a positive impact on some groups within this protected characteristic more than others. The 2011 census reports that “people from the Gypsy or Irish Traveller ethnic group (24.7%), and people identifying as White British (21.8%) or White Irish (10.0%) were most likely to live in a rural location”, whereas “people from Pakistani (99.1%), Bangladeshi (98.7%), and Black African (98.2%) backgrounds were most likely to live in an urban location”. A lower proportion of pupils from ethnic groups most likely to live in a rural location achieve expected progress across a number of

assessment metrics than the national average e.g., 43% and 42% of Gypsy/Roma and Irish Traveller respectively met the expected standard in phonics in year 1; pupils from the White British ethnic group made lower than average progress between 11 and 16 years old, measured by 'Progress 8'⁹. Improved financial support for schools in rural areas could in turn help to support the progress of such pupils.

As well as this possible positive impact, it is important to note that the proposals will not negatively impact pupils from ethnic groups that are less to be living in such areas. This is because the national funding formula will continue to direct money where additional resource is most likely to be required, and a significant percentage (17% in 2021-22) of overall funding will continue to be distributed on the basis of proxies of additional need, such as deprivation and low prior attainment, which a greater proportion of pupils in urban areas meet.

- **Religion or belief:** these proposals are likely to have a positive impact on this protected characteristic. This is because a significant proportion of rural schools are designated as Church of England or Catholic, so providing such schools extra financial support supports viability of local provision, including local faith-based provision.
- **Sex:** these proposals will not impact this protected characteristic. Sparsity distances will continue to be the average distance to a school's closest pupils' second closest *compatible* schools, which avoids assuming children could attend any of their nearby schools where this is not the case e.g., single-sex schools.
- **Sexual orientation:** no impact of these proposals is considered likely in relation to this protected characteristic.

We have also assessed the impact of these proposals on pupils from disadvantaged socioeconomic backgrounds. While small and remote schools have, on average, a lower proportion of pupils that meet proxies of additional need in the NFF compared to schools that are not small and remote, 11% of pupils across all small and remote schools in the 2021-22 NFF were eligible for FSM (compared to 17% of pupils across all other schools). Nonetheless, we have considered this statistic when designing these proposals and tried to come up with proposals that better support small, remote schools in an affordable way without resulting in less funding for proxies of additional need, including indicators of deprivation. We have tried to achieve this in two ways:

⁹ [Gov.uk data on pupils' results](https://www.ethnicity-facts-figures.service.gov.uk/education-skills-and-training) (<https://www.ethnicity-facts-figures.service.gov.uk/education-skills-and-training>)

- By providing additional support to small, remote schools, using an improved measure of remoteness, this extra funding is targeted to those most likely to face particular pressures and where second closest schools are furthest away; and
- Proposing to increase factor values by £10,000 will provide significant support for each individual, eligible school, but at an overall additional cost that will not necessitate reductions to other factor values, such as those for pupils meeting indicators of deprivation or low prior attainment.

Overall, these proposals provide a significant amount of additional support to small, remote schools, which is likely to, as indicated by this equalities impact assessment, have beneficial consequences for pupils with protected characteristics as well as pupils living in rural areas at large. And because we are proposing to achieve this in a targeted way, funding allocated on the basis of pupils' characteristics – no matter where pupils live – will not be impacted and the NFF will continue to allocate a significant proportion of funding on the basis of proxies of additional need.

E. Confidentiality

Information provided in response to consultations, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000, or the Environmental Information Regulations 2004.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Education will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 2018 and the UK GDPR, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Would you like us to keep your responses confidential?

Yes, No

If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential.



Department
for Education

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Department
for Education

Review of national funding formula for allocations of high needs funding to local authorities: changes for 2022-23

Consultation

Launch date: 10th February 2021

Respond by: 24th March 2021

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1. Introduction

- 1.1. We are inviting local authorities in England, schools and colleges, other interested organisations and individuals to respond to specific proposals for a small number of changes to the national funding formula that we will use to allocate high needs funding to local authorities in the 2022-23 financial year. We are also seeking views on some of the longer term changes to the formula that could be considered in future.
- 1.2. High needs funding allocations to local authorities are one aspect of the distribution of funding to schools, colleges and other organisations that make provision for children and young people with special educational needs (SEN), those who are disabled, and those who require alternative provision (AP) because their needs cannot be met in the school they would normally attend.
- 1.3. We are allocating significant increases in high needs funding – an additional £780 million in 2020-21, compared to 2019-20 funding levels, and a further £730 million in 2021-22, bringing the total allocated by the end of next year to over £8 billion. We are aware that many local authorities have in the past spent more on high needs than we have allocated, and therefore want to make sure that we are allocating high needs funding as appropriately and fairly as possible. This is the first stage of our planned review of the high needs national funding formula, first introduced for the allocations of funding to local authorities in 2018-19.
- 1.4. We are currently considering wider SEN and disability (SEND) and AP system changes that could be implemented in future years. The aim of the SEND review, 6 years on from the reforms inaugurated by the Children and Families Act 2014, is to make sure the system is consistent, high quality, sustainable, and integrated across education, health and care. Our AP reforms are intended to improve the behaviour, attendance and post-16 outcomes of young people in AP, and reduce the number who need to stay in that provision long term.
- 1.5. These broader reviews of the SEND system and AP arrangements are likely to have implications for the way that we allocate high needs funding. The pandemic has unavoidably delayed completion of this SEND Review, but our ambition is to publish the review's proposals for consultation in the spring of 2021. We are thinking hard about how best to time and structure that consultation so that families and professionals alike can fully participate and make their views known. But in the meantime, we are continuing to work closely with children, young people and experts across education, health and care to develop policy thinking. We then expect there to be a subsequent further consultation on changes to the distribution of high needs funding consequential on the review, which could be implemented

beyond 2022-23. The development of proposals for longer-term changes following the SEND review, however, does not preclude us from making immediate improvements to the high needs funding formula that we use for allocations in 2022-23. Indeed, we think that it is important to give the opportunity now for people to express views on the ways that we propose the formula is improved for 2022-23, especially given the pressures that local authorities are facing.

- 1.6. The questions we would like answers to are set out in a separate online survey. Please respond using this survey if possible, as other forms of response will not be as easy to analyse, although other formats will be available (see section 1.10). Before you respond to the online survey questions, please read the rest of this document. You do not have to answer all the questions, but in any case, it would be very helpful if you would answer the initial questions so we can see whether you are responding on behalf of a particular type of organisation, or from a specific local authority area in England.

Who this is for

- 1.7. This consultation is for:

- Local authorities
- Schools and colleges
- Any other interested organisations and individuals

Issue date

- 1.8. 10th February 2021

Enquiries

- 1.9. If your enquiry is related to the policy content of the consultation you can contact the team via email:

HighNeedsNFF.CONULTATION@education.gov.uk

If your enquiry is related to the DfE e-consultation website or the process in general, you can contact the DfE Ministerial and Public Communications Division by email:

Consultations.Coordinator@education.gov.uk or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

Additional copies

- 1.10. Additional copies are available electronically and can be downloaded from: [GOV.UK DfE consultations](#). Word or pdf versions of questions can exceptionally be made available on contact with HighNeedsNFF.CONSULTATION@education.gov.uk.

The response

- 1.11 The results of the consultation and the Department's response will be [published on GOV.UK](#) following analysis of the responses later in 2021.

2. About this consultation

- 2.1. This consultation is seeking views on possible changes to two specific factors in the high needs national funding formula, which is the formula the department uses to allocate funding to local authorities for children and young people with complex needs.
- 2.2. This national funding formula was first introduced, following extensive consultation, for the calculation of high needs funding allocations to local authorities in 2018-19. Before 2018-19, allocations had been based on each local authority's past spending, and the formula marked a significant and widely welcomed shift towards a fairer distribution of funding to local areas, based on the needs in those areas. Aware that the formula would need to adapt to changing circumstances, we undertook to review it to see if changes were needed after the first four years of its operation.
- 2.3. This first stage of consultation is to consider specific questions about improvements to the formula funding distribution that could be implemented for 2022-23, but which would not pre-empt wider and longer-term changes resulting from the current SEND review or AP reforms. We are also asking a couple of more general questions, the responses to which we hope will help us in taking forward any longer-term changes to the funding arrangements.
- 2.4. Following the 2019 call for evidence on the funding of provision for children and young people with SEND and those requiring AP, and subsequent representations we have received, we are clear that there are a number of other issues relating to the current funding arrangements, but which are not specifically about the national funding formula. For example, there are continuing questions about the expectation that mainstream schools meet the costs up to £6,000 of supporting a pupil with SEND from their core budget, the level of the £10,000 per place funding for special schools and the funding arrangements for young people with SEND in further education. Such issues will be addressed as part of the SEND review and in subsequent consultations.
- 2.5. In this consultation we are asking for views specifically about the way that high needs funding is allocated through the national funding formula, rather than about the overall level of funding. We have already announced that schools and high needs funding will amount to £7.1 billion in 2022-23, compared to 2019-20, and will be looking carefully at how much high needs funding is required nationally in subsequent years as part of the next government spending review.
- 2.6. Annex A sets out further information about the current high needs funding arrangements. Annex B provides further advice on the proposed changes to local authorities' allocations. Annex C sets out the

equalities impact of these proposals.

3. How we use historic levels of local authority expenditure in the funding formula

- 3.1. We know from previous research, carried out prior to the introduction of the current national funding formula, and from more recent data analysis, that the demand for SEND and AP provision varies considerably between areas because of local factors that are outside the direct control of local authorities. Similarly, the supply and pattern of specialist provision in each area varies considerably for a number of reasons, including decisions taken in the past, local authority boundaries and a range of other local factors. Local authorities can influence the demand for and supply of specialist provision, but some changes – such as the building of a new special school – often take several years to implement. The historic spend factor in the national funding formula is the main proxy we currently use for these local demand and supply constraints that can significantly affect local authorities' levels of spending on high needs.
- 3.2. The changes to this factor that we are considering, therefore, are intended to make sure that the funding formula better reflects such local factors that drive the costs of provision locally, and which take time to change.

Proposal to use actual expenditure from 2017-18

- 3.3. In the 2018-19 formula, and the formulae for subsequent years, we have calculated this lump sum element based on 50% of each local authority's planned expenditure on high needs in 2017-18, as reported by the authority for the purpose of establishing a baseline. Now that we have authorities' actual expenditure on high needs for that year, we can see how that has varied from the planning amounts originally submitted to the department. Annex B sets out that variation for each authority.
- 3.4. Actual expenditure on high needs in 2017-18 will be a better representation of past spending levels than the planned spending amounts we used in the initial years of the formula. We do not intend to update this factor on a regular basis using more recent data, as to do so would introduce an incentive on local authorities to spend more in order to attract more funding in future. We therefore propose to replace the current lump sum included in the formula calculation with an amount calculated on the basis of actual expenditure in 2017-18 reported by each local authority. If you wish to respond on this proposal, please answer question 1 on the online survey.

Increasing the proportion of actual expenditure from 2017-18

- 3.5. With the significant increases in high needs funding through the formula since 2018-19, the overall proportion of funding allocated through this factor has reduced considerably, down by 10 percentage points from 44% of funding in 2018-19 to 34% in the 2021-22 formula. Although some local authorities will have been able to make changes that have helped them spend within their high needs funding allocations, for others speed at which this funding has reduced, as a proportion of total high needs funding, will have been greater than the speed at which they have been able to make changes to local patterns of provision, so we are considering whether it would be appropriate to increase the proportion of funding through this factor.
- 3.6. One way of doing that would be to use more recent outturn data, but because we do not intend to use data from more recent years, as explained above, the alternative would be to increase the percentage of the 2017-18 actual expenditure amounts, from 50% to, say, 60%. This would increase the significance of this factor in the 2022-23 formula, reflecting a more gradual pace of change in the pattern of spending that it would be reasonable to expect from local authorities. As an illustration, if the percentage of actual expenditure had been set at 60% of 2017-18 spending levels, the historic spend factor would have made up 40% of the overall 2021-22 formula: a more modest four percentage point reduction since 2018-19.
- 3.7. We would therefore be grateful for views on the option of increasing the percentage of actual expenditure in 2017-18 included in the funding formula calculation. If you wish to respond on this, please answer question 2 on the online survey.

Finding an alternative to the historic spend factor

- 3.8. We are aware that using a past level of spend as a factor in the funding formula is not the perfect long term solution to how we reflect local issues in the funding arrangements. While historic spending reflects local circumstances that should be acknowledged in the funding distribution, it can also reflect aspects of the local system – such as where there is poor value for money – that should not be reinforced through funding allocations. Past levels of spending also reflect the situation in a local area as it was, and, over time, will cease to reflect current patterns of need or demand. Ideally, therefore, we would prefer to replace the historic spend factor with an alternative factor or factors, that better reflect these local issues, and are able to be kept up to date.
- 3.9. Research that was carried out prior to the introduction of the national

funding formula considered the reasons for the differences between spending patterns in local authorities. The research was conducted by the Isos Partnership¹ and reported that in any single area the factors which shaped spending on children and young people with SEND were both complex and multiple. At a higher level, however, they identified three main drivers at play, in addition to the local demographic context that determined underlying needs.

- 3.10. First, parental preference was considered a critical driver of the nature and quantity of different types of provision available in a local area, which shaped how and where money was spent. It was also noted that parental preference is influenced strongly by the quality of relationships and dialogue between parents, providers and authorities.
- 3.11. Second, in their research they found that the capacity and ability of all types of provider in a local area to provide high-quality education for children and young people with SEND, and the readiness of those providers to work together in support of a common endeavour to improve outcomes for all children and young people with SEND, had a significant bearing on how funding was distributed.
- 3.12. Finally, they concluded that the strategic decisions that local authorities make about how they will meet the needs of children and young people with SEND, the pattern of provision that they have, or will, put in place and the centrally commissioned support on offer, will affect how and how much money is spent.
- 3.13. We are considering how far we should reflect this local variation in provision and the consequent funding distribution, and the factors we would use. It is important that any factor we use instead of historic spending does not create perverse incentives: for example, to create more placements in special schools in order to gain more funding, when some of those pupils would make better progress if they were well supported in a mainstream school. Any factor would also need to be “fit for purpose” for use in a funding context: for example, that the data used are collected uniformly across the country, with robust assurance processes in place; and that the data set is relatively stable from year-to-year, so as not to subject local authorities to significant swings in their funding.
- 3.14. The earliest any alternative factors we might use would be introduced into the formula for allocations is 2023-24, following the SEND review and subject to later consultation. Nevertheless, we would be grateful for initial views on both the extent to which the funding formula should

¹See the link to the report written by Isos Partnership: [Research on funding for young people with special educational needs \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

reflect the local demand for and pattern of SEND and AP provision, and the factors we might use. If you wish to respond on this, please answer question 3 on the online survey.

4. Attainment data used in the funding formula

- 4.1. We use low attainment at the end of key stages 2 and 4 as two of the group of proxy indicators of SEND in the national funding formula, because there is a strong association between low attainment and some types of SEND. The formula calculation uses attainment data for pupils living in each local authority area, from the most recent 5 years of key stage 2 tests and GCSE exams (e.g. 2015 to 2019 test and exam results have been used in the formula we published in July 2020 for the 2021-22 allocations). For the 2022-23 funding formula we will not have 2020 key stage 2 test data, or GCSE exam results that would be appropriate to use for this purpose, because of the disruption caused by the pandemic.
- 4.2. We have considered using the same data from 2015 to 2019 as used in the 2021-22 formula, but this series would continue to include older data from before the changes to the tests and exams in 2016. So instead we propose to update the series using 5 years' data from 2016, and to substitute the most recent 2019 data in place of the missing 2020 attainment data.
- 4.3. In view of continuing disruption to the 2021 tests and exams, we are likely to need to take a similar approach in the 2023-24 funding formula, i.e. use the 2019 data in place of both 2020 and 2021 attainment data.
- 4.4. If you wish to give views on how we propose to address the absence of 2020 attainment data, please answer question 4 in the online survey. Section 5 gives further information about our plans for improving this and the other SEND and AP proxies in the formula.

5. Effective proxies for SEND and AP in the formula

- 5.1. Our future development of the funding system must support the outcome of the SEND review, and any changes to the AP arrangements. This is one of the reasons why we are limiting the scope of potential changes to the high needs funding formula for 2022-23, and planning another consultation, likely to be undertaken later in 2021, on further changes to the funding arrangements that will be needed following the SEND review.
- 5.2. As well as the historic spend and low attainment factors referred to in the previous sections, we currently use a measure of the local population of children and young people, two health and disability measures (the number of children in bad health and the number of families in receipt of disability living allowance) and two deprivation indicators (the number of children eligible for free school meals and a local area deprivation measure) – see annex A for more information on how these indicators work together as proxies for SEND.
- 5.3. In responses to previous consultations, it has often been argued that allocations to individual local authorities should be based, at least in part, on the number of children and young people who have education, health and care (EHC) plans. Numbers of EHC plans, however, cannot be used as a robust indicator of underlying need because the way they are used varies considerably across local areas (with no consistent national threshold for requiring an EHC plan), and the number of plans is therefore not necessarily directly associated with the local authority's need to spend. For example, a parent may request an EHC needs assessment because they are worried that without a plan their child will not be admitted to the school that will best meet their needs. Furthermore, there would be a significant risk of introducing a perverse incentive on local authorities to increase the number of EHC plans, despite the bureaucracy involved, beyond those that are really needed to enable children and young people with SEND to receive a good quality education.
- 5.4. The SEND review is considering whether system changes are needed to provide more consistency in EHC needs assessment and planning process, and to improve other aspects of the SEND arrangements. Following the SEND review we will consider whether consequent changes to the proxies we use in the funding formula would be appropriate: it is important that the proxies used represent the factors that will best reflect spending pressures on local authorities' SEND services, following any reshaping of those services in the light of the review outcomes. At the next stage of consultation we will also consider whether there are new factors that could either replace

existing factors, for example those that may have become out of date², or that could be added to the formula to address particular types or prevalence of identified need³. In addition, we will also look at how we fund SEND support in mainstream schools.

- 5.5. We would therefore welcome views on how we could improve the proxy factors within the high needs national funding formula. This will then inform our thinking on potential changes to the high needs national funding formula for 2023-24 onwards. If you wish to offer ideas on factors that could be added to the current formula, or that could replace the current proxies, please answer question 5 in the online survey.

² For example, one of the factors we use is data from the 2011 population census that counts the number of children in bad health in a local authority area. However, a question on this is expected to appear in the 2021 population census.

³ For example, although we do not use 19 to 25 population data because the numbers are distorted by the location of higher education institutions, we will look to see whether modification of the 2 to 18 population data would better reflect the underlying needs amongst 19 to 25 year olds that should be met from high needs funding.

6. Conclusion

- 6.1. This consultation forms the first stage of our review of the high needs national funding formula, and focuses on specific proposals for the allocations to local authorities in the 2022-23 financial year. Future consultations will cover further proposals for changes to the formula and to the arrangements for the funding for SEND and AP. An equalities impact assessment has been carried out for the changes that we have proposed in this consultation; see annex C for further details.
- 6.2. If you have any comments on the equalities impact of these proposals for change, please answer question 6 in the online survey.

Annex A: The current high needs funding system

High needs funding is provided to local authorities through the high needs block of the dedicated schools grant (DSG). Local authorities must spend that funding in line with the associated conditions of grant 2021-22⁴, and School and Early Years Finance (England) Regulations⁵ 2021. High needs funding is also provided directly to some schools and colleges⁶ by the Education and Skills Funding Agency (ESFA).

The high needs funding system supports provision for children and young people with special educational needs and disabilities (SEND) from their early years to age 25, to enable both local authorities and institutions to meet their statutory duties under the Children and Families Act 2014. High needs funding is also intended to support good quality alternative provision (AP) for pupils of compulsory school age who, because they have been excluded or suspended, or because of illness or other reasons, cannot receive their education in mainstream or special schools.

The high needs funding block provides local authorities with resources for place funding and top-up funding for institutions, and funding for high needs services delivered directly by the authority or under a separate funding agreement with the service provider (including funding devolved to schools and colleges for that purpose), as permitted by regulations.

The high needs funding block of the DSG has, since 2018-19, been distributed by means of a national funding formula applied consistently across all local authorities, that calculates each authority's allocation.

The formula attempts to balance the two fundamental drivers determining local authorities' relative need to spend on high needs:

- the nature of the local SEND system. Within the current formula the basic entitlement, historic spend and hospital education factors are elements of the formula that reflect local issues, for example the number of pupils in special schools; and
- the underlying needs of the population being served. The population and other proxy factors in the formula, which relate to the

⁴ <https://www.gov.uk/government/publications/dedicated-schools-grant-dsg-2021-to-2022/dsg-conditions-of-grant-2021-to-2022>

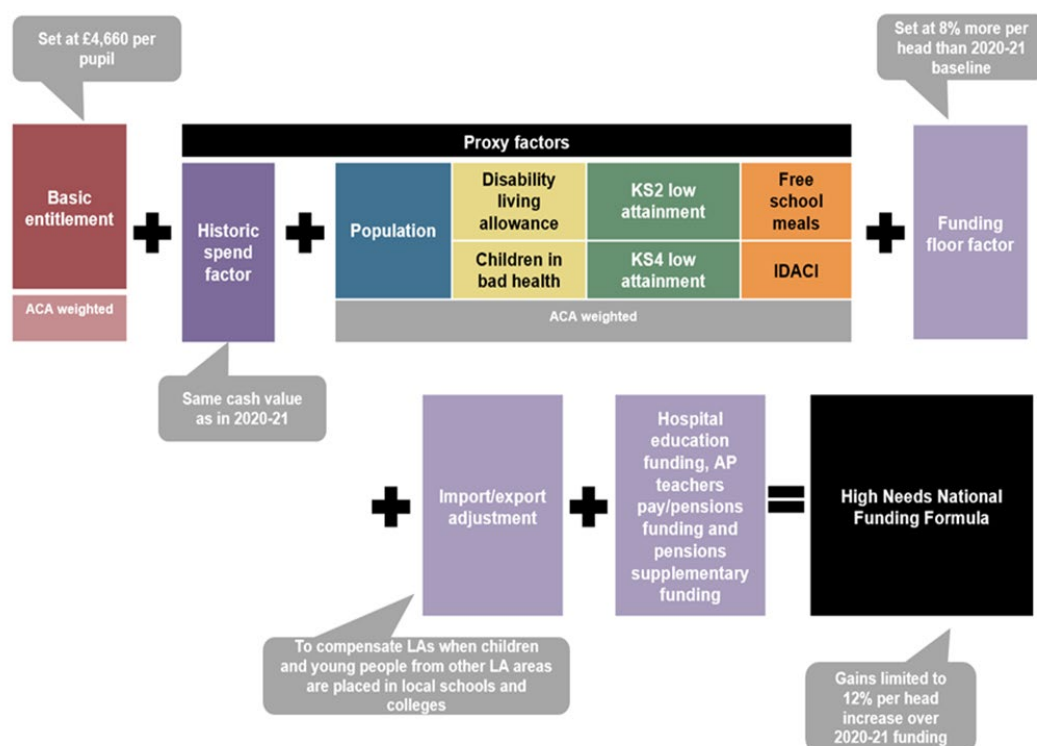
⁵ <https://www.legislation.gov.uk/ukxi/2021/59/made>

⁶ In this consultation we have used the term(s) "schools and colleges" to refer to different types of school, including pupil referral units, academies, free schools, non-maintained special schools and independent schools; and to different types of further education (FE) provider – general FE colleges, independent learning providers and special post-16 institutions (i.e. specialist colleges).

characteristics of the children and young people living in the local authority area, combine together to reflect the level of underlying needs.

Figure 1 below summarises the formula used for the 2021-22 allocations.

Figure 1



For a more detailed account of the operation of the high needs national funding formula in 2021-22 please see the relevant high needs funding formula technical note: [High needs national funding formula: technical note \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Annex B: The impact of the proposed historic spend formula factor changes

1. Annex A has a link to the technical note setting out how the historic spend factor is calculated in the 2021-22 formula. Section 3 of this document explains the proposal to change the values used to calculate this factor from those based on 2017-18 planned expenditure, to amounts based on 2017-18 actual expenditure.
2. The actual expenditure data used to calculate these new historic spend factor amounts is from the 2017-18 section 251 returns from local authorities, and from the deductions made from local authorities' 2017-18 dedicated schools grant high needs block allocations for direct funding by the Education and Skills Funding Agency of places in academies and further education⁷. As for the original calculations, we have used the expenditure lines from the local authority level data as shown in table 1⁸. The calculation of the historic spend factor amount includes adjustments that reduce the historic spend by the amount of the basic entitlement factor, reverse the positive or negative import/export adjustments and subtract the hospital education factor amount⁹.

Table 1

Section 251 lines included
1.0.1 Individual Schools Budget (ISB) (after academy recoupment) ¹⁰
1.2.1 Top up funding - maintained schools
1.2.2 Top-up funding – academies, free schools and colleges
1.2.3 Top-up and other funding – non-maintained and independent providers
1.2.4 Additional high needs targeted funding for mainstream schools and academies
1.2.5 SEN support services
1.2.6 Hospital education services
1.2.7 Other alternative provision services
1.2.8 Support for inclusion

⁷ Places in academies and places in further education – data from [DSG allocations: 2017 to 2018 \(www.gov.uk\)](https://www.gov.uk/government/publications/dsg-allocations-2017-to-2018)

⁸ Data from <https://www.gov.uk/guidance/section-251-2017-to-2018>: note, for all lines NET expenditure has been used.

⁹ Number of pupils in special schools/academies, hospital education funding and import/export adjustments – data from <https://www.gov.uk/government/publications/national-funding-formula-tables-for-schools-and-high-needs-2019-to-2020>

¹⁰ Only expenditure for special schools and PRU/AP schools from this line are included.

Section 251 lines included
1.2.9 Special schools and PRUs in financial difficulty
1.2.10 PFI and BSF costs at special schools, AP/ PRUs and Post 16 institutions only
1.2.11 Direct payments (SEN and disability)
1.2.12 Carbon reduction commitment allowances (PRUs)
1.2.13 Therapies and other health related services
1.4.11 SEN transport

3. Table 2 below shows our calculation of the changes to each local authority's historic spend factor amount. Note that expenditure information is not available for local authorities that have been through boundary changes since 2017-18. For these authorities a simple apportionment has been calculated, based on the apportionment of the historic spend amounts previously provided, to give an indication of the impact.
4. Also in table 2, to give an indication of how the change might impact future allocations of high needs funding, we have applied the new values to the 2021-22 national funding formula, and illustrated what the difference would have been to the underlying percentage increase in each local authority's high needs funding allocation in 2021-22 allocation, compared to 2020-21. It is important to note that the impact would not be exactly the same in 2022-23, because of the other data that will be updated in the formula, and because the overall level of increase will not be the same.

Table 2

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Barking and Dagenham	£28,123,481	£29,963,071	£12,482,621	£13,321,426	12.0%	12.0%
Barnet	£48,033,977	£49,696,598	£21,625,987	£22,319,136	8.0%	8.0%
Barnsley	£21,530,000	£25,779,319	£9,790,873	£12,003,032	12.0%	12.0%
Bath and North East Somerset	£22,832,000	£25,153,665	£10,085,212	£11,085,669	8.0%	8.0%

¹¹ The underlying percentage increase in protected high needs funding, per head of population, between 2020-21 and 2021-22 - as shown in the high needs NFF tables published in July 2020 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901852/2021-22_NFF_summary_table.xlsx, high needs tab, column H)

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Bedford Borough	£21,226,000	£21,433,230	£9,199,261	£9,187,433	8.0%	8.0%
Bexley	£32,109,000	£32,420,937	£14,696,026	£14,969,846	8.0%	8.0%
Birmingham	£151,467,000	£156,651,420	£64,002,087	£66,554,193	12.0%	12.0%
Blackburn with Darwen	£18,431,400	£20,450,940	£8,437,360	£9,467,328	11.8%	12.0%
Blackpool	£18,654,000	£19,683,116	£7,681,927	£8,170,825	11.4%	12.0%
Bolton	£33,354,000	£35,826,834	£15,225,444	£16,597,500	10.8%	12.0%
Bournemouth, Christchurch & Poole	£37,175,926	£40,953,138	£17,333,590	£17,333,590	8.0%	8.0%
Bracknell Forest	£15,673,028	£14,378,803	£7,597,056	£6,858,462	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Bradford	£65,012,779	£59,886,545	£29,371,531	£26,681,153	12.0%	11.9%
Brent	£54,220,000	£51,042,432	£25,953,945	£24,451,239	8.0%	8.0%
Brighton and Hove	£24,850,000	£24,389,722	£11,464,348	£11,250,618	9.5%	8.0%
Bristol, City of	£50,667,390	£54,623,544	£22,148,697	£23,969,597	8.5%	10.8%
Bromley	£47,062,000	£47,433,711	£20,673,297	£20,553,461	8.0%	8.0%
Buckinghamshire	£79,785,000	£78,716,007	£36,813,933	£36,338,943	8.0%	8.0%
Bury	£29,308,032	£33,107,730	£13,645,659	£15,484,374	8.0%	8.0%
Calderdale	£17,665,000	£17,289,930	£8,241,304	£7,998,762	12.0%	12.0%
Cambridgeshire	£65,252,000	£68,003,213	£29,942,834	£31,251,406	8.0%	8.0%
Camden	£34,106,825	£33,553,665	£14,265,132	£13,713,991	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Central Bedfordshire	£27,406,427	£26,799,073	£11,851,260	£11,532,781	8.5%	8.0%
Cheshire East	£33,924,000	£34,560,731	£16,535,477	£16,610,449	8.0%	8.0%
Cheshire West And Chester	£37,832,252	£37,110,167	£16,317,190	£16,098,213	8.0%	8.0%
Cornwall	£40,068,000	£42,090,683	£18,174,714	£19,091,585	12.0%	12.0%
Coventry	£35,395,000	£34,906,240	£15,160,240	£14,913,197	12.0%	10.6%
Croydon	£58,819,000	£63,375,071	£27,359,993	£29,291,078	8.0%	8.0%
Cumbria	£42,262,637	£40,163,605	£19,720,095	£18,696,566	9.7%	8.0%
Darlington	£12,132,500	£13,901,582	£5,290,397	£6,179,436	10.0%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Derby	£35,175,614	£34,604,099	£15,647,028	£15,216,022	9.8%	8.0%
Derbyshire	£69,402,000	£68,128,711	£33,031,554	£32,566,660	10.1%	8.3%
Devon	£66,640,572	£69,435,158	£30,710,230	£32,150,463	9.8%	10.7%
Doncaster	£28,932,000	£28,418,992	£13,370,279	£12,952,995	12.0%	12.0%
Dorset	£34,997,014	£38,552,839	£15,839,159	£15,839,159	8.0%	8.0%
Dudley	£29,970,000	£30,689,367	£12,381,842	£12,795,964	12.0%	12.0%
Durham	£48,936,000	£52,320,883	£21,460,204	£23,111,816	12.0%	12.0%
Ealing	£52,641,000	£54,584,414	£24,602,556	£25,562,170	8.0%	8.0%
East Riding of Yorkshire	£21,526,496	£21,890,007	£10,156,248	£10,365,504	12.0%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
East Sussex	£50,509,000	£48,813,016	£23,239,408	£22,313,217	9.9%	8.0%
Enfield	£44,604,100	£42,678,463	£21,057,172	£20,035,265	8.0%	8.0%
Essex	£131,999,000	£133,464,541	£60,382,948	£60,711,824	9.1%	8.2%
Gateshead	£21,779,000	£23,423,725	£9,741,377	£10,309,739	10.1%	11.5%
Gloucestershire	£57,213,334	£58,888,867	£25,651,202	£26,413,962	9.3%	9.5%
Greenwich	£46,008,431	£45,126,204	£20,822,255	£20,425,393	8.0%	8.0%
Hackney	£41,304,614	£42,072,650	£19,442,307	£19,672,343	8.0%	8.0%
Halton	£16,559,000	£16,744,464	£7,353,514	£7,415,620	10.4%	9.7%
Hammersmith and Fulham	£20,080,000	£25,328,053	£7,957,023	£10,323,708	10.0%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Hampshire	£107,228,000	£112,142,615	£46,009,539	£48,219,193	11.9%	12.0%
Haringey	£35,854,000	£37,301,947	£16,458,948	£17,671,816	8.0%	9.3%
Harrow	£32,204,396	£33,935,112	£14,670,609	£16,183,194	8.0%	8.0%
Hartlepool	£10,661,230	£11,055,775	£4,691,163	£4,830,435	12.0%	12.0%
Havering	£22,698,263	£23,104,218	£10,603,814	£10,864,176	8.0%	8.0%
Herefordshire	£14,329,000	£15,228,453	£6,405,621	£6,835,457	10.1%	11.7%
Hertfordshire	£104,161,000	£96,035,672	£45,998,113	£41,684,508	9.7%	8.0%
Hillingdon	£35,130,000	£37,901,510	£15,937,975	£16,531,207	8.0%	8.0%
Hounslow	£46,277,000	£43,969,262	£21,161,149	£19,770,158	8.0%	8.0%
Isle of Wight	£14,878,000	£15,125,330	£6,947,456	£7,026,538	8.8%	8.2%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Islington	£27,605,000	£25,704,986	£12,796,427	£11,849,000	8.5%	8.0%
Kensington and Chelsea	£16,005,000	£18,475,045	£6,809,805	£7,826,422	9.2%	12.0%
Kent	£198,170,384	£201,319,968	£87,889,671	£89,111,010	8.0%	8.0%
Kingston upon Hull, City of	£27,369,000	£29,452,088	£12,464,500	£13,392,044	11.4%	12.0%
Kingston upon Thames	£20,455,000	£24,387,628	£8,976,122	£10,170,298	8.0%	8.0%
Kirklees	£34,398,000	£38,359,762	£15,415,901	£17,431,771	12.0%	12.0%
Knowsley	£19,610,000	£20,250,367	£8,859,253	£9,500,775	9.6%	11.3%
Lambeth	£41,803,000	£43,202,050	£19,484,987	£20,045,053	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Lancashire	£107,475,969	£115,344,201	£48,059,906	£51,674,972	10.8%	12.0%
Leeds	£64,812,672	£62,965,901	£29,213,162	£27,961,776	12.0%	12.0%
Leicester	£48,130,000	£49,712,326	£21,035,562	£21,695,560	9.1%	9.3%
Leicestershire	£66,021,052	£65,600,503	£29,719,333	£29,322,935	8.0%	8.0%
Lewisham	£50,703,795	£49,918,291	£23,746,610	£23,726,543	8.0%	8.0%
Lincolnshire	£81,631,706	£71,806,451	£36,453,765	£31,452,152	8.0%	8.0%
Liverpool	£46,055,754	£45,044,591	£19,616,464	£18,952,957	12.0%	12.0%
Luton	£27,392,047	£25,796,378	£12,903,647	£12,011,509	8.9%	8.0%
Manchester	£70,934,000	£73,933,742	£31,740,266	£32,949,888	10.3%	10.6%
Medway	£37,383,544	£37,937,026	£16,183,808	£16,332,538	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Merton	£32,356,000	£32,931,007	£15,277,871	£15,727,827	8.0%	8.0%
Middlesbrough	£23,289,000	£25,176,850	£9,124,362	£9,896,952	10.8%	12.0%
Milton Keynes	£39,034,784	£36,313,678	£17,544,196	£16,156,659	8.0%	8.0%
Newcastle upon Tyne	£35,824,000	£34,006,268	£15,267,989	£13,369,798	10.2%	8.0%
Newham	£47,501,000	£45,495,509	£22,742,098	£21,748,357	8.0%	8.0%
Norfolk	£77,048,000	£87,591,102	£34,785,120	£40,128,171	8.9%	12.0%
North East Lincolnshire	£17,110,000	£18,008,607	£7,857,000	£8,273,304	10.9%	11.9%
North Lincolnshire	£15,742,247	£16,651,091	£7,245,123	£7,858,045	10.4%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
North Northamptonshire	£31,726,993	£31,060,819	£13,939,813	£13,566,355	8.4%	8.0%
North Somerset	£23,072,107	£23,628,641	£10,738,608	£11,021,194	8.0%	8.0%
North Tyneside	£20,261,000	£18,699,163	£8,781,008	£8,159,089	11.1%	8.0%
North Yorkshire	£47,902,000	£51,451,351	£22,572,000	£24,505,176	9.6%	12.0%
Northumberland	£32,233,000	£33,395,315	£14,918,567	£15,395,725	11.1%	11.4%
Nottingham	£29,440,298	£34,060,022	£13,233,330	£15,004,616	12.0%	12.0%
Nottinghamshire	£60,464,237	£64,551,368	£28,901,777	£31,044,551	12.0%	12.0%
Oldham	£29,919,445	£31,747,525	£13,051,513	£13,860,004	12.0%	12.0%
Oxfordshire	£58,980,000	£60,766,723	£25,631,572	£26,274,593	10.0%	9.8%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Peterborough	£27,943,570	£28,817,087	£12,304,297	£12,617,135	9.6%	9.5%
Plymouth	£29,624,000	£30,040,088	£12,706,156	£12,964,070	9.5%	9.2%
Portsmouth	£19,459,000	£18,237,402	£8,202,242	£7,563,214	12.0%	12.0%
Reading	£19,261,400	£20,163,658	£9,816,786	£10,315,234	8.0%	8.0%
Redbridge	£41,789,615	£43,176,345	£19,881,199	£20,782,845	8.0%	8.0%
Redcar and Cleveland	£16,108,173	£16,478,324	£7,212,513	£7,373,918	10.8%	10.6%
Richmond upon Thames	£24,910,000	£27,165,046	£11,202,856	£12,371,588	8.0%	8.0%
Rochdale	£21,538,000	£22,663,846	£9,880,294	£10,304,355	12.0%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Rotherham	£28,730,000	£33,249,674	£12,800,816	£14,877,653	11.1%	12.0%
Rutland	£3,882,327	£3,448,267	£1,894,017	£1,693,987	8.0%	8.0%
Salford	£31,575,000	£35,089,051	£14,295,170	£16,014,719	10.4%	12.0%
Sandwell	£38,667,228	£38,192,391	£17,549,646	£17,231,074	10.1%	8.2%
Sefton	£27,556,000	£27,547,001	£12,282,358	£12,180,760	10.5%	9.0%
Sheffield	£52,725,000	£52,767,461	£23,206,115	£23,063,010	12.0%	12.0%
Shropshire	£25,079,000	£25,542,102	£11,933,200	£12,168,226	10.5%	10.2%
Slough	£23,221,000	£25,288,162	£10,435,307	£11,541,586	8.0%	8.0%
Solihull	£26,742,580	£27,512,008	£11,670,480	£12,002,001	8.0%	8.0%
Somerset	£49,758,400	£52,180,559	£22,689,838	£23,992,388	10.0%	11.3%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
South Gloucestershire	£31,202,526	£35,908,047	£14,310,432	£16,723,983	8.0%	8.0%
South Tyneside	£17,097,000	£16,577,345	£7,344,925	£6,935,097	11.3%	8.0%
Southampton	£22,619,942	£25,112,958	£10,168,037	£11,421,113	10.1%	12.0%
Southend-on-Sea	£17,783,562	£18,284,005	£7,495,531	£7,673,752	12.0%	11.6%
Southwark	£42,884,908	£51,618,450	£19,286,806	£23,588,536	8.1%	12.0%
St Helens	£21,669,000	£20,696,332	£9,921,978	£9,154,127	9.2%	8.0%
Staffordshire	£71,442,921	£75,709,634	£30,027,599	£31,824,286	10.6%	11.8%
Stockport	£29,822,000	£29,734,568	£13,727,728	£13,532,039	9.3%	8.0%
Stockton-on-Tees	£25,035,326	£25,312,656	£11,114,311	£11,335,351	10.3%	10.1%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Stoke-on-Trent	£29,493,037	£36,139,084	£13,774,243	£16,951,354	10.9%	12.0%
Suffolk	£57,940,447	£58,766,773	£26,558,785	£26,572,841	10.5%	9.3%
Sunderland	£23,186,530	£22,798,372	£9,905,450	£9,856,871	12.0%	12.0%
Surrey	£142,348,000	£147,055,349	£64,484,117	£66,417,221	8.0%	8.0%
Sutton	£36,954,000	£35,897,090	£16,830,505	£15,836,843	8.0%	8.0%
Swindon	£30,232,000	£30,114,410	£13,470,520	£13,406,324	8.0%	8.0%
Tameside	£19,028,045	£19,298,827	£8,655,813	£8,772,385	12.0%	12.0%
Telford and Wrekin	£20,801,209	£21,197,631	£9,156,063	£9,296,174	9.4%	8.9%
Thurrock	£22,444,000	£24,655,929	£10,295,138	£11,488,693	8.0%	11.2%
Torbay	£17,218,000	£18,899,388	£7,179,459	£7,930,828	9.6%	12.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Tower Hamlets	£46,677,410	£47,094,720	£21,058,113	£20,835,296	8.0%	8.0%
Trafford	£25,038,000	£25,547,970	£11,396,274	£11,676,365	8.0%	8.0%
Wakefield	£28,074,000	£30,298,748	£12,587,527	£13,647,974	12.0%	12.0%
Walsall	£29,893,640	£29,300,096	£13,562,165	£13,103,926	12.0%	12.0%
Waltham Forest	£36,047,353	£37,427,505	£15,661,426	£16,334,578	8.0%	8.0%
Wandsworth	£43,284,977	£40,731,670	£17,844,426	£16,787,764	8.0%	8.0%
Warrington	£20,096,525	£21,524,241	£9,013,192	£9,675,828	9.4%	11.4%
Warwickshire	£59,201,333	£60,491,309	£26,627,879	£27,044,981	8.0%	8.0%
West Berkshire	£20,056,000	£19,611,347	£8,419,066	£8,222,127	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
West Northamptonshire	£37,324,588	£36,540,882	£16,399,215	£15,959,868	9.9%	8.7%
West Sussex	£77,406,000	£75,663,821	£34,641,903	£33,583,219	9.6%	8.0%
Westminster	£24,756,000	£23,943,920	£11,439,465	£10,941,779	8.0%	8.0%
Wigan	£27,444,000	£27,865,018	£12,527,873	£12,658,559	12.0%	12.0%
Wiltshire	£47,147,500	£44,709,479	£21,322,449	£20,105,850	9.4%	8.0%
Windsor and Maidenhead	£18,718,500	£19,336,963	£8,239,495	£8,413,116	8.0%	8.0%
Wirral	£35,061,200	£34,136,451	£14,518,418	£13,924,046	12.0%	9.2%
Wokingham	£18,049,608	£19,306,041	£8,420,712	£9,054,679	8.0%	8.0%

LA Name	Current 2017-18 baseline used for historic spend factor	2017-18 actual expenditure amount we propose to use in future	Original funding through the historic spend factor	Proposed level of funding through the historic spend factor	Actual % increase in high needs allocations between 20-21 and 21-22 ¹¹	Theoretical % increase in high needs funding allocations between 20-21 and 21-22 (using the proposed historic spend factor)
Wolverhampton	£33,071,000	£31,224,735	£14,420,809	£13,344,136	9.5%	8.0%
Worcestershire	£48,080,000	£50,445,094	£21,006,015	£22,199,767	10.8%	11.8%
York	£18,417,903	£18,711,381	£7,994,161	£8,024,818	8.0%	8.0%

5. The different historic spend amounts, if used in the 2021-22 national funding formula calculations, would have meant that 47% of authorities would have experienced a change in their allocations, with 35 receiving a larger increase and 36 receiving a smaller increase. For 79 authorities, the effect of the 8% funding floor and the 12% limit on gains would have been to override the impact of the change in the historic spend factor value.
6. If a local authority wishes to query the amounts in table 2 above, please send the enquiry to HighNeedsNFF.CONSULTATION@education.gov.uk by the end of the consultation period.

Annex C: The high needs NFF consultation equalities impact assesment

The Public Sector Equality Duty

1. The Equality Act 2010 identifies the following as protected characteristics for the public sector equality duty:
 - Age
 - Disability
 - Gender Reassignment
 - Pregnancy and Maternity
 - Race (including ethnicity)
 - Religion or belief
 - Sex
 - Sexual orientation
2. Under Section 149 of the Equality Act 2010, the Secretary of State is under a duty to have due regard to the need to:
 - a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, in particular the need to:
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
 - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it, in particular the need to:
 - tackle prejudice, and
 - promote understanding.

What we are proposing in this consultation package

3. This consultation sets out proposed changes to the high needs national funding formula for 2022-23, and seeks views on some aspects of the formula that we are looking to change in future years. The formula calculates funding allocations to local authorities for the education of children and young people with special educational needs and disabilities (SEND) or those who require alternative provision (AP). Local authorities distribute this funding to schools, colleges and other providers.

Consideration of the protected characteristics identified in the Equality Act 2010

4. This is an assessment, pursuant to the public sector equality duty, of the potential impact of these proposals. The Equality Act 2010 identifies eight protected characteristics, as set out in paragraph 1. Our initial assessment is that our funding reform proposals may impact positively on children and young people with a disability by improving the local authority level distribution of resources they can access, and so better matching available resources to need. We have no evidence to suggest there would be a negative impact, either on those with a disability, or on those young people with other protected characteristics. We welcome stakeholder feedback on this topic.

Consultation question

5. We welcome your views on the equalities impact of our proposals for change. If you do have any comments on the impact that these proposals may have on equality, please let us know by answering question 6 within this questionnaire.



Department
for Education

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