

# School Funding Formula Consultation

## Summary of Responses - Duplicates Removed

### Consultation Visitors

Total Visits 1.26 k

Documents	Downloads	
	Visitors	/ Views
Consultation document	420	516
School Interactive Model	342	436
Consultation Document - Appendix 6	168	195
Equality Impact Assessment	86	90

### Number of Responses

A) an individual school (maintained schools, individual academies or free schools) 110  
 B) an Academy Trust for all Kent schools within the Trust 18

	A	B	Total	
Primary	77	71	148	71%
Secondary	29	22	51	26%
All-through	2	1	3	2%
Special	2	3	5	2%
Blank	0	0	0	0%
<b>Total</b>	<b>110</b>	<b>97</b>	<b>207</b>	<b>100%</b>

### Responses by District

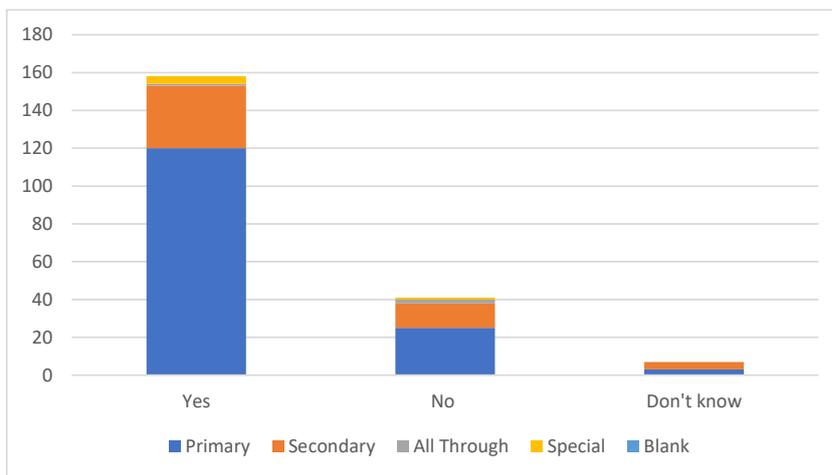
Ashford	8	6%
Canterbury	6	5%
Dartford	7	5%
Dover	9	7%
Folkestone and Hythe	5	4%
Gravesham	8	6%
Maidstone	19	15%
Sevenoaks	8	6%
Swale	5	4%
Thanet	8	6%
Tonbridge and Malling	15	12%
Tunbridge Wells	12	9%
Blank	18	14%
<b>Total</b>	<b>128</b>	<b>100%</b>

### Responses by Role

Bursar/Business Manager	52	41%
Headteacher	57	45%
Executive Headteacher	5	4%
Governor	4	3%
Other	10	8%
<b>Total</b>	<b>128</b>	<b>100%</b>

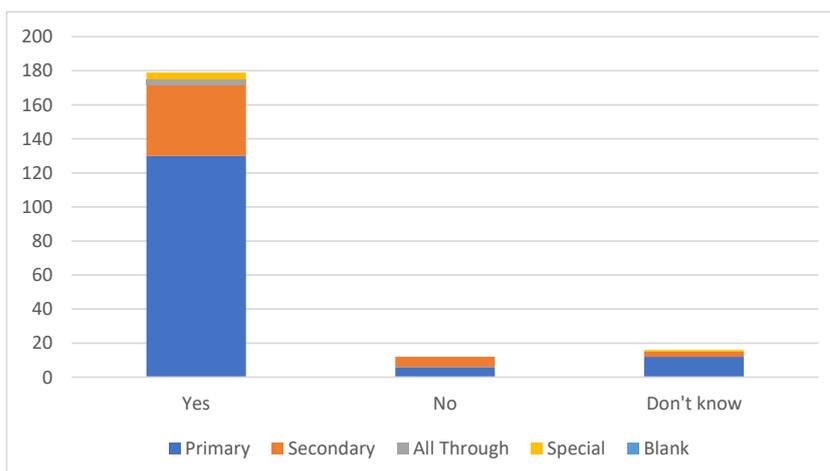
Since 2020, KCC has run a Falling Rolls Fund to provide financial support to schools who suffer a significant yet temporary fall in pupil numbers, where local planning data shows that the surplus places would be needed within the next three financial years. This Fund has been financed through an annual top-slice of the primary and secondary school budgets. For 2024-25, the DfE are introducing separate grant funding for the operation of a Falling Roll Fund, along with further guidance and changes to the mandatory criteria. We are proposing to maintain a Falling Roll Fund with future funding to be met from the DfE calculated allocation rather than continuing to top-slice primary and secondary school budgets to supplement this Fund. The current criteria, set out in Appendix 3 of the consultation document, will be updated to reflect mandatory changes directed by the DfE with any further changes to criteria subject to a separate consultation once funding allocations have been agreed (if necessary). The Schools' Funding Forum will be consulted on whether the underspend from 2023-24 is used in 2024-25 to support transition to this new funding model. Please see section 1 and Appendix 3 of the consultation document for further details. Do you support the principle of continuing to have a Falling Roll Fund?

	Primary	Secondary	All Through	Special	Blank	Total
Yes	120	33	1	4	0	158
No	25	13	2	1	0	41
Don't know	3	4	0	0	0	7



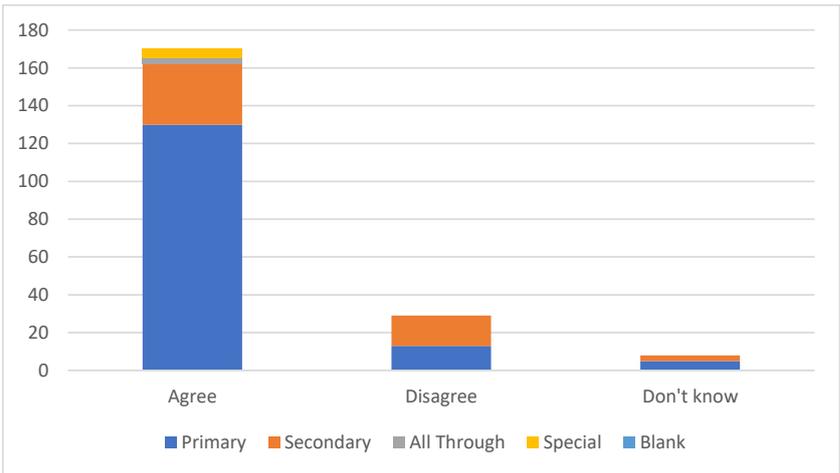
Do you support the principle of the Falling Roll Fund being funded from the DfE calculated allocation and no longer supplemented by an additional top-slice from the primary and secondary school budgets in 2024-25 and future years?

	Primary	Secondary	All Through	Special	Blank	Total
Yes	130	42	3	4	0	179
No	6	6	0	0	0	12
Don't know	12	3	0	1	0	16



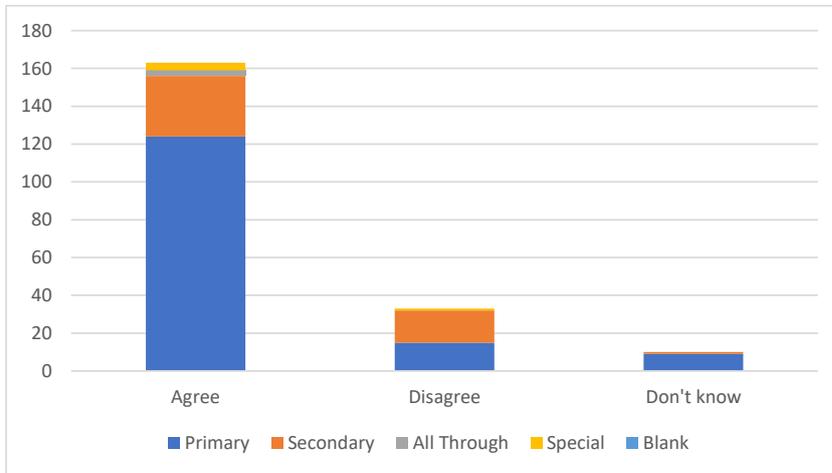
For 2024-25, KCC is proposing to repeat the transfer from the Schools Block to into the High Needs Block made in previous years. We appreciate we have asked this question in previous years', but we are required to consult annually on this proposal. The request is to transfer between 1.2% to 1.5% of the school budget to the High Needs Block (approximately £15m to £19m). We recognise this request is slightly higher than the transfer made in recent years, but it does match our proposals submitted as part of KCC's Safety Valve application. For us to return to a sustainable position we recognise an annual request equivalent to 1.2% is likely to be required for each of the next 4-years, and so we would like to seek your views as to whether you wish to see a higher transfer (1.5% for 2024-25) over the next 3 years rather than a slightly lower transfer (1.2%) but over 4 years. By approving a 1.5% transfer for 2024-25 would give schools the flexibility to either cease the block transfers a year early (if in the subsequent 2 years the block transfers increased to approximately 1.65%) or alternately lead to a position where the block transfer in 2027/28 would be substantially smaller (approximately 0.3%). In all options the total amount transferred from the school block over the 4-year period would stay the same, it is the profile that changes. The Safety Valve is a DfE led programme for those local authorities with the highest accumulated High Needs deficits, whereby the Council has agreed to implement actions to bring the deficit down and to move to an in-year breakeven position by March 2028 in return for a contribution from the DfE totalling £142m to help pay off the accumulated deficit between 2022-23 and 2027-28. In addition, the Council will be contributing up to £82m during the same period. These contributions are enabling Kent to move to a more sustainable funding system without the need to make more significant cuts in high needs services to pay off the accumulated deficit. In order to support this, the continued transfer of funding from the schools' budget during this period will be required. Similar transfers have been made since 2018, and supported by both the Schools and the Schools Funding Forum to contribute towards SEN services in mainstream schools funded from the High Needs Block. It would help to support the system of SEN support across the county including ensuring sufficient funding for the County Approaches to Inclusive Education. Please see section 2 and appendix 6 of the consultation document for further details. Do you agree or disagree to a transfer from the Schools Block to the High Needs Block to contribute towards support for Children with SEN in mainstream schools funded from the High Needs Block?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	130	32	3	5	0	170
Disagree	13	16	0	0	0	29
Don't know	5	3	0	0	0	8



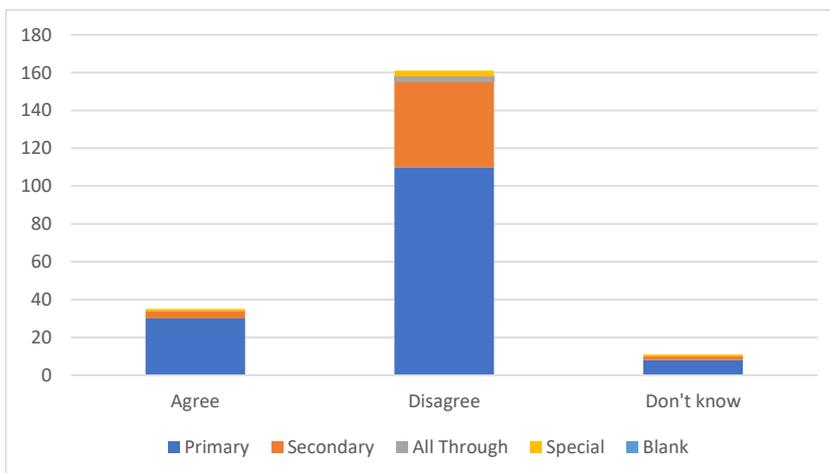
Do you agree or disagree with the transfer of 1.2% (approximately £15.1m) from the Schools Block to the High Needs Block for 2024-25, to fund support for children with SEN in mainstream schools funded from the High Needs Block?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	124	32	3	4	0	163
Disagree	15	17	0	1	0	33
Don't know	9	1	0	0	0	10



Do you agree or disagree with the option to transfer a higher amount of 1.5% from the Schools Block to the High Needs Block for 2024-25, on the principle the period of transfers would be shorter?

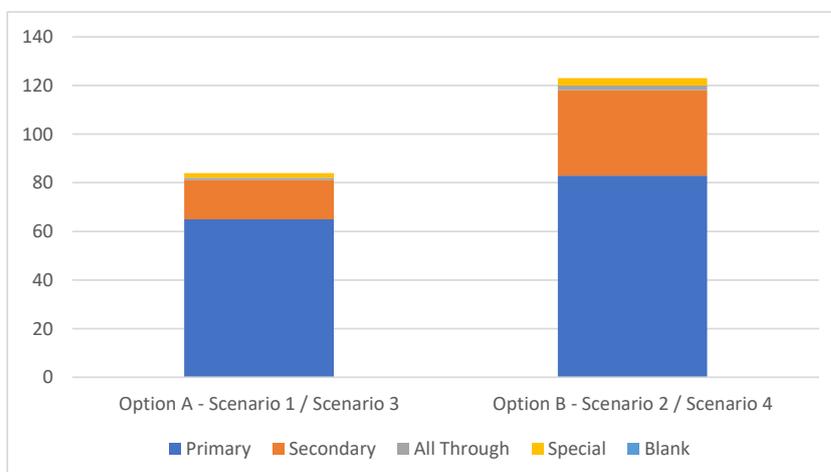
	Primary	Secondary	All Through	Special	Blank	Total
Agree	30	4	0	1	0	35
Disagree	110	45	3	3	0	161
Don't know	8	2	0	1	0	11



In 2023-24, the Council moved the Kent's local formula (LFF) to a position where it meets the DfE definition of "mirroring" the NFF both in terms of factors and rates, whereby all rates are within 2.5% of the NFF (see Appendix 2). Exceptions were made to enable the funding of High Needs transfer and other changes in the demographics of the pupil population not covered by the grant funding. In addition, the Council was also successful in dis-applying the mandatory protection factor (Minimum Per Pupil Level) to ensure all schools contribute more equally towards the funding of these areas. If there is continual support to fund the transfer from the Schools Block, we would like your views on how this should be funded, along with any further changes in pupil demographics. In 2023-24, all factor rates were reduced equally except the Minimum Per Pupil Level factor which was reduced by a lesser extent (0.5% below the NFF). The Minimum Per Pupil Level is a protection factor, which allocates further funding to a school budget, to ensure a schools receive a minimum amount of funding per pupil. This factor will "top-up" a school when the budget calculated on the characteristics of the school is lower than the protection threshold. By including a reduction to this protection factor, in the same way as the other factor valves, ensures all school budgets contribute to the funding the High Needs Transfer. The proposal is to maintain the principles agreed in 2023-24 and continue to mirror all NFF factors and rates whilst ensuring all schools continue to contribute as equally, as reasonably possible, towards the funding of the transfer or further changes in pupil demographics. This approach will mean the formula rates will continue to increase in a similar way to the National Funding Formula.

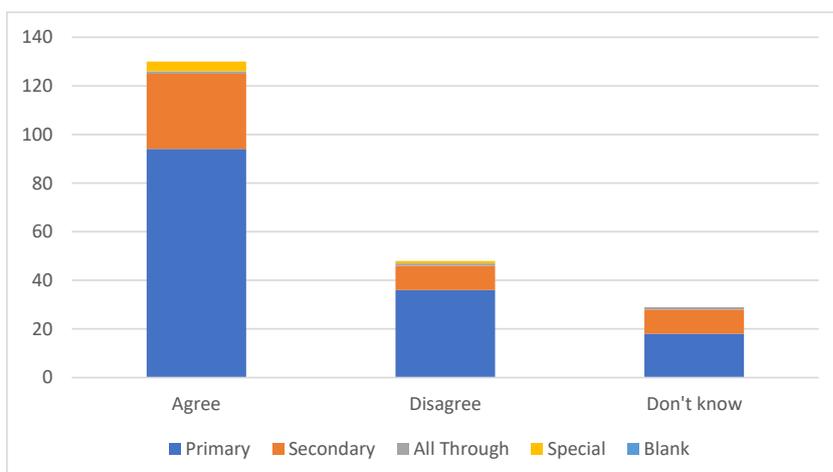
We are seeking your views as to whether we continue to set the Minimum Per Pupil level at 0.5% lower than the NFF whilst other factors in the formula are reduced by more (around 1.6%-2.1% below NFF), or whether the MPPL should be set at 0.9% lower than the NFF and all other factors set at around 1.5%-1.9% below NFF (with the possibility that all factors are set on the same basis in 2025-26, which would be subject to a future consultation) with the aim that all schools will contribute equally towards the high needs transfer in future years. The proposal will continue to mean any further pupil demographic changes, not funded through the NFF grant, will be met by further reductions to all factors (except the protection factors i.e. MPPL). The Minimum Per Pupil Level is a mandatory factor and so any changes to it would also be subject to Secretary of State approval. If there is support to transfer funding from the Schools Block to support children with SEN in mainstream schools, KCC would like to understand which of the following scenarios schools prefer: a) Scenario 1 / Scenario 3 – support the principle of mirroring the National Funding Formula by reducing all NFF factor values equally to fund support for Children with SEN in mainstream schools and any further pupil demographic changes, except the Protection Factors which are set at 0.5% less than the NFF (Minimum Per Pupil Level Factor and Minimum Funding Guarantee). (Appendix 4, Table 2 and 4). All schools contribute towards the funding of high needs transfer; however schools on the MPPL contribute at a lower rate. b) Scenario 2 / Scenario 4 – support the principle of mirroring the National Funding Formula by reducing all NFF factor values equally to fund support for children with SEN in mainstream schools except the Protections Factors which are set at 0.9% less than NFF (Minimum Per Pupil Level Factor and Minimum Funding Guarantee). (Appendix 4, Table 3 and 5). All schools would contribute more equally towards the funding of the high needs transfer. Which scenario would you prefer?

	Primary	Secondary	All Through	Special	Blank	Total
Option A - Scenario 1 / Scenario 3	65	16	1	2	0	84
Option B - Scenario 2 / Scenario 4	83	35	2	3	0	123



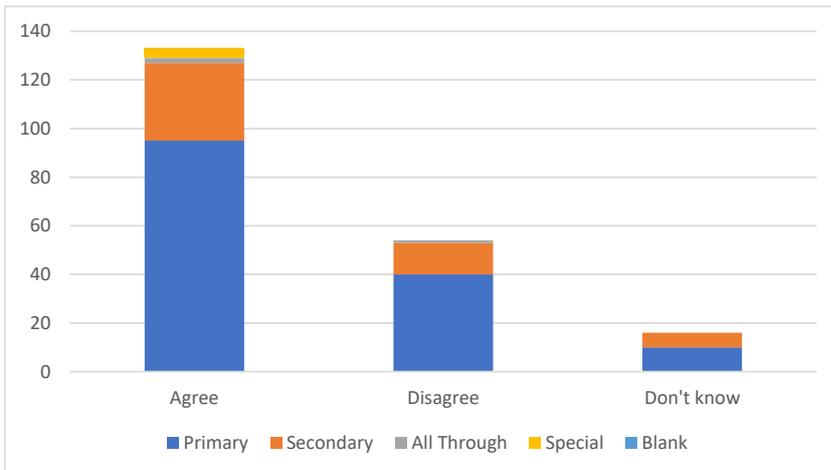
The notional SEN budget is not a separate budget but is identified within a maintained schools' delegated budget share, or an academy's general annual grant, and is calculated by local authorities using their local mainstream schools funding formula factors. It is intended to identify to the estimated proportion of the school budget that helps schools to comply with their duty to use their "best endeavours to meet SEN of their pupils" including the costs of SEN Support and up to the first £6,000 of the additional costs for individual children. There is no national formula for the calculation of the Notional SEN budget, but the DfE have recently published additional guidance and are recommending all local authorities review their calculation each year alongside their local formula. In Kent, it is also used to calculate whether a school is eligible for "notional SEN top up funding" (additional contribution towards the first £6,000 of additional support that is normally expected to be funded by a mainstream school). Kent's current formula for SEN Notional Budget is based on the principle that pupils with certain demographic characteristics are more likely to have SEN and therefore attract additional funding through certain funding factors in the core budget. The DfE have indicated the factors they would normally expect to see included in the calculation Mobility Factor: this factor provides additional funding to schools who have a significant number of pupils admitted at non-standard times of the year. The DfE have indicated there may be a higher prevalence of SEN amongst pupils who frequently move between schools. We are seeking your views as to whether you think this is the case and so should be considered in the SEN Notional Budget Calculation. Do you agree or disagree whether the mobility factor should be included in the SEN Notional Budget?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	94	31	1	4	0	130
Disagree	36	10	1	1	0	48
Don't know	18	10	1	0	0	29



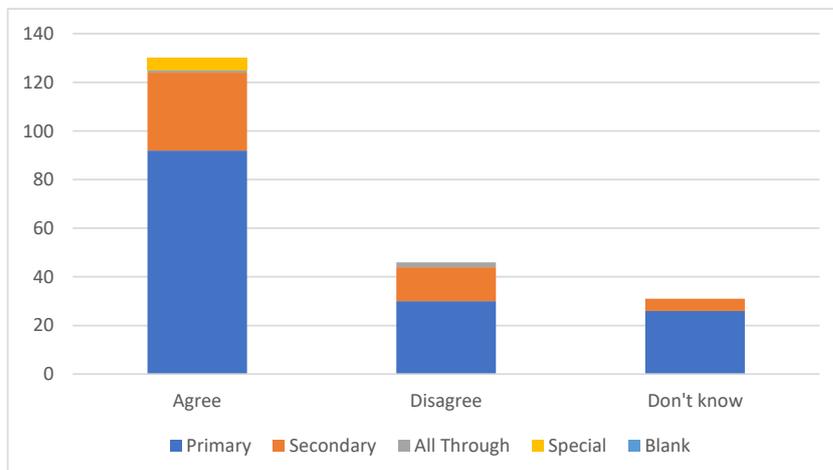
English as an additional language: this factor provides additional funding to a school with pupils where English is not their first language. This factor has historically been included in the SEN Notional Budget calculation. Analysis has indicated there is not a relationship between a pupil with SEN and this characteristic. On this basis we are seeking views as to whether this factor is removed from the SEN Notional Budget calculation. Do you agree or disagree whether English as an additional Language should be removed from the SEN Notional Budget?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	95	32	2	4	0	133
Disagree	40	13	1	0	0	54
Don't know	10	6	0	0	0	16



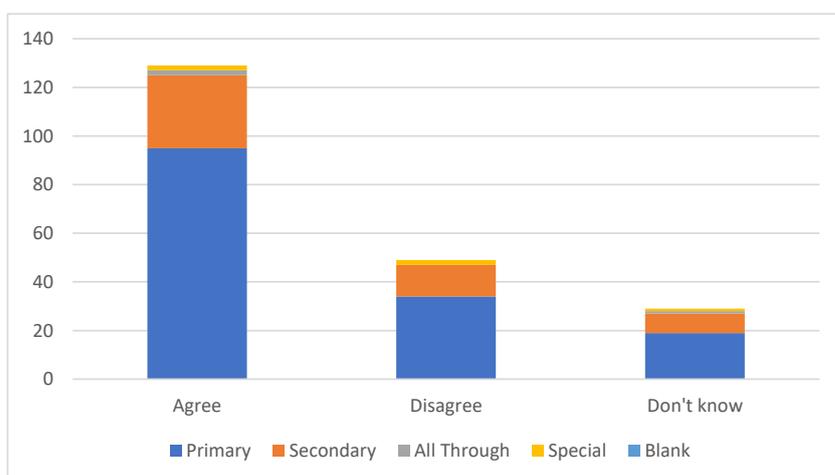
Basic Entitlement Factor: this factor provides a standard amount of funding for every pupil in the school (with a different rate applied for different key stages). This factor has historically been excluded from the SEN Notional Budget calculation however, the DfE have indicated they would expect to see a small proportion of this funding included. On this basis we are seeking your views as to whether this factor should be considered (in part) in the SEN Notional Budget calculation to recognise the prevalence of SEN is not only directly attributable to certain demographic characteristics of pupils. Do you agree or disagree whether we should include a proportion of the basic entitlement factor in the SEN Notional Budget?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	92	32	1	5	0	130
Disagree	30	14	2	0	0	46
Don't know	26	5	0	0	0	31



Protection Factors: this factor provides “top up funding” for schools where either, their core school budget is below a certain threshold or to ensure per pupil funding increases by a minimum percentage each year. Currently, 100% of the funding received through the minimum per pupil level is included within the SEN Notional Budget Calculation to recognise some schools receive other funding (not directly through the more traditional factors) that could be attributable to supporting SEN and so demonstrating that these schools have sufficient funding for their pupils with SEN. We are seeking your views whether the proportion of this factor is reduced to reflect “top up” funding may be received for other reasons than just SEN. Do you agree or disagree whether we should review the proportion of the Protection Factors (Minimum Per Pupil Level) in the calculation of the SEN Notional Budget?

	Primary	Secondary	All Through	Special	Blank	Total
Agree	95	30	2	2	0	129
Disagree	34	13	0	2	0	49
Don't know	19	8	1	1	0	29



Do you have any other views or comments on the calculation of SEN Notional Budget?

It is frankly extraordinary that MPPL funding be included in the notional SEN budget. Our school receives nearly £500k due to the woeful funding that would be received by factors alone. The MPPL was introduced to recognise that such schools NEED more than this to run a school. The idea that this can all be allocated to SEN is laughable. We support the full NFF.

SEN funding needs to be calculated appropriately as a primary school we will have children whom we will need funding for

I am slightly concerned about question 15 as I do not see why the BEF is part of notional funding. Why is this now a consideration?

Move towards the National Funding Formula

It is incredibly, and ever more challenging trying to meet the needs of children in school. They are so diverse and require such additional support - we find ourselves only able to apply for additional funding for a select few to make it manageable. Children require such bespoke 1:1 support now that for an infant school like ours, we have to contribute much of our budget when applying for HNF so we can employ an additional adult to support the child. Parents view our school already having in mind that we are 'good' at supporting, however this is to the detriment of our school budget. There is NOT enough money for SEN across our schools, and it is not easy to teach anymore. There is such a high level of provision mapping and intervention that is required, just to help children make the expected progress. We need additional TAs to support with this, but can not afford. We can not deliver high quality teaching without the funds to support.

A defined formula set by the DfE would be welcomed.

If the SEN budget is notional - then why are we talking about what is included. It feels if by stealth this is going to be measured and not notional. As a selective school this looks like a way to further reduce non-high school funding.

Schools with high levels of need should be identified and protected from rapid changes in your formula calculations as in 2021 when you increased the notional SEN amount dramatically; funding for such schools should be ringfenced

Schools with lower numbers of SEND children should not benefit from Notional SEN Funding. Notional SEN Funding should directly relate to the number of SEND children on role. Schools with high numbers of SEND children will be using this funding to support SEND children. Schools with lower numbers will use this as part of their MPPFL. Schools with high numbers of SEND children effectively have a lower MPPFL.

Would also favour a formula which allows for a greater level of funding to be made available to schools like ours where there is higher proportion of SEN compared to the national and county average

no

The MPPL 'top up' is to ensure that schools receive a minimum funding level, to label that all SEN is patently false. It prevents schools with a higher level of HNF children claiming back an element of the additional funds school pays to look after HNF children as schools are unlikely to reach the 40% top up rule.

It must reflect the number of students in each school that have an EHCP or are on the SEND register (as long as this is done properly). The current situation is not equal as some schools receive much more funding than others, despite having a much smaller cohort of SEND students.

Scenario 3 and 4 hold back 1.5% of the schools' block funding to redistribute to the high needs block - while scenario 1 and 2 only hold back 1.2%.

For scenario 2 the funding formula rate increased by a slightly higher rate than the national funding formula (NFF) while the minimum per pupil funding is slightly less than the NFF rate increase.

When factors are changed it has historically meant that sometimes the resulting new formula results in a lower amount allocated. Will the change in factors above mean less funding?

Notional SEN should not be equal in settings with different incidences of SEN and therefore a reduced proportion should be applied to these settings.

Kent should certainly reduce the percentage of MPPL included in SEN notional budget from the current 100% to maybe even 0% - only 14 LEAs use MPPL to any extent in their notional SEN calculation - see Figure 31 in <https://www.gov.uk/government/publications/schools-block-funding-formulae-2022-to-2023/schools-block-funding-formulae-2022-to-2023-analysis-of-local-authorities-schools-block-funding-formulae#notional-special-educational-needs-sen>.

Appendix 5 sets out two different schools and seems to show that protection factors such as MPPL should be included so that schools notional SEN budgets are similar, which seems to be based on the assumption that all schools should have similar notional SEN funding. This is not true. A school with a higher incidence of SEN needs a higher notional SEN budget. As the consultation document states "The protection factors (minimum per pupil level and minimum funding guarantee) were also included to reflect that schools receive other "top up" funding that could be attributable to support SEN". Yes, some of the protection factors could be attributed to SEN, but not all of it, as the top up funding is also to support other needs.

No

No

I don't understand enough about the Notional SEN budget to comment

Providing support beyond £6000 is becoming more of an issue when the need to support families with assessment and counselling are taken into account - something schools are doing more and more. Whilst not all student who access counselling have an SEND, very many do. With changes to HNF a school like ours may well be penalised as SEND in grammar settings is not something some schools understand - particularly as there is a current (recognised) deficit of SRP support for high performing girls with ASC as is provided at the Judd and Langton Boys for male students. We also experience more issues with post-16 students and SEND needs - a growing issue for those capable of A Level study who wish to continue at their 11-16 setting, or look to transfer at this stage into a new sixth form.

No

I would like there to be a considered approach to how much of a schools budget is identified as SEN Notional Budget. Whilst appreciating that the focus is for mainstream schools to be able to support the SEN needs with a reducing top up funding, this must not be at the detriment of other children in the school and a reduced general budget allocation. Schools need flexibility to be able to allocate more budget to SEN if needed, without it being ringfenced and pressure put to balance increasing costs against reducing general allocations.

Require increased funding to provide support for schools with high % of SEN pupils

In a small school with a high level of need, the SEN Notional Budget barely covers the cost of the SENCo. Even with HNF top-up this puts inclusive schools at a financial disadvantage.

It feels that there is a hidden agenda here...

Quite probably KCC debt related to a high needs funding system that was devised with no ceiling.

Conflicting information from KCC SEND meetings and KCC BUDGET TEAM meetings are leaving us feeling ill informed to answer these questions with any certainty.

The notional budget based on current factors discriminates against school where SEN is high, but levels of deprivation are low. Our school does not currently fall into any of the deprivation factors, we have low FSM, low EAL, not much pupil mobility and high attainment. Staffing and resources still need to be in place for the many pupils who have SEN, but the budget is not made available to our school because we don't fall into these categories.