

# Response ID ANON-TEB1-7BWS-F

Submitted to **Schools national funding formula**

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## Introduction

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**Please select your role from the list below::**

Other

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Representative body

**Organisation name::**

f40

**Local authority area::**

N/A

### D Would you like your response to be confidential?

No

**Please give your reason for confidentiality::**

## Principles for a reformed funding system

### 1 Do you agree with our proposed principles for the funding system?

Yes

**Please provide any further comments::**

In advance of responding to specific questions, f40 wishes to make the following statements:

- f40 welcomes the introduction of a redistributive approach to funding schools so that schools and their pupils receive similar levels of funding nationally. This has been the sole purpose of f40's twenty year fair funding campaign.
- This response builds upon the f40 narrative and formula previously sent to the Department for Education (DfE) and should be considered part of our response to this first stage consultation.
- f40 disagrees with the hard formula approach and the ring-fencing of the Schools Block separately from the other blocks in the DSG because this works against the concept of local flexibility in the management of some formula elements for schools.
- As ADCS has pointed out, funding directed via MATs will not necessarily result in funding to individual schools being consistent. They will pool and redistribute funding reflecting the MAT's business priorities. Yet this form of local flexibility is exactly what the DfE is attempting to stop by excluding LAs and schools (through the local Forum) from involvement in school funding arrangements.
- Until the DfE publishes the second part of the consultation, it is not possible to see whether the proposals meet the principles.
- There is currently no published evidence base to any of the proposals and f40 would like to see the detailed evidence that backs up these proposals. Having engaged with the DfE over formula arrangements, f40 would like to see its proposals included within the second stage proposals.
- We would like to remind the DfE that the Dedicated Schools Grant was not created in a vacuum: it was simply a way of describing LA budgets at a time when there was not a specific schools grant. Certain LA budgets were then described as the 'Schools Budget' – some of them with more justification than others – and this found itself being transformed into the DSG. Not all of this was delegated to schools but some was spent centrally in a more cost-efficient and service-effective way on needs across each LA authority and its schools. As LAs initially received the same level of DSG as the former LA budgets, there was no overall funding issue at first. However, as rules have tightened on this expenditure, this has caused more of a problem and, specifically, the general tone of the DfE about LAs holding this money back from schools, is an example of over-simplification which is not helpful.
- The £390m that was added to the baseline in 2015-16 was, in f40's view, allocated via a flawed methodology, in particular by being based solely on the Schools Block of the DSG. f40 maintains its strong advice that any transitional protection arrangements implemented in future are reviewed in terms of the total DSG (i.e. all three blocks).
- This consultation is being conducted in a very tight timeframe which includes the Easter holidays for schools. This makes full engagement with schools and the

schools forums extremely difficult. Without much more detail and certainty it is very difficult to plan for the implementation of the proposals for 2017-18 and it is therefore very important that the release of the second stage consultation must be timely to allow for full responses which can be completed prior to the summer holidays.

- The DfE has created national arrangements for the 'easy' elements of funding formula – the pupil-led parts – but left LAs with the difficult issue of premises and worse are proposing to fund these based on historic costs. Currently the LA manages these elements first and distributes the remaining funding to all schools.
- The difficult part includes the PFI costs, joint use costs, split sites, pupil growth and rates, and how to effectively manage small less economic, but necessary schools. Without the flexibility to manage these costs first, either schools will be out of pocket or the LA will be, depending upon how the regulations are written. Neither arrangement is satisfactory or fair.
- Ring-fencing the Schools Block will leave no incentive for schools to be inclusive. Funding will not alter if they take or leave a child with SEN, this will place extra pressure on the High Needs Block, which can currently be managed by moving money between blocks if necessary.
- All funding streams should be considered together within the proposals including Post-16, High Needs, Pupil Premium, Early Years and any other existing grants.

Now, specifically in response to Question 1

We generally agree with the proposed principles for the funding system, but the definition of 'fair' has yet to be defined and will not be transparent until the second consultation is launched. The weightings that are to be applied to the national funding formula elements need to enable all schools to educate all pupils as well as enabling them to support pupils with additional needs so that all pupils have the opportunity to achieve their potential; neither group should be supported to the detriment of the other.

This means that the basic entitlement and lump sum need to be based on overt costs of education, not on the amount left over when other sums have been distributed. This was the underlying fault with the historic basis of the current system and the new system needs to address this comprehensively.

The principle of 'fair' funding is set against the DfE assertion that funding to schools should be the same across the country. However, any potential distribution to MATs is likely to provide different funding to schools and is no different from the current system of distribution to LAs, therefore the DfE appears to be setting itself up to fail its stated principles.

Looking at principle 4 – 'A funding system that gets funding straight to schools' – f40 does not consider that this principle is being met by the current proposals and is too simplistic. We agree that as much funding as possible should go to schools, at similar levels, but in practice this must take account of local circumstances. As the proposals stand, funding for some parts of the system will go direct to schools, but there will still be a considerable element that doesn't go direct (especially in the 'soft' years). Paragraph 2.49 suggests that the DfE would like to formalise other school factors and explore how to do it, but does not provide assurance that this will happen in 2019-20. If, as looks likely at present, a significant part of the system for schools (which includes high cost pupils' costs) does not go direct to schools, f40 does not see why all the funding cannot be directed by the LA to distribute along with its Schools Forum.

## The structure of the funding system

### 2 Do you agree with our proposal to move to a school-level national funding formula in 2019-20, removing the requirement for local authorities to set a local formula?

No

#### Please provide any further comments::

The f40 model is based on a principle of funding via an evidence based formula to a local area and allowing schools, through the Schools Forum, to then choose how to allocate to meet their needs. A national funding formula where the amount a school receives at the basic level and is the same across all schools in the country looks attractive on paper, but in reality the amounts that schools will receive will be (and should be) different because of area costs and school/site specific costs. It follows that funding per pupil across schools will be different whether there is a school-led funding formula or local authority-led funding formula, so the DfE will still need to explain these differences and LAs would be important to this process.

The method for distribution should still be determined by the local authority. The concept that funding for all schools is predominantly the same is welcomed, but f40 believes that the amounts that are given to schools are better distributed by reference to local drivers and priorities.

By removing local decision making from the formula any incentives that currently exists within the system for schools to work together for the benefit of pupils in the system, is also removed. If the amount that schools receive is automatic, schools will become more competitive and start to act to the detriment of the weakest and most vulnerable pupils. For example, if schools know that it makes no difference to the amount of funding they receive, they could choose to be less inclusive. Currently LAs can reduce the amount that goes through schools to support the pupils that schools cannot or choose not to support and who have to be placed in expensive provision; there is a benefit for schools to work for the benefit of all pupils in the LA area. By guaranteeing the amount of funding that a school receives, there is no incentive to take difficult pupils thus putting further pressure on an already pressurised High Needs Block with no accountability by schools as to how that helps children in the area.

We are also concerned that once the values in the formula have been set, there is no mechanism for review or for schools to feedback how they are working. The values cannot be fixed and simply left untouched for years at a time. The differing priorities of Government as to the priorities for schools will have an impact on the funding levels and these need to be regularly considered.

f40 wonders if the DfE or EFA has really understood the cost and complexity of directly managing the school funding arrangements for the whole school system. We have significant reservations about the ability of the EFA to accurately distribute funding to approximately 23,000 schools in time to enable schools to set budgets. We are not convinced that the EFA would be competent to answer the inevitable multiple questions from individual schools, which will be largely based on local circumstances. Given feedback from academies on your response times (and we have multiple examples of LAs supporting academies to answer questions that are strictly the business of the EFA) and in times of reducing staff levels in the EFA we are extremely concerned about the capacity of this to be done centrally.

The issues above also raise the question of whether TUPE will apply to LA staff who currently undertake school funding roles.

### **Building block A: per-pupil costs**

#### **3 Do you agree that the basic amount of funding for each pupil should be different at primary, key stage 3 and key stage 4?**

Yes

**Please provide any further comments::**

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. We would therefore recommend that consideration is given to the work that f40 has already undertaken on this and which has already been shared with the DfE. However, in line with our previous responses it would be better if there were some local flexibility to meet the needs of pupils at different ages in line with the local schools forum views.

### **Building block B: additional needs factors**

#### **4a Do you agree that we should include a deprivation factor?**

Yes

#### **4b Which measures for the deprivation factor do you support?**

Pupil-level only (current FSM and Ever6 FSM)

**Please provide any further comments::**

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. We would therefore recommend that consideration is given to the work that f40 has already undertaken on this and which has already been shared with the DfE. We support Ever6 FSM.

f40 maintains that Pupil Premium should be included within the new formula and to support that suggestion considers that there is a need to bring together necessary information about income levels held by all government departments in order to remove the need for parent applications.

Bringing Pupil Premium into the funding formula would enable a holistic view of deprivation and remove potential double funding for the same needs.

If two funding streams are to remain, there needs to be clear explanation of the expected outcomes for both streams.

The data changes need to be smoothed to remove the cliff edges of funding, especially if IDACI is used. The importance of this was highlighted by many unintended outcomes experienced in the recent IDACI updating.

#### **5 Do you agree we should include a low prior attainment factor?**

Yes

**Please provide any further comments::**

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. We would therefore recommend that consideration is given to the work that f40 has already undertaken on this and which has already been shared with the DfE.

The changes that are taking place to the Key Stage 2 SATS and to the reception baseline tests (including the variability of the different approved tests themselves) could have a huge impact on the number of pupils that either achieve or don't achieve the expected levels in both tests. There needs to be appropriate analysis of the tests to ensure that the results do not either dilute or underestimate the needs of schools. It is this sort of analysis that LAs do locally that the DfE/EFA will need to take responsibility for moving forwards. We question whether the EFA is close enough to the ground to anticipate these sorts of changes and take appropriate action within a national funding system.

#### **6a Do you agree that we should include a factor for English as an additional language?**

Yes

**Please provide any further comments::**

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. We would therefore recommend that consideration is given to the work that f40 has already undertaken on this and which has already been shared with the DfE.

#### **6b Do you agree that we should use the EAL3 indicator (pupils registered at any point during the previous 3 years as having English as an additional language)?**

Yes

**Please provide any further comments::**

f40 questions whether it takes two years or three years to successfully acquire English to enable learning. EAL3 should be used as an indicator if the evidence (as distinct from LA practice in funding), suggests that it takes three years. Otherwise EAL2 should be used.

**Building block C: school costs**

**7 Do you agree that we should include a lump sum factor?**

No

**Please provide any further comments:**

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. We would therefore recommend that consideration is given to the work that f40 has already undertaken on this and which has already been shared with the DfE.

There does need to be a separate lump sum for both primary and secondary phases.

The f40 model aims to meet the basic costs of a 'normal minimum' school size – defined as 60 pupils for a primary school and 600 pupils for a secondary school. We acknowledge that there are schools of below these sizes in many authorities; our expectation is that the additional cost of such schools in rural areas is covered by sparsity or as a work round, split sites. Where sparsity is not an issue, our view is that the funding model should not subsidise uneconomic provision.

There is an interaction between the lump sum and small schools which may not be reflected in sparsity alone.

**8 Do you agree that we should include a sparsity factor?**

Yes

**Please provide any further comments::**

In principle, but this needs to be clearly related to the lump sum and the assumptions on minimum size of school. When the factor was introduced three years ago, f40 discussed with the DfE the need to find a better method of defining sparsity and there was agreement that the measure does not work well for rural schools. It does not work well because without additional capital it is not possible to rationalise the school estate to support the sparse school method. Even asking two near schools to work in partnership (without formal structural changes) may not reduce the costs to such an extent that small rural schools remain viable. If near schools amalgamate there is probably the need for a split site factor to replace some of the lost lump sum, but the proposals for payment to LAs of funds for split sites leaves absolutely no incentive for the LA to suggest schools go down this route. Clearly, LAs will not be able to afford it (and the lump sum from the closing school cannot be recycled locally. (Also see answer to question 10). Academies and MATs may help in this regard, but they still need sufficient funding to deliver education across large geographical areas.

And yet, astonishingly, here we are three years later with the DfE proposing exactly the same method without having undertaken any research into this or suggested alternative methods. How this measure is used will lead to unintended closures of schools through funding strangulation and poor opportunities for pupils in those schools, which could lead to more children being bussed miles to school each day just because the funding system is not supporting the school estate effectively.

Importantly, schools also act as a social community hub in an area and are not just stand-alone institutions. Small schools need to be supported not only to maintain standards but also to preserve, in an efficient manner, their benefit to the community around them.

**Building block C: other school costs**

**9 Do you agree that we should include a business rates factor?**

No

**Please provide any further comments::**

No, given that rates add no value to the education of pupils, they cannot be formularised and that they are hugely different dependent on the charitable status of the school, it would be better if they were removed from the education system altogether.

However, if Business Rates are to be part of the school funding formula, f40 assumes that the EFA will also manage the complicated and often painful adjustment process.

**10 Do you agree that we should include a split sites factor?**

Yes

**Please provide any further comments::**

If a national formula is to be in place, the EFA will need to create clear, solid criteria for split sites and administer and these over time.

Recognition must be given to schools with genuinely split sites and ideally this will be part of local discretion and not part of the national funding formula. It would be almost impossible to fund these nationally taking into consideration the range of local circumstances and, therefore, it should be part of local discretionary arrangements.

If split site arrangements are funded nationally they must be regularly reviewed as they can be subject to huge change over short periods (e.g. a new building may close a site or change the need for the split site – will the EFA be able to keep up with this?)

**11 Do you agree that we should include a private finance initiative factor?**

Yes

**Please provide any further comments::**

f40 believes it is essential and must reflect actual costs. LAs costs must continue to be shared with DSG on a permanent basis regardless of the changes to regulations for national funding formula. To remove the link from the school funding system is to backtrack completely from the arrangements made when the PFIs were set up. This is a major moving of the goalposts and has the potential to leave LAs with huge costs and/or debts. See also response to Question 13.

**12 Do you agree that we should include an exceptional premises circumstances factor?**

Yes

**Please provide any further comments::**

If a national formula is to be in place, the EFA will need to create clear, solid criteria for exceptional premises circumstances and administer these over time.

But, recognition must be given to schools with exceptional premises circumstances and this should be part of local discretion and not part of the national funding formula. It will be almost impossible to fund these nationally taking into consideration the range of local circumstances and, therefore, should be part of local discretionary arrangements.

As would appear to be clear from the exceptional circumstance requests that have already been made by LAs nationally, these cover such a range of circumstance as to be impossible to formulaise. Circumstances change and are subject to considerable local knowledge which is likely to be lessened as schools become academies and arm's length from the LA. The LAs ability to keep track of these will diminish as the amount of soft information from school improvement teams or other services about schools that is available in the LA diminishes.

**13 Do you agree that we should allocate funding to local authorities in 2017-18 and 2018-19 based on historic spend for these factors?**

**Yes/No - Business rates:**

No

**Yes/No - Split sites:**

No

**Yes/No - Private finance initiative:**

No

**Yes/No - Other exceptional circumstances:**

No

**Please provide any further comments::**

These must be on actual cost basis (and must be refreshed annually).

Historic costs do not meet the requirement of schools or the LA. Many PFI contracts and other exceptional circumstances arrangements are linked to national inflation indices and, therefore, to provide only historic costs will not provide the school with sufficient funds to meet the payment.

Business Rates, similarly, generally increasing year on year and so if funding is provided to the LA based on historic costs, schools will not receive actual funding but a reduced funding. This needs to be linked to the academy rates mechanism whereby EFA pays actuals based on receipt of the bill. It would not be reasonable, and would probably be open to challenge, for maintained schools not to receive actual funding, but for academies to be fully reimbursed. Also where rates are revalued this can be taken into consideration completely. See also response to Question 9.

A long term and efficient solution needs to be found to deal with a range of local circumstances that cannot be managed nationally. This lends itself to a locally managed schools soft formula as outlined by f40 in its proposals.

**Building block C: growth**

**14 Do you agree that we should include a growth factor?**

Yes

**Please provide any further comments::**

**15 Do you agree that we should allocate funding for growth to local authorities in 2017-18 and 2018-19 based on historic spend?**

No

**Please provide any further comments::**

For the first two years it is important to reflect actual growth rather than historic growth. It is incongruous that future funding requirements for unknown growth are based on past funding.

From 2019-20 onwards there needs to be a mechanism to cover all types of future growth including infant class size legislation, falling rolls, new school start up and dis-economy costs and temporary and permanent expansions, including the revenue costs of resources for these places. This needs to be linked to the LA

statutory responsibility to ensure the sufficiency of school places in a strategic and economic fashion. Without these levers and mechanisms LAs will be unable to fulfil their responsibilities for school places.

## **Building block D: geographic costs**

### **16a Do you agree that we should include an area cost adjustment?**

Yes

### **16b Which methodology for the area cost adjustment do you support?**

hybrid methodology

#### **Please provide any further comments::**

But it would be helpful if the higher housing costs associated with living in a high cost low wage area (second homes driving up housing costs) which have an impact on teacher recruitment could be worked into it.

We are concerned about how the hybrid will be applied when there are no national pay scales as more academies are part of the arrangements.

We need more detail about how the ACA will be applied: is it individual to the school or generic for the LA area. The current anomalies of schools on opposite sides of a road receiving different funding won't be solved by an ACA that is too broad.

## **Factors not included in the formula**

### **17 Do you agree that we should target support for looked-after children and those who have left care via adoption, special guardianship or a care arrangements order through the pupil premium plus, rather than include a looked-after children factor in the national funding formula?**

Yes

#### **Please provide any further comments::**

This is inconsistent with retaining the Pupil Premium and the deprivation element of the formula.

F40 is concerned about how the amount will be removed from LAs.

Funding for the different values needs to be based upon evidence and a clear rationale for the amounts chosen. The f40 preferred method would be to allow local discretion for Schools Forums to allocate funds to this if it chooses.

### **18 Do you agree that we should not include a factor for mobility?**

Yes

#### **Please provide any further comments::**

f40 is broadly in agreement with this other than for service children and traveller children. Funding for their needs must be based upon evidence and a clear rationale.

f40's preferred method would be to allow local discretion for Schools Forums to allocate funds to this if it chooses. If the mobility factor is to be removed, then funding for mobility should be linked to the service children Pupil Premium instead (if Pupil Premium remains beyond 2019-20). See also the answer to Question 19 about having two factors for the same purpose.

### **19 Do you agree that we should remove the post-16 factor from 2017-18?**

Yes

#### **Please provide any further comments::**

## **Transition to the reformed funding system**

### **20 Do you agree with our proposal to require local authorities to distribute all of their schools block allocation to schools from 2017-18?**

No

#### **Please provide any further comments::**

f40 is extremely unhappy with this proposal and would advocate a soft formula reflecting local needs and accountability for the longer term.

f40 believes that the DfE has again completely missed the point that there is a solid interaction between the High Needs Block and the Schools Block. The costs to the High Needs Block are based in part on the arrangements that the LA, with its schools, has for high needs pupils (Special Schools, RP etc.).

The move towards a formula for the High Needs Block is anticipated to be lengthy and substantively based on historic costs and does not match up with the

timing of changes to the Schools Block. By treating the blocks in isolation leaves vulnerable children open to an education based on cost efficiencies rather than the most appropriate provision for the individual and is likely to drive the High Needs costs up without any impact on the schools that are driving them up.

Where schools and LA work together for the child and to make a range of provision for children, the flexibilities between the blocks can be utilised towards the best arrangements for all children including, for example, the provision of new special school academies to provide efficiency in high needs places

To split the High Needs Block from the Schools Block in this way puts all the pressure into the High Needs Block with no relief valves left in the system. In the long term this will not be to the benefit of any vulnerable children that need help.

As stated in Question 2 there are no incentives for schools to be inclusive by splitting the High Needs Block from the Schools Block and f40 believes there must be flexibility to move funding between the blocks (including the Early Years Block) as required and agreed with the Schools Forum.

**21 Do you believe that it would be helpful for local areas to have flexibility to set a local minimum funding guarantee?**

Yes

**Please provide any further comments::**

But the reference to several years of transition in the consultation document is worrying. The document recognises that cost pressures affect schools differently according to their ability to make efficiencies, which is related to how well funded they are. For low funded schools their ability to make the required efficiencies is constrained by the low funding and the longer this situation continues, the harder it is for those schools to provide a well-rounded education for their pupils.

f40 would like to know how this will be applied to existing academies. Transitional protections for academies must be removed very quickly; there are now no reasons for additional transition funding for academies. As stated in f40's proposal narrative this can be used to support the funding for schools that will have an exceptional movement in funding.

**Funding remaining with local authorities**

**22 Do you agree that we should fund local authorities' ongoing responsibilities as set out in the consultation according to a per-pupil formula?**

No

**Please provide any further comments::**

f40 would prefer to see a full description of ongoing functions before attempting to answer this question. We are concerned that not all the responsibilities will cease to the extent that this consultation assumes they will.

Until all schools are academies, LAs could end up with the most vulnerable schools left and those schools won't have the funding to pay for school improvement (for example). We think there will be higher costs to LAs as a result of removal of soft intelligence systems. There will be a fixed element of cost until the last school is converted and LAs will still need to pay schools and account (book keep) for schools monies (for example).

Maintained schools will not be provided with transitional funding for the lost ESG in the way that academies are likely to be and this is not equitable.

Even if all the proposals in this consultation and the White Paper occur, LAs will still get embroiled in complaints and questions from parents and the media even if school funding isn't the LAs responsibility (as part of local democracy and accountability). This will have a cost – including a reputational cost for both the LA and the DfE.

From 2017 onwards, when LAs will no longer have statutory responsibilities for school improvement, any school converting to a sponsored academy with a deficit will be the responsibility of the DfE and f40 strongly believes that deficits will at that point become the responsibility of the DfE/EFA and cannot be left with the LA.

If the DfE insists on funding LA responsibilities according to a funding formula, then the amount must be based on a realistic estimates of LA costs and potentially at differing amounts dependent upon the costs in the system in the first place.

**23 Do you agree that we should fund local authorities' ongoing historic commitments based on case-specific information to be collected from local authorities?**

Yes

**Please provide any further comments::**

There is an expectation in the consultation document that historic costs will unwind over time, but given that for many LAs PRC costs are based upon the life expectancy of a former employee, his/her spouse and in some cases their children, this could be an extremely long unwind period.

Schools Forums may have agreed a set of ongoing local arrangements (including staff costs) which will be difficult to unwind. These decisions have been made locally and in consultation with schools, so why is the DfE overriding these local decisions? Costs of redundancy made as a result of the DfE's decisions should be payable by the DfE.

f40 also considers that these types of arrangements should not cease and subject to local agreement should be allowed to continue and new ones should be allowed to start if required.

## The education services grant

### 24 Are there other duties funded from the education services grant that could be removed from the system?

**Please provide your comments::**

f40 would need more information to be able to answer this question. What changes does the DfE have in mind? There is not enough information to answer this even within the White Paper Educational Excellence Everywhere.

f40 believes all statutory responsibilities should be sufficiently resourced. Sufficient resources includes funding for the costs to transferring all schools to academies, and funding the costs of closing services associated with maintained schools, including redundancy costs and any ongoing PRC costs that arise as a direct result of these proposed changes. Currently the LA can hold a small miscellaneous budget from the DSG to support school costs; there is no mention of how these costs are to be managed in future.

Many of the roles that are currently undertaken by local authority staff will continue into the future to be undertaken by the EFA and there are therefore TUPE implications for these proposals for LA staff. We anticipate hearing from the DfE shortly as to how staff will be notified of these arrangements.

It is assumed that in future the DfE/EFA will pick up the costs of any closing schools along with the duties associated with closing schools such as retention of school records (pupil and accounting) for the statutory periods, clearance and cost efficient disposal of furniture and equipment (protection of public monies), safeguarding processes associated with closing schools.

### 25 Do you agree with our proposal to allow local authorities to retain some of their maintained schools' DSG centrally – in agreement with the maintained schools in the schools forum – to fund the duties they carry out for maintained schools?

Yes

**Please provide any further comments::**

Although our response is Yes, our inclination is to disagree with this concept, because it appears to be moving the costs from LAs to maintained schools without transitional protection. This is not the same for academies who will have protection on the loss of ESG.

However, if this route is to be followed, then the flexibility to request funding from the Schools Forum for these duties is needed.

We cannot realistically make a full judgement on this until we see the proposals and the detail about how this might work.

Further, there are other elements of pooled funding, such as trade union facilities budgets, free school meal eligibility checking arrangements etc., all contingencies which are far more effective when provided centrally and are valued by schools (including in some cases academies who also buy into these arrangements). These arrangements cannot be dismantled quickly and it is not to the benefit of schools to dismantle all of them. How can these arrangements be continued?

## Equality analysis

### 26 Please provide any comments on the equality analysis.

**Please provide any further comments::**

As stated in the main consultation responses, the impact of ring-fencing the Schools Block separately from the High Needs Block could have an impact on pupils who are disabled or have other SEN. There needs to be more research on how the ring-fencing interacts with the ways that LAs are currently organised for high needs pupils and with the levers on funding for support to these pupils, where such levers are removed.