

**Kenilworth School and Sixth Form**  
**Response to the National Funding Formula (NFF) Consultation Stage 2**

You may be aware that the Government are currently consulting on a new approach to funding education. Warwickshire has traditionally been a very poorly funded authority and we were hopeful that the NFF would see a redistribution of money across England so that our pupils would receive the same investment in their education as their peers in other areas.

The NFF falls considerably short of that, with significant differences between local authorities being maintained. At Kenilworth School and Sixth Form, we will actually receive less money to educate our students than we do now and that is on top of the significant reductions we have had to manage over the last five years. We thought it might be helpful if we outlined these for you.

Since 2013 we have had the funding we used to get to support the separate sixth form site reduced from £435,000 per annum to £38,000. Sixth Form funding has been cut from £1,942,481 to £1,653,856; in 2011 our sixth form students were funded at £4,581 each, in 2016 that has gone down to £4,135. We have also lost the funding we used to get as a specialist Sports College which was £315,020 each year. On top of this our annual capital funding has been reduced by £185,000 to £36,000. This was used for IT expenditure and refurbishments and these now have to be largely funded from the main school budget.

Our staff costs are currently 85% of our total expenditure, compared to 82% in 2012. Despite two rounds of redundancies staffing costs are rising; this is due to reduced income combined with increased National Insurance and Pension contributions even though the number of employees has decreased. From 1 April 2017 we will also have to pay £27,500 per annum for the Apprenticeship Levy.

As we are a school consisting of a majority of students who are considered to be advantaged in terms of socio-economic profile, we do not gain significant additional funding for pupil premium or disadvantaged students. We acknowledge that schools with a large proportion of disadvantaged students should have more funding to support their needs. However, under the NFF the allocation is disproportionately weighted against school such as ours.

Funding given to schools in a different socio-economic context from ours may have 3 times the additional income to support disadvantaged students, students with lower prior attainment and those who have English as an additional language but this should not be to the detriment of other schools such as ours. As our income is decreasing, we have to subsidise our 6<sup>th</sup> form and pupil premium expenditure through our main school budget which is decreasing year on year.

Continuing to offer the same broad and balanced curriculum in the future which meets the needs of all our students, is going to be impossible under the NFF.

*We would strongly urge you to take the time to respond to the Department for Education's consultation document and to write and email your MP.* The MP for Kenilworth and Southam is Jeremy Wright; his address is Mr Jeremy Wright QC MP, House of Commons, London, SW1A 0AA and his email address is [Jeremy.wright.mp@parliament.uk](mailto:Jeremy.wright.mp@parliament.uk).

We have put together a response to the consultation which reflects the impact the NFF will have on Kenilworth School (see pages 3 – 7) and you may wish to use this. It is always best to use your own words wherever possible as the Department for Education (DfE) will give less weight to lots of responses which say exactly the same thing.

Responses to the consultation can be made by clicking on this link:

<https://consult.education.gov.uk/funding-policy-unit/schools-national-funding-formula2/>

**The deadline for responses is 22 March 2017.**

When asked for details, please note that we are a local authority maintained school, our name is Kenilworth School and Sixth Form and our local authority is Warwickshire.

1. **In designing our national funding formula, we have taken careful steps to balance the principles of fairness and stability. Do you think we have struck the right balance?**

**NO**

The proposed NFF fails to achieve fair funding; it does not ensure that all schools receive the viable minimum to deliver core provision. It fails to reduce unjustifiable differentials between schools and geographical areas.

There is an undue emphasis in the consultation is on redistributing existing money more fairly, but not on the basic funding levels that are required for every school to deliver what is required (ie there should be a needs-based approach). As a result, the proposals being put forward still seem to rely heavily on historic spend (which, in turn, is influenced by previous Department for Education decisions regarding grant distribution). As a result, schools with similar characteristics will still be funded at different levels across the country

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

**YES**

Secondary schools must be funded at a higher level than primaries, however there is still an issue about *how* funding has been distributed *between* secondary schools across the country (rather than between sectors within the Local Authority area). There appears to be a failure to reflect the basic resources required to operate a secondary school.

3. **Do you support our proposal to maximise pupil-led funding?**

**YES**

The relative funding balance between all the factors in the formula must result in adequate funding for all schools, irrespective of size or location. However, we are of the view that there are too many factors proposed and too high a weighting applied to those factors. This has resulted in pupil-led funding being less in the national formula than in our current local formula and this undermines the basic principle of funding following the child.

4. **Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors? (Pages 20-21)**

**NO – allocate a lower proportion to additional needs**

The basic level of funding allocated to all schools needs to be adequate. Additional needs funding should not be at the expense of the basic entitlement funding. The latter is intended to provide a core baseline of funding for all

pupils. The fundamental problem with the NFF is the proposal to reduce basic per pupil funding from 76.6% to 72.5%, where it needs to increase to at least 80%. The impact of the NFF for Kenilworth School, as currently proposed, will be to reduce our curriculum offer.

A needs-led model should be produced to ensure that all schools are able to function with appropriate pupil teacher ratios and a lump sum that is set to meet a defined set of costs. Additional needs funding then needs to be added to this. The proposal does not currently deliver on this.

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

**Deprivation - pupil based at 5.5%**

**NO - Allocate a lower proportion**

There is already a duplication of funding of deprivation through pupil premium.

Where schools attract relatively low levels of additional needs funding there needs to be confidence that basic funding is sufficient to cover the costs of running the school, so that additional needs funding can be targeted where it is most needed, rather than prop up the funding for the majority of pupils.

**Deprivation - area based at 3.9%**

**NO - Allocate a lower proportion**

Any additional needs funding should be at a minimum to allow the maximum amount possible to be allocated to basic per pupil funding.

**Low prior attainment at 7.5%**

**NO - Allocate a lower proportion**

There is no evidence to link increasing the low prior attainment funding from 4.3% to 7.5% (£1550/pupil) in terms of raising attainment. All schools have SEND pupils with a range of disabilities who do not have low prior attainment. It would be more appropriate to allocate any such funds into the core entitlement to allow schools to support SEND students for whom they do not receive additional funding.

**English as an additional language at 1.2%**

**The proportion is about right**

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

**NO**

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

**Primary**

**This is about the right amount**

**Secondary**

**Allocate a higher amount**

It is not logical that primary and secondary schools should receive the same lump sum. In the case of Kenilworth School, we are more than 4 times larger than the largest of our primary feeder schools.

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

**Primary**

**This is about the right amount**

**Secondary**

**This is about the right amount**

9. **Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?**

**YES**

10. **Do you agree with the principle of a funding floor?**

**YES**

Kenilworth School's strong preference would be for a more fundamental review of the national formula that improves the equity of funding between areas. If the existing formula is implemented then the funding floor could not worsen, especially given the considerable losses that we will face as a result of the move to the national formula.

11. **Do you support our proposal to set the funding floor at minus 3%?**

**No – the floor should be lower (i.e. allow losses of more than 3% per pupil)**

If the NFF is to really be fair across all parts of the country, losses of greater than 3% per pupil will be required or there cannot be an equitable redistribution of education funding.

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

**YES**

- 13. Do you support our proposal to continue the minimum funding guarantee at minus 1.5%?**

**YES**

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

**YES**

More thought should be given to the level of basic per pupil unit funding that is necessary to run a secondary school. The National Association of School Business Managers (NASBM) calculates that at the moment it is £4,800 per annum. Under the NFF as proposed, Kenilworth School and Sixth Form will receive just £3,998. All students, whatever school they attend, in whatever part of the country and whatever their social background, should have access to a broad and balanced curriculum.

In the last five years, we have reduced expenditure on all non-staffing items as much as possible. We have had to absorb considerable increase in staffing costs including additional National Insurance and pension contributions as well as government agreed pay increases. Staffing costs now make up 85% of our total expenditure.

There are no big savings left to make by clever purchasing; the only options left are to increase class sizes, reduce the curriculum and reduce choices for students at KS4.

- 15. Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?**

**No - there should not be a deprivation factor**

Schools should receive the maximum amount of funding directly so that they can allocate resources as is most appropriate to their own context.

- 16. Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?**

**YES**

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

*Kenilworth School does not have a view on this*

- 18. Is there any evidence relating to the 8 protected characteristics identified in the Equality Act 2010 that is not included in the equalities impact assessment and that we should take into account?**

*Kenilworth School does not have a view on this*