

DfE Consultation

Fair Schools funding for all: completing our reforms to the National Funding Formula

Schools Block

The scope of the directly applied NFF

Please refer to section 3.1 of the consultation document.

1. Do you agree that our aim should be that the directly applied NFF should include all pupil-led and school-led funding factors and that all funding distributed by the NFF should be allocated to schools on the basis of the hard formula, without further local adjustment through local formulae?

- Yes
- No ✓** (Reasoning: *local discretion has previously been applied in Wiltshire re: sparsity and mobility previously to avoid double funding from army rebasing or, unfair / different funding levels for similar size and type schools*)
- Unsure

2. Do you have any comments on how we could reform premises funding during the transition to the directly applied NFF?

Please comment:

Having given this some thought we can offer no better alternative and agree that a formulaic factor for Split Site allowances would be appropriate. With regards the exceptional circumstances, this funding is applied to those schools without a hall or sports fields to enable the school to access these facilities from a community provider. Being able to continue funding for these schools is important but a national formulaic approach could result in over-funding some schools and under-funding others.

Growth and falling rolls funding

Please refer to section 3.3 of the consultation document.

3. Do you agree with our proposal to use national, standardised criteria to allocate all aspects of growth and falling rolls funding?

- Yes ✓** (Currently, schools have to be “good” to benefit for falling rolls funding, low eligibility)
- No
- Unsure

4. Do you have any comments on our proposed approach to growth and falling rolls funding?

Please comment:

A consistent funding methodology for 'growth' would be appropriate however some growth can be forecast and some can be 'unknown and lagged' – any method would need to suit both types of growth.

For brand new opening schools, a transparent and clear funding process for any 'pump priming' and annual funding towards revenue costs should be clear.

Setting a level of tolerance before awarding growth funding and falling rolls funding for what is considered to be 'business as usual' number growth and falls.

The use of a 'Pupil Number Adjustment' (PNA) to clawback growth funding issued to schools is wholly unfair as the schools anticipating the growth will have staffed up, according to the planned growth and should not be penalised through a PNA.

Next steps for the transition to the end state NFF for schools

Please refer to section 3.4 of the consultation document.

5. Do you agree that, in 2023-24, each LA should be required to use each of the NFF factors (with the exception of any significantly reformed factors) in its local formulae?

- Yes
- No ✓
- Unsure

6. Do you agree that all LA formulae, except those that already 'mirroring' the NFF, should be required to move closer to the NFF from 2023-24, in order to smooth the transition to the hard NFF for schools?

- Yes ✓
- No
- Unsure

7a. Do you agree that LA formulae factor values should move 10% closer to the NFF, compared with their distance from the NFF in 2022-23?

- Yes
- No ✓
- Unsure

7b. If you do not agree, can you please explain below.

Please comment:

Should be 100% - otherwise no point having a NFF – all LA's should have been moving towards the NFF as Wiltshire has done – there has been sufficient time for Schools Forums to transition.

8. As we would not require LAs to move closer to the NFF if their local formulae were already very close to the NFF, do you have any comments on the appropriate threshold level?

Please comment:

There shouldn't be a need for a threshold and all LA's should move to the NFF or, not with flexibility limited to relevant factors only

Next steps for the transition to the end state NFF for schools

Please refer to section 3.4 of the consultation document.

9. Do you agree that the additional flexibility for LAs in the EAL factor, relating to how many years a pupil has been in the school system, should be removed from 2023-24?

- Yes ✓ (As the proposal is to use the maximum period - EAL3, then no flexibility req'd in NFF)
- No
- Unsure

10. Do you agree that the additional flexibilities relating to the sparsity factor should remain in place for 2023-24?

- Yes ✓
- No
- Unsure

Central school services

Please refer to section 4.2 of the consultation document.

11. Are there any comments you wish to make on the proposals we have made regarding ongoing central school services, including on whether in the future central school services funding could move to LGFS?

Please comment:

There are services included in CSSB which are statutory for all schools, academy and mainstream and further statutory duties for mainstream schools. It is therefore vitally important that this funding is not diluted, reduced, removed or, additional burdens placed on already stretched local authorities.

Schools need and rely on statutory and preventative school improvement services provided by the local authority – if these were diluted, reduced, removed etc, then the impact on schools would be they would need to procure these using school budgets and not have the economy of scale benefits that the local authority enjoys.

This should be considered alongside the future role of schools forums

Incorporating the grant in the LGFS would result in a loss of transparency of the funding

12. Do you agree with the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs?

- Yes
- No
- Unsure

A consistent funding year

Please refer to section 4.5 of the consultation document.

13. How strongly do you feel that we should further investigate the possibility of moving maintained schools to being funded on an academic year basis?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

14. Are there any advantages or drawbacks to moving maintained schools to being funded on an academic year basis that you feel we should be aware of?

Please comment:

This is a very tricky issue, the impact is wider than school's accounting records although there are obvious benefits for aligning academic and financial years, schools have been managing the part year funding for many years with incredible success.

Schools

Academy heads tell us they like the alignment but that the requirement for them to complete academy monthly management accounts means the mid year return is less burdensome.

Maintained heads are concerned they will need to ask finance/admin staff to work during the school summer holidays and this could have contractual repercussions and an additional financial burden.

Maintained schools would need to complete a mid year return as at 31/3 in order to return their "soft" financial year to the local authority for them to include in their SOA.

The impact of lagged funding that academies endure would also impact maintained schools. Modelling would need to be carried out to explore the possibility of using January census data rather than the previous October's census data

Local Authorities

Huge volumes of midyear data from maintained schools for local authorities to process which will require resource.

One option is to exclude schools from local authority accounts to avoid the necessity of a "soft close" year end

Equalities Impact Assessment

Please refer to Annex C of the consultation document.

15. Please provide any information that you consider we should take into account in assessing the equalities impact of the proposals for change. Before answering this question, please refer to Annex (C) of the consultation document.

Please comment:

No comment

16. Are there any further comments that you wish to make about our proposed move to complete the reforms to the NFF?

Please comment:

With reference to 1. Above, in Wiltshire, we have benefitted from significant sums from the MOD when the army re-based from Germany in 2019.

The MOD provided additional funding for schools admitting significant numbers of pupils from Germany. Funding mobility on top of this would have funded those schools twice for those pupils.

Sparsity under the previous formula (as the crow flies) when modelled, put almost identical schools in very different funded positions and schools forum did not think this formula factor was fair – it was therefore not issued at the maximum sum.

Annualised schools funding does not allow efficient strategic planning, a three-year settlement taking account of increases such as the new social care employers national insurance increase, the upcoming pension strain pressures and of course, each year to be aligned to the cost of living (pay) inflation would reflect actual cost pressures schools are facing.

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