

Consultation - Bradford District's Early Years Single Funding Formula 2018/19

1) Introduction

- 1.1 Attached with this introduction is the full draft Technical Statement, which sets out the proposed methodology and timetable for the calculation of funding allocations for individual providers delivering the 2, 3 and 4 year old free entitlements in 2018/19. This Statement includes direction on the funding of the extended 30 hours free entitlement for eligible 3 and 4 years olds, which began at September 2017. The major changes in the operation of Bradford's EYSFF for 2018/19 are set out at the beginning of the Statement.
- 1.2 Our proposals for 2018/19 incorporate our response to the changes set out by Government in its consultation on national funding formula and early years funding reform in 2017, which can be accessed here. Our proposals follow what we set out for providers in our consultation in autumn 2016 and what we began to implement at April 2017. The only significant deviation from our autumn 2016 consultation is the proposed implementation of a monthly 'starters and leavers' counting and payment arrangement from 1 April 2018. This is a significant change in methodology and providers should review this closely.
- 1.3 As we set out in autumn 2016, the most significant 'directed' change resulting from the DfE's national reform is the reduction in the value of Setting Base Rates allocated in Bradford for the delivery of the 3 and 4 year old universal and extended entitlements. This is especially significant for the PVI sector in 2018/19. The rates of funding for Maintained Nursery Schools remain protected in 2018/19 (and 2019/20) because the DfE has allocated specific monies into the DSG to enable / require this.
- 1.4 Please note that the values of funding rates quoted in this consultation document, including the Setting Base Rates, are currently indicative and should be viewed as such. These indicative rates are highlighted in yellow. It is expected that rates of funding for 2018/19 will be set following the Schools Forum meeting on 10 January 2018. However, the rates presented in this document do represent what we aim to fund in 2018/19. Therefore, these do give providers a base on which to plan.
- 1.5 The Authority has developed the proposals for 2018/19 on the basis that:
- We will continue the policy of ring-fencing of the Early Years Block.
- We will move to monthly starters and leavers counting at April 2018, which will replace the termly headcount count methodology (and 2nd headcount for the 2 year old offer).
- We will seek to simplify the processes for PVI providers, which will include no longer publishing a 'hard copy' pre-calculated Confirmed Indicative Budget for PVI providers in March. Instead, we will begin monthly payments based on the latest confirmed position and we will enable providers to use a ready reckoner to estimate funding.
- Our Early Years Single Funding Formula will continue to 100% pass through the DSG funding rate for:
 - The 2 year old free entitlement
 - o The Early Years Pupil Premium (required)
 - The Disability Access Fund (required)
- We will continue & increase the Early Years Block's contribution to EY SEN Inclusion funds, which is
 proposed to be managed through a new SEND EY Centres of Excellence structure. Early Years
 Inclusion monies will be 100% funded from within the Early Years Block from 1 April 2018.

- We will establish a Universal Base Rate for the 3 & 4 year old offer, as required by the DfE, with this
 overridden in 2018/19 for:
 - Nursery Schools with the allocation of the specific MNS factor, meaning that the funding rates for each nursery school (base and deprivation) will continue to be retained at their 2016/17 values, as we have done in 2017/18.
 - PVI providers and nursery classes through the allocation of additional one off monies on a transitional / temporary basis. The aim will be to set a base rate at £4.12 per hour, as set out in the autumn 2016 consultation.
- We will continue the nursery school sustainability supplement using the current methodology but bringing the 30 hours extended entitlement into the calculation (which will reduce the cost of the sustainability supplement).
- We will continue our current deprivation supplement within the 3&4 year old EYSFF in 2018/19, calculated at 9.5% of EYSFF, and will keep this under review. Deprivation rates will reduce in 2018/19 because the overall EYSFF funding envelope is reducing due to the impact of national reform.
- We will not introduce any further supplements in 2018/19 and will keep this position under review, noting that any additional supplements would erode the value of the deprivation supplement as the maximum spend on all supplements set by the DfE is 10% of EYSFF.
- We will aim to hold one off monies within the Early Years Block so that a minimum 3 & 4 year old base rate of £4.11 can be afforded in 2019/20, as set out in the autumn 2016 consultation. This will be subject to the value of one off monies available.
- 1.6 Please use the responses form attached at the end of this document to submit your views on the proposals outlined in the consultation. There is space on this form for you to comment on any aspect of the proposals. If you wish to discuss these proposals in more detail, or have any specific questions, please contact either Andrew Redding andrew.redding@bradford.gov.uk 01274 432678, Dawn Haigh dawn.haigh@bradford.gov.uk 01274 433775 or Jaclyn McManus jaclyn.mcmanus@bradford.gov.uk 01274 433775.
- 1.7 We are also currently setting up the facility for responses to be submitted via 'snap survey'. Details of how responses can be submitted in this way will be published shortly.
- 1.8 Please ensure that your response is submitted by the deadline of **Friday 1 December 2017**. Any responses received after this deadline date may not be included in the overall analysis presented to the Schools Forum.
- 1.9 It is anticipated that the Schools Forum will make its final recommendations on 2018/19 arrangements on Wednesday 10 January 2018. A confirmed Technical Statement, giving sight of the final Early Years Single Funding Formula, and rates of funding, for the 2018/19 financial year will be published very shortly after.

Bradford District Early Years Single Funding Formula 2018/19

(DRAFT VERSION FOR CONSULTATION)

PLEASE NOTE THAT THIS TECHNICAL STATEMENT IS WRITTEN ON THE RECOMMENDATIONS
FOR THE 2018/19 FINANCIAL YEAR BUDGET MADE BY BRADFORD SCHOOLS FORUM AT ITS
MEETING ON XX JANUARY 2018. A FINAL DECISION ON THESE RECOMMENDATIONS WILL BE
TAKEN BY COUNCIL ON XX FEBRUARY 2018

INTRODUCTION AND SUMMARY

1) The Basic Early Years Single Funding Formula (EYSFF) for the 3 and 4 year olds universal and extended free entitlement in 2018/19 is:

$(a + b) \times c + d = Total EYSFF Funding 2018/19$

- a) Provider Base Rate (£ per child per hour)
- b) Provider Deprivation & SEN Rate (£ per child per hour)

(a + b) = Provider's Total Funding Rate

- c) No. of Free Entitlement Hours actually delivered at the provider (per year)
- d) Funding for Sustainability (Nursery Schools)

For example, on the simple basis that all children at a provider access 15 hours entitlement per week for 38 weeks per year, funding using the EYSFF in 2018/19 will look like *:

a) Provider Base Rate	£4.12	** Example Rate Only
b) Provider Deprivation & SEN Rate	£0.30	** Example Rate Only

^{*} Please note that counting arrangements are more sensitive that set out in this example. Providers are funded on a full 'starters and leavers' methodology for the actual number of hours delivered across the full year.

The provider's funding rate per hour = (£4.12 + £0.30) = £4.42

c) No. of Free Entitlement Hours actually delivered at the provider (per year) = 39,660 calculated as follows:

	Children	Hours Delivered
i Summer Term	78	14,040
ii Autumn Term	62	13,020
iii Spring Term	70	12,600
		0.4== 0.0

Sub Total EYSFF Funding = $£4.42 \times 39,660 = £175,297$

2) The Basic Early Years Single Funding Formula (EYSFF) for the extended 30 hours entitlement for eligible 3 & 4 Year Olds is proposed to operate within the same framework as the universal 15 hours entitlement as set out in this Technical Statement.

Rates of funding, timetabling and counting arrangements are the same. Specific guidance about the funding of the 30 hours entitlement, where necessary, is incorporated into this Statement.

3) The <u>2 year old free entitlement</u> in 2018/19 is proposed to continue to be funded via a simple flat rate per child per hour for all providers. The value of rate for all providers is set at £5.20.

The timetabling and counting arrangements for the funding of the 2 year old entitlement are the same as for the 3 and 4 year old entitlement. Specific guidance about the funding of the 2 year old entitlement, where necessary, is incorporated into this Statement. The movement to starters and leavers (explained below) removes the need to continue a 2nd headcount.

Question 1 – Do you agree with the proposal to retain the single funding rate value for all providers for the 2 year old entitlement set at the value the DfE funds Bradford's Early Years Block (which in 2017/18 was £5.20 per hour)? If not, please can you explain why not.

4) We propose to move from a termly headcount to a monthly <u>'starters and leavers'</u> based counting arrangement from April 2018 for the funding of all entitlements.

This technical statement explains this new counting arrangement and how monthly payments will be adjusted during the year. From 1 April 2018, all providers are required to submit information, at individual child level, on their actual delivery of entitlement hours on a monthly basis. This information is to be submitted through the Bradford Provider Gateway. This means that funding will be calculated on actual hours delivered, adjusted for school holidays and where children take up their entitlement over extended weeks. 'Hours delivered' are the free entitlement hours children are registered to take at that setting, taken from the contracts signed with parents.

Under the starters and leavers methodology, the number of hours delivered, rather than the headcount of children on roll, determines funding.

At the same time, responding to feedback, we have sought to simplify the payment methodology for PVI providers and have moved away from the use of a pre-populated estimated Indicative Budget as the basis of monthly payments. Confirmed Indicative Budgets will still be calculated and used for maintained providers.

There are 2 different proposed methodologies for the timing of payment adjustments, one for PVI providers and one for maintained providers. A worked example for each is attached with this Statement. Both are based on the monthly re-calculation of funding for actual delivery. However, whereas the PVI methodology *implements* a payment adjustment monthly, the maintained provider methodology groups the monthly adjustments together to implement payment changes 3 times a year. This is because maintained schools already have a well-established monthly advances payments system and EYSFF funding will continue to be allocated using this. These systems will be kept under review.

The starters and leavers methodology is somewhat different from the previous termly headcount methodology and providers in all sectors may find that their total levels of funding and the profile of this funding across the year are affected by this. All providers must, using the Ready Reckoner, assess how the starters and leavers methodology affects their funding levels and should consider what action they take in response. In certain circumstances, for example, where providers admit children late in the term, the new methodology will fund hours previously not counted under the single termly count method and these providers may see their funding increase. However, the Authority can identify that the funding levels of providers in the following circumstances could be reduced by this change:

- Providers that have informal or formal staggered intakes of nursery children. For example, where
 occupancy in September is lower than what would have been recorded previously in that term's
 census collected in October, the funding the provider would receive in the autumn term would be
 lower than allocated under the single termly count method.
- Providers that do not deliver provision equivalent to a full 190 days annually due to holiday and other closed days e.g. INSET days.
- Maintained providers that have a holiday calendar that is different from the Authority's standard calendar. These providers see may see larger adjustments vs. the Confirmed Indicative Budgets as

these budgets will estimate funding per term based on the Authority's standard calendar. This would possibly be more of an issue for providers where the numbers per term are significantly different.

Providers, where the numbers on roll vary significantly week on week. The previous single termly
count 'smoothed' these variations. The actual starters and leavers methodology will not do this.

The Authority's main advice is for all providers to use the Ready Reckoner, which will be published again in February 2018, to assess the impact and any risk within their 2018/19 budget planning. Prior to this, providers can use the examples attached to this Statement to gain a better understanding of the change.

Question 2 – Do you agree with the proposal to move to a monthly 'starters and leavers' based counting arrangement from 1 April 2018 for all entitlements? If not, please can you explain why not.

Question 3 – Do you agree with the proposed approach to the calculation of monthly payments, and adjustments, as set out in this Technical Statement? If not, please can you explain why not.

Question 4 – Do you have any comments on how we could improve the proposed arrangements, including where our guidance could be clearer?

5) We propose to move towards the establishment of a <u>Universal Base Rate</u> for the 3 and 4 year old entitlements at April 2018, as we set out in the autumn 2016 consultation

A Universal Base Rate for the funding of 3 and 4 year old provision is a requirement of the DfE's national early years funding reform. Local authorities are required to have this in place at April 2019 at the latest.

We developed, and consulted on, the principles on which the 2018/19 EYSFF is based in our response to the DfE's reform at April 2017, on which our current 2017/18 year's formula is set. We set out the intention in autumn 2016 to adopt new arrangements in 2018/19 under protection, including a universal base rate. A key guiding principle for 2018/19 proposals has been to guard against moving away from what we have agreed and set out for providers previously, on the basis that providers have used this information to inform their business planning.

Below are the rates of funding we forecasted and published within the autumn 2016 consultation:

ESTIMATED Rate Per Hour	2016/17	2017/18	2018/19	2019/20
2 YO Offer - Universal Base Rate	£4.83	£5.20	£5.20	£5.20
3 & 4 Year Old Entitlement				
Setting Base Rate – Nursery Schools	£5.70	£5.45	£4.12	£4.11
Setting Base Rate – Nursery Classes	£4.13	£4.11	£4.11	£4.11
Setting Base Rate – PVI Providers	£4.62	£4.42	£4.12	£4.11
Mean Deprivation & SEN Rate	£0.68	£0.50	£0.49	£0.47
Nursery Schools Supplement	£1.07	£1.87	£3.16	£3.18
Looked After Children Additional	£1.75			
Early Years Pupil Premium	£0.53	£0.53	£0.53	£0.53

In its recommendations for 2017/18 the Schools Forum agreed:

- To 'ring-fence' the Early Years Block in 2017/18 and to apply this principle in future years.
- To identify a (minimum) sum of £500,000 of DSG one off monies held to allocate into the 2018/19 EYSFF in particular to support the value of the setting base rate for the PVI sector.
- The enhancement of the Early Years Block's SEN Inclusion budget from April 2017 (a budget total of £600,000, funded 50/50 between the Early Years and the High Needs Block).

So, in 2018/19 it is proposed that there is now a single Universal Base Rate per hour for the 3 and 4 year old free entitlements. The value of this is £4.12 per hour. It is made up of £4.01 of on-going Early Years Block DSG funding and £0.11 of one off monies, which is funded from Early Years Block DSG reserves. All providers are funded on this starting Base Rate. Maintained Nursery Schools then receive an additional amount, from the DfE's specific Maintained Nursery School Supplement, to bring the Base Rate for Maintained Nursery Schools up to £5.70 per hour, which is the value of their Base Rate in 2016/17 prior to the implementation of the DfE's national formula reform.

It is important that providers understand that an element of the base rate funding in 2018/19 is funded by one off reserves, which can only be allocated whilst reserves are present.

Question 5 – Do you agree with the proposal to seek to retain the universal base rate funding values in 2018/19 that were published in the Authority's consultation in autumn 2016, incorporating the allocation of some Early Years Block DSG reserves? If not, please can you explain why not.

Question 6 – Do you have any comments on this estimated universal base rate?

6) One off funding is included within the proposed the Setting Base Rate for the 3 and 4 year old universal and extended entitlements in 2018/19, which is time limited and may not continue after April 2019.

The Authority's intention is to seek to retain the base rate funding values in 2019/20 that were published in the autumn 2016 consultation. The delivery of this is subject in particular to a) the continuation of a sufficient value of reserve to allocate in 2019/20 and b) the value of the Early Years Block at and after April 2019. Without the allocation of one off monies in 2018/19, the setting base rate for nursery classes and PVI providers would be £4.01 per hour. The extent to which a higher rate can be maintained from 1 April 2019 is subject to the 2 factors highlighted above, but also how the move to starters and leavers and the full establishment of the extended 30 hours entitlement affects the cost of our provision vs. the value of the Early Years Block as well as other considerations, such as the value of the deprivation and SEN supplement and the value of the Early Years Inclusion Fund. These matters will be considered further in annual review of the EYSFF. Certainly, the position may be that the on-going value of the Universal Base Rate, from April 2019, could fall to around £4.00 per hour.

The alternative to holding reserve for 2019/20 would be to allocate more reserve into the 2018/19 EYSFF to provide for a higher funding rate than £4.12. This would mean that settings would have a higher rate in 2018/19 but potentially a rate lower than £4.11 / closer to or at £4.00 in 2019/20.

The overall spending on the deprivation and SEN supplement is proposed to be retained at 9.5% in 2018/19. Because the values within the EYSFF have reduced (due to national reform) the rates of deprivation and SEND funding have also reduced (as these are calculated on 9.5% of a budget smaller than existed in 2017/18). We do not propose to introduce any further supplements in 2018/19 and will keep this position under review, noting that any additional supplements would erode the value of the deprivation supplement (with the supplements cap being set by the DfE at 10% in total).

Question 7 – Do you agree with the proposal to seek to hold Early Years Block reserve so that we can retain the base rate funding value in 2019/20 that was published in the Authority's consultation in autumn 2016 (£4.11) rather than allocate all reserve into the 2018/9 EYSFF? If not, please can you explain why not.

Question 8 – Do you agree with the proposal to continue our current Deprivation and SEN supplement factor in 2018/19 set to allocate 9.5% of the EYSFF? If not, please can you explain why not.

Question 9 – Do you agree with the proposal not to add any further supplements into the Early Years Single Funding Formula in 2018/19? If not, please can you explain why not.

7) Funding is allocated <u>in addition</u> to the basic Early Years Single Funding Formula for 3 purposes, which are explained further in this Statement:

- Early Years Pupil Premium
- Disability Access Fund
- Early Years SEND Inclusion

Question 10 – Are there any changes that you would like to see made to the Early Years Single Funding Formula in 2018/19 that have not been proposed?

Question 11 - Do you have any other comments that you have not made elsewhere in your response?

SECTION 1

a) There is now a single Universal Base Rate per hour for the 3 and 4 year old free entitlements. In 2018/19 the value of this is £4.12

- The Base Rate is expressed as a value of funding per child per hour.
- It is made up of £4.01 of on-going Early Years Block DSG funding and £0.11 of one off monies, which is funded from Early Years Block DSG reserves.
- All providers are funded on this starting Base Rate. Maintained Nursery Schools then receive an
 additional amount, from the DfE's specific Maintained Nursery School Supplement, to bring the
 Base Rate for Maintained Nursery Schools up to £5.70 per hour, which is the value of their Base
 Rate in 2016/17 prior to the implementation of the DfE's national formula reform.
- The Universal Base Rate is used to fund both the universal 15 hours entitlement and the additional extended 15 hours entitlement, up to a maximum of 30 hours per child, for eligible children.
- The Universal Base Rate is fixed and will not change during 2018/19 (it is fixed at the point the 1st draft of Indicative Budgets are published, which for 2018/19 is in February 2018) (please see the timetable).
- For Primary schools and academies with Nursery classes, funding allocated to support whole school
 costs remains fully within the Primary sector funding formula (e.g. business rates).

b) The value of a provider's 'Deprivation & Special Educational Needs (SEN) Rate' for 3 and 4 year olds is based on the measured level of deprivation of children taking the free entitlement at that provider

- All Local Authorities are required by the Department for Education (DfE) to have a deprivation factor within their EYSFF. This funding is allocated, in addition to the Base Rates, specifically to:
 - Support raising the educational outcomes and life chances of children from more deprived backgrounds
 - Support the reduction of the attainment gap that currently exists between children from more deprived and children from more affluent backgrounds
 - Support providers for the additional costs associated with the delivery of the free entitlement to children from more deprived backgrounds and to children that have additional lower level educational needs (Early Years Action, Early Years Action +).
 - Please note that this funding does not replace the provision and processes in place within the Bradford District to support children with higher level special educational needs.

As with the Base Rate:

- o A provider's 'Deprivation & SEN Rate' is expressed as a value per child per hour,
- o These rates are fixed at the point the 1st draft of Indicative Budgets are published, which for 2018/19 is in February 2018. They will not change during 2018/19.
- All 3 and 4 year old entitlement hours, including the extended 30 hours, delivered at a provider are funded at the same Deprivation and SEN Rate.
- The DfE's Maintained Nursery Schools Supplement is allocated to maintain each Maintained Nursery School's 'Deprivation and SEN Rate' at the 2016/17 value.
- Unlike the Base Rate, Deprivation and SEN Rates vary according to the measured level of deprivation of children attending each provider. Each provider's Deprivation and SEN Rate is calculated using the Index of Multiple Deprivation and the postcodes of children taking up the free entitlement at the provider, recorded in the January 2018, January 2017 and January 2016 censuses (3 year rolling average). Because of the time lag in data, the Local Authority appreciates that using this approach may produce some anomalous funding results, especially for smaller providers. We keep this approach under review.

Rates of funding have been calculated, based on the estimates of funded hours delivered used to
calculate the Indicative Budgets, using the Index of Multiple Deprivation (IMD) scores linked to
individual children's postcodes. Where this data for an individual provider cannot be properly
determined or is not available, and for providers that newly establish during the year, the provider's
deprivation rate will be calculated using the average IMD scores for all providers of this type. This is
especially applicable for Childminders.

c) Each provider is funded on the number of 3 and 4 year old free entitlement hours actually delivered with this information being collected monthly on a full 'starters and leavers' basis

- This is a change in process for 2018/19. Previously providers have been funded on the basis of a termly count, collected 3 times a year (in May, October and January).
- From 1 April 2018, providers are required to submit information, at individual child level, on their actual delivery of entitlement hours on a monthly basis. This information is to be submitted through the Bradford Provider Gateway. Specific technical guidance on the use of the Gateway, and the information that is required to be submitted, is provided here (link to be added).
- This means that funding allocated will be calculated on actual hours delivered, adjusted for school
 holidays and where children take up their entitlement over extended weeks. As a simple example, a
 maintained school will not receive funding in August if the school is fully closed and no hours have
 been delivered. However, if a school is open and delivers hours over the summer holidays, it will
 receive funding for that delivery.
- 'Hours delivered' are the free entitlement hours children are registered to take at that setting, taken from the contracts signed with parents.
- The Gateway will open on the first day of each month, beginning 1 April 2018, and will close on the last day of each month, but allowing specifically for more time at the beginning of September where schools return after 1 September. Once the Gateway is closed, the Local Authority will process the delivery information and will calculate / amend funding and payments as set out in paragraph f. Payments to PVI providers will be made monthly and will be adjusted monthly. Payments to maintained providers will be made monthly and adjusted termly.
- The Gateway will open at the start of each month with pre-populated information from the previous month. This means that providers do not have to enter information from scratch. Providers are advised to update their information on the Gateway 'as they go' so that the job of inputting / revising this is not left until the end of each month.
- The Authority reserves the right to make adjustments to the funding paid, including continuing to fund on the previous month's data, or basing a payment on an estimate, or not making any payment, where the information submitted by providers is demonstrably incorrect or is missing.
- The timing of certain duplicate checks may mean that funding is corrected, or withdrawn, at a later date.
- The censuses required by the DfE are no longer used for EYSFF purposes. However, schools are still required to submit a termly census and PVI providers an annual census in January.

d) Only children eligible for the 3 and 4 year old free entitlements will be funded

Universal 15 Hours Entitlement

The EYSFF for 3 and 4 year olds will only allocate funding for children in providers that are
accessing the free entitlement from the term after their 3rd birthday. The 1 September, 1 January
and 1 April are taken as start dates for each of the terms. The offer has been extended to eligible 2
year olds, but this does not mean all children accessing provision under aged 3 are eligible for
EYSFF funding.

- The maximum number of hours any child will be funded for, for the period 1 April 2018 to 31 March 2019, for the universal entitlement is 15 hours per week (for 38 weeks) or the annual equivalent of this total. This is the same for any child regardless of their age, so a four or five year old child staying in nursery (rather than starting Reception) will only be funded for the maximum on this basis, unless they are eligible for the extended 30 hours or they are continued to be placed at the request of the Local Authority (e.g. children with SEND), where they will be funded for 30 hours.
- The monthly 'starters and leavers' methodology will identify where a child stretches their take up of their entitlement over more than 38 weeks and will fund this accordingly.
- Although a child can take up their entitlement over two providers, the maximum entitlement is still the equivalent of 15 hours per week over 38 weeks per year, unless otherwise agreed. Where a child attends two providers, the Local Authority will fund each provider on a pro-rata basis only up to a maximum of 15. Where a child attends two providers, the individual providers should ensure they are aware of the free entitlement hours being accessed by that child at another provider; this should help to avoid funding discrepancies regarding duplicate pupils. This may involve discussion with the providers involved where the pro-rata split is not clear from the census returns.
- The ESYFF no longer applies a cap on the number of hours funded based on the published admission number of a maintained setting.

Extended 30 Hours Entitlement

- Some children will be entitled to 30 hours per week (for 38 weeks per year) and, for these children, 30 hours x 38 weeks is the maximum number of hours that will be funded by the EYSFF between 1 April 2018 and 31 March 2019.
- The monthly 'starters and leavers' methodology will identify where a child is stretching their take up of their entitlement over more than 38 weeks and will fund this accordingly.
- More detailed guidance on the eligibility requirements for the extended 30 hours entitlement, the
 processes for determining this and how the Authority is required to verify eligibility, can be found on
 Bradford Schools Online here.

e) The Confirmed Indicative Budget published in March 2018 for maintained providers only gives an estimate of funding. A pre-calculated Indicative Budget for PVI providers is replaced with a flexible Ready Reckoner

- A pre-calculated 1st draft Indicative Budget for 2018/19 will be published at the end of February 2018 only for maintained providers. This will show a provider's Base Rate and Deprivation and SEN Funding Rate, which are fixed for 2018/19. For the purposes of calculating these Indicative Budgets, simple estimates of the funded free entitlement hours for the following year will be used. The pre-calculated Indicative Budget will be largely calculated on hours delivered by each school recorded in the previous year i.e. estimating that a school's numbers will be the same, adjusted for known changes, such as the full year delivery of the extended 30 hours entitlement.
- Maintained providers will have the opportunity to revise their estimates, should they wish, to incorporate their latest information on admissions for the coming financial year, including anticipated numbers of children taking up the extended 30 hours offer. A Confirmed Indicative Budget for 2018/19 will then be published in mid-March 2018. This budget will be used to begin payments to maintained schools within the whole-school advances system. A ready reckoner for maintained providers to use to estimate funding adjustments will be published, as now, alongside the Confirmed Indicative Budgets.
- Pre-calculated Indicative Budgets will no longer be published for PVI providers. Instead, an
 electronic (Excel) Ready Reckoner will be published in February 2018, showing the per hour rates
 of funding for each provider and allowing providers to calculate their own indicative budgets based
 on their estimates of hours to be delivered across the next financial year. This change is in
 response to the requests from providers to simplify the information that is published. Please note

that the publication of a ready reckoner for PVI providers is not new (this is done now), but its publication will be brought forward from March to February.

f) A provider's actual funding will be adjusted to reflect differences between estimated and actual entitlement hours delivered during the financial year

- Because of the time lag in the collection of actual information e.g. we cannot make a payment in April 2018 based on actual April delivery as this data will not be available until after the Gateway closes on 30 April, initial payments that are made will be based on estimates.
- The first payment of the year, in April 2018, for maintained providers will be based on the Confirmed Indicative Budget. For PVI providers this will be based on spring term 2018 actual delivery information (from 1 April 2019 this will be based on the March 2019 actual).
- The collection of actuals information monthly then allows for the redetermination of payments on a monthly basis in arrears. So the estimated payment for April 2018 can be adjusted in May 2018. We can then fund May using the April actual, June using the May actual, and so on.
- There are 2 different methodologies for the timing of adjusting payments, one for PVI providers and one for maintained providers. A worked example for each is attached with this Statement. Both are based on the monthly re-calculation of funding for actual delivery. However, whereas the PVI methodology *implements* a payment adjustment monthly, the maintained provider methodology groups the monthly adjustments together to implement payment changes termly 3 times a year. This is because maintained schools already have a well-established monthly advances payments system and EYSFF funding will continue to be allocated using this. Schools are already familiar with the way in which these advances are set at the start of the financial year, but are then adjusted to take account of changes in funding during the course of the year. The adjustments to EYSFF funding will be incorporated into the September 2018, January 2019 and March 2019 advances. Please see the timetable.
- The table below summarises the different methodologies:

Payment	PVI	Maintained
April 2018	March actual	As per the Confirmed Indicative Budget estimate for summer term
May 2018	April actual + adjustment for the difference between the April payment and April actual	As per the Confirmed Indicative Budget estimate for summer term
June 2018	May actual + adjustment for the difference between May payment and May actual	As per the Confirmed Indicative Budget estimate for summer term
July 2018	June actual + adjustment for the difference between June payment and June actual	As per the Confirmed Indicative Budget estimate for summer term
August 2018	July actual + adjustment for the difference between July payment and July actual	As per the Confirmed Indicative Budget estimate for summer term
September 2018	August actual + adjustment for the difference between August payment and August actual	As per the Confirmed Indicative Budget estimate for autumn term + adjustment for summer term actuals (April through to August)
October 2018	September actual + adjustment for the difference between September payment and September actual	As per the Confirmed Indicative Budget estimate for autumn term
November 2018	October actual + adjustment for the difference between October payment and October actual	As per the Confirmed Indicative Budget estimate for autumn term

December 2018	November actual + adjustment for the difference between November payment and November actual	As per the Confirmed Indicative Budget estimate for autumn term
January 2019	December actual + adjustment for the difference between December payment and December actual	As per the Confirmed Indicative Budget estimate for spring term + adjustment for autumn term actuals (September through to December)
February 2019	January actual + adjustment for the difference between January payment and January actual	As per the Confirmed Indicative Budget estimate for spring term
March 2019	February actual + adjustment for the difference between February payment and February actual	Payment based on actual spring term incorporating any required adjustment for over / under payment (January through to February)

- Under both methods it is not possible to make the final payment in March 2019 using the March actual delivery information as this will not be collected until 31 March. Therefore, for both PVI and maintained providers, the March 2019 payment will be based on the February actual, meaning that an adjustment will be made in the first payment in the new 2019/20 financial year for the difference between the March payment and the March actual. Essentially, all providers will be paid in 12 instalments in the 2018/19 financial year for the actuals between April 2018 and February 2019 (11 actuals) with 1 estimate for March 2019. For maintained providers, the spring term adjusted funding will be based on the January actual plus the February actual x2.
- Please also see the timetable for when adjustments will be published and actioned in 2018/19.
- This is a new methodology that will be tested and reviewed for 2019/20. We welcome feedback from providers on the payments adjustment system.
- Additional notes on the calculation of adjustments:
 - Other funds Early Years Pupil Premium and Disability Access Fund especially will be paid within the monthly system.
 - o For academies, the default method of payment / adjustment will be that of the maintained providers.
 - o Funding adjustments will take account of the Maintained Nursery School sustainability funding; the ready reckoner provided by the Local Authority will incorporate this.
 - o The value of adjustments for maintained providers is influenced by the accuracy of the estimates of funded hours within the Confirmed Indicative Budget used to begin payments.
 - The movement to the 'starters and leavers' methodology means that settings that have previously staggered intakes into nursery provision may see larger negative adjustments where their number on roll is low at the start of each term. Settings should use the Ready Reckoner to predict this and to consider what action to take.
 - Adjustment values are likely to be larger in settings that have more volatile numbers that change month on month. Settings should use the Ready Reckoner.
 - o The positioning of school holidays differently from the Authority's standard timetable may affect the value of adjustments. Settings should use the Ready Reckoner.
 - Adjustments for all providers can be both positive and negative.
 - Where closed or closing providers owe funding to the Local Authority that cannot be recovered through the adjustment of advances the provider will be asked to pay the funding back via cheque or BACs. Open providers that have significant negative adjustments, that would take more than one month to repay, or are present at the end of the financial year, may be asked by the Authority to repay via cheque or BACs.

g) In 2018/19 EYSFF funding will continue to be paid monthly to all providers

- Maintained schools already have a well-established monthly advances payment system and EYSFF funding will be allocated using this.
- We moved to monthly payments for PVI providers at April 2016. 2018/19 arrangements are revised and simplified on those of 2017/18 as explained above.
- Payment schedules will continue to be published monthly on Bradford Schools Online. The PVI schedules will automatically give sight of basis for the calculation of payments on actuals data. For maintained providers, an additional schedule will be published alongside the whole-school advances schedules in September, January and March so that providers can see the detail of the EYSFF adjustment calculations.
- Please note that, following the revised methodology, the 2nd payment to PVI providers in April, which is currently made, will cease. Only 1 payment will be made per month to each provider.
- PVI providers, as now, should contact the Authority to ask for increased payments during the year, so that they receive payments appropriate to their volume of business in real time, where the standard methodology for estimating payments means that that the provider is initially substantially under funded. As the Authority operates monthly payments, there is flexibility to adjust payments quickly in response to identified cash flow pressures. This also means that providers can request for their payments to be reduced or stopped.

h) Approach to funding Sustainability Issues in 2018/19

- The EYSFF in 2018/19 continues to include a "sustainability" factor, which works on a sliding scale basis to allocate funding specifically to Maintained Nursery Schools in addition to the funding per children per hour. This factor ensures that funding allocations continue to reflect specific:
 - o Site related costs: buildings and grounds maintenance costs, rates and insurance.
 - o Fixed type costs incurred by maintained providers in leadership and management and administration and premises staffing.
- Both maintained and PVI providers can access dedicated business support, provided by Bradford Council Early Years Service, for advice on any budget or sustainability issues.
- The Schools Forum has established a process, which is currently used to consider the allocation of additional funding, on a one off basis, to Primary schools facing exceptional cost pressures during the financial year. Requests for funding, submitted by schools, are reviewed on an individual case basis against set criteria. The most common reason for requests is a significant increase in pupil numbers during the financial year, where the school has had to make additional provision, such as setting up a new class. This established process will be used in 2018/19 as the basis on which to consider the allocation of additional funding to any maintained or PVI provider that may face exceptional cost pressures. A likely common reason for provider's asking for exceptional funding may have previously been where a provider has admitted a significant number of children after the census has been collected for that term. Given that we have moved to a full 'starters and leavers' methodology, the Authority would not expect to receive requests in the future from providers for funding support for this reason. Exceptional circumstances will always be measured in terms of the level of additional cost pressure faced by the provider.

i) The Early Years Pupil Premium (EYPP) in 2018/19

- Providers will receive up to £300 per year, or £0.53 per child per hour, for each eligible child.
- Early Years Service has access to the DfE's Eligibility Checking Service which will be used to check whether a child is eligible for the Pupil Premium. Providers will then be funded, along with their main Early Years Single Funding Formula, through the established monthly adjustments process.

- The eligible groups for the Early Years Pupil Premium will be as follows:
 - o children from low income families (defined as meeting the criteria for free school meals);
 - o children that have been looked after by the local authority for at least one day;
 - o children that have been adopted from care; have left care through special guardianship;
 - o and children subject to a child arrangement order (formerly known as residence orders)
- As with the school-age Pupil Premium, the Government believes providers are best placed to know
 how to support their disadvantaged pupils with the Early Years Pupil Premium. Restrictions will
 therefore not be imposed on how providers spend the Early Years Pupil Premium. Instead, Ofsted
 will hold providers to account for how they've used their Early Years Pupil Premium to support their
 disadvantaged children through the regular inspection process.
- The DfE's web-page gives further information on the Early Years Pupil Premium: https://www.gov.uk/guidance/early-years-pupil-premium-guide-for-local-authorities

j) Disability Access Funding (DAF)

- 3 and 4 year olds will be eligible for the DAF if they meet the following criteria:
 - o the child is in receipt of child disability living allowance and;
 - o the child receives free early education.
- Please note that four-year olds in primary school reception classes are not eligible for DAF funding. Children become eligible for free early education at different points in the year depending on when they turn 3. Details of the dates when children become eligible are available in existing guidance.
- The providers of three- and four-year-olds eligible for the DAF will be entitled to receive a one-off payment of £615 per year. The DAF is not based on an hourly rate and is an additional entitlement. Children do not have to take up the full 570 hours of early education they are entitled to in order to receive the DAF. Children in receipt of the DAF will be eligible where they take-up any period of free entitlement.
- Providers will be funded for the DAF, along with their main Early Years Single Funding Formula, through the established monthly adjustments process.
- Early years providers are responsible for identifying eligible children. Providers should speak to parents in order to find out who is eligible for the DAF. Providers will be able to use a parent declaration form template, due to be published by the DfE alongside the Model Agreement, in early 2017. The template is for parents whose child is attending their provider and is due to include a box for parents to tick if their child is in receipt of disability living allowance. The Local Authority is required to check that the DAF eligibility requirements are met and must be satisfied that the child in question is receiving disability living allowance. The Authority may wish to see evidence of the child's disability living allowance award letter and will keep a copy of this evidence on file.
- From January 2018, the DfE collects data from local authorities about DAF take-up via the school census and early years census. Providers must therefore, record their children that are taking up the DAF.
- Local authorities are required to fund all early years providers providing a place for each child eligible for the DAF in their area at the fixed annual rate of £615 per eligible child. The DAF is payable as a lump sum once a year per eligible child. If a child eligible for the DAF is splitting their free entitlement across two or more providers, local authorities are expected to ask parents to nominate the main provider. This provider will be where local authorities should pay the DAF for the child. If a child receiving DAF moves from one provider to another within a financial year, the new provider is not eligible to receive DAF funding for this child within the same financial year. DAF funding received by the original provider will not be recouped. In cases where a child who lives in one authority area attends a provider in a different local authority, the provider's local authority is responsible for funding the DAF for the child and eligibility checking. All early years providers who

are eligible to receive funding for the 3- and 4-year-old early entitlement education are also eligible to receive the DAF.

k) SEN Inclusion Fund

- Under the DfE's National Early Years Funding reforms, all local authorities are required to establish
 an SEN Inclusion fund. The purpose of the fund is to support local authorities to work with
 providers to address the needs of individual children with SEND. This structure will also support
 local authorities to undertake their responsibilities to strategically commission SEN services as
 required under the Children and Families Act 2014.
- The Local Authority is currently consulting on significant reform of the District's SEND strategy and approach to supporting SEND in early years settings. More information on this review can be found here.
- A fund of a value of £600,000 was established in 2017/18 identified to support the inclusion of children with SEND in Early Years settings. Details of how this fund currently operates, including how to access, can be found here.
- The Authority intends for Early Years Inclusion funding to be controlled by, and allocated through, the proposed Centres of Excellence, with support taking the form of allocations for individual children as well as access to support staffing and services. How this is taken forward will be subject to the consultation.

SECTION 2

I) The Free Entitlement for Eligible 2 year olds

- Free early education became a statutory entitlement for eligible 2 year olds from 1 September 2013.
 Eligible children are defined as children who are looked after and children who meet the Free School Meals eligibility criteria. The programme was extended from September 2014 to include around 40% of 2 year olds.
- The 2 year old entitlement is funded at a single flat rate per hour, £5.20 for all children. The Funding Regulations only permit a single flat rate to be used to allocate funding for the 2 year old offer.
- The timetabling and counting arrangements for the funding of the 2 year old entitlement are the same as for the 3 and 4 year old entitlement. Providers will be funded for their delivery of the 2 year old entitlement within their single monthly payment from the Authority.

SECTION 3

m) Who do I contact?

• The key Local Authority contacts for any queries about the EYSFF are:

Maintained providers: Dawn Haigh, School Funding Team, City of Bradford Metropolitan District Council, 01274 433775, dawn.haigh@bradford.gov.uk

Private, Voluntary & Independent providers: Jaclyn McManus, Early Years Service, City of Bradford Metropolitan District Council, 01274 431965, jaclyn.mcmanus@bradford.gov.uk

 Key contact details will be included in all correspondence relating to Indicative Budgets and adjustments to funding.

Appendix: Bradford District Early Years Single Funding Formula 2018/19 Timetable

Please read this timetable alongside the separate '<u>Technical Statement'</u>, which explains how the Early Years Single Funding Formula (EYSFF) will be applied across the Bradford District for the 2018/19 financial year.

Date	Key Activity
January 2018	a) Department for Education (DfE) January Census 18 January
February 2018	a) 1 st draft of Indicative Budgets for 2018/19 published week commencing 19 February
	 Maintained providers will be able to access on the Bradford Schools Online (BSO) website pre-calculated annual forecasted allocations for 2018/19 (on estimated funded hours based on the previous year's delivery and incorporating further estimates of full year delivery of the 30 hours extended entitlement) as part of their S251 Budget Statements. Providers will then have approximately 3 weeks to review the estimates of funded hours, with the opportunity to change these up or down, prior to the publication of Confirmed Indicative Budgets.
	PVI providers will be able to access on the Bradford Schools Online (BSO) website an electronic (Excel) Ready Reckoner, showing rates of funding for 2018/19 and allowing providers to calculate forecasted annual allocations on their estimates of numbers for 2018/19. Pre-calculated annual forecasts will not be published.
	b) Spring Term 2018 Adjustments Statement Published week commencing 26 February
	A reconciliation statement for all providers will be published, which will show the differences between estimated and actual spring term funded hours delivered and the value of adjustments due.
	Maintained providers and PVI providers will be able to access this statement on the BSO website.
March 2018	a) Confirmed Indicative Budgets for 2018/19 published week commencing 12 March
	 <u>Maintained Providers</u>: the Confirmed Indicative Budgets will establish the starting point for funding / payments for the 2018/19 financial year. These budgets will be different from the 1st draft where providers have asked for their estimates of funded numbers to be altered. Where a provider has not asked for their estimates to be altered their confirmed Indicative Budget will be the same as their 1st draft.
	The Confirmed Indicative Budgets will be published with a warning that these budgets are subject to change, for differences between estimates of and actual funded hours delivered recorded in the termly censuses.
	The Confirmed Indicative Budgets will be published in the same way as the 1 st draft Indicative Budgets.
	At the same time Confirmed Indicative Budgets are published, the Authority will provide a 'ready reckoner', which providers can use to anticipate likely adjustments to funding for actual funded hours delivered.

b) Monthly Advances for <u>Maintained and PVI providers</u> amended to incorporate Spring Term 2018 adjustment

- For <u>Maintained providers</u>, the value of Local Authority I01 funding used to calculate the monthly advances will be amended in the final advances update in March 2018 to take account of the adjustment due from the January census. This adjustment will impact on each school's March 2018 carry forward balances position. Schools should use the ready reckoner provided by the Authority to ensure that this adjustment is incorporated by schools in their forecast of their year end balances position.
- For <u>PVI providers</u>, any positive adjustment following the re-calculation of funding using the January Census actual numbers will be paid in a single additional payment. A provider that has been overpaid must repay the value of overpayment by cheque by **30 April 2018**. Where a cheque is not received by 30 April 2018, the Local Authority will deduct the value of the outstanding overpayment from the next available monthly advance in the summer term. This is likely to be in May 2018.

April 2018

a) For Maintained and PVI providers, initial payments for 2018/19 will begin

- For <u>Maintained providers</u>, monthly advances for 2018/19 will be calculated from the Section 251 Budget Statements and a schedule & breakdown of payments will be published at the beginning of April.
- For <u>PVI Providers</u>, an initial single payment for April will be made based on March 2018 actual delivery. Please see the Technical Statement.

April 2018 to March 2019 (12 times in the year)

a) For <u>Maintained and PVI providers</u>, the Bradford Provider Gateway opens at the beginning and closes at the end of each month for all providers to submit to the Authority actual delivery data for all funded hours for that month

•	April 2018:	Gateway Opens: 1 April	Gateway Closes: 30 April
•	•	, , ,	· · · · · · · · · · · · · · · · · · ·
•	May 2018:	Gateway Opens: 1 May	Gateway Closes: 31 May
•	June 2018:	Gateway Opens: 1 June	Gateway Closes: 30 June
•	July 2018:	Gateway Opens: 1 July	Gateway Closes: 31 July
•	August 2018:*	Gateway Opens: 1 Aug	Gateway Closes: 10 Sept
•	September 2018:	Gateway Opens: 10 Sept	Gateway Closes: 30 Sept
•	October 2018:	Gateway Opens: 1 Oct	Gateway Closes: 31 Oct
•	November 2018:	Gateway Opens: 1 Nov	Gateway Closes: 30 Nov
•	December 2018:	Gateway Opens: 1 Dec	Gateway Closes: 31 Dec
•	January 2019:	Gateway Opens: 1 Jan	Gateway Closes: 31 Jan
•	February 2019:	Gateway Opens: 1 Feb	Gateway Closes: 28 Feb
•	March 2019:	Gateway Opens: 1 Mar	Gateway Closes: 31 Mar

- b) For <u>PVI Providers</u>, payments are then calculated / adjusted each subsequent month for actual delivery data, as explained in the Technical Statement. A payments schedule is published each month on Bradford Schools Online, which sets out the value and timing of payments and how these have been calculated.
- c) For <u>Maintained Providers</u>, monthly payments are made within the established whole-school advances system, with these payments adjusted termly (in September, January and March), rather than monthly, for the difference between estimated (CIB) and actual monthly EYSFF delivery data, as explained in the Technical Statement. A whole-school advances schedule is published monthly. Specific adjustment schedules are

	published termly (in September, January and March alongside the whole- school advances statements for these respective months) to show how EYSFF funding has been revised for actual delivery.
May 2018	a) May (Summer Term) Census 17 May 2018
	Maintained providers will submit their termly census to the DfE via COLLECT. This Census is not used for EYSFF funding purposes.
September 2018	a) Monthly Advances for <u>Maintained providers</u> amended to incorporate Summer Term adjustments
	 For Maintained providers, the value of LA I01 funding used to calculate the monthly advances will be amended in September to take account of the adjustment due from the summer term actual delivery data.
	A reconciliation statement for maintained providers will be published, alongside the advances schedule, which will show the differences between estimated and actual summer term funded hours delivered and the value of adjustments due.
October 2018	a) October (Autumn Term) Census 4 October 2018
	Maintained providers will submit their termly census to the DfE via COLLECT. This Census is not used for EYSFF funding purposes.
January 2019	a) Monthly Advances for <u>Maintained providers</u> amended to incorporate Autumn Term adjustments
	For Maintained providers, the value of Local Authority I01 funding used to calculate the monthly advances will be amended in December to take account of the adjustment due for the autumn term for actual delivery data.
	A reconciliation statement for maintained providers will be published, alongside the advances schedule, which will show the differences between estimated and actual autumn term funded hours delivered and the value of adjustments due.
	b) DfE January (annual) Census 17 January 2019
	<u>Maintained providers</u> will submit their termly census to the DfE via COLLECT. This Census is not used for EYSFF funding purposes.
	PVI providers will submit their census directly to Bradford Council EYS via the Bradford Provider Gateway. This Census is not used for EYSFF funding purposes.
February 2019	a) 1 st Draft of Indicative Budgets for 2019/20 Published (see notes for February 2018)
March 2019	a) Monthly Advances for <u>Maintained providers</u> amended to incorporate Spring Term adjustments
	For Maintained providers, the value of Local Authority I01 funding used to calculate the monthly advances will be amended in March to take account of the

adjustment due for the autumn term for actual delivery data.

A reconciliation statement for maintained providers will be published, alongside
the advances schedule, which will show the differences between estimated and
actual spring term funded hours delivered and the value of adjustments due.

The Local Authority has sought to plan this timetable as comprehensively as possible. Please note however, that all dates in this timetable are provisional and subject to change. Where we anticipate that any dates will significantly change, the Local Authority will do it's best to notify all providers as soon as possible.

If you have any queries, please contact:

Maintained providers: Dawn Haigh, 01274 433775 dawn.haigh@bradford.gov.uk

• PVI providers: Jaclyn McManus, 01274 431965, <u>jaclyn.mcmanus@bradford.gov.uk</u>

RESPONSES FORM

Consultation on the Early Years Single Funding Formula 2018/19

Name	Setting Name
THE DEADLINE FOR RE	SPONSES TO THIS CONSULTATION IS FRIDAY 1 DECEMBER 2017
Please send completed questionna	nire responses to:
School Funding Team City of Bradford Metropolitan Distric 1st Floor, Britannia House, Hall Ings Bradford BD1 1HX	ot Council
Tel: 01274 432678 Fax: 01274 435054 Email: <u>andrew.redding@bradford.</u>	gov.uk
Please complete the questionnaire record comments.	by marking the appropriate boxes. There is a space below each question for you to
for the 2 year old entitlement 2017/18 was £5.20 per hour)?	rith the proposal to retain the single funding rate value for all providers t set at the value the DfE funds Bradford's Early Years Block (which in If not, please can you explain why not. alance Agree (some reservations)
If not, please provide further explanation	anation here:
	with the proposal to move to a monthly 'starters and leavers' based April 2018 for all entitlements? If not, please can you explain why not.
Strongly Agree On B	alance Agree (some reservations) Strongly Disagree
If not, please provide further explanation	anation here:

	rou agree with the proposed approach to the calculation of monthly payments, ar et out in this Technical Statement? If not, please can you explain why not.
Strongly Agree	On Balance Agree (some reservations) Strongly Disagree
If not, please provid	e further explanation here:
	you have any comments on how we could improve the proposed arrangement ur guidance could be clearer?
in 2018/19 that w	ou agree with the proposal to seek to retain the universal base rate funding value ere published in the Authority's consultation in autumn 2016, incorporating the Early Years Block DSG reserves? If not, please can you explain why not.
Strongly Agree	On Balance Agree (some reservations) Strongly Disagree
If not, please provid	e further explanation here:

Question 6 – Do you ha	ave any comments on this estimated universal base rate?	
retain the base rate fu	gree with the proposal to seek to hold Early Years Block reserve solution in 2019/20 that was published in the Authority's contact and reserve into the 2018/9 EYSFF? If not, possible the contact and reserve into the 2018/9 EYSFF?	onsultation in
Strongly Agree	On Balance Agree (some reservations) Strongly Disagree	
If not, please provide furt	her explanation here:	
	u agree with the proposal to continue our current Deprivat 2018/19 set to allocate 9.5% of the EYSFF? If not, please can yo	
Strongly Agree	On Balance Agree (some reservations) Strongly Disagree	
If not, please provide furt	her explanation here:	

Strongly Agree		On Balance Aç	jree (some rese	ervations)		Strongly Disagree	
If not, please pro	ovide furth	ner explanation he	re:				
		ere any change 18/19 that have			to see	e made to the Earl	y Years S
uestion 11 – I	Oo you h	nave any other o	comments tha	it you hav	e not n	nade elsewhere in y	our respo

Question 9 – Do you agree with the proposal not to add any further supplements into the Early Years