

CONSULTATION & INFORMATION ON PRIMARY & SECONDARY FUNDING FORMULA 2019/20 FINANCIAL YEAR

Document JK Appendix 1a

1. Introduction

1.1 This document sets out the Authority's proposals for:

- The calculation of budget shares for mainstream primary (reception to year 6) and secondary (year 7 to year 11) schools and academies in Bradford for the 2019/20 financial year (the "funding formula"). For those who may not wish to read the full detail of this document, an extended summary of the formula funding proposals is given in paragraph 3.
- The criteria to be used to allocate additional amounts from centrally retained funds within the Schools Block of the Dedicated Schools Grant (DSG), including from the Growth Fund.
- The establishment of a new Falling Rolls Fund within the Schools Block.

1.2 This document also asks for feedback on the continuation for the 2019/20 financial year of funds de-delegated from maintained primary and secondary schools. Please be aware however, that due to the timescale necessary for confirmation, the Schools Forum has already decided to continue de-delegation in 2019/20 from maintained primary schools for the purposes of subscribing to Fischer Family Trust.

1.3 The deadline for responses to this consultation is **Friday 30 November 2018**. An analysis of responses received will be discussed at the Schools Forum meeting on 5 December. Please address all questions and responses to Andrew Redding 01274 432678 andrew.redding@bradford.gov.uk. A response form is included at Appendix 6.

1.4 Please note that separate consultation documents, on Early Years Block and High Needs Block funding arrangements for 2019/20, are published on Bradford Schools Online. These consultations are signposted from our latest news and updates page [here](#).

2. Background

2.1 The message "DO NOT PANIC" has been communicated in our consultations in recent years. This remains an important message. The Minimum Funding Guarantee (MFG) continues to protect schools and academies against sharp reductions in any single year in per pupil funding due to formula or school census data changes. The level of MFG provided is one of the key decisions that must be made for 2019/20.

2.2 However, we are currently in a period of change, one the more significant being the establishment of a National Funding Formula (NFF) for the calculation of primary and secondary mainstream budget shares. Another of the more significant changes is the movement towards a NFF for the allocation of High Needs Block funding. A briefing note, which summarises the latest announcements on NFF and which was written for Bradford's Schools Forum in September, can be viewed below, along with the DfE's latest NFF policy summary [here](#) (link to the School Forum webpage 19 September; Document JC).

For reference, the DfE's detailed July 2018 announcements, and a link to the DfE's original September 2017 NFF announcements, can be viewed [here](#).

Quite significantly, in terms of our short term view, the DfE has announced that local authorities will retain operational responsibility for determining primary and secondary mainstream funding formulae for at least 2 more financial years. We had expected this responsibility to pass to Government at April 2020, meaning that 2019/20 would have been the final year of local formula funding arrangements. However, although clearly on the horizon, the implementation date for the 'hard' NFF is uncertain.

What this hard NFF will look like when it does come is also a little uncertain. Although we would expect it to be similar to the NFF currently constructed, the DfE has stated that elements of this formula, such as pupil mobility and low prior attainment, are under review. The DfE has also very clearly stated that the future direction of NFF, how much money it allocates and how the protections currently within it continue or release (including the Minimum Funding Guarantee), will be influenced by the outcomes of the autumn 2019 spending review. We do expect some changes in the composition of the NFF for 2020/21, including a new pupil mobility formula and possibly changes in the secondary low prior attainment factor. The DfE however, has not yet made any announcements about formula funding arrangements, and the values of DSG funding available to local authorities, in 2020/21. We do not expect to hear anything until next year.

The position of Pupil Premium after 2019/20 is also to be decided – whether and how this continues (as a separate grant funding stream or merged into the NFF). The longer term positions of other significant grants, including UIFSM, PE and Sports Grant and Year 7 Catch Up, as well as the new Teacher’s Pay Grant and the indicated additional grant funding that will be allocated in 2019/20 to support the increased cost of employer’s contributions to teacher pensions, are also to be decided within the autumn 2019 spending review.

2.3 We set out in our [autumn 2017 consultation](#) (*this is a useful reference document as it provides a summary of the DfE’s policies and how we’ve got to where we are*) the changes we proposed to make to Bradford’s mainstream primary and secondary funding formula in 2018/19 in preparation for the establishment of the ‘hard’ NFF. These changes built on those we made in 2017/18, which were influenced by our analysis of the proposals the DfE set out in its December 2016 consultation. To briefly summarise what we did for the current 2018/19 financial year:

1. We replaced our local formula with the DfE’s NFF, using this as closely as the Regulations and affordability allowed to calculate individual formula allocations for both primary and secondary phases. We were one of 41 authorities nationally that did this. Within this, we adopted a principle for the clearer ‘earmarking’ of primary-phase and secondary-phase funding within the Schools Block i.e. we sought to spend primary Schools Block resource on the primary phase and secondary on the secondary phase.
2. We retained unchanged our existing local approaches in areas of formula funding that NFF does not yet cover. These are:
 - Pupil Mobility.
 - Business rates (actual cost).
 - Split sites.
 - PFI (Building Schools for the Future).
 - Growth Funding.
 - The definition of Notional SEND.
 - The SEND Funding Floor (where we protected each school’s 2018/19 allocation at 2017/18 cash levels, funded by the High Needs Block).
3. We did not transfer any monies from the Schools Block to the High Needs Block.
4. We set a Minimum Funding Guarantee (protecting individual schools) at positive 0.4% per pupil. This meant that all schools, regardless of NFF impact, received a minimum 0.4% per pupil formula funding increase.
5. We set a Ceiling (capping gains for individual schools) at positive 3.0% per pupil.
6. We established the DfE’s new optional minimum levels of per pupil funding (MFL) at their full values of £3,500 (primary) and £4,800 (secondary). We matched fairly closely the NFF methodology for the calculation of this funding, so far as the Regulations permitted, but we did not exclude split sites or pupil mobility funding from the calculation of the minimum levels.

2.4 There were a couple of specific issues that were created by our movement to NFF that we said we would look at more closely for 2019/20. These were:

- The knock on implications for our Notional SEND calculation, where our movement to NFF, because of the increased weighting this gives low prior attainment, has meant that the values of notional SEND budget for all schools have substantially increased. We said that we would benchmark our notional

SEND approach against what other authorities have done in 2018/19 and consider whether we should adjust our calculation for 2019/20.

- The knock on implications for our SEND Funding Floor, where our movement to NFF, because of the increased weighting this gives Additional Educational Needs (AEN), has meant that most schools would not receive SEND Floor Funding. We agreed to protect allocations in 2018/19, by guaranteeing that all schools would receive at least the same cash allocation in 2018/19 as they did in 2017/18. We said we would review the position for 2019/20.

2.5. The combination of our transfer of £5.7m from the Schools Block to the High Needs Block in 2017/18 and our implementation of the DfE's NFF to calculate individual school budget shares in 2018/19 has created the following formula funding landscape in Bradford:

- Primary phase: in 2018/19, 128 out of 156 schools (82%), including academies, were funded on the 0.4% Minimum Funding Guarantee, at a total value of £7.11m. 4 schools were capped by the 3% ceiling, by a reduction in total of £0.03m. 15 schools were funded at the £3,500 minimum level, receiving £0.80m in total via this factor. All other schools were funded above £3,500 per pupil.
- Secondary phase: in 2018/19, 13 out of 29 schools (45%), including academies, were funded on the 0.4% Minimum Funding Guarantee, at a total value of £1.48m. 3 schools were capped by the 3% ceiling, by a reduction in total of £0.25m. 2 schools were funded at the £4,800 minimum level, receiving £0.52m in total via this factor. All other schools were funded above £4,800 per pupil.
- All through schools: in 2018/19, 3 out of the 4 academies (75%) were funded on the 0.4% Minimum Funding Guarantee, at a total value of £0.28m. None of these academies were capped by the 3% ceiling. All of these academies were funded above the £4,042 minimum level.

From these summary statistics, it is quite easy to see how important decisions regarding the Minimum Funding Guarantee are to the values of budget shares received by our schools and academies.

3. Formula Funding Proposals for 2019/20

3.1 There are **7 key decisions** we need to take on Bradford's 2019/20 mainstream primary and secondary funding formula arrangements. These are very similar to the types of decisions that were needed for 2018/19. These are:

1. Whether we continue to closely mirror NFF and adopt 'directed' change (in the prior attainment primary variable adjustment and in the MFL factor).
2. Whether we transfer budget from Schools Block to the High Needs Block in support of high needs sufficiency delivery.
3. Directly influenced by decision 2:
 - a. The value of Minimum Funding Guarantee we provide. The Government permits this to be set between positive 0.5% and minus 1.5%. 0% would mean, for example, that a school that is funded on the MFG and has the same pupil numbers recorded in October 2018 as in October 2017 would receive the same core formula funding in 2019/20 as they received in 2018/19.
 - b. The value of uplift to formula variables under NFF, where we would mirror the level of MFG we set (so a 0% MFG would mean cash flat formula variables).
 - c. Whether we use the new optional factor, which would provide a minimum of a 1% increase on published 2017/18 NFF per pupil baselines for each school.
4. The value of the ceiling we adopt, if we adopt one, which will cap increases for schools and academies that may be gaining from the 2019/20 formula funding approach and / or NFF.
5. Whether we continue our existing local approaches to the factors not yet covered by the NFF.

6. Whether we retain our existing Growth Fund methodology and criteria.

7. Whether we take any specific action in relation to the issue of falling rolls and ‘under-subscription’.

3.2 Against the 7 decisions then, the Authority proposes the following. Within these proposals, in certain places, we refer to ‘subject to final affordability’. The modelling (appendices 1 and 2) using the existing October 2017 Census dataset indicates that the proposals set out below are affordable. However, the cost of formula funding in 2019/20 will change once the October 2018 Census dataset is used e.g. FSM%s go up and down, prior attainment scores change. We cannot predict with total accuracy what the change in cost will be; the cost won’t be confirmed until the dataset is released by the DfE in December. Therefore, in this consultation, we must place caveats in certain places.

Decision 1 – Whether we continue to closely mirror NFF and adopt ‘directed’ change

3.3 The table below shows the variable values of the DfE’s NFF applied to Bradford in 2019/20 (so including Area Cost Adjustment). These are the same as applied in 2018/19, with the exception of the value of the primary phase low prior attainment variable, which is highlighted, which the DfE has reduced from £1,055 to £1,022. The DfE has done this to retain the total proportion of spend nationally on low prior attainment in the primary phase as the changes made to the Early Years Foundation Stage Profile in 2013 now fully work through.

Factor	NFF £ 2019/20
Primary – Base £APP	£2,747.44
Secondary – Key Stage 3 Base £APP	£3,863.62
Secondary – Key Stage 4 Base £APP	£4,386.70
Lump Sum – Primary & Secondary	£110,017
Primary - Deprivation – FSM Ever 6	£540.09
Primary - Deprivation – Flat FSM	£440.07
Secondary - Deprivation – FSM Ever 6	£785.13
Secondary - Deprivation – Flat FSM	£440.07
Primary - Deprivation – IDACI F	£200.03
Primary - Deprivation – IDACI E	£240.04
Primary - Deprivation – IDACI D	£360.06
Primary - Deprivation – IDACI C	£390.06
Primary - Deprivation – IDACI B	£420.07
Primary - Deprivation – IDACI A	£575.09
Secondary - Deprivation – IDACI F	£290.05
Secondary - Deprivation – IDACI E	£390.06
Secondary - Deprivation – IDACI D	£515.08
Secondary - Deprivation – IDACI C	£560.09
Secondary - Deprivation – IDACI B	£600.10
Secondary - Deprivation – IDACI A	£810.13
Primary - English as an Additional Language (3)	£515.08
Secondary - English as an Additional Language (3)	£1,385.22
Primary – Low Prior Attainment	£1,022.16
Secondary – Low Prior Attainment	£1,550.25
Primary – Minimum £APP	£3,500
Secondary – Minimum £APP	£4,800

3.4 So the NFF in 2019/20 retains the same dynamic, including its focus on Additional Educational Needs (AEN), low prior attainment within AEN, and the reduction in the value of the lump sum, which is the most significant factor in terms of impact on the primary phase.

3.5 The Authority’s case for moving in 2018/19 to fully replicate the DfE’s NFF in our calculation of individual primary and secondary formula allocations was strongly supported. As such, we believe that schools will continue to support the principle that, in this period prior to the establishment of the ‘hard’ NFF, our local formula funding arrangements should move in line with the DfE’s NFF as this incrementally may develop.

3.6 We propose therefore, that **we amend our local formula to adopt the lower prior attainment variable value in the primary phase**. As the modelling in Appendix 1 shows, materially, the impact of this reduction on individual primary allocations is negated in the vast majority of cases by either the Minimum Funding Guarantee or the £3,500 Minimum Level of Funding.

3.7 We also propose that **we amend our calculation of the £3,500 (primary) and £4,800 (secondary) minimum per pupil funding** to come more closely in line with the DfE's NFF calculation, which excludes the additional funding that schools may receive via split sites and pupil mobility factors.

3.8 We do not propose to alter our primary and secondary funding formula in 2019/20 other than for these two amendments. The indicative impact of both these amendments is shown in Appendix 1.

Question 1 - Do you agree with the proposal to continue to mirror the DfE's NFF to calculate primary and secondary school and academy formula funding allocations in 2019/20, incorporating the amendments to the primary-phase low prior attainment variable value and to the calculation of the MFLs? If not, please explain the reasons why not.

Decision 2 - Whether we transfer budget from Schools Block to the High Needs Block

3.9 **The Local Authority proposes that the sum of £2.0m of budget (which is slightly under 0.5% of the Schools Block) is transferred from the Schools Block to the High Needs Block in 2019/20.** The basis for this proposal is set out in more detail in Appendix 3. This is rooted in the current position in Bradford where the need for spending on provision for high needs children and young people is growing at a faster rate than our High Needs Block NFF allocation.

3.10 What this transfer means, indicatively, for the formula funding allocations of individual primary and secondary schools and academies in 2019/20 is shown in Appendix 1 (columns 14 and 15). Essentially, a transfer of £2.0m means that the 2019/20 funding formula, including the Minimum Funding Guarantee, will be set at cash flat (0%) on 2018/19 rather than being set at positive 0.5%. As such, this transfer does not represent an 'active cut' to primary and secondary school budgets. It represents using the small amount of growth in the 2019/20 Schools Block DSG settlement to support high needs provision system pressure.

3.11 The Authority's proposal is one of four cross-block budget movements that seek to manage the pressure within an inter-related high needs funding system. All the positive growth across the DSG in 2019/20 is being allocated to support high needs spending. The relatively recent separation of the DSG into blocks (Schools Block, High Needs Block, Central Services Block, Early Years Block) is not helpful in this regard as it leads to the view that the blocks operate in isolation, where monies transferred between them are lost to originating block, when in fact spending is inter-connected. There are five very visible connections (dependencies) that exist between the Schools Block and the High Needs Block (HNB):

- Where the HNB does not provide for a sufficient number of specialist places for high needs children and young people the knock on consequences of this are felt across the system, including in mainstream primary and secondary schools. The HNB is reliant on schools delivering effective universal and alternative provision to support pupils with lower level higher incidence and emerging SEND. There then needs to be sufficient HNB funded provision to enable pupils with higher levels of SEND to receive support appropriate to their levels of need. 95% of the HNB (95% of £68m) is spent on delegated / places provision. The HNB for the 2019/20 academic year is forecasted to fund 686 more specialist places in Bradford-located settings than were initially planned to be funded in 2016/17 (2,634 in total, excluding out of authority and independent placements). A breakdown of the places funded by the HNB can be viewed within the High Needs Funding consultation. However, our demographic and needs-led data clearly evidences the need to continue to develop more places, incurring substantial additional cost to the HNB.
- The HNB funds the top up (element 3) for children and young people with EHCPs educated in mainstream primary and secondary schools and academies. The Schools Block funds elements 1 and 2 (in the national system these total £10,000) for pupils both with and without EHCPs. The SEND resources that are allocated within mainstream school budgets are shown for reference in Appendix 2. Where the numbers of pupils in mainstream settings with SEND increases this creates a financial pressure on both the Schools Block and the HNB, where the Schools Block must fund a greater

number of element 2s and the HNB must fund a greater number of top ups. The number of children with EHCPs in mainstream schools in Bradford has increased substantially year on year, resulting in an annual growth in spending pressure in this element of the HNB of between 20%-22%; £1.1m - £1.3m in cash terms. This is additional spending from the High Needs Block for pupils that are educated in mainstream schools.

- The HNB, through the existing SEND Funding Floor mechanism, provides £0.48m of additional support to ensure that mainstream schools and academies have a minimum value of element 2 funding to support pupils without EHCPs.
- The HNB funds the place-element for 309 alternative provision placements across PRUs, the primary behaviour centres, alternative providers and education in hospital settings. These places are accessed by pupils without EHCPs that are on the rolls of mainstream primary and secondary schools and academies. This HNB spend continues then to support mainstream schools in managing the costs of alternative provision.
- The HNB continues to fund SEND teaching support services that work directly with mainstream schools and academies.

3.12 Our medium term financial modelling very clearly evidences that our HNB allocation from the DfE, on its own, is not sufficient to meet demand. As a result, there is both a high risk of deficit within our HNB and a risk around the creation of specialist places. Whilst the Authority continues to develop our strategy for the creation of more specialist places, and how we can balance our HNB, contributions are required across the DSG, including from the Schools Block. It is likely that a contribution will continue to be required in future years unless there is a significant change in the way the DfE transitions to NFF.

3.13 The NFF outcome for our High Needs Block 2019-2022 is significantly damped and is therefore, wholly inadequate. Bradford's 2019/20 allocation, calculated on needs-led data, should be c. £16.9m higher than our 2017/18 baseline. This increase however, is substantially reduced due to damping. An estimated £12.4m of the £16.9m growth we should receive now under the NFF 'end product' is missing. We expect only £4.2m of this £12.4m to be allocated to us over 2020-22; approximately an additional £2m a year. The impact of this transition is actually the root cause of our HNB financial problem. As an illustration, £1.3m of this £2m income growth in 2019/20 is immediately needed to meet the forecasted rising cost of EHCPs in mainstream settings before we begin to look at how we can finance more specialist places and meet other system pressures.

Question 2 - Do you agree with the proposal to transfer £2.0m from the Schools Block to the High Needs Block in 2019/20? If not, please explain the reasons why not.

Decision 3a – The value of Minimum Funding Guarantee we provide

3.14 Following from the proposal for the transfer of £2.0m of budget from the Schools Block to the High Needs Block, **the Authority proposes to set the Minimum Funding Guarantee (MFG) in 2019/20 at 0%.** 0% means that a school or academy that is funded on the MFG and has the same pupil numbers recorded in October 2018 as in October 2017 will receive the same core formula funding in 2019/20 as they received in 2018/19. This is shown at individual school and academy level in Appendix 1.

3.15 0% is proposed in sight of the following:

- This is the level of MFG we recommended in February 2018 that schools use in their budget planning going forward and we set up the Authority's budgeting software on this basis.
- Whilst the value of the overall school funding settlement continues to be eroded in real terms, due to the growth in salaries cost, there is new additional grant funding to be allocated – the Teachers' Pay Grant (limiting the cost of the September 2018 award on school budgets to 1%) and an expected additional grant to offset the increase in the employer's contribution to teacher pensions - which will in 2019/20 reduce the scale of this erosion and will improve the budget forecasts of schools. It is acknowledged that the position of these grants after 2019/20 is not clear nor is whether a further grant would accompany a pay award for teachers higher than 1% at September 2019. However assuming that this is the case, we estimate broadly that the overall average expenditure increase for primary

and secondary schools in 2019/20 will be between 2.3% and 2.8%. The two key drivers of this increase are the pay award for NJC scale associate staff (which is not supported by additional grant monies) and inflation on prices. This average expenditure increase is estimated to be lower than that to be met by special schools (3.3%) and nursery schools (3.5%) in 2019/20. Nursery schools will also be funded on a cash-flat (0%) basis in 2019/20. The position of the funding of special schools is still being reviewed, but the place-element, which allocates more than 50% of funding, is retained cash flat at £10,000 in 2019/20.

- The Authority expects to use a proportion of the projected under-spending within de-delegated funds in 2019/20 to reduce the cost to maintained primary schools of the maternity & paternity insurance scheme. Whilst this will only benefit maintained primary schools, the impact on these schools will be significant. We currently estimate that the cost per pupil will reduce in 2019/20 only from £43.28 to £19.11.
- The Authority proposes, with our consultation on the Early Years Single Funding Formula, to implement a new holistic Early Years SEND Inclusion Fund, which will allocate additional funding to low level emerging SEND in early years, funded from the Early Years Block. This will allocate new funding into primary schools and academies with nursery provision in 2019/20.
- The adoption of NFF has increased the funding in real terms of a number of secondary schools and academies. Without the application of a ceiling in 2019/20 (see decision 4), the NFF end product for 'winners' is now fully allocated. Even following a cash flat (0%) settlement, the total / average funding per pupil allocated to the secondary phase in 2019/20, indicatively, has increased by 1.6% compared with 2017/18.
- The £3,500 (primary) and £4,800 (secondary) minimum per pupil funding levels have been adopted in full. These are unaffected by a transfer from the Schools Block. A number of lowest funded schools and academies (15 primaries; 2 secondaries) have received significant funding growth as a result, which is consolidated in 2019/20.

Question 3 - Do you agree with the proposal to set the Minimum Funding Guarantee at 0% in 2019/20? If not, please explain the reasons why not.

Decision 3b – The value of uplift to formula variables under NFF

3.16 The values of the NFF variables in 2019/20, as applied to Bradford including Area Cost Adjustment, are shown in the table on page 4. Following from the proposals a) to transfer £2.0m of budget from the Schools Block to the High Needs Block and b) to set the Minimum Funding Guarantee (MFG) in 2019/20 at 0%, **the Authority proposes to retain the formula variables cash flat (also at 0%) on 2018/19.** Therefore, primary and secondary formula funding allocations would be calculated using the variable values shown on page 4 without further uplift.

Question 4 - Do you agree with the proposal to retain the NFF variables cash flat (0%) on 2018/19 in line with a 0% MFG? If not, please explain the reasons why not.

Decision 3c – Whether we use the new optional factor, which would provide a minimum of a 1% increase on published 2017/18 NFF per pupil baselines for each school

3.17 The proposal to transfer £2.0m of budget from the Schools Block to the High Needs Block allocates the growth within the 2019/20 Schools Block settlement. As a result of this, **it would not be possible to adopt the DfE's optional 1% factor.** However, in reviewing what this factor does, we have concluded that we would not wish to propose to adopt this in any case.

3.18 Column 16 in Appendix 1 shows what the difference would be between providing for a 0.5% increase on the 2018/19 formula funding settlement and a 1% increase on the 2017/18 settlement. The 1% factor does not affect the schools and academies that are funded on the MFLs (£3,500 and £4,800) but are not on the

MFG. A large number of secondary schools and academies are already in receipt of growth exceeding 1% per pupil so this factor would not add value here. For most remaining primary and secondary schools and academies, the difference the 1% factor makes is small; the difference between a 0.4% settlement in 2018/19 + a 0.5% settlement in 2019/20 = 0.9% vs. 1% on 2017/18; a difference of 0.1%. To adopt 1% now, we would effectively override the decision we took in 2018/19, for affordability reasons, to set the MFG at 0.4% not 0.5%. For a small number of primary schools and academies the difference is more sizable. This is because these schools are in receipt of pupil mobility funding and, whereas, pupil mobility funding is included in the calculation of the MFG, under the 1% option it is excluded and then added after a 1% increase has been allocated. The 1% factor then treats pupil mobility as an 'add on', because it is not included in the NFF yet, whereas we have always treated this as a factor that is part and parcel of a school's formula allocation as are the other additional educational needs factors. As such, we do not think it would be correct for us now to separate off pupil mobility funding in this way, especially as it is to be brought into NFF at April 2020.

Question 5 - Do you agree with the proposal not to implement the optional 1% increase per pupil on 2017/18 NFF baseline factor? If not, please explain the reasons why not.

Decision 4 – The value of the ceiling we adopt, if we adopt one

3.19 The Local Authority proposes not to apply a ceiling in 2019/20, subject to final affordability. A + 3.0% per pupil ceiling was in place in 2018/19 in recognition that the increases that NFF allocates to a small number of our schools and academies were capped at 3% by the DfE within our Schools Block DSG settlement i.e. we had not been given the money by DfE to fund increases in per pupil funding above 3%. However, the full values of NFF increases are now allocated to our Schools Block in 2019/20. As such, it feels fair to fully pass these increases out to schools and academies through our funding formula.

3.20 The schools that were affected by the ceiling in 2018/19 are shown in Appendix 1. Our modelling indicates that only a very small number of schools would be capped by a ceiling if there was one of e.g. 3% in 2019/20. Our modelling also indicates that the value of the reduction in funding for these schools would be substantial as a proportion of the school's allocation. Our modelling is currently based on October 2017 Census data and the position of schools on a ceiling may change when October 2018 Census data is used. Hence why we place a 'subject to final affordability' caveat here. However, we feel that it is now reasonable to permit the NFF to work un-capped as the two reasons for increases in per pupil funding from this point are a) NFF increase and b) October 2018 Census data evidencing a greater level of pupil-led need in the school.

Question 6 - Do you agree with the proposal not to apply a ceiling in 2019/20? If not, please explain the reasons why not.

Decision 5 – Whether we continue our existing local approaches to the factors not yet covered by the NFF

3.21 The Local Authority proposes to continue our current 2018/19 formulae for the allocation of both split sites (see appendix 3) and pupil mobility. These factors will be updated for October 2018 Census data. The values of the formula factors will be cash flat (0%) on 2018/19. As the NFF is likely to contain a factor for pupil mobility from April 2020, we feel it makes sense to retain our current formula in 2019/20 and to review whether we adopt the NFF approach in 2020/21 once the details of this are known.

3.22 Business rates will continue to be funded at actual cost.

3.23 We propose to continue to pass through the specific BSF DSG affordability gap values using our current method (see appendix 4), continuing the adjustment to ensure that the amounts passed on to academies by the ESFA on an academic year basis are equivalent to the amounts that the Authority requires academies to pay back on a financial year basis. The DfE is currently looking how PFI funding can be brought into the NFF but there is no timescale for this yet.

3.24 Following further analysis and benchmarking work, **we propose to continue to use our existing methodology for the definition of notional SEND budgets for mainstream primary and secondary schools and academies within the Schools Block funding formulae.** Please see Appendix 4. The DfE's work to better 'describe' SEND needs, responsibilities and costs, replacing the concept of a 'notional SEND budget', is continuing and this work will influence future policy on high needs funding.

3.25 Also following further analysis, **the Local Authority proposes to continue to protect SEND Floor allocations for primary and secondary schools and academies at 2017/18 levels, subject to the conclusion of the discussions that are to take place with the Schools Forum on the transfer of Schools Block monies to the High Needs Block in 2019/20** (decision 2). Please see Appendix 4 for the current SEND Floor methodology. We have identified that we need to find a better way of calculating additional mainstream SEND funding support now that we have moved to National Funding Formula. So review is planned by April 2020 and this will be discussed with the Schools Forum. This review most likely may not result in a change in the total value of support overall that will continue to be funded, but may result in this support being more concentrated. However, we wish to ensure continuity in 2019/20.

Question 7a - Do you agree with the proposal to continue to use our existing formulae for the allocation of split sites and pupil mobility funding? If not, please explain the reasons why not.

Question 7b - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG affordability gap funding? If not, please explain the reasons why not.

Question 7c - Do you agree with the proposal to continue to use our existing methodology for the definition of notional SEND budgets? If not, please explain the reasons why not.

Question 7d - Do you agree with the proposal to continue to protect SEND Funding Floor allocations at 2017/18 cash values pending review for April 2020? If not, please explain the reasons why not

Decision 6 – Whether we retain our existing Growth Fund methodology and criteria.

3.26 The DfE's National Funding Formula does not yet include a methodology, which prescribes how Growth Funding should be allocated at individual school or academy level. Local authorities in 2019/20 therefore, retain the responsibility for determining arrangements locally, albeit within tight Regulations. Local authority compliance with these Regulations is checked annually by the ESFA.

3.27 Our proposed Growth Fund arrangements and criteria are set out in the documents embedded under paragraph 6. These are unchanged from current arrangements with the exception of some clarification on the timing of the confirmation of allocations to secondary schools and academies that have already begun expansion before 2019/20.

Question 8 - Do you agree with the proposed criteria and methodology for the allocation of the Growth Fund to schools and academies in 2019/20? If not, please explain the reasons why not.

Decision 7 – Whether we take any specific action in relation to the issue of falling rolls and 'under-subscription'.

3.28 Paragraph 7 sets out a proposal, in principle, **for the establishment of new Falling Rolls Fund within the Schools Block and also asks for feedback regarding the use of de-delegated funding in support of maintained schools only that are affected by falling rolls and / or under-subscription that would not be eligible for funding from a Falling Rolls Fund because of their latest Ofsted judgement.**

3.29 This is a matter still under consideration with the Schools Forum and, as such, feedback from schools and academies is important at this stage in helping to further shape proposals, especially on the scope of, and eligibility triggers for, financial support.

3.30 This has so far been presented to the Authority as a primary-phase issue. The proposal therefore, focuses on the primary phase. Secondary-phase colleagues will wish to consider how this matter affects them. However, the Authority is currently minded to suggest that Falling Rolls mechanism, if approved, is not extended to the secondary phase in 2019/20.

Question 9a - Do you agree with the proposal in outline to establish a Falling Rolls Fund within the Schools Block for the primary-phase in 2019/20? If not, please explain the reasons why not.

Question 9b - Do you agree with the proposed scope and eligibility triggers for the Falling Rolls Fund? If not, please explain the reasons why not.

Question 9c – Would you agree to the use of de-delegated funding to support maintained primary schools only (but not primary academies) that are facing falling rolls and / or under-subscription that are not eligible for the Falling Rolls Fund due to their latest Ofsted judgement?

4. Consultation Impact Modelling

4.1 As the set of decisions that are required to be taken for 2019/20 are relatively simple, the modelling attached with this document is also relatively simply.

- **Appendix 1** is a single sheet model, which shows the actual formula funding position of each primary and secondary school and academy for the current 2018/19 financial year and then the indicative position for 2019/20 where the settlement is cash flat (0%). The difference between a cash flat settlement and a 0.5% positive settlement is then highlighted. The impact of the reduction in the low-prior attainment variable value for the primary phase is also specifically shown. This appendix shows the value of Minimum Funding Guarantee funding within each school's and academy's formula allocation (showing the extent to which the school or academy is reliant on the MFG) as well as the value of MFL (£3,500 primary; £4,800 secondary) top up. This appendix also shows how much each school and academy currently receives via the SEND Funding Floor.
- **Appendix 2** is a single sheet model, which shows the total value of resources within school and academy 2018/19 financial year budgets allocated to support children and young people with SEND. This is an important reference document in the context of considering the pressure on the high needs funding system.

4.2 Appendix 1 is illustrative only for 2019/20. The pupil numbers and other data used to calculate allocations are the same as used in 2018/19 (they are based on the October 2017 Census), with the exception of some adjustments to the pupil numbers of newly establishing academies. So **this modelling is published only for the purposes of enabling schools and academies to understand how the main decisions on formula funding will affect their 2019/20 financial year formula allocations so that they are able to form a view and respond to this consultation. The modelling does not constitute indicative or final budgets for 2019/20.** The modelling makes no reference to:

- Changes in the number of pupils in schools that will be recorded in the October 2018 Census that will feed into 2019/20 allocations.
- Changes in data e.g. FSM% and prior attainment that will be sourced from the October 2018 Census data that will feed into 2019/20 allocations.

4.3 There are keys underneath both appendices 1 and 2, which explain each column.

4.4 All modelling uses the Authority's APT data and baselines. We are aware that a number of academies have different (higher) baselines within their GAG Statements due to specific agreements with the ESFA about levels of protected funding. For the purposes of our consultation modelling we have excluded these additional amounts so that we compare like with like on the figures that the Authority recognises and agrees.

4.5 If you would like to discuss the modelling in more detail, or discuss the data on which allocations are calculated, please contact Andrew Redding

5. 2019/20 Schools Block De-Delegated Funds

5.1 The Finance Regulations continue to significantly restrict the extent to which the Dedicated Schools Grant (DSG) can be held and managed centrally. The Government's intention is to ensure maximum delegation of the DSG to maintained schools and academies at the start of each year. The Regulations do allow funding for certain types of expenditure to be 'de-delegated', or passed back, from maintained school budgets within the

Schools Block. This only applies to schools maintained by the Local Authority and the Schools Forum must agree to de-delegate on a phase specific basis.

5.2 Previously, the Schools Forum has established Schools Block de-delegated funds to:

- take advantage of the economies of scale brought about by central management and bulk purchase e.g. Fischer Family Trust subscription.
- provide services that schools would find difficult or less cost effective to replace on an individual basis e.g. trade union facilities time.
- protect schools, especially smaller schools, against unpredictable expenditure e.g. maternity and paternity cover.
- provide funds to be available to support schools in financial difficulty or those facing exceptional circumstances, allocated using agreed criteria.
- cover the costs in schools of authority-level re-organisation, including safeguarded salaries and also the cost of deficit budgets of closing schools or deficits held by schools that convert to academy status under sponsored arrangements.

5.3 Decisions to de-delegate within the Schools Block must be taken annually.

5.4 The Schools Forum will further discuss the position of de-delegated funds for 2019/20 over the autumn term. This document asks for your feedback so this can be considered as part of these discussions. This consultation asks for your views only on whether funds should continue to be de-delegated. Please be aware that the values of these funds, where they continue, will be considered further. We would generally expect the values of funds to match anticipated cost pressures and to take account of the impact of maintained schools converting to academy status.

5.5 Please be aware that due to the timescale necessary for confirmation, the Schools Forum has already decided to continue de-delegation in 2019/20 from maintained primary schools for the purposes of subscribing to Fischer Family Trust.

5.6 Maintained schools are reminded that:

- Schools Forum members representing maintained secondary schools agreed in the 2017/18 DSG round to the cessation of de-delegation for the Maternity / Paternity 'insurance' scheme, Fischer Family Trust, Exceptional Circumstances and School Staff Public Duties and Suspensions from the secondary phase. It is assumed that the Schools Forum and maintained secondary schools will not wish to revisit this decision.
- Schools Forum members representing maintained primary schools agreed to the cessation of de-delegation for behaviour support services at 1 September 2018. Maintained schools now have the choice to buy into these services directly.

5.7 The following 'de-delegated' funds are held in the current 2018/19 financial year:

- School Behaviour Support Team (primary only and only to 31 August).
- FSM Eligibility Assessments (primary and secondary).
- Fischer Family Trust – School Licences (primary only).
- School Maternity / Paternity 'insurance' (primary only).
- Trade Union Facilities Time (primary & secondary).
- Trade Union Health and Safety Representative Time (primary & secondary).
- School Staff Public Duties and Suspensions Fund (primary only).
- School Re-Organisation Costs (primary and secondary).

- Exceptional Costs & Schools in Financial Difficulty (primary only).

Further information on these funds, including values held in 2018/19 and the criteria by which they are allocated, is given in Appendix 5.

5.8 We do not propose amendment in 2019/20 to the criteria for the allocation of de-delegated funds with the exception of possible adjustment, subject to this consultation, which would enable the SIFD / exceptional costs de-delegated fund to allocate funding to maintained primary schools facing falling rolls and / or that are under-subscribed.

5.9 If funding is not de-delegated for the purposes listed in 5.7 above, then the funding will remain within school budgets for schools to provide for the cost of services from their own resources, including purchasing services available through the Local Authority. The Authority is aware that the views of individual schools may be influenced by the extent of value they feel they receive from accessing these funds currently. In making final recommendations, the Schools Forum will consider specific responses to this consultation along with the overall most effective approach for maintained schools across the District. Please contact your Schools Forum representatives if you have any specific comments on these funds.

5.10 The Schools Forum has recently considered ([14 March 2018](#)) a detailed assessment of the Authority's current Trade Union Facilities Time arrangements, and has concluded that these arrangements are effective and continue to offer value for money.

5.11 Colleagues in maintained primary schools will be aware of the warnings that have been given previously about the viability of current arrangements for supporting maternity / paternity costs. We have warned, as happened in the secondary sector, that we may be moving towards the position where existing arrangements are no longer financially efficient or viable. This is due to the growth in cost at the same time as a reducing number of maintained schools. The maternity / paternity scheme will remain in place for 2019/20, subject to agreement through this consultation. However, the continuation of this from April 2020 will be reviewed. Schools will be given warning where a decision is taken to cease this fund and we will discuss with the Schools Forum how schools can be given sufficient time to respond.

Question 10 – Should sums continue or cease to be de-delegated from maintained school budgets in 2019/20 for the purposes listed above? Please explain the reasons why if you believe that these should cease or change.

6. Schools Block Growth Fund

6.1 We operate a Growth Fund within the Schools Block, which supports both maintained schools and academies expanding for basic-needs purposes at the request of the Local Authority to manage more effectively the financial pressures brought by places expansion. This fund helps to maintain a stable financial platform for schools and academies across the District in support of raising standards.

6.2 The DfE's National Funding Formula does not yet include a methodology, which prescribes how Growth Funding should be allocated at individual school or academy level. Local authorities in 2019/20 therefore, retain the responsibility for determining arrangements locally, albeit within tight Regulations. Local authority compliance with these Regulations is checked annually by the ESFA.

6.3 Our proposed Growth Fund arrangements and criteria are set out in the documents embedded below. These are unchanged from current arrangements with the exception of some clarification on the timing of the confirmation of allocations to secondary schools and academies that have already begun expansion before 2019/20.



Growth Funding
2019 - primary criteri



Growth Funding
2019 - secondary crit

6.4 For reference, the value of the Schools Block Growth Fund in 2018/19, broken down between phases and types, is shown in the table below:

	Primary	Secondary	Total
Existing Known Expansions	£326,927	£166,146	£493,073
Existing Bulge Classes	£247,541	£0	£247,541
New Expansions	£314,131	£700,000	£1,014,131
Pre-Opening Costs	£0	£0	£0
Diseconomies of Scale	£35,416	£550,000	£585,416
Total Value 2018/19	£924,015	£1,416,146	£2,340,161

We will confirm the value of the Schools Block Growth Fund for 2019/20 as part of the DSG setting process, which will be concluded with the Schools Forum in January 2019.

7. Falling Rolls Fund 2019/20 & De-Delegated Support for Maintained Schools

7.1 The issue of under-subscription and / or falling rolls was raised with the Schools Forum in September following the most recent round of budget discussions that the Local Authority has had with our maintained schools. A small number of maintained primary schools have specifically asked whether / what additional support can be provided to help them manage the situation and protect school standards. Schools have typically asked for support a) in helping to control the predictability of admission numbers (via PAN arrangements) and b) in helping to manage the financial impact of unpredictable and / or uneven pupil numbers.

7.2 This is a matter still under consideration with the Schools Forum and, as such, feedback from schools and academies is important at this stage in helping to further shape proposals, especially on the scope of, and eligibility triggers for, financial support.

7.3 This has so far been presented to the Authority as a primary-phase issue. The proposal therefore, focuses on the primary phase. Secondary-phase colleagues will wish to consider how this matter affects them. However, the Authority is currently minded to suggest that Falling Rolls mechanism, if approved, is not extended to the secondary phase in 2019/20.

7.4 There are two ways direct financial support for schools / academies that are facing falling rolls and / or under-subscription could be provided from the DSG:

- A Falling Rolls Fund for both maintained schools and academies.
- The use of exceptional circumstances de-delegated funding available only for primary maintained schools.

7.5 Under a Falling Rolls Fund, local authorities may set aside Schools Block funding to create a small fund to support good schools with falling rolls, where local planning data shows that the surplus places will be needed within the next three financial years. A Falling Rolls Fund would be a mechanism through which support could be provided to both maintained schools and academies and both would be required to contribute to the cost of the fund. This is the only route through which financial support could be provided locally from Bradford's DSG to under-subscribed academies. The value of a Falling Rolls Fund could be quite limited however, when looking purely at under-subscription. One of the big limitations is the mandatory requirement that only good schools are eligible, meaning that a number of schools and academies would currently not be supported, including those recently converted sponsored academies that do not have Ofsted judgements.

7.6 Under the existing de-delegated exceptional circumstances fund, we could allocate monies to eligible maintained primary schools, using the Falling Rolls mechanism, without the application of the Ofsted good trigger (trigger 3). This would mean that we could support these schools that may be facing under-subscription issues that are related to demographics not to the popularity of the school. Academies however, including recent sponsored conversions, would neither contribute to nor be able to access this funding and funding would cease when a maintained school converts to an academy. There are therefore, some knock-on consequences to using delegated funds in this way that should be fully considered.

7.7 The Schools Forum, as it continues to consider this matter, has asked that feedback is now collected from schools and academies on these two support options and has agreed to consult with schools and academies on the proposal for a Falling Rolls Fund set out in the document embedded below:



Proposal Outline Oct
18.docx

8. Consultation Responses

8.1 Please use the responses form in Appendix 6 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 Andrew Redding, using the contact details shown in paragraph 1.

8.2 Please ensure that your response is submitted by the deadline of **Friday 30 November 2018**. Any responses received after this deadline date may not be included in the overall analysis presented to the Schools Forum.

9. Next Steps

9.1 Following consideration of the responses to this consultation and the recommendation of the Schools Forum, the structures of the primary and secondary funding formulae to be used to calculate budgets in 2019/20, and the criteria for the allocation of Schools Block DSG contingency funds and growth funds, will be set by the Council's Executive.

9.2 Discussions on the overall DSG funding position for 2019/20 will take place in the Schools Forum between now and January 2019. You are recommended to keep in touch with these discussions by visiting the Schools Forum webpage on the Council's Minute's site [here](#).

9.3 It is anticipated that the Schools Forum will make its final recommendations on 2019/20 arrangements on Wednesday 9 January 2019.

10. Appendices

- Appendix 1 – Financial Overview (Modelling)
- Appendix 2 – SEND Resources in Schools (Summary)
- Appendix 3 – Schools Block to High Needs Block Transfer
- Appendix 4 – Technical Annex
- Appendix 5 – Schools Block De-Delegated Funds
- Appendix 6 – Responses Questionnaire

Appendix 3 – Schools Block to High Needs Block Transfer 2019/20

1) Introduction

1.1 The Authority's proposal is to transfer to the High Needs Block (HNB) up to, but not exceeding, 0.5% of the Schools Block. This is c. £2.0m in cash terms. This is rooted in the current position in Bradford where the need for spending on provision for high needs children and young people is growing at a faster rate than our High Needs Block NFF allocation.

1.2 Our medium term financial modelling very clearly evidences that our HNB allocation from the DfE, on its own, is not sufficient to meet demand. As a result, there is both a high risk of deficit within our HNB and a risk around the creation of specialist places. Contributions are required across the DSG, including from the Schools Block. It is likely that a contribution will continue to be required in future years unless there is a significant change in the way the DfE transitions to NFF.

1.3 A transfer from the Schools Block to the High Needs Block in 2019/20 is a 'one off' action, in the sense that, unlike the transfer made in 2017/18 prior to the introduction of National Funding Formula (see paragraph 2 below), any transfer drops out in the following year and does not affect the way that DSG monies are allocated to the Authority in the future.

1.4 Essentially, a transfer of £2.0m means that the 2019/20 formula settlement for schools, including the Minimum Funding Guarantee, will be cash flat (0%) on 2018/19 rather than being set at positive 0.5%. As such, this transfer does not represent an 'active cut' to primary and secondary school budgets. It represents using the small amount of growth in the Schools Block DSG settlement to support high needs provision system pressure.

1.5 All the positive growth across the DSG in 2019/20 is being allocated by the Local Authority to support high needs spending. A transfer from the Schools Block should be viewed as part of the approach, which helps to compensate for the lack of release of the damping that is the prominent feature of the High Needs Block National Funding Formula across 2019-22. A transfer is one of four cross-DSG block actions, which are proposed. The total value of these in 2019/20 is £2.93m.

1.6 The important parts of an assessment of the impact of this proposal are:

- Recognition of the connections and inter-dependencies that exist between the Schools Block and the High Needs Block. 5 key connections are set out under the summary of decision 2 (page 5). This includes recognition that a significant spending issue for the HNB is the growth in the numbers of children and young people with EHCPs in mainstream schools and academies where additional HNB spending goes back into primary and secondary schools and academies at individual school level.
- The impact on primary and secondary schools and academies of the difference, in 2019/20, between a cash flat (0%) and a positive 0.5% settlement. This is shown in Appendix 1. It is also analysed, under decision 3 (page 6), in the context of the total expenditure pressure forecasted to be felt by schools and academies in 2019/20 and in the context of the general cash flat settlement that is to be allocated across other parts of the DSG, including in early years.
- The system support provided by the HNB to the Schools Block that is proposed to remain in place in 2019/20, including the SEND Funding Floor, teaching support services and alternative provision places.
- The impact on the High Needs Block, and on the cumulative financial position of the DSG, should a transfer from the Schools Block not be enacted. The impact that 'alternative' actions to balance the HNB would have, including on the Schools Block.

2) Background – 2017/18 Transfer and National Funding Formula Protection & Damping

2.1 Prior to the DfE's consultations on national funding formula, we identified that our High Needs Block spending has historically been lower than that of other authorities, but that our Schools Block spending has been higher, as a result of our inclusion strategies. We held an expectation therefore, that national funding

formula would bring our DSG allocation more in line with the national picture, meaning that we would see a reduction in our Schools Block but also a substantial increase in our High Needs Block funding. We understood that this would require transition, as funding would need to move with pupils and the development of additional high needs places over time against the backdrop of needing to significantly expand high needs capacity to meet demographic needs growth. We argued in our consultation responses to the DfE that authorities should continue to have flexibility to move monies around the blocks in the DSG in order to manage this transition.

2.2 At April 2018, the DfE moved to a national funding formula for the allocation of DSG funding to local authorities. From analysis of the DfE's detailed modelling, published in December 2016, we identified that a substantial transfer from the Schools Block to the High Needs Block was necessary in 2017/18 to enable the creation of high needs places and to prevent a substantial and immediate High Needs Block financial problem. The Schools Forum agreed in January 2017 to transfer £5.7m from the Schools Block to the High Needs Block. This transfer placed the majority of primary and secondary schools onto the Minimum Funding Guarantee (MFG), which was set at minus 1.5% at this point. This transfer was then 'locked in' to our DSG baselines within the DfE's calculations of NFF going forward.

2.3 Recognising the size of the transfer that was made in 2017/18 the Local Authority did not propose a transfer in 2018/19.

2.4 The NFF is now doing basically what we expected it would do, by reducing in relative terms the value of our Schools Block in favour of substantially increasing the value of our High Needs Block.

2.5 The NFF outcome for our Schools Block is disappointing as it does not respond adequately to the growth in costs in schools, especially in salaries costs. However, our 2019/20 Schools Block settlement is better than what the DfE set out in its December 2016 consultation. Our allocation is c. £6.5m higher than in 2017/18, on an equivalent pupil numbers basis, as this now includes the 1% per pupil minimum increase announced by government in July 2017. Any negative impact of the NFF on the formula allocations of individual primary and secondary schools in Bradford has so far not been realised because we set an MFG at positive 0.4% in 2018/19; our schools and academies received £8.86m of MFG protection. The MFG for schools will continue in 2019/20, with the value depending on the conclusions of the discussions on a Schools Block transfer.

2.6 The NFF outcome for the High Needs Block as set out for 2019-2022 is wholly inadequate. Bradford's 2019/20 allocation should be c. £16.9m higher than the 2017/18 baseline. This increase however, is substantially reduced, capped for 2019/20 at 6.09% on 2017/18. This means that an estimated £12.4m of the £16.9m growth we estimate to receive under the NFF 'end product' is missing. We expect only £4.2m of this £12.4m to be allocated to us over 2020-22. This is because the HNB NFF formula is expected only to release a further 3% growth a year and it continues to allocate 50% of the national pot on historic spend rather than the new needs-led formula. The DfE has stated that the inclusion of the historic spend element will not be reviewed until April 2022.

2.7 It is in this context that the Authority proposes the four cross-DSG block actions set out in the introduction, including a transfer from the Schools Block. We must plan on the basis that no further HNB monies will come from the release of damping in the NFF before April 2022. In fact, the data continues to evidence increasing need in Bradford as this is updated annually, so the gap between the value of HNB funding we should receive under the final NFF 'end product' and what we actually receive will increase over 2020-2022. The NFF end product is needs-led and in itself is an indicator of the growth in need in Bradford and also of the growth in cost pressure that must be managed.

3) Context – Other Local Authorities

3.1 There is a telling paragraph within the ESFA's operational guidance for authorities for 2019/20:

"An increasing number of local authorities are now incurring a deficit on their overall DSG account, largely because of overspends on the high needs block. With effect from 2019 to 2020 the department intends to tighten up the rules under which local authorities have to explain to us their plans for bringing the DSG account back into balance. We intend to require a report from any local authority that has a DSG deficit of more than 1% as at 31 March 2019. This report will need to be discussed with the schools forum and set out the authority's plans for bringing the DSG account back into balance."

4) High Needs Block Financial Forecast Summary 2019-2022 and Assessment

4.1 It is currently forecasted that the HNB in 2018/19 will overspend by £1.27m. Added to the surplus balance brought forward from 2017/18, we estimate at this time that the HNB will hold a cumulative surplus balance in the region of £1.6m at 31 March 2019. However, a number of spending areas within this forecast are moveable. This balance is ring-fenced to support the HNB going forward.

4.2 Table 1 below summarises the High Needs Block position currently forecasted for the 2019-2022 period before the addition of the £2.9m of cross-DSG block actions. The estimated nature of this forecast must be stressed. Changes in growth rates in some specific areas, including places creation, mainstream EHCPs, post 16 and out of authority / independent placements may alter the forecasts as these are larger budgets. This being said, the forecast is at the very least a reasonable representation of the size of the minimum cost pressure we expect to manage. The table evidences that this pressure cannot be met solely by HNB DSG income – the expenditure growth rate is higher than NFF income growth rate.

Table 1

	2019/20	2020/21	2021/22
HNB DSG Income	68,331,042	70,666,214	72,604,120
<i>Income growth on the previous year</i>	<i>2,453,967</i>	<i>2,335,172</i>	<i>1,937,906</i>
HNB Expenditure	72,303,589	76,814,884	81,764,552
<i>Expenditure growth on the previous year</i>	<i>5,184,411</i>	<i>4,511,296</i>	<i>4,949,668</i>
HNB In Year Budget Position (negative = deficit)	-3,972,547	-6,148,670	-9,160,432
HNB Balance Brought Forward (negative = deficit)	1,617,110	-2,355,437	-8,504,108
HNB Balance Carried Forward (negative = deficit)	-2,355,437	-8,504,108	-17,664,539

4.3 95% of the £72.3m expenditure in 2019/20 is on places / delegated high needs provision. The remaining 5% is expenditure on centrally managed support, including medical home tuition and teaching support services.

4.4 This forecast includes financial provision for the 491 additional places that were agreed to be created with the Schools Forum in January 2017 (with an estimated total full year cost of £10.5m). It includes the 72 places associated with a new SEMH free school. 390 of these 491 places are funded at April 2019. Within this forecast, the SEMH free school opens at September 2020.

4.5 In addition to the £10.5m cost of developing places capacity, there are 3 main areas where spending is forecasted to continue to increase substantially across the 2019-22 period: Out of authority / independent placements, Mainstream EHCPs and Post 16 provision (further education). The table below shows this actual / estimated cost increase (the % in brackets is % increase on the previous year).

Table 2

	OLA / Independent Placements	Mainstream EHCPs	Post 16 Provision
2015/16	£4.78m	£3.35m	Not available
2016/17	£ 5.65m (18.2%)	£4.02m (20.0%)	£3.20m
2017/18	£6.75m (19.5%)	£4.97m (23.6%)	£3.58m (11.9%)
2018/19 forecasted	£8.15m (20.7%)	£5.97m (20.1%)	£4.40m (23.0%)
2019/20 forecasted	£9.81m (20.3%)	£7.28m (21.9%)	£5.12m (16.4%)
2020/21 forecasted	£11.08m (12.9%)	£8.74m (20.0%)	£5.52m (7.8%)
2021/22 forecasted	£12.73m (14.9%)	£10.40m (19.0%)	£5.92m (7.3%)

4.6 The growth in these 3 areas explains £3.7m of the £5.18m (70%) of total expenditure growth forecasted in 2019/20. This spending growth is the result of demographic and SEND trends; there are 3,530 children and young people with EHCPs in Bradford in 2018/19 compared with 2,225 in 2014/15. The growth in out of authority / independent placements spending evidences that, despite our growth, we do not have sufficient specialist places in Bradford. The Authority is currently re-assessing our requirement for additional specialist places, with a view to seeking to substantially reduce the growth rate of out of authority and independent placements in favour of Bradford-located provision. However, this does not mean that additional spending on places will reduce. We are in fact concerned that our current financial forecast under estimates the cost of the number of additional specialist places that are required to be created going forward. The Authority is working to clarify our estimates as a priority.

4.7 In this context, the £2.9m of cross-DSG block movement is proposed to offset most but not all of the anticipated £3.97m in year over-spending in the High Needs Block in 2019/20 so that the HNB is not cumulatively in deficit at the end of 2019/20. However, this £2.9m, where repeated in future years, will not be sufficient to balance the HNB going forward and there is significant risk of deficit.

4.8 In this context, the Local Authority is currently re-assessing our HNB financial and provision strategy and will continue to discuss this regularly with the Schools Forum and its Steering Group. The Authority will need to discuss with the Schools Forum what further actions should / can be taken to avoid the accrual of a significant deficit. The Authority will need to bring this discussion forward with urgency should a transfer from the Schools Block to the High Needs Block not be approved for 2019/20.

Appendix 4 – Technical Annex

This appendix contains more technical detail on the definitions and calculations of factors that are contained within Bradford Council's primary & secondary school funding model.

Notional SEND (Mainstream Schools Block Primary & Secondary)

Local authorities are required to define for each primary and secondary school the value of formula funding that is 'notionally' allocated for SEND (for meeting the first £6,000 of needs for pupils with EHCPs and the needs of pupils without EHCPs). Our calculation has built up over time. How Bradford currently defines notional SEND (the %s of funding in each factor that make up this budget) is shown in the table below.

Formula Factor	% Primary	% Secondary
Prior Low Attainment	100%	100%
Free School Meals Factor	23.1%	10.2%
IDACI Factor	22.4%	19.2%
Base £APP	7.5%	6.3%

In addition, 6% of a school's allocation under the Early Years Single Funding Formula, for schools and academies that have nursery provision, is also defined to be available for supporting SEND in early years.

SEND Funding Floor (Mainstream Primary & Secondary)

The SEND Floor provides a 'top up' where the SEND formula does not allocate a minimum level of funding, after the cost of EHCPs has been removed. This is re-calculated on a monthly basis for changes in EHCP positions. SEND formula funding is defined as the notional SEND in the table above but does not include the 5.5% (primary) / 4.5% (secondary) of the Base £APP element. The floor tops up funding to these minimums:

- For Primary schools and academies: £19,931 or £69.10 per pupil (whichever is greater).
- For Secondary schools and academies £75,337 or £69.10 per pupil (whichever is greater).

The values of SEND Floor allocations for individual primary and secondary schools and academies are currently protected at 2017/18 cash levels i.e. schools and academies in 2018/19 received at least the value of allocation they have received in 2017/18.

Split Sites (Mainstream Primary & Secondary)

Our split sites factor operates as follows:

a) The criteria used to define a split site are as follows:

- *Essential* - two or more distinctly separate campuses where there is no single continuous boundary and where the campuses are split by a through road.
- Additional criteria (for weighting of funding):

Category A - where it is impossible not to move a proportion (either 25% or 50%) of total school / academy pupils between the campuses within the school day

Category B - where the campuses are more than 400 metres apart

b) The criteria used to allocate funding to a school / academy operating across a split site based on the categories defined above, are as follows:

Category	Primary Lump	Primary APP	Secondary Lump	Secondary APP
<i>Essential</i>	£8,514.75	0.00	£9,782.62	0
<i>A</i>	0	£107.73	0	£113.67
<i>B</i>	£18,426.01	£9.15	£20,558.87	£12.78

- Split sites funding is paid to all schools and academies that meet the above criteria.
- Federated schools are not eligible for split sites funding.
- Where 2 schools have amalgamated and the new school is operating across a split site, the school will not be eligible for split sites funding whilst it is in receipt of the additional lump sum (in the year immediately after amalgamation).
- Funding is only applicable for Reception to Year 11 mainstream provision.
- We would not expect split sites funding to apply to co-located or offsite behaviour centres.

PFI (Building Schools For the Future)

Our Private Finance Initiative (PFI) / BSF formula factor (mainstream secondary) simply apportions the DSG's contribution to the affordability gap of the Building Schools for the Future (BSF) programme across applicable secondary schools / academies.

The formula for splitting the total contribution between BSF schools / academies is as follows: (Total affordability gap to be funded by the DSG / Total cost of school unitary charges) x Individual school's unitary charge as a % of the total unitary charge.

Other Technical Matters

The following aspects of the current mainstream primary and secondary formula funding framework remain in place in 2019/20:

- DSG sourced formula funding allocations for primary (reception to year 6) and secondary (pre 16) will be calculated on the October (2018) Census.
- Unlike formula funding, the Pupil Premium Grant is allocated on January (2019) Census pupil numbers.
- Local authorities must allocate at least 80% of the delegated schools block funding through the pupil-led factors, which include the base amount per pupil, deprivation, low prior attainment, English as an additional language, pupil mobility and looked after children factors. We allocated 91.8% of the delegated schools block funding via the pupil-led factors in 2018/19, and the modelling included in this consultation indicates that we continue at least at this % in 2019/20.
- The Minimum Funding Guarantee (MFG) continues to be the only protection mechanism available for individual primary and secondary school and academy allocations.
- The existing framework for the funding of High Needs pupils continues. A High Needs pupil is still defined, for financial purposes, as one whose education costs more than £10,000 per year. The first elements of funding for High Needs pupils continue to be already delegated within budget shares. A top up is then allocated separately, on a monthly basis, for the cost of additional support above the £6,000 threshold. This is set out in more detail on our consultation on high needs funding.
- Allocations for academies and free schools will continue to be paid directly by the Education & Skills Funding Agency (ESFA). The ESFA will use the pro-forma submitted by the Authority in January each year to calculate individual allocations.

Appendix 5: Purposes of Schools Block De-Delegated Funds Retained in 2018/19

1. FSM Eligibility Assessments:

This fund covers the work the Local Authority's Benefits Team does in relation to Free School Meals eligibility for pupils in maintained primary and secondary schools. It covers staffing and ICT costs associated with:

- The processing of all applications for FSM for all maintained schools
- Checking & verifying claims, notifying parents of successful and unsuccessful claims
- Notifying schools of successful claims and changes to existing claims
- Assisting schools with eligibility, take up and administrative issues & providing guidance
- Promoting maximum take up of FSM eligibility, including cross checking pupil FSM data with other Authority benefits systems

The Local Authority makes use of a nationwide FSM checking system, which means that paper evidence does not have to be supplied by parents. Applications for all children who attend Bradford schools can be processed quickly via the Council's website, telephone, personal visit or in writing. Currently, schools do not have direct access to this checking system.

If this de-delegated fund is not held in 2019/20, schools will either need to undertake FSM assessment themselves or purchase services. The Local Authority offers a traded service to academies.

2. Fischer Family Trust – Primary School Licences:

This fund pays for maintained primary schools' subscriptions to Fischer Family Trust (FFT). FFT provides a unique service to schools and the local authorities. This services analyses previous national end of key stage data and the contextual data of schools and uses this to provide estimates of outcomes at pupil level for the next key stage result. These pupil level results are aggregated at school and at local authority level. Over time these estimates have come to be held in high regard and the work of the FFT is valued by schools and local authorities. Government funding for the FFT was withdrawn at March 2012. As a consequence, the FFT restructured their pricing and data access policies. The purchasing of the data through the Local Authority offers significant savings.

De-delegation for this purpose ceased from the secondary phase at 31 March 2017.

If this de-delegated fund is not held in 2019/20, maintained primary schools will need to purchase their own licences to access FFT data, on an individual basis or as a cluster of schools. Please be aware that due to the timescale necessary for confirmation, the Schools Forum has already decided to continue de-delegation in 2019/20 from maintained primary schools for the purposes of subscribing to Fischer Family Trust.

3. Primary School Maternity / Paternity 'insurance':

This fund has historically acted as an 'insurance' pot, where maintained primary schools are reimbursed for the costs of the salaries of staff on maternity / paternity leave, so that the cost of cover / supply arrangements can be afforded from the school's budget. The Schools Forum has discussed the delegation of this pot to schools on a number of occasions over the last ten years or so, and has always concluded that the protection this centrally managed fund offers, especially to smaller schools, against the disproportionate and unpredictable nature of maternity / costs is vital.

De-delegation for this purpose ceased from the secondary phase during 2017/18.

If this de-delegated fund is not held in 2019/20, maintained primary schools will not be reimbursed for the salary cost of staff on maternity / paternity leave and would have to make alternative arrangements to manage this cost, for example, by including maternity cover within the school's supply insurance arrangements or by working in clusters to share the cost of staffing cover.

Colleagues in maintained primary schools will be aware of the warnings that have been given previously about the viability of current arrangements for supporting maternity / paternity costs. We have warned, as happened in the secondary sector, that we may be moving towards the position where existing arrangements are no longer financially efficient or viable. This is due to the growth in cost at the same time as a reducing number of maintained schools. The maternity / paternity scheme will remain in place for 2019/20, subject to agreement through this consultation. However, the continuation of this from April 2020 will be reviewed. Schools will be given warning where a decision is taken to cease this fund and we will discuss with the Schools Forum how schools can be given sufficient time to respond.

4. Trade Union Facilities Time & Health and Safety Facilities Time:

There is a legal obligation (under The Trade Union and Labour Relations (Consolidation) Act 1992) for an employer to provide facilities for recognised trade unions to function within the workplace, including an obligation to grant time off with pay. The recognised unions in schools are:

- Teacher Trade Unions - NUT, NASUWT, ATL, ASCL, NAHT, VOICE, and
- The Trade Unions representing support and other professional school staff – UNISON, GMB and UNITE

To meet this obligation, Bradford Council has agreed to release a number of staff for part or all of their time from their school duties to carry out their duties as elected lay officials. This applies to the recognised trade unions in schools with significant memberships. Historically the agreed ratio for facility time has been 1 day per 400 members, which has been used as a mutually acceptable, in principle, starting point for the joint management and trade union discussions. Current facility time arrangements with respect to school employees provide a total of 7.3 FTE as follows:

- NUT has 2.1 FTE lay officials (10.5 days per week)
- NASUWT has 1.8 FTE lay officials (9 days per week)
- ATL has 1 FTE lay official (5 days per week)
- NAHT has 0.4 FTE lay official (2 days per week)
- UNISON has 1.3 FTE lay officials (6.5 days per week)
- GMB has 0.6 FTE lay officials (3 days per week)
- ASCL has 0.1 FTE lay official (1 day a fortnight)

If this de-delegated fund is not held in 2019/20, individual maintained primary and secondary schools will need to consider how they will meet their statutory obligations to allow trade unions to represent and consult with their members and with the school as the employer, as local branch trade union representatives would no longer be available without cost. For example, each trade union has the right to appoint a trade union representative within a school to carry out statutory functions, and seek time off for these representatives to be trained to carry out these duties.

In order to comply with the letter and the spirit of the Health and Safety Regulations, Bradford Council and the Trade Union Health and Safety Lay Representatives in Bradford made a Health and Safety Agreement in 1989. Nominated accredited Trade Union and lay Health and Safety representatives continue to carry out Health and Safety inspections in schools, with the aim being to inspect each school once a year, and are released for all or part of their time from their school responsibilities to carry out these duties. Safety Representatives also carry out site management visits in relation to building work and work with the Council's Health and Well Being Team on occupational matters and undertake the role of investigating accidents, disease and other medical matters. A total of 6 days per week (1.2 FTE) of facilities time is currently funded within the DSG for these purposes.

If this de-delegated fund is not held in 2019/20, individual maintained primary and secondary schools will need to consider how they will meet their employer statutory obligations around health and safety.

The Schools Forum has recently considered ([14 March 2018](#)) a detailed assessment of the Authority's current Trade Union Facilities Time arrangements, and has concluded that these arrangements are effective and continue to offer value for money.

5. School Staff Public Duties and Suspensions Fund:

This fund has historically acted, on a similar basis to maternity / paternity payments, as an 'insurance' type pot for maintained primary schools to be reimbursed for staffing costs associated with public duties (magistrates / court duties) and, more significantly, where an employee is suspended from duty following a Child Protection allegation and where the Police are undertaking an investigation. In the case of suspensions, schools are reimbursed for 50% of the cost of the salary of the member of staff suspended.

De-delegation for this purpose ceased from the secondary phase at 31 March 2017.

If this de-delegated fund is not held in 2019/20, maintained primary schools will not be reimbursed for the salary cost of staff and would have to make alternative arrangements to manage this cost.

6. School Re-Organisation Costs:

This fund serves 2 purposes and the proposed criteria for allocating funding in 2019/20 are unchanged from 2018/19:

- School staff safeguarded salaries: funding is allocated based on the actual cost of agreed safeguards for individual staff in primary and secondary schools. Only safeguards that have been previously agreed are funded from the DSG. So there is no 'eligibility' criteria as such, other than these safeguards must have been already established and agreed with the Authority following re-organisations. Every year, schools are asked to confirm whether or not safeguards for individual staff are still applicable e.g. where a member of staff has left, the safeguard ceases to be paid. The total cost of safeguards reduces year on year.
- Deficit of Closing Schools: where a maintained primary school closes with a deficit budget, or where a maintained primary school with a deficit budget converts to academy status under a sponsored agreement, the deficit returns to the Authority. The de-delegated fund is established to meet the cost of this from the DSG. Please note that there is no de-delegation from the secondary phase for this purpose.

If this de-delegated fund is not held in 2019/20, maintained primary schools will not be reimbursed for the additional salary cost of staff placed through re-organisation and the Authority would need to discuss with the Schools Forum how any deficits of maintained primary schools, that are not repaid by the school incurring the deficit, are alternatively managed.

7. Exceptional Costs & Schools in Financial Difficulty:

This fund is in place for maintained primary schools to enable additional financial support to be provided, in a transparent and controlled way, to specific schools that may face difficult circumstances and unreasonable cost pressures and also to support schools that require immediate intervention around standards that may not be able to identify funds from their own budgets.

De-delegation for this purpose ceased from the secondary phase at 31 March 2017.

The purpose of this fund is to provide support for the budgets of maintained primary schools in the following circumstances:

- Exceptional growth in pupil numbers not picked up within the terms of the Growth Fund.
- 1 Form of Entry (or smaller) primary schools, where the cost of external HR investigations places the school in financial difficulty i.e. would reduce the forecasted carry forward balance below £20,000 *
- Priority 3 or 4 schools, where additional intervention / support is required and where the school's budget cannot meet the costs without placing the school in financial difficulty i.e. would reduce the forecasted carry forward balance below £20,000 *
- Local Authority statutory interventions e.g. costs of an IEB.

- Any other circumstance, where the exceptional nature of this is agreed by the Schools Forum and where to not provide financial support would place the school in a financially difficult position that it is likely to have a detrimental impact on outcomes for children. *

* £20,000 is a reasonable safety net to apply for all schools i.e. a school with £20,000 holds adequate reserve to meet small value additional unexpected costs.

The financial impact of exceptional in year pupil numbers growth is the most common reason for schools requesting exceptional funding. The criteria for allocating funding in such circumstances in 2019/20 are unchanged from 2018/19 and are as follows:

- The main factor taken into account is the extent of additional cost pressure faced by a school. This is assessed on the information provided by the school on what action has been needed to meet a growth in pupil numbers.
- The extent of increase in numbers: actual numbers and % of roll (vs. the phase average).
- Whether the Local Authority has directed the additional pupils to the school.
- How the additional pupils are distributed across the school.
- Whether this is a one off issue i.e. the potential extent for exceptional growth and further cost pressure in future years.
- In judging exceptional funding for children admitted on appeal, what the specific circumstances are at the school which require the school to make additional provision in the first year.
- The school's carry forward balances position.
- The change in the school's expenditure shown in the Start Budget vs. Q1 vs. Q2 vs. Q3 monitoring reports.
- The Priority category of the School (is the school in Priority 3 or 4?)
- Whether the school has received financial support or funding from elsewhere.

We have set out in paragraph 7 of this document a proposal for the establishment of a Falling Rolls Fund. We also ask schools to consider whether we should enable the SIFD / exceptional costs de-delegated fund to allocate funding to maintained primary schools facing falling rolls and / or that are under-subscribed. Subject to the outcomes of this consultation, the criteria for the allocation of SIFD / exceptional costs funding may be amended in 2019/20.

2018/19 Schools Block De-Delegated Funds: Values

The table below shows the total values that were de-delegated from individual school budgets in the current financial year (before reductions have been made following the conversion of maintained schools to academy status during the year).

Fund	Primary £	Secondary £	Total Value £
School Behaviour Support Team	£128,022	n/a	£128,022
FSM Eligibility Assessments	£54,736	£14,220	£68,956
Fischer Family Trust – School Licences	£21,600	n/a	£21,600
School Maternity / Paternity 'insurance'	£1,461,135	n/a	£1,461,135
Trade Union Facilities Time	£154,015	£38,797	£192,812
Trade Union Health and Safety Rep Time	£23,535	£5,929	£29,464
School Staff Public Duties & Suspensions Fund	£31,380	n/a	£31,380
School Re-Organisation Costs – Safeguarded salaries	£46,253	£3,071	£49,324
School Re-Organisation Costs – Deficit Budgets	£132,234	n/a	£132,234
Exceptional Costs & SIFD	£88,000	n/a	£88,000
Totals	£2,140,910	£62,016	£2,202,926

These total values were de-delegated from 2018/19 individual maintained school budgets on a flat amount per pupil basis, with the exception of FSM Eligibility Assessments, which has been de-delegated on an amount per Ever 6 FSM formula pupil, as follows:

Fund	Primary £app	Secondary £app
School Behaviour Support Team	£3.79	n/a
FSM Eligibility Assessments (per FSM)	£5.80	£5.14
Fischer Family Trust – School Licences	£0.64	n/a
School Maternity / Paternity 'insurance'	£43.28	n/a
Trade Union Facilities Time	£4.56	£4.56
Trade Union Health and Safety Rep Time	£0.70	£0.70
School Staff Public Duties & Suspensions Fund	£0.93	n/a
School Re-Organisation Costs – Safeguarded salaries	£1.37	£0.36
School Re-Organisation Costs – Deficit Budgets	£3.92	n/a
Exceptional Costs & SIFD	£2.61	n/a
Total Per Pupil	£61.80	£5.62
Total Per FSM (Ever 6)	£5.80	£5.14

Each maintained school has contributed from its 2018/19 delegated budget share the amount per pupil (£app) shown above multiplied by its number of reception to year 11 pupils, or by its number of Ever 6 FSM formula pupils for FSM Eligibility Assessments.

APPENDIX 6: RESPONSES FORM

**CONSULTATION & INFORMATION ON PRIMARY & SECONDARY FUNDING
FORMULAE 2019/20 FINANCIAL YEAR**

Name _____ School / Academy _____

Please choose your phase below:

PRIMARY SECONDARY

THE DEADLINE FOR RESPONSES TO THIS CONSULTATION IS FRIDAY 30 NOVEMBER 2018

Please send completed questionnaire responses to:

School Funding Team (FAO Andrew Redding)
City of Bradford Metropolitan District Council
Britannia House (1st Floor)
Hall Ings
Bradford
BD1 1HX

Tel: 01274 432678
Fax: 01274 435054
Email: andrew.redding@bradford.gov.uk

Please complete the questionnaire by marking the appropriate boxes. There is a space below each question for you to record comments.

Question 1 - Do you agree with the proposal to continue to mirror the DfE's NFF to calculate primary and secondary school and academy formula funding allocations in 2019/20, incorporating the amendments to the primary-phase low prior attainment variable value and to the calculation of the MFLs? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 2 - Do you agree with the proposal to transfer £2.0m from the Schools Block to the High Needs Block in 2019/20? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 3 - Do you agree with the proposal to set the Minimum Funding Guarantee at 0% in 2019/20? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 4 - Do you agree with the proposal to retain the NFF variables cash flat (0%) on 2018/19 in line with a 0% MFG? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 5 - Do you agree with the proposal not to implement the optional 1% increase per pupil on 201718 NFF baseline factor? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 6 - Do you agree with the proposal not to apply a ceiling in 2019/20? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 7a - Do you agree with the proposal to continue to use our existing formulae for the allocation of split sites and pupil mobility funding? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 7b - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG affordability gap funding? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 7c - Do you agree with the proposal to continue to use our existing methodology for the definition of notional SEND budgets? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 7d - Do you agree with the proposal to continue to protect SEND Funding Floor allocations at 2017/18 cash values pending review for April 2020? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 8 - Do you agree with the proposed criteria and methodology for the allocation of the Growth Fund to schools and academies in 2019/20? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 9a - Do you agree with the proposal in outline to establish a Falling Rolls Fund within the Schools Block for the primary-phase in 2019/20? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 9b - Do you agree with the proposed scope and eligibility triggers for the Falling Rolls Fund? If not, please explain the reasons why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 9c – Would you agree to the use of de-delegated funding to support maintained primary schools only (but not primary academies) that are facing falling rolls and / or under-subscription that are not eligible for the Falling Rolls Fund due to their latest Ofsted judgement?

Strongly Agree On Balance Agree (some reservations) Strongly Disagree

If not, please provide further explanation here:

Question 10 – Should sums continue or cease to be de-delegated from maintained school budgets in 2019/20 for the purposes listed above? Please explain the reasons why if you believe that these should cease or change.

	<i>YES - de-delegate</i>	<i>NO</i>
FSM Eligibility Assessments	<input type="checkbox"/>	<input type="checkbox"/>
Fischer Family Trust – School Licences	<input type="checkbox"/>	<input type="checkbox"/>
School Maternity / Paternity ‘insurance’	<input type="checkbox"/>	<input type="checkbox"/>
Trade Union Facilities Time	<input type="checkbox"/>	<input type="checkbox"/>
Trade Union Health and Safety Rep Time	<input type="checkbox"/>	<input type="checkbox"/>
School Staff Public Duties and Suspensions Fund	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any additional comments here:

Please use the space below to record any further comments you would like to make on the proposals, which you have not included in your other responses.

Please send completed questionnaire responses to Andrew Redding by Friday 30 November 2018:

- *E-mail:* andrew.redding@bradford.gov.uk
- *Fax:* 01274 435054
- *Post:* **School Funding Team (FAO Andrew Redding)
City of Bradford Metropolitan District Council
Britannia House (1st Floor)
Hall Ings
Bradford
BD1 1HX**