

Response ID ANON-ESDE-RPZB-Y

Submitted to Early years funding formulae
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Introduction

What is your name?

Name:
Andrew Redding

What is your email address?

Email:
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Are you responding as an individual or on behalf of an organisation?

Organisation

What is the name of your organisation?

Organisation:
City of Bradford MDC

What type of organisation is this?

Type of Organisation:
Local Authority

What local authority area are you or your organisation based in?

Local Authority area:
Bradford

Would you like us to keep your responses confidential?

No

Reason for confidentiality (optional):

EYNFF additional needs factor

1 Do you agree with our proposal to update the underlying data in the additional needs factor in the EYNFF?

Yes

Do you agree with our proposal to update the underlying data in the additional needs factor in the EYNFF?:

Yes, we agree that allocations should be based on the latest available data.

It is somewhat concerning however, that such a re-distribution of funding between authorities is now required. The DfE must assess again the sufficiency of the minimum increases in rates of funding. In the current financial climate: inflation on prices, energy cost increases and salaries costs, how will a 1% increase in Bradford's early years entitlement funding rates in 2023/24 support the sustainability of providers, the continued development of high quality entitlement provision, the effective recruitment and retention of staff, as well as help limit increases in childcare costs that are faced by parents?

We would highlight that the vast majority of providers and local authorities have not been aware that the data that the DfE has used to distribute early years funding has not been updated, and has become so adrift. The vast majority of providers in Bradford will now not understand how a redress of this means that they will only see a maximum 1% increase in their funding rates in 2023/24.

The floors must be re-assessed as a priority, in the context of the current financial climate. We would suggest that the DfE takes a longer multi-year approach to the update of the underlying data, meaning that the ceilings on gains should be reduced in 2023/24 in order to afford a higher value floor for all local authorities.

2 Do you agree with our proposal to move to using the free school meals headline measure?

Yes

Do you agree with our proposal to move to using the free school meals headline measure?:

No comments.

3 Do you agree with our proposal to update the way in which the Disability Living Allowance data is used?

Yes

Do you agree with our proposal to update the way in which the Disability Living Allowance data is used?:

No comments

EYNFF area cost adjustment

4 Do you agree with our proposal to update the underlying data used in the area cost adjustment in the EYNFF, in particular the rateable values data and the GLM data, when available?

Unsure

Do you agree with our proposal to update the underlying data used in the area cost adjustment in the EYNFF, in particular the rateable values data and the GLM data, when available?:

5 Do you agree with our proposed amendments to the proxy measure for premises related costs in the EYNFF, including introducing schools rateable values data?

Unsure

Do you agree with our proposed amendments to the proxy measure for premises related costs in the EYNFF, including introducing schools rateable values data?:

Teachers' pay and pensions grants

6 Do you agree with our proposed approach to mainstreaming the early years element of the teachers' pay and pensions grants?

No

Do you agree with our proposed approach to mainstreaming the early years element of the teachers' pay and pensions grants?:

This is an unwelcome complication, which is likely to create additional administration for local authorities, and which will have wider knock on consequences.

Notwithstanding that mainstreaming will be simpler for the DfE / ESFA, our overriding view is that it will be much simpler and more time effective, for local authorities, to continue separate grant arrangements. Local authorities will otherwise be required to operate a quality supplement. Does this mean that authorities will be required to collect evidence from individual schools / providers of the employment of teachers that specifically teach in early years classes and that are also members of the Teacher Pension Scheme? What happens if a teacher is not a member of this Scheme (or if a change in a teacher's arrangements takes place during the year)? This sort of requirement will add a new burden of administration. This does depend however, on the type of flexibility that authorities are given to construct new quality supplements. We would suggest that authorities be given a good amount of flexibility to replicate the former grant funding, especially in the first year of merger.

Although the choice of using a quality supplement may be left to each authority, the reality will be that, if authorities do not do this for 2023/24, there will be a significant re-distribution of 3&4 year old funding away from schools / classes, which will be difficult to correct in future years. Guidance on any quality supplement, and flexibility, therefore, must be provided asap in the autumn term, should the mainstreaming go ahead, in order for local authorities to plan and consult on this for 2023/24.

We currently spend 8% on supplements (all on a deprivation supplement). We estimate that a full 'replication' of the grants within our early years formula, using some form of quality supplement, will require approx. 3%, meaning that we will breach the 10% restriction. Without regulatory flexibility, our choices will be either to reduce the replication of the grant or reduce our spend on our deprivation supplement. We suggest that the 10% restriction is reviewed to provide authorities with flexibility to manage this change.

7 Do you agree with our proposal to update the operational guide to encourage local authorities to take account of additional pressures that some providers might face using the existing quality supplement?

Yes

Do you agree with our proposal to update the operational guide to encourage local authorities to take account of additional pressures that some providers might face using the existing quality supplement?:

See response to question 6.

If the decision is taken to mainstream the grants, then there will need to be new regulatory provision, which will permit local authorities to target the former grants back towards schools and classes that will typically have higher costs due to their employment of teachers.

Although the choice of using a quality supplement may be left to each authority, the reality will be that, if authorities do not do this for 2023/24, there will be a significant re-distribution of 3&4 year old funding away from schools / classes, which will be difficult to correct in future years. To give authorities time to plan this, guidance on any quality supplement, and flexibility, therefore, must be provided asap in the autumn term, should the mainstreaming go ahead.

2-year-old funding formula

8 Do you agree with our proposal to update the underlying data in the area cost adjustment in the 2-year-old formula?

Yes

Do you agree with our proposal to update the underlying data in area cost adjustment in the 2-year-old formula?:

Yes, we agree that allocations should be based on the latest available data.

It is somewhat concerning however, that such a re-distribution of funding between authorities is now required. The DfE must assess again the sufficiency of the minimum increases in rates of funding.

We would highlight that the vast majority of providers and local authorities have not been aware that the data that the DfE has used to distribute early years funding has not been updated, and has become so adrift. The vast majority of providers in Bradford will now not understand how a redress of this means that they will only see a maximum 1% increase in their funding rates in 2023/24.

The floors must be re-assessed as a priority, in the context of the current financial climate. We would suggest that the DfE takes a longer multi-year approach to the update of the underlying data, meaning that the ceilings on gains should be reduced in 2023/24 in order to afford a higher value floor for all local authorities.

9 Do you agree with our proposal to introduce a proxy for premises related costs into the 2-year-old formula?

Unsure

Do you agree with our proposal to introduce a proxy for premises related costs into the 2-year-old formula?:

Protections

10 Do you agree with our proposed approach to protections in the EYNFF for 2023-24?

No

Do you agree with our proposed approach to protections in the EYNFF for 2023-24?:

Whilst we agree with a proposal to establish year-on-year protections, we strongly disagree that 1% in 2023/24 represents sufficient protection. The DfE must assess again the sufficiency of this minimum increase in rates of funding.

11 Do you agree with our proposed approach to protections in the 2-year-old formula for 2023-24?

No

Do you agree with our proposed approach to protections in the 2-year-old formula for 2023-24?:

Whilst we agree with a proposal to establish year-on-year protections, we strongly disagree that 1% in 2023/24 represents sufficient protection. The DfE must assess again the sufficiency of this minimum increase in rates of funding.

Reform of maintained nursery school supplementary funding

12 Do you agree with our proposal to introduce a minimum hourly funding rate and a cap on the hourly funding rate for MNS supplementary funding?

Yes

Do you agree with our proposal to introduce a minimum hourly funding rate and a cap on the hourly funding rate for MNS supplementary funding?:

No further comments

13 Do you agree with our proposed approach to rolling the teachers' pay and pensions grants into MNS supplementary funding?

No

Do you agree with our proposed approach to rolling the teachers' pay and pensions grants into MNS supplementary funding?:

Please see our response to question 6.

Mainstreaming is an unwelcome complication, which is likely to create additional administration and will have wider knock on consequences.

Equalities Impact Assessment

14 Do you have any comments about the potential impact, both positive and negative, of our proposals on individuals on the basis of their protected characteristics? Where any negative impacts have been identified, do you know how these might be mitigated?

Do you have any comments about the potential impact, both positive and negative, of our proposals on individuals on the basis of their protected characteristics? Where any negative impacts have been identified, do you know how these might be mitigated?:

Any other comments

15 Are there any other comments that you would like to make about our proposed reforms?

Are there any other comments that you would like to make about our proposed reforms?: