

## Response ID ANON-VMYX-T5RH-Q

Submitted to Implementing the direct national funding formula  
Submitted on 2022-09-02 10:01:11

### Introduction

What is your name?

Name:  
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What is your email address?

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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 Metropolitan District Council

What type of organisation is this?

Please pick the organisation you belong to.:  
Local Authority

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

Please select:  
Bradford

Would you like us to keep your responses confidential?

No

Reason for confidentiality (optional):

### Interaction between the direct NFF and funding for high needs (1)

1 Do you agree that local authorities' applications for transfers from mainstream schools to local education budgets should identify their preferred form of adjustment to NFF allocations, from a standard short menu of options?

Yes

If you have any comments on this question or on other aspects of the operation of transfers of funding from mainstream schools to local authorities' high needs budgets, please give these below. Please limit your answer to 200 words.:

Whilst we agree that the method of adjustment would meet the fair and equitable elements of the NFF, there should still be the opportunity for local authorities to present alternative methods of adjustment to the Department. Any list presented by the Department should not be a 'closed list' and should be presented to local authorities for further consultation before adoption or implementation.

### Interaction between the direct NFF and funding for high needs (2)

2 Do you agree that the direct NFF should include an indicative SEND budget, set nationally rather than locally?

Yes

If you wish to explain your answer, please do so here. Please limit your answer to 200 words.:

We agree that the fair and equitable elements of the NFF should be applied to the Notional SEND. This will also support the development of consistent national standards for SEND provision. In the run up to the implementation of this, it may be helpful for the Department to set minimum and maximum thresholds to allow local authorities to tailor to the needs of their authority.

### Growth and falling rolls funding

3 Do you have any comments on the proposals to place further requirements on how local authorities can operate their growth and falling rolls funding?

Please limit your answer to 200 words.:

A set of national principles for these funds seems sensible to meet the aims of the NFF in regard to fairness, consistency and simplicity across the entire country. We favour the idea of retaining local control at local authority level, as local authorities have the knowledge and data to set / adjust policies to ensure maximum benefit for schools and academies in their areas.

4 Do you believe that the restriction that falling rolls funding can only be provided to schools judged "Good" or "Outstanding" by Ofsted should be removed?

No

5 Do you have any comments on how we propose to allocate growth and falling rolls funding to local authorities?

Please limit your answer to 200 words.:

More information is required here to aid understanding of the proposed mechanism for calculating growth and falling rolls funding, specifically with reference to the impact of the proposed 'netting-off'.

Where an MSOA has net zero change, this could be underpinned by some schools having a large reduction and some schools having the same large growth, but, "netted off" - this would not generate funding for the local authority? If so, this would leave significant pressure on the local authority to support both types of schools, without any Schools Block funding to cover this. We need more clarity and more detail to be presented on the 'netting-off' approach, in order to offer a more constructive response.

We have some concerns about the use of a threshold. Using a threshold of "significant" falling rolls may mean that an authority that has multiple areas just under a threshold would not receive funding support, even though the cumulative position for the authority is a large fall in numbers. How would the authority receive funding to support their management of the cumulative position? Funding will be used cross MSOA (rather than funding being restricted to the MSOA that generates it), so there does need to be some recognition of the cumulative impact, and the use of a threshold at MSOA level may distort this. Applying a threshold at authority level instead (or perhaps as well as) may be a better option.

6 Do you agree that we should explicitly expand the use of growth and falling rolls funding to supporting local authorities in repurposing and removing space?

Yes

7 Do you agree that the Government should favour a local, flexible approach over the national, standardised system for allocating growth and falling rolls funding; and that we should implement the changes for 2024-25?

Yes

8 Do you have any comments on the proposed approach to popular growth?

Please limit your answer to 200 words.:

Is there any data to show whether parents would rather choose an academy over an LA Maintained School? Or more likely that parental choice would be primarily based on School Performance that influences parental choice. Some LA Maintained Schools work extremely hard to reverse any misfortune associated with a poor Ofsted report or low Progress Scores and subsequently become 'popular' due to this success. Their status as an academy or Maintained School should not be a barrier to accessing funding when considering the consistent and fair principles of the NFF.

## Premises funding

9 Do you agree we should allocate split site funding on the basis of both a schools' 'basic eligibility' and 'distance eligibility'?

Yes

10 Do you agree with our proposed criteria for split site 'basic eligibility'?

No

11 Do you agree with our proposed split site distance criterion of 500m?

Unsure

12 Do you agree with total available split sites funding being 60% of the NFF lump sum factor?

The funding should be higher

13 Do you agree that distance eligibility should be funded at twice the rate of basic eligibility?

Unsure

14 Do you agree with our proposed approach to data collection on split sites?

Yes

15 Do you have any comments on our proposed approach to split sites funding?

Please limit your answer to 200 words.:

We strongly disagree with the proposal that off site playing fields are not be considered to be "split site". There is a substantial cost associated with transporting pupils safely to another location, with maintaining a second site, and with timetabling inefficiencies, regardless of the nature of the second site. There should be a mechanism to support these additional costs. and the NFF split site basic criteria should respond to this.

Linking the value of split sites funding to the value of the NFF lump sum we feel should be re-considered for the secondary phase, as the lump sum represents a much smaller portion of secondary-phase budgets. Our current split site model uses pupil numbers, as this approach better reflects the scale of the costs that secondary schools have, relating to the movement / travel of pupils and teachers between sites, duplicated costs and timetabling inefficiencies. Under the current proposals, our secondary phase split sites schools will lose substantially. We see the use of the lump sum as the key reason for this. We would recommend that pupil numbers are brought into the factor, especially for the secondary phase.

16 Do you agree with our proposed approach to the exceptional circumstances factor?

Unsure

17 Do you have any comments on the proposed approach to exceptional circumstances?

Please limit your answer to 200 words.:

As an authority that does not have any exceptional circumstances, we have no strong view on this.

The minimum funding guarantee (MFG) under the direct NFF

18 Do you agree that we should use local formulae baselines (actual GAG allocations, for academies) for the minimum funding guarantee (MFG) in the year that we transition to the direct NFF?

Yes

19 Do you agree that we should move to using a simplified pupil-led funding protection for the MFG under the direct NFF?

Yes

20 Do you have any comments on our proposals for the operation of the minimum funding guarantee under the direct NFF?

Please limit your answer to 200 words.:

It seems sensible to transition to a fully pupil-led model, to remove the distortion caused by school led factors, including that caused by large changes to the lump sum.

It is also sensible / essential to base the MFG on actual allocations received by schools and academies in the final year of transition.

The annual funding cycle

21 What do you think would be most useful for schools to plan their budgets before they receive confirmation of their final allocations: (i) notional allocations, or (ii) a calculator tool?

Unsure

22 Do you have any comments on our proposals for the funding cycle in the direct NFF, including how we could provide early information to schools to help their budget planning?

Please limit your answer to 200 words.:

Schools and academies are used to the current system of "delay" before receiving actual allocation information and, in my experience, the work that local authorities do, to provide as early as possible the best estimates of allocations, meets the needs of schools currently. Schools and academies are aware of the current caveats that precede any modelling or notional allocations.

The delivery of improvements to the current timeline would need to be secure before announcing these, and, if final allocations can be announced sooner (e.g. in December), they will absolutely need to be final allocations that are confirmed without alteration. So the timescales need to be secure.

Regarding the use of notional allocations or a calculator tool (question 21), we like the idea of a calculator tool. However, the facility for schools to alter

characteristics / data and to estimate their own funding needs to be balanced off with the risks associated with 'garbage in, garbage out' and the opportunity for big financial decisions to be taken based on incorrect funding estimates. To support this, we would actually recommend that both fixed notional allocations, as well as a calculator tool, are provided.

23 Do you have any comments on the two options presented for data collections in regards to school reorganisations and pupil numbers? When would this information be available to local authorities to submit to DfE?

Please limit your answer to 200 words.:

We would prefer the option to have access to a form earlier in the autumn term, albeit that this isn't pre-populated. This recognises the difficulties that might be present in pulling together a return over the Christmas and new year period.

It would significantly help local authorities for academy October census submissions to be verified and released on COLLECT much sooner than they currently are. In the last couple of years, we have not been able to access a large number of academy October census returns in COLLECT until late November at the earliest. This has had Schools Block as well as Early Years Block impact for us and causes difficulties with our modelling.

24 Regarding de-delegation, would you prefer the Department to undertake one single data collection in March covering all local authorities, or several smaller bespoke data collections for mid-year converters?

One single data collection

25 Do you have any other comments on our proposals regarding the timing and nature of data collections to be carried out under a direct NFF?

Please limit your answer to 200 words.: