

Document OX App 1a CONSULTATION & INFORMATION ON MAINSTREAM PRIMARY & SECONDARY FORMULA FUNDING 2023/24 FINANCIAL YEAR

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) maintained schools and academies in Bradford for the 2023/24 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 and from the Falling Rolls Fund.

1.2 This document also asks for feedback on the continuation for the 2023/24 financial year of funds de-delegated from maintained mainstream primary and secondary schools. **Please be aware however, that, due to the timescale necessary for confirmation, the Schools Forum has already decided to continue / discontinue de-delegation in 2023/24 from mainstream maintained primary schools for the purposes of subscribing to Fischer Family Trust.**

1.3 The deadline for responses to this consultation is **Tuesday 29 November 2022**. An analysis of responses received will be discussed at the Schools Forum meeting on 8 December. Please address all questions and responses to Jonty Holden 01274 431927 jonty.holden@bradford.gov.uk. A response form is included at Appendix 4. However, this year we have introduced a web-based questionnaire, which we encourage you to use to submit your response. Please access the web-based questionnaire [here](#).

1.4 Please note that separate consultation documents, on Early Years Block and High Needs Block formula funding arrangements for 2023/24, will be published on Bradford Schools Online. These consultations will be signposted from our latest news and updates page [here](#).

2. Background

2.1 It is important to confirm, for mainstream primary and secondary schools and academies, that the Minimum Funding Guarantee (MFG), and the DfE's mandatory Minimum Levels of Per Pupil Funding (MFLs), remain in place in 2023/24. These factors protect individual schools and academies against sharp reductions in per pupil funding in any single year, that may be caused by technical formula or by October Census data changes, and provide for a minimum value of per pupil formula funding. The values of the MFLs for each phase are set nationally by the DfE, and are mandatory, but the level of the MFG is one of the key decisions that we must take locally.

2.2 In their most recent three-year budget forecasting, maintained primary and secondary schools will typically have budgeted in 2023/24 for a 'headline' increase of 2.00% per pupil in core formula funding and for a Minimum Funding Guarantee (MFG) of positive 1.50%. Schools affected by the mandatory Minimum Levels of Per Pupil Funding (MFLs) will typically have estimated that these minimums will increase by 2.00%. We are aware that a number of academies in Bradford follow the Authority's guidance in estimating their future year formula funding.

2.3 The actual 2023/24 settlement, provided through the National Funding Formula (NFF), and as announced by the DfE in July 2022, is confirmed as follows. The basic 'headline' settlement is close to the Authority's estimates. However, the Minimum Levels of Per Pupil Funding (MFLs), and the Minimum Funding Guarantee (MFG), are set lower than estimated.

- The national Schools Block settlement for 2023/24 provides for an overall 1.9% increase on 2022/23 in funding per pupil. This scale of increase aligns with our previous assessment, that the current 3-year national school funding settlement has been weighted towards 2022/23, with reduced increases to be allocated by the DfE in 2023/24 and in 2024/25.
- Unlike in recent years, rather than a single % increase being applied to all NFF factors, the FSM6 (Free School Meals Ever 6) and Income Deprivation Affecting Children Index (IDACI) factors have been additionally uplifted. This weights the 2023/24 settlement towards schools and academies with higher levels of deprivation, as measured by FSM6 and IDACI. As a result, schools and academies, that are funded above the levels of the MFL and MFG, will typically see per pupil funding increases in the region of 2.6% in 2023/24, which is higher than the overall aggregated 1.9%.
- The national Schools Block NFF per pupil increase of 1.9% is aggregated as follows:
 - The core NFF factors (AWPU and lump sum) are increasing by 2.4%.
 - The deprivation NFF factors (FSM6 and IDACI) are increasing by 4.3%.
 - All other NFF factors are increasing between broadly 2.1% and 2.6% (after the variable values have been rounded to the nearest £5).
 - The mandatory Minimum Levels of Funding Per Pupil (MFLs) are increasing by 0.5%.
 - The Minimum Funding Guarantee (MFG) can be set at a maximum 0.5%. The DfE has funded a 0.5% minimum floor increase for all schools and academies.
- After applying the basic % uplifts, the DfE has further increased the AWPU, FSM6 and lump sum factors in order to allocate the Schools Supplementary Grant (SSG) via the National Funding Formula. The SSG was a new grant, introduced at by the DfE April 2022, to support the costs of pay awards and the 1.25% NHS / Social Care National Insurance Levy. The MFLs have been uplifted to allocate the SSG. SSG allocations have also been added into school and academy baselines, so that the Minimum Funding Guarantee will provide protection, which is inclusive of the SSG allocations was were received separately in 2022/23. On this basis, mainstream primary and secondary schools and academies must now cease to budget for the SSG as a separate additional allocation. All schools and academies should carefully check their 2023/24 budget scenarios (including any scenarios that are continued from existing ones) to ensure that they are not double counting the SSG. For wider awareness, please note that the small proportion of Schools Supplementary Grant, that has been allocated in respect of early years and post 16 pupils, will continue to be allocated as a separate grant in 2023/24. It is the Reception to Year 11 element of the SSG that has been merged into core NFF formula funding for the 2023/24 financial year.
- The Minimum Levels of Per Pupil Funding (MFLs) for 2023/24 are £4,405 (primary – increased from £4,265) and £5,715 (secondary – increased from £5,525). These are the minimum values of per pupil funding that schools and academies must receive in 2023/24. These minimums continue to be mandatory and are therefore, not subject to local consultation. An important point to highlight is that the uplift of the MFLs in 2023/24 is significantly lower than the uplift of the core NFF factors – the core NFF factors (AWPU and lump sum) are increasing by 2.4% but the MFLs are increasing by only 0.5% (both figures are prior to the transfer of Schools Supplementary Grant). Schools and academies that are funded on the MFLs will only receive a 0.5% increase in their funding per pupil in 2023/24. This is very likely to be lower than the increase that these schools and academies will have forecasted (2.00%), based on the DfE's 2022/23 approach to uplifting the MFLs in line with the increase in the core factors.
- The Minimum Funding Guarantee can be set between 0% and positive 0.5% in 2023/24. This permitted range is much narrower than in 2022/23, and the maximum of 0.5% is also much lower than the maximum 2.0% that could be set in both 2021/22 and 2022/23. This means that the gap between the MFG and the increase in the core NFF factors is much greater in 2023/24 than it was in both 2021/22 and 2022/23. Schools and academies that are funded on the MFG will only receive a maximum 0.5% increase in their funding per pupil in 2023/24. As with the MFL schools, this is very likely to be lower than the increase that these schools and academies will have forecasted (1.5%), based on the DfE's approach in the last 2 years to setting the minimum and maximum MFG levels.

- The positions and values of the remaining long-standing recurrent separate mainstream pre-16 additional grants in 2023/24 – Pupil Premium Grant, Primary PE & Sports Premium and Universal Infant Free School Meals – are still to be confirmed. DfE announcements on these grants, when they come, will be signposted on Bradford Schools Online.

2.4 We are in an extended period of system change, one of the most significant changes being the movement towards a 'hard' National Funding Formula (NFF) for the calculation of mainstream primary and secondary core formula funding allocations. The DfE has for some time stated that its longer-term intention is to transition to a 'hard' formula approach, where school and academy formula allocations will be calculated by the DfE, rather than by local authorities, using the National Funding Formula. The DfE first introduced the National Funding Formula (NFF) in 2018/19 in 'soft' format, meaning that local authorities can currently still decide the formulaic calculations that are used for distributing funding to mainstream primary and secondary schools and academies within their areas, albeit within tight Regulations. Local authorities continue to set their own Growth Fund and Falling Rolls Fund arrangements. There currently are also elements that are not yet covered by the NFF, the most prominent of these being the funding of PFI (Building Schools for the Future) and of split sites.

2.5 The DfE has just completed another stage of consultation, on the final transition to the hard NFF. Although there isn't a fixed date for when this will be implemented, the DfE sets out the aim for full implementation within the next 5 years - by 2027/28 at the latest; sooner if possible, but no later. Changes have been directed by the DfE for the 2023/24 financial year, which are incorporated into this consultation. The DfE then already proposes to make targeted changes to the NFF for the 2024/25 financial year, which we will incorporate into our consultation this time next year. These include a new mandatory NFF factor for split sites funding and the amendment of Growth Fund and Falling Rolls Fund arrangements. We are also conscious that the current national SEND and Alternative Provision Reviews are very likely to have implications for mainstream formula funding, with changes possibly introduced from April 2024. The DfE has also indicated that the construction of the NFF will continue to be reviewed annually.

2.6 In the context of this transition, we wish to continue to ensure that we take an approach now to formula funding that will minimise any turbulence that might be caused by the final stages of the transition in the near future. Further announcements and consultations, at a detailed level, will be required in order for us to have a clearer understanding of the medium to longer term impact of further NFF reform on the funding of individual mainstream primary and secondary maintained schools and academies in Bradford. Due to the DfE setting out proposals for a gradual approach, the timing of the final movement to the hard NFF is still uncertain. What the NFF will look like post-transition is also uncertain. We might perhaps expect this to be similar to the NFF as currently constructed, using similar factors, values, and protections. However, whilst it has been confirmed that the Minimum Funding Guarantee will continue, the DfE has stated that many elements and factors of the National Funding Formula are under review. More recently, the DfE has clearly indicated that the NFF development will be heavily influenced by the final outcomes of the current national SEND and Alternative Provision Reviews. This includes the definition of Notional SEND budgets within mainstream formula funding allocations, for which the DfE has recently provided further guidance.

2.7 There are two directed changes, which affect our 2023/24 formula funding arrangements:

- For mainstream primary and secondary formula funding, authorities must now use all National Funding Formula factors, and only these factors. Authorities that do not currently 'mirror' (fully use already) the NFF must move 10% closer. Authorities that currently mirror the NFF must continue to do so by staying within 2.5% of the NFF formula factor variable values. As Bradford already directly mirrors the NFF, this new restriction requires minimal response within our arrangements for 2023/24. However, this does restrict the extent to which we could move away from the NFF, either to allocate additional funding (via budget headroom, where available) or to reduce the cost of our formula funding arrangements in order to secure their affordability.
- We are now formally required to add the National Funding Formula 'sparsity factor' into our local formula. However, this is a 'tick box' exercise only, as none of our schools / academies qualify for sparsity funding. Although a very small number trigger the 'sparse' part of eligibility for this funding (as these schools / academies are at least 2 miles (primary) or 3 miles (secondary) distance by road away from their nearest school / academy), none are small enough to trigger the 'size' part of eligibility for this funding.

2.8 Other than these directed changes, there is a great deal of continuity in 2023/24:

- The factors that were not included in National Funding Formula in 2022/23 are still not included e.g. split sites, PFI. Although changes will be made for 2024/25, we continue to set these factors locally in 2023/24.
- The construct of the National Funding Formula is the same as it was in 2022/23, incorporating the same factors and how these are applied.
- The Minimum Levels of Per Pupil Funding (MFLs) are still in place and continue to be mandatory. The Minimum Funding Guarantee (MFG) is also still in place.
- Local authorities continue to have the flexibility to set their own Growth Fund and Falling Rolls Fund mechanisms, but must still comply with DfE's guidance, which has not changed.
- The existing framework for the de-delegation of funding from maintained schools continues unchanged.
- Although the DfE has provided new guidance on Notional SEND, this guidance stops short of prescribing local arrangements. Authorities continue to have full flexibility to define their own Notional SEND budgets. There are also no changes in operational guidance, which alter the way SEND funding works for mainstream schools and academies in 2023/24 e.g. the £6,000 threshold (element 2) is still £6,000.
- We will need to continue to absorb the cost of the 'lag' in data. In 2023/24, this will be the lag between the funding of schools / academies on October 2022 Census data and the funding of the Dedicated Schools Grant (DSG) Schools Block on October 2021 Census data.
- We will need to continue to manage the cost of Business Rates (NNDR), including the impact of re-evaluation at April 2023.
- Local authorities continue to be permitted to use the Reception Uplift Factor, on an optional basis.

2.9 To give context to the proposals that we put forward now for 2023/24, it is helpful to summarise briefly the key decisions that we have taken at and since this date:

- In 2018/19, we replaced our local formula with the DfE's National Funding Formula, using this to calculate individual formula allocations for both primary and secondary phases. We have continued this 'mirroring' policy in each year since, adopting annual incremental changes in the NFF construction and uplifts in formula variable values. The DfE established a new pupil mobility NFF factor in 2020/21, which, following a year of transition, we fully adopted for both primary and secondary phases. We have also adopted, as required, the Minimum Levels of per Pupil Funding (MFLs).
- We have set a Minimum Funding Guarantee (MFG - protecting / ensuring a minimum increase in individual maintained school and academy per pupil funding year on year) as follows. For the last 3 years, we have set our MFG with reference to the maximum level that was permitted by the Regulations:
 - 2018/19 at positive 0.40% per pupil
 - 2019/20 at 0% per pupil
 - 2020/21 at positive 2.34% per pupil
 - 2021/22 at positive 2.00% per pupil
 - 2022/23 at positive 2.00% per pupil
- Since 2018/19, we have not applied a ceiling, which would have capped the values of annual increases in per pupil funding received by individual maintained schools and academies. All formula funding gains, from annual data changes, have been passed through to maintained schools and academies.
- We have not transferred monies from the Schools Block to the High Needs Block since 2019/20. In setting the Minimum Funding Guarantee at positive 2.34% in 2020/21, which was 0.5% higher than permitted under the normal regulations, our intention was to 'give back' to mainstream schools and academies the money we transferred in 2019/20.

- We have retained unchanged our local approaches in the areas of formula funding that the DfE's NFF does not yet cover. These are:
 - Business Rates (actual cost).
 - Split sites.
 - PFI (Building Schools for the Future).
 - Growth Fund (at individual school level).
 - Falling Rolls Fund.
 - Notional SEND definition.

2.10 The combination of a number of changes and decisions since 2017/18 – transfer from the Schools Block to the High Needs Block in 2017/18 and in 2019/20, our mirroring of the DfE's National Funding Formula, year on year changes for individual schools and academies in the data recorded in / sourced with reference to the pupils recorded in their annual October censuses, the DfE's mandatory Minimum Levels of per Pupil Funding - has created the following landscape in Bradford in 2022/23:

- Primary phase: 67 out of 156 schools and academies (43%) are funded on the Minimum Funding Guarantee. 34 schools and academies (22%) are funded at the £4,265 minimum per pupil level. All other schools and academies are funded above £4,265 per pupil.
- Secondary phase: 5 out of 31 schools and academies (16%) are funded on the Minimum Funding Guarantee. 2 schools and academies (6%) are funded at the £5,525 minimum per pupil level. All other schools and academies are funded above £5,525 per pupil.
- All through academies: 1 out of the 4 academies (25%) is funded on the Minimum Funding Guarantee. All of these academies are funded above their composite minimum per pupil funding levels.
- In total, 73 out of 191 schools and academies (38%) are funded on the Minimum Funding Guarantee. This is reduced from 109 (57%) in 2021/22. In total, 36 out of 191 schools and academies (19%) are funded on the minimum per pupil funding levels. This is reduced from 43 (23%) in 2021/22.

2.11 As a final point of reminder, and for awareness, our separate consultation on High Needs Block formula funding presents the Local Authority's proposals for the funding of pupils with Education Health and Care Plans in mainstream settings in 2023/24. This consultation is signposted from our latest news and updates page [here](#), and includes proposals for allocating top-up funding and for the SEND Funding Floor. We discuss within this consultation here, as well as within the High Needs Block consultation, the proposed amendments to the definition of Notional SEND budgets.

3. Formula Funding Proposals for 2023/24

3.1 There are **7 key decisions** we need to take on Bradford's 2023/24 mainstream primary and secondary Schools Block funding formula arrangements. These decisions are similar to those that were needed for 2022/23.

3.2 The 7 decisions are:

1. Whether we transfer budget from Schools Block to the High Needs Block and, if we do, the value of this transfer.
2. Whether we continue to fully mirror the DfE's National Funding Formula (NFF).
3. The value (% level) of the Minimum Funding Guarantee, which can be set between 0% and positive 0.5%.
4. Whether we continue our existing local approaches to the factors that are still not covered by the National Funding Formula.

5. In light of the DfE's new recent guidance, whether we continue our existing approach to the definition of Notional SEND budgets, or whether we now take steps to review and to incrementally adjust this definition in the movement towards the 'hard' NFF.
6. How we would amend our mainstream primary and secondary funding formula, if necessary for affordability reasons, should the total cost of our formula substantially increase (and be unaffordable) when the October 2022 Census dataset is used.
7. Whether we retain, with their existing criteria and methodologies, the funds currently managed centrally within the Schools Block.
 - a. Growth Fund
 - b. Falling Rolls Fund (primary phase)
 - c. Funds de-delegated from mainstream maintained primary and secondary schools

3.3 Please be aware that the values of the primary and secondary phase Minimum Levels of Funding per Pupil (MFLs) are mandatory and not for local determination. We are not consulting on the application of the MFL factor.

3.4 Running alongside our 7 decisions, it should be noted:

- As stated in paragraph 2.7, we are formally required to add the 'sparsity factor' into our local formula. As the addition of this factor into our 2023/24 formula is mandatory, and as none of our school / academies are eligible, we are not consulting on this. We will inform the DfE, via our Authority Pro-forma Tool (APT) return in January, that we have mirrored the NFF sparsity factor in 2023/24.
- The construct of the national high needs funding system – the notional value of £4,000 for element 1 and £6,000 for element 2 – remains unchanged from 2022/23 arrangements.
- The role of Bradford's Dedicated Schools Grant in the funding of PFI (Building Schools for the Future) remains unchanged, limited to funding the agreed DSG Affordability Gap. PFI funding is a matter that the Schools Forum wishes to monitor closely within the national 'hard' NFF review work to come.
- The Education and Skills Funding Agency (ESFA) made a change at April 2022 to how payments to billing authorities from mainstream primary and secondary maintained schools and academies for business rates (NNDR) can be managed. This change was optional. Bradford Local Authority has determined not to implement the amended approach at this time.
- The data source for the Pupil Premium Grant (PPG) has been transferred on a permanent basis from the annual January Census back to the annual October Census. 2023/24 PPG allocations data will be sourced with reference to the pupils recorded in the October 2022 Census.
- The Local Authority has recently directly contacted schools and academies that currently receive split sites funding, in order to collect information and to verify their continuing eligibility for split sites funding under the DfE's proposed new NFF split sites factor, which is planned to be introduced for 2024/25. We take the opportunity here to highlight the DfE's eligibility criteria, so that all schools and academies are able to review whether they might be eligible. Please contact Jonty Holden with any queries and if you do assess that you might be eligible. The DfE's eligibility criteria are listed in the embedded document below.



split sites eligibility

3.5 Running alongside these decisions, we wish to explain the position of the use of the Reception Uplift Factor for the primary phase.

- We employed the Reception Uplift Factor, on a one-off exceptional basis, in 2022/23, using £0.495m of the £0.917m primary-phase surplus balance that was carried over from 2021/22. For 2022/23, this factor enabled the Local Authority to increase the funded pupil number count for schools and academies that had higher reception year numbers recorded in the January 2021 Census than were recorded in the

October 2020 Census. Recognising that the October Census is taken relatively early in the autumn term, the purpose of the Reception Uplift Factor is to fund primary schools and academies that have substantial later intakes of pupils into their reception years (as a result e.g. of admission of pupils on appeal or from having available places as a consequence of under-subscription). Albeit that this funding is allocated a year in arrears. In 2022/23, we allocated funding in respect of 102 additional reception year pupils.

- We used the Factor within our local formula, up to 2017/18. However, as the Factor is not used or funded within the DfE's National Funding Formula (NFF), in order to fully mirror the NFF, we ceased to use it at April 2018. Only 11 local authorities used it in 2022/23.
- We explained in our consultation, published this time last year, that we would not normally revisit the decision to cease using the Factor, but for closer consideration of the financial implications of the COVID-19 pandemic. An area of concern that was raised by Schools Forum members was the delay in the normal primary-phase admissions appeals timetable that the pandemic caused in autumn 2020, meaning that potentially a larger than normal number of primary phase appeals for the reception year were concluded after the October 2020 Census was taken. Applying the Reception Uplift Factor was intended to help minimise the negative financial impact of this situation on schools and academies that admitted reception year children on appeal between October 2020 and January 2021. Although we identified that this Factor would also more generally support primary schools and academies that were undersubscribed in their reception years, the main rationale for our re-introduction of the Factor was the COVID-19 pandemic impact in autumn 2020. Its use was intended to be one-off and exceptional.
- As such, we are minded not to use the Reception Uplift Factor again in 2023/24. There is also an affordability consideration, as the cost of the Factor (c. £0.50m) would need to be met from available headroom, or from balances, as it is not funded by the DfE. We identify already that there is likely to be pressure in meeting the cost of our main 2023/24 formula funding arrangements, which will require the use of balances, before we then would add a further £0.50m of cost for the Reception Uplift Factor.

Decision 1 - Whether we transfer budget from the Schools Block to the High Needs Block in 2023/24

3.6 This is the first decision in our consultation, because a transfer of monies out of the Schools Block of the Dedicated Schools Grant (DSG) directly affects the amount of funding that is available to spend on mainstream primary and secondary formula funding and therefore, what level of uplift and what Minimum Funding Guarantee we can afford to propose in 2023/24.

3.7 On current estimates, our High Needs Block allocation in 2023/24 is £111.90m. This represents an increase of 6.4% in cash terms and 6.8% in per pupil terms. This increase is lower than received in recent years. Our overall cash increase was 10% in 2022/23 and 14% in 2021/22. This lower increase aligns with our assessment, that the current 3-year national school funding settlement has been weighted towards 2022/23, with reduced increases to be allocated in 2023/24 and in 2024/25. We anticipate that High Needs Block funding nationally may only increase between 3% and 5% in 2024/25. On this assumption, whilst we forecast the continued growth in the numbers of children and young people in Bradford with EHCPs, we also forecast that our High Needs Block financial position will be significantly challenging going forward. Our management of this position must begin in 2023/24, and we discuss this further within our separate High Needs formula funding consultation.

3.8 However, the high needs funding settlements that we have recently received from the DfE have put Bradford's High Needs Block in a fundamentally much stronger position than was the case back at the start of the transition to the National Funding Formula in 2018/19. **As a result, the Local Authority does not propose to transfer Schools Block funding to the High Needs Block in the 2023/24 financial year.** This means that the full Schools Block settlement will be retained for spending on the funding of mainstream primary and secondary provision.

3.9 At the end of the 2021/22 financial year, within the High Needs Block, we held a cumulative surplus balance of £23.021m. The Authority has discussed the retention and uses of this balance with the Schools Forum, over the spring and summer terms, and we have identified already that we are likely to need to use a substantial proportion of this balance in 2023/24. We will continue to discuss the High Needs Block with the Schools Forum across the autumn term.

Decision 2 – Whether we continue to fully mirror the DfE’s 2023/24 National Funding Formula

3.10 The table below shows the DfE’s National Funding Formula (NFF) factors in 2023/24, as these are applied to Bradford (so adjusted for area costs - ACA), compared against those used for 2022/23. These are the factors that we use in Bradford to allocate formula funding to mainstream primary and secondary schools and academies. The key changes for 2023/24 are:

- The values of the NFF pupil-led factors have been uplifted in line with the DfE’s settlement, which we’ve described in paragraph 2.3. As in previous years, prior to the application of the ACA, the DfE has rounded the NFF variable values to the nearest £5. This rounding affects the % increases.
- The mandatory minimum levels of funding per pupil (MFLs) have been increased from £4,265 to £4,405 (primary) and from £5,525 to £5,715 (secondary).
- The Base £APP (AWPU), Lump Sum and FMS6 (Ever 6) factors have been further increased in order to allocate the Schools Supplementary Grant, which has been merged into the National Funding Formula.
- We have added the National Funding Formula Sparsity Factor, as we are now required to have this factor within our local formula (although no schools or academies in Bradford are eligible for funding).

Factor	NFF £ 2023/24	NFF £ 2022/23	£Diff	% Diff
Primary – Base £APP (AWPU)	£3,394.54	£3,217.51	+ £177.03	+ 5.50%
Secondary – Key Stage 3 Base £APP	£4,785.77	£4,536.73	+ £249.04	+ 5.49%
Secondary – Key Stage 4 Base £APP	£5,393.86	£5,112.82	+ £281.04	+ 5.50%
Lump Sum – Primary & Secondary	£128,020	£121,319	+ £6,701.00	+ 5.52%
Primary - Deprivation – FSM Ever 6	£705.11	£590.09	+ £115.02	+ 19.49%
Primary - Deprivation – Flat FSM	£480.08	£470.08	+ £10.00	+ 2.13%
Secondary - Deprivation – FSM Ever 6	£1,030.16	£865.14	+ £165.02	+19.07%
Secondary - Deprivation – Flat FSM	£480.08	£470.08	+ £10.00	+ 2.13%
Primary - Deprivation – IDACI F	£230.04	£220.04	+ £10.00	+ 4.54%
Primary - Deprivation – IDACI E	£280.04	£270.04	+ £10.00	+ 3.70%
Primary - Deprivation – IDACI D	£440.07	£420.07	+ £20.00	+ 4.76%
Primary - Deprivation – IDACI C	£480.08	£460.07	+ £20.01	+ 4.35%
Primary - Deprivation – IDACI B	£510.08	£490.08	+ £20.00	+ 4.08%
Primary - Deprivation – IDACI A	£670.11	£640.10	+ £30.01	+ 4.69%
Secondary - Deprivation – IDACI F	£335.05	£320.05	+ £15.00	+ 4.69%
Secondary - Deprivation – IDACI E	£445.07	£425.07	+ £20.00	+ 4.71%
Secondary - Deprivation – IDACI D	£620.10	£595.10	+ £25.00	+ 4.20%
Secondary - Deprivation – IDACI C	£680.11	£650.10	+ £30.01	+ 4.62%
Secondary - Deprivation – IDACI B	£730.12	£700.11	+ £30.01	+ 4.29%
Secondary - Deprivation – IDACI A	£930.15	£890.14	+ £40.01	+ 4.49%
Primary - English as an Additional Language (3)	£580.09	£565.09	+ £15.00	+ 2.65%
Secondary - English as an Additional Language (3)	£1,565.25	£1,530.24	+ £35.01	+ 2.29%
Primary – Low Prior Attainment	£1,155.18	£1,130.18	+ £25.00	+ 2.21%
Secondary – Low Prior Attainment	£1,750.28	£1,710.27	+ £40.01	+ 2.34%
Primary - Pupil Mobility	£945.15	£925.15	+ £20.00	+ 2.16%
Secondary – Pupil Mobility	£1,360.22	£1,330.21	+ £30.01	+ 2.26%
Primary – Minimum £APP (MFL)	£4,405	£4,265	+ £140.00	+ 3.28%
Secondary – Minimum £APP (MFL)	£5,715	£5,525	+ £190.00	+3.44%
Primary – Sparsity Lump Sum	£56,309.01	n/a	n/a	n/a
Secondary – Sparsity Lump Sum	£81,913.10	n/a	n/a	n/a

3.11 So, the NFF in 2023/24 retains the same dynamic as in the last five years, including its focus on Additional Educational Needs (AEN) funding, the Low Prior Attainment factor within AEN, and the lower value of lump sum, which has been one of the most significant factors in terms of impact of the NFF on smaller schools and on the primary phase more widely.

3.12 The Authority's case for moving to fully replicate the DfE's NFF, originally put forward for 2018/19, was strongly supported. Schools and academies in Bradford have since continued to support our close mirroring of the NFF. Therefore, we believe schools and academies will also support the principle that, in this short period, prior to the final establishment of the 'hard' NFF, when further transition has been directed by the DfE for 2023/24 for all local authorities, our local formula funding arrangements should continue to move fully in line with the DfE's NFF as this uplifts and incrementally develops. For point of reference, 74 (out of 152) authorities in 2022/23 directly mirrored the NFF, as we did.

3.13 We propose therefore, **subject to final affordability (please see decision 6), that we will continue to fully mirror the NFF in 2023/24, using the 'NFF 2023/24' factor values shown in the table above.**

3.14 The indicative impact of this proposal is shown in Appendices 1a and 1b. Please also refer to the explanation of the modelling in paragraph 4.

Question 1 - Do you agree that our local formula in 2023/24 should fully mirror the DfE's 2023/24 National Funding Formula and that this formula should be used to calculate primary and secondary school and academy mainstream formula funding allocations? If not, please explain the reasons why not.

Decision 3 – The % level of the Minimum Funding Guarantee (MFG)

3.15 The Minimum Funding Guarantee (MFG) is the mechanism through which the Authority must ensure a minimum percentage increase in funding per pupil for all schools and academies in 2023/24. Typically, we seek to set the MFG at the maximum that is permitted by the Regulations, provided that this is affordable, having also considered the minimum that has been provided by the DfE within its NFF settlement, as well as how costs in schools and academies may increase, especially following teacher and support staff pay awards and salary on-costs changes.

3.16 The DfE permits the Minimum Funding Guarantee in 2023/24 to be set between 0% and positive 0.5%. 0.5% would mean, simply for example, that a school or academy that is funded on the MFG, and that has the same total pupil numbers recorded in October 2022 as recorded in October 2021, will receive in 2023/24 the cash value of its 2022/23 core-formula funding, plus its Schools Supplementary Grant, uplifted by 0.5%.

3.17 The DfE has provided a floor (a minimum increase) of + 0.5% in its notional 2023/24 NFF calculations for individual schools and academies. A 0.5% MFG in Bradford would effectively pass this floor through to delegated budgets in Bradford.

3.18 As we have presented in section 2, the permitted range of the MFG, between 0% and 0.5%, is much narrower than was permitted in 2022/23, and the maximum of 0.5% is also much lower than the maximum 2.0% that could be set in both 2021/22 and 2022/23. Schools and academies that are funded on the MFG will receive a maximum 0.5% increase in their funding per pupil in 2023/24. This is very likely to be lower than the increase that these schools and academies will have forecasted (1.5%), based on the DfE's approach in the last 2 years to setting the minimum and maximum MFG levels.

3.19 In this context, as well in the context of the pay award and inflationary cost pressures that all schools and academies currently face, we take the view that it is essential that we set the MFG at the maximum that is permitted by the Regulations, and at the level that has been funded by the DfE. **So, subject to final affordability (please see decision 6), we propose to set the Minimum Funding Guarantee (MFG) in 2023/24 at the maximum permitted level of positive 0.5%.** The impact of this is shown in Appendices 1a and 1b, illustratively, at individual school and academy level. Please note that this illustrative modelling is still based on the October 2021 Census dataset. Whether schools and academies are funded on the MFG in 2023/24, as well as the value of MFG funding, will be affected by the changes that are recorded in the October 2022 Census dataset.

Question 2 - Do you agree with the proposal, subject to final affordability, to set the Minimum Funding Guarantee at the maximum permitted positive 0.5% in 2023/24? If not, please explain the reasons why not.

Decision 4 – Whether we continue unchanged our existing local approaches to the factors not yet covered by the NFF

3.20 **Business rates (NNDR)** will continue to be funded at actual cost. The Education and Skills Funding Agency (ESFA) made a change at April 2022 to how payments to billing authorities from mainstream primary and secondary maintained schools and academies for business rates (NNDR) can be managed. This change was optional. Bradford Local Authority has determined not to implement the amended approach at this time.

3.21 **We propose to continue in 2023/24 our current formulae for the allocation of split sites funding.** Please see the technical annex at Appendix 2. We propose to increase the values of the variables used within the split site formula by 2.4%, in line with the uplift of the core NFF factors (the AWPU and lump sum, before the addition of the Schools Supplementary Grant), subject to final affordability (please see decision 6). Please see paragraph 3.4 for information about the continuation of split sites funding in 2024/25.

3.22 **We propose to continue to pass through the specific BSF DSG Affordability Gap values using our current method** (please see Appendix 2), 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.

Question 3a - Do you agree with the proposal to continue to use our existing formula for the allocation of split sites funding, uplifted by 2.4% in 2023/24 (subject to affordability)? If not, please explain the reasons why not.

Question 3b - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG Affordability Gap funding in 2023/24? If not, please explain the reasons why not.

Decision 5 – Notional SEND Budgets

3.23 **We propose to amend in 2023/24 our definition of Notional SEND budgets within mainstream primary and secondary school and academy formula funding allocations.**

3.24 Local authorities are required to define for each primary and secondary school and academy the value of its mainstream formula funding that is 'notionally' allocated for Special Educational Needs and Disabilities (SEND) - for meeting the first £6,000 of the cost of the additional needs both of pupils with EHCPs and also of pupils without EHCPs. This not additional funding, but a definition of how much funding, that is already allocated, is available to support SEND. How Bradford currently (in 2022/23) defines notional SEND (the %s of funding within each formula factor that make up this budget) is shown in the table below. We have also explained our current Notional SEND budget approach in Appendix 2. The Section 251 Budget Statements for maintained schools, and the General Annual Grant (GAG) Statements for academies, show the calculation of Notional SEND budgets for individual schools / academies. We also publish on Bradford Schools Online, annually in February, the calculation of Notional SEND budgets for all primary and secondary schools and academies in Bradford for the following financial year.

3.25 Our current definition has built up over time, but, in particular, is based on how we began to delegate EHCP (then known as SEND Statements) funding to schools around 15 years or so ago, before the advent of the current national place-plus high needs funding methodology and the £6,000 element 2. We have identified that we should look again at our definition, but, as we've explained in consultations in recent years, we have not progressed a local review because we expected that the DfE's national SEND Review, as well as the movement to the hard National Funding Formula, would determine how Notional SEND would work in the very near future. The DfE did also previously suggest that the concept of a Notional SEND budget could be replaced with something else.

3.26 The DfE however, has now confirmed that Notional SEND budgets will continue to be defined going forward and that, at the point the hard National Funding Formula is introduced (by 2027/28 at the latest), there will be a national consistent definition.

3.27 Highlighting that there is currently quite a bit of difference in how local authorities define Notional SEND budgets for schools and academies in their areas, and seeking to encourage movement towards greater

consistency prior to the establishment of the hard National Funding Formula, the DfE has recently published new [operational guidance](#) for local authorities. Whilst this guidance does not prescribe how authorities should now define Notional SEND, it does strongly encourage all local authorities to review their approaches, and sets out broad expectations.

3.28 We have reviewed our approach, especially by comparing our definition to national, regional and other useful averages (including similar High Needs Block funded authorities and Metropolitan District Authorities). Our rationale for approaching our review this way is that, as was the case with the initial construction of the National Funding Formula, and as is now behind the DfE’s methodology for the review of NFF factors (including e.g. split sites funding), we anticipate that a national consistent definition of Notional SEND will be strongly informed by averages (by the common national picture). Where we are different, we wish to begin to make changes, to bring our approach closer in line with averages, incrementally, rather than having a significant single change at the point the hard National Funding Formula is established. It may also be the case that the DfE does further prescribe approaches for Notional SEND prior to 2027/28, and we wish to be well placed to absorb this.

3.29 In our review, we have not intrinsically set out with the aim of significantly altering the values of Notional SEND budgets that are retained by schools and academies, either overall or by the majority of individual settings. By this, we mean that, if we compare what Notional SEND budgets would be in 2023/24 using our current approach, against a new approach, there aren’t significant differences overall or within the majority of schools / academies (when we look at Notional SEND as a % of funding or on a per pupil basis). One of the changes that we propose however, does specifically increase the Notional SEND budgets for schools and academies that receive funding via the MFL factor. However, we feel that there is a clear rationale for this, which is explained below.

Irrespective of whether we use the existing or the new method, the overall total value of Notional SEND budgets is expected to increase in 2023/24, due to pupil numbers and other changes (including the merger of the Schools Supplementary Grant), as well as due to the 2023/24 funding settlement. Individual schools and academies however, will see differences (both up and down) due to pupil numbers and pupil circumstances changes (differences between the October 2022 and the October 2021 Censuses), again, irrespective of whether we use the current or the new method.

3.30 Following our review, we propose to make two changes to our definition of Notional SEND budgets in 2023/24. Firstly, we propose to bring our definition of Notional SEND more in line with national averages, by adjusting the percentages of the different factors that make up the Notional SEND budget, as follows:

Current

Formula Factor	% Primary	% Secondary
Prior Low Attainment Factor	100%	100%
Free School Meals Factor	23.1%	10.2%
Income Deprivation Affecting Children Index (IDACI) Factor	22.4%	19.2%
Base £APP funding (AWPU)	7.5%	6.3%

Adjusted to

Formula Factor	% Primary	% Secondary
Prior Low Attainment Factor	100%	100%
Free School Meals Factor	25.0%	25.0%
Income Deprivation Affecting Children Index (IDACI) Factor	25.0%	25.0%
Base £APP funding (AWPU)	6.5%	4.0%

3.31 Secondly, we propose to bring into the definition of Notional SEND a proportion of the additional funding that schools and academies receive via the Minimum Levels of per Pupil Funding (MFL) factor. We propose, for both primary and secondary phases, to bring 48% of MFL funding into the Notional SEND Budget. The rationale for this is to improve the fairness and equity of our definition. A principal reason why per pupil funding levels vary between schools / academies is differences in the levels of additional needs of pupils, as measured by Free School Meals, IDACI, Low Prior Attainment etc. The MFL factor brings the per pupil funding for all schools and academies up to a defined minimum. It is the case that 2 primary schools, for example, could receive £4,405 per pupil in 2023/24, one receiving this via the ‘normal’ funding formula and

one receiving this because the MFL has kicked in to provide the minimum of £4,405. Using our current definition, the school that receives £4,405 via the normal formula has an appropriate proportion of its additional needs funding included within its Notional SEND budget. However, because we don't currently bring in the MFL factor, the school that receives a top up to the £4,405 does not. On this basis, we take the view that the inclusion of the MFL factor within our Notional SEND budget definition will improve the fairness and equity of this definition. We have calculated 48% taking an aggregate of the %s that are used across the other factors.

3.32 Illustrative modelling, showing the impact of these 2 changes on the Notional SEND budgets of individual schools and academies, is presented at Appendix 1c. We must stress that this modelling is illustrative. It is calculated on the same basis as the main Appendix 1a and 1b formula funding modelling. Please see section 4 for an explanation of this basis. Appendix 1c does not show what confirmed final 2023/24 Notional SEND budgets will be. In particular, these final budgets, which will be published in February 2023, will be influenced by the changes in data that are recorded in the October 2022 Census. We would also like to highlight, for the MFL schools and academies, that the increases in their Notional SEND budgets, as a result of the inclusion of the MFL factor, is offset by the other proposed changes in the definition, including the reduction in the % taken from Base £APP (AWPU) funding.

3.33 We will continue to annually review our Notional SEND definition in the lead up to the hard National Funding Formula, including in response to any further prescription from the DfE, and may consult on further incremental changes.

3.34 Please note that we intend to continue to add to Notional SEND budgets 6.0% of a mainstream school's or academy's allocation from the Early Years Single Funding Formula, for mainstream primary schools and academies that have early years entitlement provision.

3.35 Finally, we wish to highlight that our separate consultation on high needs formula funding discusses the continuation of the mainstream SEND Funding Floor in 2023/24. All schools and academies are strongly encouraged to access this consultation.

Question 4 - Do you agree with the proposal to adjust our definition of Notional SEND within mainstream primary and secondary formula funding? If not, please explain the reasons why not.

Decision 6 – How we would amend our mainstream primary and secondary funding formula, if necessary for affordability reasons, should the total cost of the formula substantially increase (and be unaffordable) when the October 2022 Census dataset is used.

3.36 Lag in the pupil-need data, such as Free School Meals %s and Low Prior Attainment %s, between that, which is required to be used to calculate individual school and academy formula funding allocations and that, which is used by the DfE to calculate Dedicated Schools Grant funding to local authorities, is a feature of the current formula funding system. For the current 2022/23 financial year, for example, schools and academies have been funded with reference to their October 2021 Census data. The Local Authority however, received Dedicated Schools Grant (DSG), from which the cost of these school and academy allocations must be met, calculated using data recorded a year earlier in the October 2020 Census. For 2023/24, schools and academies will be funded with reference to their October 2022 Census data, whereas the Local Authority will receive DSG funding using the October 2021 Census dataset.

3.37 Where there are only relatively small data changes year on year, or where there are 'ups and downs' in different data streams, which generally cancel each other out, this lag does not cause overall affordability problems. By 'affordability problems', we mean that the cost of formula funding using the National Funding Formula mirroring approach (Decision 2) exceeds the value of Dedicated Schools Grant funding that the Authority has received from the DfE, to the extent that the Authority has to adjust its proposals to reduce cost.

3.38 One of the problems in managing this situation is that, although we can identify and very indicatively estimate in advance potential areas of change, we do not know for certain whether our formula funding proposals are affordable until we receive the relevant October Census dataset from the DfE in December

each year. It is difficult to model the impact for individual schools and academies with certainty in advance of receiving the dataset.

3.39 In our consultation documents, published in recent years, we have always highlighted this as an issue and we have stated that our proposals are subject to a final 'affordability check'. We have also always previously stated that, if we need to adjust our proposals, we will work closely with the Schools Forum. Prior to 2022/23, affordability was not really a big issue. Although there have been some changes in individual factors, the overall cost of formula funding using the final December dataset has either been as expected or has reduced rather than increased.

3.40 In our 2022/23 consultation however, we discussed this issue in more detail, and presented a set of management options, because we identified that, partly as a consequence of the COVID-19 pandemic, we would have greater swings in costs associated with individual formula factors, as a result of greater differences between the data recorded with reference to the October 2021 Census and the data recorded with reference to the October 2020 Census. This time last year we identified the potential for significant cost changes in 2 areas in particular:

- Free School Meals %s (both Flat and Ever 6) recorded in the October 2022 Census, which we expected to substantially increase on the %s recorded in October 2021.
- As the summer 2019 assessment results were used for a 3rd cohort of children (due to the absence of summer assessments), Low Prior Attainment (LPA) allocations for schools and academies were generally expected to reduce in 2023/24 vs. 2022/23. This is because attainment in 2019 was better on average than in the years where the data dropped out of the LPA calculation.

3.41 Ultimately, our 2022/23 funding formula, using the October 2022 Census dataset, cost £0.95m more than using the October 2021 Census dataset. Within this, the cost of the FSM factors was £1.80m greater and the cost of the Low Prior Attainment factor was £0.66m lower (the balance accounted for by changes in other factors). Rather than adjust our formula funding proposals, we decided with the Schools Forum in January 2022 to use Schools Block budget headroom, which was created from a one-off reduction in Growth Fund costs, alongside a small value of Schools Block reserves.

3.42 Whilst we anticipate that the cost of data lag will be lower in 2023/24 than it was in 2022/23, we still do expect that there will be cost. We anticipate that our FSM%s will generally have increased again between October 2021 and October 2022. We also anticipate that our Low Prior Attainment costs will reduce again, but that this reduction will not fully offset the increase in FSM costs. Lower MFG and MFL levels in 2023/24 mean that there is greater potential for material changes in the cost of formula funding. Changes in data will have implications for the allocations received by individual schools and academies in 2023/24. Schools and academies need to be alert to this, and we give further warning in section 4. But changes also have implications for the affordability of our formula funding approach; in particular, full mirroring (Decision 2).

3.43 As such, we feel that it continues to be appropriate, and will continue to aid transparency, to set out in a little more detail the approaches that the Authority would take were we to find that the funding formula approach that we set out in this consultation document for 2023/24, in particular under Decisions 2 (mirroring of the NFF) and 3 (the MFG set at 0.5%), is not affordable when we use the October 2022 Census dataset provided by the DfE in December. We wish to give schools and academies the opportunity now to provide feedback. This feedback will help guide our continued discussions with the Schools Forum on this issue.

3.44 The 4 broad options that are available are:

- A. Use a value of brought forward balances (one off monies) either to afford our proposals without amendment or to reduce the size of other amendments that might be applied.

- B. Reduce our funding formula factor values, moving away from exact mirroring of the NFF as proposed in Decision 2, so that the cost fits within the Dedicated Schools Grant budget available on a phase-specific basis. Within this, in order to comply with the DfE's tightening of the Regulations regarding the National Funding Formula in 2023/24, we would not be permitted to reduce our formula factor variable values by more than 2.5%.
- C. Re-introduce a ceiling, which would cap the year on year %increases in per pupil funding for individual schools and academies that, for example, see higher than average %per pupil increases.
- D. Reduce the Minimum Funding Guarantee (MFG) from the 0.5% proposed in Decision 3. Within this, we would not be permitted to set an MFG at lower than 0%.

To be clear on a specific point - we would not be permitted to reduce the values of the Minimum Levels of Funding (MFLs), as these values are set by the DfE and are mandatory. Therefore, the minimum values of £4,405 (primary) and £5,715 (secondary) per pupil will be unaffected by any affordability adjustments that we may make.

3.45 It is the Authority's view currently that:

- Using brought forward balances (A) will be an initial management option. However, we must be careful to ensure that affordability can be managed on an on-going basis. Balances can only be spent once and using these to support an on-going formula funding cost issue may potentially create affordability problems for 2024/25.
- Reducing the Minimum Funding Guarantee (D), from the 0.5% proposed, would be the last adjustment we would consider and, if we reduced it, we would only do so having first reduced formula factor values (B). This would be in recognition of the importance of the MFG for the primary-phase and also of the need to ensure that the DfE's funded minimum increase of 0.5% is passed through to schools and academies, in response to estimated growth in costs. Not providing an MFG at the maximum permitted 0.5%, whilst not making any other formula funding cost adjustments, would also further widen the gap in the increases in funding received by schools and academies on the MFG versus those funded on the National Funding Formula.
- Re-introducing a ceiling (C) would be considered before adjusting the MFG but, again, only in combination with adjusting the formula factor values (B). We specifically recognise that we would need to very carefully consider the impact a ceiling would have on individual schools and academies. We would not wish the re-introduction of a ceiling to have a disproportionate impact on the funding received by a relatively small number of schools and academies for supporting pupils with Additional Educational Needs (AEN), including pupils who share protected characteristics who strongly correlate with measures of AEN. It is likely that schools and academies, that will see above average % increases in per pupil funding in 2023/24, will achieve these increases because the level of AEN of their pupils has grown. We would need to be very careful about the impact a ceiling would have on reducing funding growth for individual schools and academies in such circumstances.
- The main 'go-to' option for reducing the overall cost of formula funding, after use of brought forward balances, but before a reduction in the MFG and before the re-introduction of a ceiling, would be to reduce the values of the factor variables (B). In doing this, the Authority would not adjust how each formula factor works, but would adjust the value of the variable used for that factor. We would make these adjustments on a phase-specific basis i.e. the adjustments for primary may be different than those for the secondary phase because the formula funding affordability position for the primary phase may be different.

The values of the variables that are currently proposed for 2023/24 are shown in the table under Decision 2.

We propose that we would take a 'collective pro-rata' scaling style approach to adjusting variable values, meaning that we would reduce all factors by the same %, with the scaling % set at the value required to bring the cost of the total formula by phase back within the budget available. There are different approaches that could be taken here, but this kind of 'collective pro-rata' scaling approach ensures, firstly, that we would 'step away' from mirroring the National Funding Formula in an even way. This means, crucially, that this will create less turbulence when seeking to return to mirroring from April 2024, when further DfE restrictions are likely to be introduced. Secondly, this approach means that adjustments would not have a disproportionate impact on individual Additional Educational Needs formula factors and the funding that schools and academies receive via these factors. We assess, for example, that there would be a significant disproportionate impact were we to offset any growth in the FSM factor cost only by reducing the values of the FSM variables.

Once we have the final affordability figures, and we know the % reduction that might be needed, we will look more closely with the Schools Forum at our approach before finalising this in January 2023.

3.46 We recognise that the discussion here is technical as well as a little abstract. Whilst we are not certain currently that such affordability adjustments will be necessary (or the scale of them if they are, or if the scale will be such that we would need to use more than one adjustment), we nonetheless think it is helpful to highlight this now as a potential issue. We welcome any views that you might have on how best to approach this and we welcome any specific points that you wish the Authority and the Schools Forum to consider, including with reference to your own school or academy.

Question 5 - Do you have any views on how the Authority should adjust the 2023/24 funding formula, from that which is proposed in this consultation, should the total cost of the funding formula substantially increase (and be unaffordable) when the October 2022 Census dataset is used. We welcome any specific points that you would wish the Authority and the Schools Forum to consider.

Decision 7 – Whether we retain, with their existing criteria and methodologies, the funds currently managed centrally within the Schools Block

3.47 The DfE's National Funding Formula does not yet include a methodology, which prescribes how Growth Funding should be allocated at individual school and academy level. Local authorities in 2023/24 therefore, retain the responsibility for determining arrangements locally, albeit within tight Regulations. Local Authority compliance with these Regulations is checked annually by the Education and Skills Funding Agency (EFSA). **Our proposed Growth Fund arrangements and criteria for 2023/24 are set out in the documents embedded under paragraph 6. These are unchanged from current arrangements.**

3.48 We established back in 2019/20 a Falling Rolls Fund for our primary phase. **Our proposed Falling Rolls Fund arrangements and criteria for 2023/24 are set out in the document embedded under paragraph 7. These are unchanged from current arrangements.**

3.49 This document also asks for feedback on the continuation for the 2023/24 financial year of funds de-delegated from maintained primary and secondary schools within the Schools Block of the Dedicated Schools Grant. **Our proposed de-delegated fund arrangements and criteria for 2023/24 are set out in paragraph 5 and also in detail in Appendix 3. These are unchanged from current arrangements.**

Question 6 - Do you agree with the proposed criteria and methodology for the allocation of the Growth Fund to schools and academies in 2023/24? If not, please explain the reasons why not.

Question 7 - Do you agree with the proposed criteria and methodology for the allocation of the Falling Rolls Fund to primary-phase schools and academies in 2023/24? If not, please explain the reasons why not.

Question 8 – Should sums continue or cease to be de-delegated from maintained school budgets in 2023/24 for the purposes listed? Please explain the reasons why if you believe that these should cease or change.

4. Consultation Impact Modelling

4.1 As the set of formula funding decisions that are required to be taken for 2023/24 are relatively straightforward, the modelling attached with this document is relatively simple.

Appendix 1a is a single sheet model, which shows actual formula funding allocations, plus Schools Supplementary Grant allocations, for each primary and secondary school and academy for the current 2022/23 financial year, compared against illustrative allocations for 2023/24 that are calculated on the Authority's proposals and using estimated October 2022 pupil numbers.

Appendix 1b is a ready reckoner, which provides a breakdown by factor of the totals (shown in columns 4 and 9 in Appendix 1a) for each school and academy.

Appendix 1c is a model, which shows the illustrative impact of the proposed amendment to the definition of Notional SEND budgets within primary and secondary mainstream formula funding allocations.

4.2 To clarify what Appendix 1a and Appendix 1b show:

- All modelling for academies uses the Authority's financial year figures not the academic year General Annual Grant (GAG) figures calculated by the EFSA (which the Authority does not see).
- This modelling is calculated on the proposals before any affordability adjustments would be made under Decision 6.
- The illustrative 2023/24 allocations include the Schools Supplementary Grant (SSG), which has been merged into core formula funding. Mainstream primary and secondary schools and academies must now cease to budget for the SSG as a separate additional allocation. All schools and academies should carefully check their 2023/24 budget scenarios (including any scenarios that are continued from existing ones) to ensure that they are not double counting the SSG.
- The totals in Appendix 1a for 2022/23 (column 4) and for 2023/24 (column 9) are the core delegated formula funding allocations excluding business rates, split sites and PFI. These totals also exclude all additional High Needs place and EHCP top up funding, Growth Funding, Falling Rolls Funding, Early Years funding, Post 16 funding and all other additional separate grant streams (PPG, UIFSM etc).
- Apart from pupil numbers, all pupil-level data used to calculate the 2023/24 illustrative allocations shown in column 9 e.g. IDACI, FSM%, EAL%, Low Prior Attainment is sourced from the October 2021 Census (or with reference to the pupils that were recorded as on roll in the October 2021 Census) and is the same data that was used to calculate actual 2022/23 core formula funding allocations. **Schools and academies should remember that actual 2023/24 allocations will be calculated on updated data sourced from (or with reference to the pupils recorded on roll in) the October 2022 Census. Using updated October 2022 Census data may quite significantly change the value of formula funding received by an individual school or academy in 2023/24 from what is shown in Appendix 1. This is especially the case in schools and academies that are not already substantially funded via the Minimum Funding Guarantee (MFG) or those that do not receive substantial uplifts to the DfE's minimum per pupil funding levels (MFLs).**
- The 2023/24 illustrative allocations are calculated **using an estimate of pupil numbers that will be recorded in the October 2022 Census**. This means that the cash differences between 2023/24 and 2021/22 allocations (Appendix 1a column 13) include the impact of the estimated growth or estimated reduction in pupil numbers between October 2022 and October 2021.

4.3 The key at the bottom of Appendix 1a explains what is shown in each column. The modelling helps identify in particular:

- The scale of the growth or reduction in the numbers of funded pupils estimated between October 2022 and October 2021 (column 15).
- The range of % uplifts that may be received by individual schools and academies next year, in total cash (column 13) and per pupil terms (column 16), incorporating estimated changes in pupil numbers between

October 2022 and October 2021, but before any further pupil-level data changes that may be recorded in the October 2022 Census are brought in. To aid analysis, column 18 shows the % change in per pupil funding when the 2023/24 allocations are calculated using the same total number of pupils that were funded in 2022/23. Column 18 therefore, shows the impact of formula funding proposals on a like-for-like pupil numbers basis.

- How formula funding proposals, combined with the estimated changes in pupil numbers, but before any further pupil-level data changes that may be recorded in the October 2022 Census are brought in, affect the total cash values of formula funding allocations that may be received by schools and academies in 2023/24 compared with 2022/23 (column 13).
- The schools and academies that were funded on the DfE's Minimum Levels of per pupil Funding (MFLs) in 2022/23 (column 7) and indicatively will be funded on the uplifted MFLs in 2023/24 (column 12). Schools and academies that are on the MFLs in both years will see a 0.5% per pupil increase in core formula funding in 2023/24.

Schools and academies that were funded on the MFLs in 2022/23 have a positive figure in column 7. Schools and academies that are modelled at this time to remain on the MFLs in 2023/24 also have a positive figure in column 12.

Depending on their October 2022 Census datasets, and changes in pupil-level data, schools and academies currently modelled in Appendix 1 to be on the MFLs in 2023/24 may come off these to be funded at a per pupil funding value that is higher. This might happen especially in schools and academies that received only relatively small values of MFL funding in 2022/23. The opposite may also happen, again depending on changes in pupil-level data recorded in the October 2022 Census. Schools and academies that in 2022/23 were not funded on the MFLs may find that they come onto the MFLs in 2023/24. This might happen especially in schools and academies that are reasonably close already to the MFL values and that might see changes in pupil-level data from the October 2022 Census that reduce their per pupil funding.

To stress, as it is based on October 2021 Census data, the Appendix 1 modelling does not show the impact of October 2022 Census data changes on a school's or academy's position versus the MFL in 2023/24. This impact can only be modelled using the October 2022 Census dataset when this is provided in December.

- The schools and academies that were funded in 2022/23 on the Minimum Funding Guarantee (MFG) and that may remain on the MFG in 2023/24 to receive the proposed minimum 0.5% per pupil increase. These schools and academies are highlighted in purple in Appendix 1a. The funding of these schools and academies will be directly affected by the final value of the MFG we set in 2023/24. For example, if under Decision 6, for affordability reasons, we were to set the MFG at lower than 0.5% (but not lower than 0%), these schools and academies would be directly affected.

Schools and academies that were funded on the MFG in 2022/23 have a positive figure in column 6. Schools and academies that are modelled at this time to remain on the MFG in 2023/24 also have a positive figure in column 11. If the figure in column 6 is zero then the school or academy was not on the MFG in 2022/23. If the figure in column 11 is zero then the school or academy is modelled at this stage to be off the MFG in 2023/24.

As with the warning given above about the MFLs, schools and academies must treat the MFG modelling with caution at this time. A school's or an academy's position versus the MFG in 2023/24 may change when the October 2022 Census dataset is used to calculate final allocations. For example, a reduction in Low Prior Attainment (LPA) funding may mean that a school or an academy comes onto the MFG in 2023/24, when it was not funded on the MFG in 2022/23 and is not currently modelled to be on the MFG in 2023/24. This is because the reduction in LPA funding may mean that the school or academy would not receive a minimum 0.5% increase in per pupil funding through the application of the normal National Funding Formula and so must have its funding topped up to the 0.5% minimum.

Using an opposite example, an increase in FSM funding, because a school's or an academy's FSM% recorded in the October 2022 Census is higher than that recorded in October 2021, may mean that a school or academy comes off the MFG in 2023/24, when it was on the MFG in 2022/23 and is currently

modelled to remain on the MFG in 2023/24. This is because the increase in FSM funding is substantial enough to result in a total per pupil funding uplift in 2023/24 that exceeds the 0.5% minimum that would be provided by the MFG.

Generally speaking, these sorts of position changes are more likely in schools and academies that receive only relatively small values of MFG funding. For schools and academies that receive quite large values of MFG funding, it will take more substantial changes in pupil-level data to alter their positions versus the MFG in 2023/24. These changes may take more than one year to have an impact.

However, to stress, because it is not based on October 2022 Census data, the current modelling in Appendix 1 does not yet show the impact of changes in pupil-level data on a school's or academy's position versus the MFG in 2023/24. This impact can only be modelled using the October 2022 Census dataset when this is provided in December.

- The schools and academies funded in 2022/23 on the Minimum Funding Guarantee (MFG) that may come off the MFG in 2023/24 because the size of uplifts received from our continued mirroring of the National Funding Formula is greater than the minimum 0.5% the MFG provides.

If the figure in column 6 is positive and the figure in column 11 is zero then the school or academy is modelled on current October 2021 based-data to come off the MFG in 2023/24 as a result of the NFF funding uplift. In the Appendix 1 modelling at this stage, these schools and academies may receive increases in 2023/24, which are above the 0.5% per pupil provided by the MFG but which are lower than the increases received by schools and academies that were not on the MFG in 2022/23. This position is created because the value of MFG protection previously allocated in 2022/23 is deducted from the school's or academy's total % gain in 2023/24.

Typically, schools and academies that received only small values of MFG funding in 2022/23, may come off the MFG in 2023/24, subject to what happens with their pupil-level data to be taken from October 2022 Census.

- The schools and academies that are not currently funded on either the Minimum Funding Guarantee or on the DfE's per pupil minimums (MFLs) i.e. they are funded purely on the National Funding Formula, and may remain so in 2023/24, depending on the impact of changes in their pupil-level data to be recorded in the October 2022 Census. These schools and academies have zeros in all columns 6, 7, 11, and 12. They may receive increases in funding per pupil that are more in line with, or may actually exceed, the overall 'headline' National Funding Formula uplift. However, the funding received by these schools and academies is more prone to being directly affected by year on year census data changes. Depending on their October 2022 Census data, the confirmed final values of their 2023/24 formula funding allocations could change more significantly, both up and down, from what is currently modelled in Appendix 1 than for schools and academies that are on the MFG or on the MFLs.

4.4 On the basis of the illustrative modelling in Appendix 1a, the formula funding landscape in Bradford in 2023/24 is as follows:

- Primary phase: 51 out of 156 schools / academies (33%), are funded on the Minimum Funding Guarantee (at 0.50%). 26 schools / academies (17%) are funded at the £4,405 MFL value. All other schools / academies are funded above £4,405 per pupil.
- Secondary phase: 3 out of 31 schools / academies (10%) are funded on the Minimum Funding Guarantee (at 0.50%). 1 academy is funded at the £5,715 MFL value. All other schools / academies are funded above £5,715 per pupil.
- All through academies: None of the 4 academies are funded on the Minimum Funding Guarantee (at 0.50%) and all 4 academies are funded above the composite MFL value.
- In total, 54 out of 191 schools / academies (28%) are funded on the Minimum Funding Guarantee (at 0.50%). 27 out of 191 schools / academies (14%) are funded at the MFL values.

4.5 If you would like to discuss the modelling in more detail, or discuss the data on which indicative allocations are calculated, please contact Jonty Holden.

5. 2023/24 Schools Block De-Delegated Funds (Maintained Schools)

5.1 The Finance Regulations continue to significantly restrict the extent to which the Dedicated Schools Grant (DSG) Schools Block can be retained and managed centrally. The Government's intention is to ensure maximum delegation of DSG funding to maintained schools and academies at the start of each financial year. The Regulations do allow funding for certain types of expenditure to be 'de-delegated' - passed back to the Local Authority - from maintained school budgets within the Schools Block. This only applies however, to schools maintained by the Local Authority, and the maintained schools members of the Schools Forum must agree to de-delegate on a phase-specific, fund-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.
- In 2022/23, to provide budget for the Local Authority's school improvement monitoring, intervention and brokering function (including statutory functions) in respect of maintained schools, following the DfE's reduction of the School Improvement Monitoring and Brokering Grant (SIMB).

5.3 Decisions to de-delegate funding must be taken annually.

5.4 The Schools Forum will discuss the position of de-delegated funds for 2023/24 over the autumn term and will take final decisions in January 2023. This document asks for your feedback so this can be considered as part of this process. This consultation asks for your views on whether funds should continue to be de-delegated.

5.5 Please be aware that, due to the timescale necessary for confirmation, the Schools Forum has already decided to continue / dis-continue de-delegation in 2023/24 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 budget setting round, to cease de-delegation from the secondary phase for the Maternity / Paternity 'insurance' scheme, Fischer Family Trust, Exceptional Circumstances and School Staff Public Duties and Suspensions. 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 cease de-delegation for behaviour support services at 1 September 2018. Maintained schools now have the choice to buy into these services directly. It is assumed that the Schools Forum and maintained primary schools will not wish to revisit this decision.
- The DfE operates a Risk Protection Arrangement (RPA). The RPA is an alternative to commercial insurance. The DfE extended the RPA to maintained schools, who have been able to buy into this since 1 April 2020. Where agreed by the Schools Forum, the Local Authority is permitted to de-delegate for the

purposes of accessing the RPA on behalf of all its maintained schools. However, we do not envisage de-delegating for this purpose in 2023/24.

5.7 The following 'de-delegated' funds are held in the current 2022/23 financial year:

- 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).
- School Improvement – replacement of the DfE's reduced SIMB Grant (primary & secondary). This was a new de-delegated fund in 2022/23.

5.8 Further information on each of these funds, including the values held in 2022/23 and the criteria by which they are allocated, is given in Appendix 3.

5.9 We do not propose any amendments for 2023/24 to the criteria that are used for the allocation of de-delegated funds.

5.10 If funding is not de-delegated in 2023/24, for the purposes listed in paragraph 5.7, then the funding that would have been top-sliced will remain within maintained school budgets for schools to meet the cost of replacement services, including by purchasing services, where 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 taking final decisions, the Schools Forum will consider specific responses to this consultation, alongside assessing what represents the most cost effective collective approach for maintained schools across the Bradford District.

5.11 Colleagues in maintained primary schools will be aware of the warnings that have been given previously about the viability of our current arrangements for supporting maternity / paternity costs. We have warned, as happened for the secondary phase in 2017/18, that we may be moving towards the position where existing arrangements are no longer financially efficient nor viable. This is due to the growth in salaries costs at the same time as the number of maintained primary schools continuing to reduce year on year. The maternity / paternity scheme will continue in 2023/24, subject to agreement following this consultation. However, the continuation of this scheme from April 2024 will be reviewed. If it is necessary to cease this scheme at a point in the future, we will further discuss with the Schools Forum how maintained primary schools are given sufficient time to respond.

6. Schools Block Growth Fund 2023/24

6.1 We operate a Growth Fund within the Schools Block, which supports both maintained schools and academies that are expanding for basic-needs purposes, at the request of the Local Authority, to manage more effectively the financial pressures brought by 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 and academy level. Local authorities in 2023/24 therefore, retain the responsibility for determining arrangements locally, albeit within tight Regulations. Compliance with these Regulations is checked annually by the Education and Skills Funding Agency (ESFA).

6.3 Our proposed Growth Fund arrangements and criteria for 2023/24 are set out in the documents embedded below. These are unchanged from the current arrangements. Please note that the values highlighted in red within the documents are indicative (subject to the finalisation of Decision 2).



Growth Funding
2023 - primary criteri



Growth Funding
2023 - secondary crite

6.4 For reference, the total value of the Schools Block Growth Fund held in 2022/23, broken down between phases and between types of allocation, prior to the recovery through recoupment of the cost of allocations to academies for the period April – August 2022, is shown in the table below:

	Primary	Secondary	Total
Existing Known Expansions	£119,824	£565,442	£685,266
Existing Bulge Classes	£103,709	£0	£103,709
New Expansions	£0	£859,200	£859,200
Pre-Opening Costs	£0	£0	£0
Diseconomies of Scale	£0	£0	£0
Total Value 2022/23	£223,533	£1,424,642	£1,648,175

6.5 We will confirm the total value of the Schools Block Growth Fund held for 2023/24 as part of the DSG setting process, which will be concluded with the Schools Forum in January 2023.

7. Falling Rolls Fund 2023/24 (Primary Phase)

7.1 The Schools Forum first established a Falling Rolls Fund for the primary phase in 2019/20. We propose to continue to operate this Fund in 2023/24 using the established criteria, which are presented in the embedded document below. This will continue for the primary-phase only.



Falling Rolls Fund
2023-24

8. Consultation Responses

8.1 If you wish to discuss these proposals in more detail, or have any questions for clarification, before you submit a response, please contact Jonty Holden using the contact details shown in section 1.

8.2 A response form is included at Appendix 4. However, this year we have introduced a web-based questionnaire, which we encourage you to use to submit your response. Please access the web-based questionnaire [here](#).

8.3 Please ensure that your response is submitted (either using the Appendix 4 form or by using the web-based questionnaire) by the deadline of **Tuesday 29 November 2022**. Any responses received after this date may not be included in the analysis that will be presented to the Schools Forum.

9. Next Steps

9.1 Following consideration of the responses received to this consultation, and consideration of the final recommendations that will be made the Schools Forum, Council in February 2023 will set the funding formula to be used to calculate budget shares to be allocated to individual mainstream primary and secondary schools and academies, and the criteria for the allocation of Schools Block funds, for the 2023/24 financial year.

9.2 Discussions on the position of the Dedicated Schools Grant (DSG), and the affordability of formula funding arrangements, for 2023/24 will continue with the Schools Forum between now and January. You are recommended to keep in touch with these discussions by visiting the Schools Forum webpage on the Council's Minutes website [here](#).

9.3 It is anticipated that the Schools Forum will make its final formal recommendations on 2023/24 DSG and formula funding arrangements on Wednesday 11 January 2023.

10. Equalities Impact Assessment 2023/24 Proposals

10.1 The Public Sector Equality Duty (PSED) of the Equality Act 2010 requires the Local Authority to give due regard to achieving the following objectives in exercising its functions:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

10.2 We assess that our proposals for 2023/24 will have a positive impact on equalities. We have considered the impact on persons who share any of the protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. We have focused on the protected characteristics for which the potential impact is largest, and which are most closely tied to the formula funding proposals we put forward. Where there is positive correlation with the measures that are used, schools and academies receive formula funding to support children and young people that share protected characteristics, related to SEND (disability) and race (ethnicity), through the Additional Educational Needs (AEN) factors that are contained within the schools' funding formula. The AEN factors are: Free School Meals (FSM), Income Deprivation Affecting Children Index (IDACI), English as an Additional Language (EAL), Low Prior Attainment (LPA) and Pupil Mobility. There is strong correlation between LPA and SEND. There is also strong correlation between race (ethnicity), EAL and Pupil Mobility. There are also correlations e.g. between SEND and measures of deprivation and between LPA and measures of deprivation. It is important therefore, that the Authority carefully considers, in particular, the equalities impact of any proposed changes to the AEN factors.

10.3 The arrangements that the Local Authority proposes in this consultation for the 2023/24 financial year retain a significant amount of continuity on current practice, Dedicated Schools Grant distribution and formula funding policy and methodology. At its centre, the Local Authority has previously determined, and continues to propose (Decision 2), to exactly mirror the DfE's National Funding Formula (NFF) for the calculation of mainstream primary and secondary maintained school and academy delegated allocations in Bradford. As such, our equalities impact assessment of our guiding Schools Block formula funding policy for 2023/24 is neutral (representing no change on current positive practice) and continues to align with the DfE's in respect of its [National Formula Funding policy](#) and its already identified positive impact on the funding of children and young people that share protected characteristics.

10.4 Behind the guiding NFF mirroring policy, the values of all formula funding factors are proposed to be uplifted in 2023/24 (Decision 2). These uplifts are assessed to have a positive impact on the funding of all pupils. These uplifts will have a positive impact on the funding of children and young people that share protected characteristics related to disability (SEND) and race (ethnicity), for which schools and academies receive additional funding through the Additional Educational Needs (AEN) formula factors that use measures that correlate with these protected characteristics. The uplifts proposed to be applied to the AEN factors are also assessed at this time not to have a disproportionate impact. In proposing to continue to mirror the National Funding Formula (NFF) in 2023/24, on current data, the balance of base NFF funding allocated for all pupils, versus the NFF funding allocated for pupils with Additional Educational Needs, remains similar, but marginally weighted more to AEN factors (due to the DfE's weighting of the 2023/24 settlement, as explained in paragraph 2.3). As we show in section 2, and in the table under 'Decision 2', we propose to uplift basic £per pupil and lump sum funding by 2.4%, prior to the addition of the merged Schools Supplementary Grant. We propose to set a minimum 0.50% uplift in per pupil funding for all schools and academies, using the Minimum Funding Guarantee methodology. The DfE requires the Minimum Levels of Per Pupil Funding (MFLs) to increase by 0.50% (prior to the addition of the Schools Supplementary Grant). The factors that

allocate funding on measures of Additional Education Needs (AEN) are proposed to increase between 2.1% and 4.3% (prior to the addition of the Schools Supplementary Grant).

10.5 The balance of the total final value of formula funding allocated in 2023/24, between base funding and AEN funding and between the different AEN funding factors, will adjust for the annual change in school data to be recorded in the October 2022 Census. Whilst we cannot yet complete accurate modelling, two changes we anticipate are that funding allocated through the FSM factors will continue to increase and funding allocated through the LPA factor will continue to decrease. As we explain in section 4, our modelling of the impact of formula uplift is currently based on existing school and academy data, which references the October 2021 Census. We have explained in section 4 of this document how the distribution of formula funding in 2023/24, and the values of allocations received by individual schools and academies, may be affected by the use of the updated October 2022 Census data. We have explained under 'Decision 6' how the Authority may be required to amend the uplifts that are applied to formula funding factors to ensure that our arrangements remain affordable. We have also set out under 'Decision 6' how the Authority will take steps to ensure that any necessary amendments do not have a disproportionate impact, including on the funding of children and young people that share protected characteristics for which schools and academies received formula funding through the Additional Educational Needs factors.

10.6 The Minimum Levels of Per Pupil Funding (MFLs) are increasing by 0.5%. This is a mandatory uplift, not for local determination. The DfE has assessed that this uplift will have a positive impact on equalities. Continuing the minimum per pupil funding levels will generally benefit the lower £per pupil funded schools and academies, that do not otherwise attract these levels of funding through the application of the normal National Funding Formula i.e. these schools and academies do not attract significant levels of funding via the Additional Educational Needs factors. These schools and academies tend to have lower than average proportions of groups with protected characteristics. However, they still tend to have some groups with protected characteristics. As the DfE states in its impact assessment, the lower than average funding increases for schools and academies funded through the minimum levels in 2023/24 (0.5% per pupil) should be considered in the context of higher than average funding increases for these schools and academies in recent years.

10.7 We propose to set the Minimum Funding Guarantee (MFG) for primary and secondary schools / academies at + 0.5% (Decision 3). The MFG at this level will provide the maximum permitted uplift to formula funding, both for schools and academies that have previously been on the MFG and remain on it in 2023/24 as well as for the schools and academies that are placed on the MFG for the first time in 2023/24 as a result of October 2022 Census data changes. The MFG uplift will be available for these schools and academies to use in support of all pupils, including those that share protected characteristics. Our proposed approach to the MFG is especially important for the primary phase, where 43% of schools and academies were funded on the MFG in 2022/23. The MFG continues to provide essential protection for schools and academies against year-on-year funding turbulence, in support of stable provision.

10.8 We assess that proposing (under Decisions 4 and 7) to continue our other current local approaches not yet covered by the National Funding Formula, including to Growth Funding and Falling Rolls Funding, in 2023/24 is impact neutral on equalities (representing no change on current positive practice).

10.9 We assess that proposing (under Decision 5) to incrementally amend our definition of Notional SEND budgets within mainstream primary and secondary formula funding allocations, as encouraged by the DfE and to bring us more in line with the common national picture in the lead up to the hard National Funding Formula, continues to support schools and academies to make effective provision for pupils with additional educational needs and with Special Educational Needs and Disabilities. The inclusion of funding allocated by the Minimum Level of Per Pupil Funding (MFL) factor will improve the fairness and equity of our definition and will help support schools and academies that receive the MFL to use the totality of their delegated funding in support of their pupils with SEND. It is important to stress that an adjustment of the Notional SEND definition does not materially change the value of formula funding that an individual school or academy receives.

11. Appendices

- Appendix 1a – Summary Financial Overview (Modelling)
- Appendix 1b – By Factor Breakdown (Ready Reckoner)
- Appendix 1c – Notional SEND Modelling

Appendix 2 – Technical Annex
Appendix 3 – Schools Block De-Delegated Funds (Maintained Schools)
Appendix 4 – Responses Questionnaire

Appendix 2 – Technical Annex (Current Formulae)

This appendix contains more technical detail on the definitions and calculations of factors that are contained within Bradford Local Authority's current 2022/23 financial year primary and secondary school and academy mainstream funding model.

Notional SEND (Mainstream Schools Block Primary & Secondary)

Local authorities are required to define for each primary and secondary school and academy the value of mainstream formula funding that is 'notionally' allocated for Special Educational Needs and Disabilities (SEND) (for meeting the first £6,000 of needs both for pupils with EHCPs and the needs of pupils without EHCPs). How Bradford currently (in 2022/23) defines notional SEND (the %s of funding within each formula factor that make up this budget) is shown in the table below.

Formula Factor	% Primary	% Secondary
Prior Low Attainment Factor	100%	100%
Free School Meals Factor	23.1%	10.2%
Income Deprivation Affecting Children Index (IDACI) Factor	22.4%	19.2%
Base £APP funding (AWPU)	7.5%	6.3%

In addition, 6.0% of a mainstream school's or academy's allocation from the Early Years Single Funding Formula, for mainstream primary schools and academies that have early years entitlement provision, is also defined to be available for supporting SEND in early years.

Following the introduction of the Minimum Level of Per Pupil Funding Factor (MFLs) in the primary and secondary funding formula, some mainstream schools and academies now receive what can be determined to be Additional Educational Needs (AEN) pupil-led funding through the MFLs, rather than through the AEN formula factors, which are used to define published notional SEND budgets. For point of clarity therefore, the Authority will consider MFL allocations within discussions that may be had with individual schools and academies about available delegated SEND monies.

SEND Funding Floor (Mainstream Primary & Secondary)

For 2022/23, we agreed to continue to trial (for a further year pending review) an amended Special Educational Needs and Disabilities (SEND) Funding Floor formula. This Floor is re-calculated on a monthly basis for changes in the numbers of Education Health and Care Plans (EHCPs) on roll.

This formula is aimed at ensuring that no mainstream primary or secondary school or academy will have to manage, from their own mainstream delegated formula funding, an above phase-average cost pressure in respect of their commitment to meet the cost of Element 2 £6,000 for their EHCPs. As well as supporting provision for pupils with EHCPs, this approach helps to protect the funding used by schools and academies to support their wider Additional Educational Needs, SEND and Alternative Provision activities. It directly financially supports schools and academies that have higher proportions of pupils with EHCPs, in support of inclusion, combining also to support schools and academies that may have lower levels of Additional Education Needs formula funding (because they have e.g. lower levels of deprivation) but higher numbers of EHCPs and also that may be smaller in size. It supports schools and academies that may have some turbulence in formula funding as a result of in year pupil numbers changes.

The formula for 2022/23 is as follows:

Where A is greater than B a school / academy receives a top up for the difference between A and B.

A = is the Full Time Equivalent (FTE) number of EHCPs in a school / academy (mainstream provision, excluding early years and post 16 students) multiplied by £6,000 (Element 2).

B = is the % of a school's Additional Educational Needs delegated formula funding that is required to be put to the Element 2 £6,000 cost of a school's EHCPs, before the SEND Funding Floor will provide additional financial support. There are 2 parts to the calculation, the % and what is meant by Additional Educational Needs delegated formula funding. Both these are fixed for the 2022/23 financial year, as follows

- The % is the phase median average % of Additional Educational Needs formula funding that schools / academies contribute to Element 2 £6,000 costs in respect of their EHCPs. The phase average is rounded plus 1%. Separate percentages are used for primary and for secondary phases. For 2022/23, these averages are set at 11% for the primary phase and 10% for the secondary phase.
- Additional Educational Needs delegated formula funding is calculated by taking the following funding factors within the delegated formula funding allocations received by mainstream schools / academies. For academies, this is within their General Annual Grant (GAG) funding:

- 100% of the English as an Additional Language factor
- 100% of the Free School Meals factors
- 100% of the Prior Attainment factor
- 100% of the Minimum Funding Level factor
- 100% of the Income Deprivation Affecting Children Index (IDACI) factor
- 80% of Minimum Funding Guarantee factor

Split Sites (Mainstream Primary & Secondary)

Our split sites factor operates in 2022/23 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>	£9,394.63	0.00	£10,793.52	0
<i>A</i>	0	£118.86	0	£125.42
<i>B</i>	£20,330.08	£10.10	£22,683.34	£14.10

- Split sites funding is paid to all individual schools and individual academies that meet the above criteria.
- Split sites funding is only allocated where the provision on the additional site does not itself qualify for an individual budget share through the DSG. Federated maintained schools, and schools / academies sharing facilities, are not eligible for split sites funding. Schools / academies with remote sixth forms or remote early years provision are also not eligible. Split sites funding also does not apply to co-located or offsite SEND resourced provisions or Alternative Provision centres.
- The criteria include where a school or academy has remote playing fields, which the school is financially responsible for maintaining and which are also more than 1 mile in distance away from the main school site.
- Where two or more schools have amalgamated, and the new school is operating across a split site, the school will not be eligible for split sites funding where this materially increases the school's allocation above the Minimum Funding Guarantee whilst it is in receipt of any additional lump sum funding.
- Funding is only applicable for Reception to Year 11 mainstream provision.

PFI DSG affordability Gap Funding (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 and 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.

As a result of discussions with the ESFA (during 2017), the financial year values of the PFI formula allocations for academies only is adjusted so that, when the ESFA converts these allocations into academic year values within academy's General Annual Grant funding, the values the academies receive on an April to March financial year basis is equivalent to the value that the academy is required to repay to the Authority through the PFI contract on an April to March financial year basis.

Other Technical Matters

The following guiding aspects of the current 2022/23 mainstream primary and secondary formula funding framework remain in place in 2023/24:

- DSG sourced formula funding allocations for mainstream primary (reception to year 6) and mainstream secondary (pre 16) will be calculated on the October 2022 Census.
- The Pupil Premium Grant for mainstream primary and secondary schools and academies will continue to be allocated on the October rather than the January Census.
- 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 (FSM and IDACI), low prior attainment, English as an additional language and pupil mobility factors. We allocated 92.1% of the delegated schools block funding via these pupil-led factors in 2022/23, and the modelling included in this consultation indicates that we continue at around this % in 2023/24.
- The existing framework for the funding of High Needs pupils continues. A High Needs pupil is still defined in 2023/24, for financial purposes, as one whose education costs more than £10,000 per year. The first elements of funding (Element 1 and Element 2) for High Needs pupils continue to be already delegated within school and academy budget shares. A top up (Element 3) is then allocated separately, on a monthly basis, for the cost of additional support above the £6,000 threshold as defined within agreed Education Health and Care Plans (EHCPs). Top up funding arrangements are set out in more detail on our separate consultation on high needs funding.
- Allocations for academies and free schools 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 2023 to calculate individual academy allocations for the 2023/24 academic year.
- The Local Authority has opted to continue to manage school and academy Business Rates (NNDR) payments according to the approach that was in place in 2021/22, rather than adopt the ESFA's amended process from April 2022. This remains the Authority's approach for 2023/24.

Appendix 3: Purposes of Schools Block De-Delegated Funds Retained in 2022/23

1. FSM Eligibility Assessments:

This fund covers the work the Local Authority's Benefits Team does in relation to assessing Free School Meals (FSM) 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 2023/24, 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. The purchasing of the data through the Local Authority has recently offered 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 2023/24, 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 / dis-continue de-delegation in 2022/23 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 previously discussed the delegation of this pot to schools on a number of occasions and has always concluded that the protection this centrally managed fund offers, against the disproportionate and unpredictable nature of maternity / costs, is vital, especially to smaller schools.

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

If this de-delegated fund is not held in 2023/24, maintained primary schools will not be reimbursed for the salary costs of staff on maternity / paternity leave and would have to make alternative arrangements to

manage this costs, 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 following conversions to academy. The maternity / paternity scheme will remain in place for 2023/24, subject to agreement through this consultation. However, the continuation of this from April 2024 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 - NEU, 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:

- NEU has 3.1 FTE lay officials (15.5 days per week)
- NASUWT has 1.8 FTE lay officials (9 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 2023/24, 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 2023/24, 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 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 the maternity / paternity scheme, 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 2023/24, 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 two purposes and the proposed criteria for allocating funding in 2023/24 are unchanged from 2022/23:

- 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 and is expected to eventually cease.
- 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. Please also note that the new de-delegation of additional budget for this purpose from the primary phase has been 'paused' since 2020/21 (as there were / are no calls on this budget).

If this de-delegated fund is not held in 2022/23, 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 Interim Executive Board (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 to 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 has previously been the most common reason for schools requesting exceptional funding. The criteria for allocating funding in such circumstances in 2023/24 are unchanged from 2022/23 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.

8. School Improvement Monitoring and Brokering (SIMB):

In 2022/23, the Local Authority newly retained, via de-delegation from both primary and secondary schools, funds to replace the monies that the Authority has previously received via the DfE's School Improvement Monitoring and Brokering Grant (SIMB). De-delegation for this purpose equated to a new £4.29 per pupil contribution.

This new de-delegated fund came directly from the DfE's decision to reduce the value of SIMB grant for all local authorities by 50% for the period April 2022 to March 2023, and then to cease the grant entirely from April 2023. Within the consultation that introduced this change, the DfE stated that local authorities will be expected going forward to fund all improvement activities, including the core improvement activities previously funded by the SIMB grant, via the de-delegation of funds from maintained school budget shares.

The Local Authority has a programme of monitoring, intervention and support. In 2022/23, the Authority is using the 50% reduced SIMB grant, combined with the replacement 50% monies available following new de-delegation, to continue this programme for the period April 2022 to March 2023. A large proportion of the Authority's programme allocates the SIMB monies to reimburse schools that provide peer-to-peer school-led support for maintained schools. A good proportion of the programme also provides maintained schools with support for governance. Key activities are:

- Induction of new headteachers (support for each new headteacher of a maintained school from an experienced and success Headteacher Partner).
- Support for interim / acting headteachers (support for each new headteacher of a maintained school from an experienced and success Headteacher Partner).
- Curriculum support for middle leaders in primary schools and subject heads in secondary schools.

- Support to Schools Causing Concern, with the support model activities split between the Local Authority and a partner school.
- Leaders of Governance support schools where governance needs development, challenge and modelling of good practice.
- Advice to governing bodies in difficulty.

The complete removal of the SIMB grant at April 2023 is a larger issue that the Authority will consider with the Schools Forum for the 2023/24 DSG budget cycle. For emphasis, the £4.29 per pupil contribution in 2022/23 only replaces 50% of the existing SIMB grant funds.

2022/23 Schools Block De-Delegated Funds: Values

The table below shows the cash budget values that were de-delegated in total from maintained school budgets in the current financial year. These figures are those at the start of the year, before reductions have been made following the conversions of maintained schools to academy status during 2022/23.

Fund	Primary £	Secondary £	Total Value £
FSM Eligibility Assessments	£35,750	£11,297	£47,047
Fischer Family Trust – School Licences	£27,229	n/a	£27,229
School Maternity / Paternity ‘insurance’	£476,746	n/a	£476,746
Trade Union Facilities Time	£101,834	£32,501	£134,335
Trade Union Health and Safety Rep Time	£15,561	£4,967	£20,528
School Staff Public Duties & Suspensions Fund	£21,844	n/a	£21,844
School Re-Organisation Costs – Safeguarded salaries	£13,817	£1,024	£14,841
School Re-Organisation Costs – Deficit Budgets *	£0	n/a	£0
Exceptional Costs & SIFD	£61,300	n/a	£61,300
School Improvement (SIMB)	£100,822	£32,178	£133,000
Totals	£854,903	£81,967	£936,870

* please note that de-delegation was paused in 2022/23

The values in the above table were generated in 2022/23 by de-delegating, from individual maintained school budgets, on a flat amount per pupil basis, with the exception of FSM Eligibility Assessments fund, which has been de-delegated on an amount per Ever 6 FSM formula pupil, as follows:

Fund	Primary £app	Secondary £app
FSM Eligibility Assessments (per FSM6)	£5.80	£5.14
Fischer Family Trust – School Licences	£1.16	n/a
School Maternity / Paternity ‘insurance’	£20.29	n/a
Trade Union Facilities Time	£4.33	£4.33
Trade Union Health and Safety Rep Time	£0.66	£0.66
School Staff Public Duties & Suspensions Fund	£0.93	n/a
School Re-Organisation Costs – Safeguarded salaries	£0.59	£0.14
School Re-Organisation Costs – Deficit Budgets *	£0.00	n/a
Exceptional Costs & SIFD	£2.61	n/a
School Improvement (SIMB)	£4.29	£4.29
Total Per Pupil	£34.86	£9.42
Total Per FSM (Ever 6)	£5.80	£5.14

* please note that de-delegation was paused in 2022/23

Each maintained school has contributed from its 2022/23 delegated budget share the amounts 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 4: RESPONSES FORM

CONSULTATION PRIMARY & SECONDARY FUNDING FORMULAE 2023/24 FINANCIAL YEAR

This form can be used to submit your response. However, this year we have introduced a web-based questionnaire, which we encourage you to use to submit your response, instead of using this paper form. Please access the web-based questionnaire [here](#).

Name _____ School / Academy _____

Please choose your phase below:

PRIMARY SECONDARY

THE DEADLINE FOR RESPONSES TO THIS CONSULTATION IS TUESDAY 29 NOVEMBER 2022

Please send completed questionnaire responses to:

jonty.holden@bradford.gov.uk

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

Tel: 01274 431927

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 that our local formula in 2023/24 should fully mirror the DfE's 2023/24 National Funding Formula and that this formula should be used to calculate primary and secondary school and academy mainstream formula funding allocations? 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, subject to final affordability, to set the Minimum Funding Guarantee at the maximum permitted positive 0.5% in 2023/24? 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 3a - Do you agree with the proposal to continue to use our existing formula for the allocation of split sites funding, uplifted by 2.4% in 2023/24 (subject to affordability)? 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 3b - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG Affordability Gap funding in 2023/24? 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 adjust our definition of Notional SEND within mainstream primary and secondary formula 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 5 - Do you have any views on how the Authority should adjust the 2023/24 funding formula, from that which is proposed in this consultation, should the total cost of the funding formula substantially increase (and be unaffordable) when the October 2022 Census dataset is used. We welcome any specific points that you would wish the Authority and the Schools Forum to consider.

Please provide feedback here:

Question 6 - Do you agree with the proposed criteria and methodology for the allocation of the Growth Fund to schools and academies in 2023/24? 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 7 - Do you agree with the proposed criteria and methodology for the allocation of the Falling Rolls Fund to primary-phase schools and academies in 2023/24? 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 – Should sums continue or cease to be de-delegated from maintained school budgets in 2023/24 for the purposes listed? Please explain the reasons why if you believe that these should cease or change.

	YES - de-delegate	NO
School Improvement	<input type="checkbox"/>	<input type="checkbox"/>
FSM Eligibility Assessments	<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"/>
School Re-Organisation Costs	<input type="checkbox"/>	<input type="checkbox"/>
Exceptional Costs & Schools in Financial Difficulty	<input type="checkbox"/>	<input type="checkbox"/>

(please note that subscription to Fischer Family Trust is not listed as the decision has already been made by the Schools Forum)

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 Jonty Holden by Tuesday 29 November 2022:

E-mail: jonty.holden@bradford.gov.uk

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