

DOCUMENT QJ APP 1A - CONSULTATION & INFORMATION ON MAINSTREAM PRIMARY & SECONDARY FORMULA FUNDING 2024/25 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 2024/25 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 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 2024/25 financial year of funds that are 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 taken a decision on de-delegation in 2024/25 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 28 November 2023**. An analysis of responses received will be discussed at the Schools Forum meeting on 6 December. Please address all questions and responses to Andrew Redding 01274 432678 andrew.redding@bradford.gov.uk. A response form is included at Appendix 4. However, we encourage you to use the web-based questionnaire 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 2024/25, will be published on Bradford Schools Online. These consultations will be signposted from our latest news and updates page [here](#).

1.5 This consultation, and the figures and modelling that are contained within it, are based on the DfE's [2024/25 National Funding Formula \(NFF\) announcements](#) that were made in July 2023. Mainstream schools and academies will be aware that, in addition to NFF-based formula funding, the DfE has established a new [Teacher Pay Grant](#), which is allocated to support the September 2023 teachers' pay award. The Pay Grant will continue in the 2024/25 financial year as an additional funding stream, which will be allocated according to the methodology and conditions to be set by the DfE, and which will be entirely separate from, and additional to, the National Funding Formula-based formula funding allocations that are set out for consultation in this document.

1.6 The Mainstream Schools Additional Grant (MSAG) that has been allocated to mainstream primary and secondary schools in 2023/24 has been merged into the National Funding Formula in 2024/25. As such, mainstream primary and secondary schools and academies must now cease to budget for the MSAG as a separate additional allocation. All schools and academies should carefully check their 2024/25 budget scenarios (including any scenarios that are continued from existing ones) to ensure that they are not double counting the MSAG.

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 2024/25. 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 formula funding per pupil. 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 2024/25 for a 'headline' increase of 1.50% per pupil in core formula funding and for a Minimum Funding Guarantee (MFG) of positive 0.50%. Schools affected by the mandatory Minimum Levels of Per Pupil Funding (MFLs) will typically have estimated that these minimums will increase by 0.50% in 2024/25. 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 2024/25 settlement for mainstream primary and secondary schools and academies, provided through the National Funding Formula (NFF), and as announced by the DfE in July 2023, is confirmed as follows. The basic 'headline' settlement is moderately higher than the Authority's 1.50% estimate and the Minimum Levels of Per Pupil Funding (MFLs) are materially higher. The Minimum Funding Guarantee (MFG) is as the Authority estimated.

- The national Schools Block NFF settlement for 2024/25 provides a 2.7% overall per pupil increase on 2023/24, inclusive of the Mainstream Schools Additional Grant (but excluding the new Teacher Pay Grant, which is not DSG Schools Block funding – please see paragraph 1.5).
- The national Schools Block NFF per pupil increase is aggregated as follows:
 - All the core NFF factors, including the deprivation and additional educational needs factors and the lump sum, prior to the addition of the Mainstream Schools Additional Grant and prior to rounding (variable values continue to be rounded to the nearest £5), are increasing by 2.4%. Following rounding, factors are increasing between broadly 1.8% and 3.0%.
 - The FSM flat variable is increasing by 1.6% (but with rounding is increasing by 2.1%).
 - The mandatory Minimum Levels of Funding Per Pupil (MFLs) are increasing by 2.4%.
 - 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.
- To highlight a specific feature of the 2024/25 settlement, in the current 2023/24 financial year settlement, rather than a single % increase being applied to all NFF factors, the deprivation / additional education needs factors - FSM6 and IDACI - were additionally uplifted, which weighted the 2023/24 settlement towards schools and academies with higher levels of deprivation. The 2024/25 settlement does not do this; all core factors are increasing by the same 2.4%, prior to rounding.
- After applying the basic uplifts, the DfE has further increased the base £app, FSM6 and lump sum factors in order to allocate the Mainstream Schools Additional Grant (MSAG) via the NFF. The MFLs have also been uplifted for this purpose. 2023/24 MSAG allocations have been added into school and academy funding baselines, so that the Minimum Funding Guarantee in 2024/25 will provide budget protection, which is inclusive of the MSAG allocations that were allocated separately in 2023/24. On this basis, mainstream primary and secondary schools and academies must now cease to budget for the MSAG as a separate additional allocation. All schools and academies should carefully check their 2024/25 budget scenarios (including any scenarios that are continued from existing ones) to ensure that they are not double counting the MSAG.
- With the uplift for the MSAG included, the Minimum Levels of per pupil Funding (MFLs) for 2024/25 are set at £4,655 (primary – increased from £4,405) and £6,050 (secondary – increased from £5,715). These are the minimum values of per pupil funding that schools and academies must receive in 2024/25. These minimums continue to be mandatory and are therefore, not subject to local consultation. In the current 2023/24 financial year settlement, the uplift of the mandatory Minimum Levels of Funding per pupil (MFLs) was significantly lower than the uplift of the core NFF factors – the core NFF factors increased by 2.4% but the MFLs increased by only 0.5%. As a result, schools and academies that were funded on the MFLs only received a 0.5% increase in their funding per pupil in 2023/24. However, in 2024/25 the MFLs are increasing by 2.4%, which is at the level of core formula funding. It is likely that this higher level of increase has been

afforded by not weighting additional funding to the NFF deprivation factors, as happened in 2023/24 (that an assessment has been made by the DfE that a priority for the 2024/25 settlement, in response to overall spending pressures, is to increase the base funding of schools and academies that are funded on the MFLs).

- The Minimum Funding Guarantee in 2024/25 can be set between 0% and positive 0.5%. This is the same range as was permitted in 2023/24.
- The conditions and values of the remaining long-standing recurrent separate mainstream pre-16 additional grants in 2024/25 – 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 intention is to transition to a 'hard' formula approach, whereby school and academy mainstream formula allocations will be calculated by the DfE, rather than by local authorities, using a single 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 tightening Regulations. Local authorities continue to set their own Growth Fund and Falling Rolls Fund arrangements. There 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).

2.5 The DfE has recently 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 has set out the aim for full implementation by 2027/28 at the latest; sooner, if possible, but no later. Changes were directed by the DfE for the 2023/24 financial year and further changes are directed for 2024/25. These changes are incorporated into this consultation: a new mandatory factor for the funding of split sites and relatively minor amendments to the operation of Growth and Falling Rolls Funds. The DfE then has already indicated that further targeted incremental changes to the NFF will be made for the 2025/26 financial year, which we will need to incorporate into our consultation this time next year. The DfE has indicated that the construction of the NFF itself will continue to be reviewed annually. We are also conscious that the current national SEND and Alternative Provision Reviews are very likely to have implications for mainstream formula funding, with significant changes possibly being introduced from April 2025.

2.6 In this context, 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. Further announcements and consultations 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, in an adjustment format, and that local authorities will continue to have responsibility for Growth and Falling Rolls Funds even after the final move to the hard NFF, 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 re-definition of Notional SEND budgets within mainstream formula funding allocations, for which the DfE has recently updated its [guidance](#).

2.7 Whilst the Local Authority in 2024/25 is still responsible for deciding Schools Block formula funding arrangements for the Bradford District, as in 2023/24, the DfE continues to require all authorities to 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, we assess that this restriction will require minimal response within our arrangements for 2024/25. However, this does affect 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.

2.8 There is only one DfE directed change, which materially affects our 2024/25 formula funding arrangements. The DfE has introduced a new NFF-factor for the allocation of additional funding to split sites schools and academies. This is a mandatory split sites factor, which all authorities must now use. This change is explained (and modelled) later in this consultation document.

2.9 For 2024/25, the DfE has clarified and updated its guidance on the operation of Growth and Falling Rolls Funds and has directed some new mandatory requirements. However, our assessment is that these directions and updates do not materially alter our local Growth Fund and Falling Rolls Fund arrangements. We have taken the opportunity to re-draft our criteria, to make the wording of these clearer, and we propose to make amendments to the triggers that are applied in the allocation of our Falling Rolls Fund, but these changes are not assessed to be material to the actual allocation of Growth and Falling Rolls Funding to schools and academies in 2024/25. These changes are set out later in this consultation document.

2.10 Other than these changes, there is a great deal of continuity in 2024/25:

- The funding of PFI (Building Schools for the Future) continues not to be included in DfE's National Funding Formula and we will continue to apply local arrangements. There currently is no timescale for the inclusion of PFI funding in the NFF.
- The construct of the National Funding Formula is the same as it was in 2023/24, 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 now comply with DfE's updated guidance and new mandatory requirements.
- The existing framework for the de-delegation of funding from maintained schools continues unchanged.
- Although the DfE has updated its guidance on Notional SEND, and has encouraged authorities to continue to review, this [guidance](#) still stops short of prescribing local arrangements. Authorities continue to have flexibility to define their own Notional SEND budgets. However, the DfE has asked that authorities in particular review the sufficiency of their Notional SEND budgets and has stated that the DfE may intervene (to require authorities to amend their definitions for the purpose of increasing Notional SEND budgets) where these budgets are assessed to be too low.
- There are no changes in operational guidance, which alter the way SEND funding works for mainstream schools and academies in 2024/25 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 2024/25, this will be the lag between the funding of schools / academies on October 2023 Census data and the funding of the Dedicated Schools Grant (DSG) Schools Block on October 2022 Census data.
- We will need to continue to manage the cost of Business Rates (NNDR) and changes in cost.
- Local authorities continue to be permitted to use the Reception Uplift Factor, on an optional basis. However, 2024/25 is the final year that use of this factor will be permitted.

2.11 To give context to the proposals that we put forward now for 2024/25, it is helpful to summarise briefly the key decisions that we have taken since the initial introduction of the National Funding Formula in 2018/19:

- 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. 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 4 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
 - 2023/24 at positive 0.50% 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.
- We have retained unchanged our local approaches in the areas of formula funding that, up to and including 2023/24, the DfE's NFF has not covered. These are:
 - Business Rates (NNDR) at actual cost.
 - Split sites.
 - PFI (Building Schools for the Future).
 - Growth Fund (at individual school level).
 - Falling Rolls Fund.
- In 2023/24, following the DfE's guidance and our benchmarking, we amended our definition of Notional SEND budgets for mainstream primary and secondary schools and academies, to improve the fairness of this definition and to bring us closer to the average of similar local authorities.

2.12 The combination of a number of changes and decisions since 2017/18 – transfers 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 2023/24:

- Primary phase: 44 out of 156 schools (28%), including academies, are funded on the Minimum Funding Guarantee. 27 schools (17%), including academies, are funded at the £4,405 minimum per pupil level. All other schools and academies are funded above £4,405 per pupil.
- Secondary phase: 4 out of 31 schools (13%), including academies, are funded on the Minimum Funding Guarantee. 1 academy (3%) is funded at the £5,715 minimum per pupil level. All other schools and academies are funded above £5,715 per pupil.
- All through academies: None of the 4 academies are funded on the Minimum Funding Guarantee. All of these academies are also funded above their composite minimum per pupil funding levels.
- In total, 48 out of 191 schools and academies (25%) are funded on the Minimum Funding Guarantee. This is reduced from 73 (38%) in 2022/23. In total, 31 out of 191 schools and academies (16%) are funded on the minimum per pupil funding levels. This is reduced from 36 (19%) in 2022/23.

2.13 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 2024/25. 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, proposed amendments to the definition of Notional SEND budgets in 2024/25.

3. Formula Funding Proposals for 2024/25

3.1 There are **7 key decisions** we need to take on Bradford's 2024/25 mainstream primary and secondary Schools Block funding formula arrangements. These decisions are similar to those that were needed for 2023/24.

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 in 2024/25 are still not covered by the National Funding Formula – Business Rates (NNDR) and PFI.
5. Considering the DfE's recently updated guidance, whether we continue to take steps to review and to incrementally adjust our definition of Notional SEND budgets in the movement towards the 'hard' NFF, also having regard for updated benchmarking information.
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 2023 Census dataset is used.
7. Whether we continue to retain the funds that are currently managed centrally within the Schools Block and agree the criteria for eligibility and for allocation of these funds.
 - 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 Please be aware that the DfE requires all local authorities to adopt a new split sites NFF factor in 2024/25. As such, we are not consulting on this change. The new NFF factor replaces our previously locally determined factor. We have previously communicated with the individual schools and academies that have received split sites funding, to validate their eligibility for continued funding and to make them aware of the potential impact of this change, which is varied. Some schools and academies gain, whereas others lose, either because the funding allocated through the new NFF factor is reduced or because they no longer are eligible for split sites funding using the DfE's mandatory definition. The change in split sites funding can specifically be identified in the modelling at Appendix 1. We will adjust our Minimum Funding Guarantee (MFG) methodology in 2024/25 to help protect against losses in funding resulting from this factor change. This will be done by not excluding split sites funding from the MFG baselines, as we have done in recent years. This will be an MFG amendment for 2024/25 only. This MFG protection will, however, be quite limited, as schools / academies will need to trigger the overall MFG before any protection would be allocated. If schools / academies are funded at a level above the MFG, even after a reduction in split sites funding, the MFG will not provide additional protection and the loss of split sites funding will be felt in full. Splits sites funding operates outside of the DfE's Minimum Levels of Funding (MFLs).

The DfE's new NFF split sites factor is made up of two parts, both of which are compulsory:

- Basic eligibility funding: schools / academies must be allocated a lump sum payment for each of their additional eligible sites.
- Distance funding: additional funding must be paid out on top of the basic eligibility lump sum for schools / academies whose eligible sites are separated by more than 100 metres (by road distance) from the main site. Funding for the distance element is allocated through a tapered approach, beginning at 100 metres, with allocations increasing linearly up to 500 metres, from which point schools / academies should receive the total maximum funding available.

The NFF lump sum for basic eligibility is £54,300 and the NFF maximum distance funding is £27,100. Local authorities are required to uplift these values with their respective Area Cost Adjustments (ACA) in their local formulae and set their local factor values within the 2.5% mirroring threshold of the ACA uplifted lump sum value.

The basic eligibility criteria for split sites funding requires additional sites to:

- Be part of the main school / academy, that is, to share the same unique reference number (URN) with the school's / academy's main site.
- Be separated from the school's / academy's main site by a public road or railway.
- Have a building on them which is maintained by the school / academy and which is primarily used for the education of 5 to 16- year-old pupils in mainstream education. This excludes playing fields, ancillary buildings and buildings leased out full time by the school / academy to another entity.

Further details on the DfE's new eligibility criteria are set out here: [annex 5: split site eligibility criteria](#).

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

- We continue to be required to include the NFF 'sparsity factor' into our local formula. As this is mandatory and is a 'tick box' exercise as none of our school / academies are eligible, we are not consulting on this. We will simply inform the DfE, via our Authority Pro-forma Tool (APT) return in January, that we have mirrored the NFF sparsity factor in 2024/25. This is what we did for 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 2023/24 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. 2024/25 PPG allocations data will be sourced with reference to the pupils recorded in the October 2023 Census.
- We do not intend to use the Reception Uplift Factor in 2024/25. 2024/25 is the final year that this could be used.

Decision 1 - Whether we transfer budget from the Schools Block to the High Needs Block in 2024/25

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 2024/25.

3.7 On current estimates, our High Needs Block allocation in 2024/25 is £122.08m. This represents an increase of 4.5% in cash terms and 5.0% in per pupil terms on 2023/24. This increase is lower than received in recent years and does align with our previous forecasting, which was informed by the DfE’s messaging, that the current 3-year national school funding settlement has been weighted towards 2022/23 and 2023/24, with reduced increases to be allocated in 2024/25. We forecast the continued growth in the numbers of children and young people in Bradford with EHCPs and that our High Needs Block financial position will be significantly challenging going forward. Our management of this position must begin in 2024/25, and we discuss this further within our separate High Needs formula funding consultation.

3.8 This being said, **the Local Authority does not propose to transfer Schools Block funding to the High Needs Block in the 2024/25 financial year.** This means that the full Schools Block settlement will be retained for spending on the funding of mainstream primary and secondary provision.

Decision 2 – Whether we continue to fully mirror the DfE’s 2024/25 National Funding Formula

3.9 The table below shows the DfE’s National Funding Formula (NFF) factors in 2024/25, as these are applied to Bradford (so adjusted for area costs - ACA), compared against those used for 2023/24. 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 2024/25 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 £4,405 to £4,655 (primary) and from £5,715 to £6,050 (secondary).
- The Base £APP (AWPU), Lump Sum and FMS6 (Ever 6) factors have been increased in order to allocate the Mainstream Schools Additional Grant, which has been merged into the National Funding Formula.
- The new mandatory split sites funding factors has been added, which allocates funding on a lump sum basis. The values of lump sums are the same for both primary and secondary phases.

Factor	NFF £ 2024/25	NFF £ 2023/24	£Diff	% Diff
Primary – Base £APP (AWPU)	£3,597.61	£3,394.54	£203.07	6.0%
Secondary – Key Stage 3 Base £APP	£5,072.86	£4,785.77	£287.09	6.0%
Secondary – Key Stage 4 Base £APP	£5,717.97	£5,393.86	£324.11	6.0%
Lump Sum – Primary & Secondary	£135,723	£128,020	£7,703	6.0%
Primary - Deprivation – FSM Ever 6	£830.14	£705.11	£125.03	17.7%
Primary - Deprivation – Flat FSM	£490.08	£480.08	£10.00	2.1%
Secondary - Deprivation – FSM Ever 6	£1,210.21	£1,030.16	£180.05	17.5%
Secondary - Deprivation – Flat FSM	£490.08	£480.08	£10.00	2.1%
Primary - Deprivation – IDACI F	£235.04	£230.04	£5.00	2.2%
Primary - Deprivation – IDACI E	£285.05	£280.04	£5.01	1.8%
Primary - Deprivation – IDACI D	£450.08	£440.07	£10.01	2.3%
Primary - Deprivation – IDACI C	£490.08	£480.08	£10.00	2.1%
Primary - Deprivation – IDACI B	£520.09	£510.08	£10.01	2.0%
Primary - Deprivation – IDACI A	£685.12	£670.11	£15.01	2.2%
Secondary - Deprivation – IDACI F	£345.06	£335.05	£10.01	3.0%
Secondary - Deprivation – IDACI E	£455.08	£445.07	£10.01	2.2%
Secondary - Deprivation – IDACI D	£635.11	£620.10	£15.01	2.4%
Secondary - Deprivation – IDACI C	£695.12	£680.11	£15.01	2.2%
Secondary - Deprivation – IDACI B	£750.13	£730.12	£20.01	2.7%
Secondary - Deprivation – IDACI A	£950.16	£930.15	£20.01	2.2%
Primary - Eng as an Additional Language	£595.10	£580.09	£15.01	2.6%
Secondary - Eng as an Additional Language	£1,605.27	£1,565.25	£40.02	2.6%
Primary – Low Prior Attainment	£1,185.20	£1,155.18	£30.02	2.6%

Secondary – Low Prior Attainment	£1,790.30	£1,750.28	£40.02	2.3%
Primary - Pupil Mobility	£970.16	£945.15	£25.01	2.6%
Secondary – Pupil Mobility	£1,395.24	£1,360.22	£35.02	2.6%
Primary – Minimum £APP (MFL)	£4,655	£4,405	£250.00	5.7%
Secondary – Minimum £APP (MFL)	£6,050	£5,715	£335.00	5.9%
Split Sites – Basic Entitlement Lump Sum	£54,309	n/a	n/a	n/a
Split Sites – Maximum Distance Lump Sum	£27,105	n/a	n/a	n/a
Primary – Sparsity Lump Sum	£57,709.81	£56,309.01	£1,400.80	2.5%
Secondary – Sparsity Lump Sum	£83,914.26	£81,913.10	£2,001.16	2.4%

3.10 So, the NFF in 2024/25 retains the same dynamic as in the last six 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.

3.11 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 2024/25 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, 2/3rds (106 out of 151) authorities mirrored the NFF (within 2.5%) in 2023/24, as we did.

3.12 We propose therefore, **subject to final affordability (please see decision 6), that we will continue to fully mirror the NFF in 2024/25, using the ‘NFF 2024/25’ factor values shown in the table above.**

3.13 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 2024/25 should fully mirror the DfE’s 2024/25 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)

3.14 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 2024/25. Typically, we seek to set the MFG at the maximum that is permitted by the Regulations, if this is affordable, having also considered the minimum that has been provided by the DfE within its NFF settlement and how costs in schools and academies may increase, especially following teacher and support staff pay awards and salary on-costs changes.

3.15 The DfE permits the Minimum Funding Guarantee in 2024/25 to be set between 0% and positive 0.5%. This is the same as the range that was permitted in 2023/24. 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 2023 as recorded in October 2022, will receive in 2024/25 the cash value of its 2023/24 core-formula funding, plus its Mainstream Schools Additional Grant, uplifted by 0.5%.

3.16 The DfE has provided a floor (a minimum increase) of + 0.5% in its notional 2024/25 NFF calculations for individual schools and academies. A 0.5% MFG in Bradford would effectively pass this floor through to delegated budgets in Bradford.

3.17 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 2024/25 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, however, that this illustrative modelling is still based on the October 2022 Census dataset. Whether schools and academies are funded on the MFG in

2024/25, as well as the value of MFG funding they receive, will be affected by the changes that are recorded in the October 2023 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 2024/25? If not, please explain the reasons why not.

Decision 4 – Whether we continue unchanged our existing local approaches to the factors that in 2024/25 are not yet covered by the NFF

3.18 **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.

3.19 **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 3 - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG Affordability Gap funding in 2024/25? If not, please explain the reasons why not.

Decision 5 – Notional SEND Budget Definition

3.20 **We propose to slightly amend our definition of Notional SEND budgets within mainstream primary and secondary school and academy formula funding allocations in 2024/25.** This follows, and is in keeping with, the amendments that were made in 2023/24 and the explanation that we gave in our consultation this time last year, that we will continue to review and to incrementally amend our definition in the run up to the establishment of the hard National Funding Formula.

3.21 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 now 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. This reflects the amendments that we made to our definition in 2023/24, where we adjusted the %s as well as brought a % of Minimum Level of Funding (MFL) top-up into our definition for the first time. These changes were aimed at improving the fairness of our definition and bringing our definition closer into line with other similar authorities, which is felt to be especially important in the run up to the implementation of the hard National Funding Formula, where the DfE has stated that a consistent national SEND budget definition will be established.

3.22 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.

3.23 Highlighting that there is still 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 updated its published [guidance](#). Authorities continue in 2024/25 to have flexibility to define their own Notional SEND budgets. However, the DfE has asked that authorities in particular review the sufficiency of these budgets and has stated that the DfE may intervene (to require authorities to amend their definitions for the purpose of increasing Notional SEND budgets) where these budgets are assessed to be too low. The DfE also strongly encourages authorities to look at how their definitions compare with other authorities. It is in this context that

we have conducted further review of our definition and propose incremental amendments for 2024/25. We have updated our benchmarking based on 2023/24 data, looking at national median averages, but also looking at the median average of the 50 most similar High Needs Block funded local authorities. This benchmarking indicates that there has been some upward movement in these averages between 2022/23 and 2023/24 and that we should incrementally adjust our definition in response.

3.24 It is important to explain that, irrespective of whether we use the existing or amended definition, the overall total value of Notional SEND budgets is expected to increase in 2024/25, due to pupil numbers, other changes, including the merger of the Mainstream Schools Additional Grant, as well as due to the 2024/25 funding settlement. Irrespective of changes to the definition, individual schools and academies will see differences (both up and down) due to pupil numbers and pupil circumstances changes (differences between the October 2023 and the October 2022 Censuses).

3.25 We propose to slightly adjust our definition as follows:

Current 2023/24

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%
Minimum Level of Funding top-up (MFL)	48.0%	48.0%

Adjusted 2024/25

Formula Factor	% Primary	% Secondary
Prior Low Attainment Factor	100%	100%
Free School Meals Factor	27.0%	27.0%
Income Deprivation Affecting Children Index (IDACI) Factor	27.0%	27.0%
Base £APP funding (AWPU)	6.25%	4.0%
Minimum Level of Funding top-up (MFL)	48.0%	48.0%

3.26 Illustrative modelling, showing the impact of these amendments 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 2024/25 Notional SEND budgets will be. In particular, these final budgets, which will be published in February 2024, will be influenced by the changes in data that are recorded in the October 2023 Census.

3.27 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.

3.28 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.

3.29 Finally, we wish to highlight that our separate consultation on high needs formula funding discusses the continuation of the mainstream SEND Funding Floor in 2024/25. 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 2023 Census dataset is used.

3.30 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 2023/24 financial year, for example, schools and academies have been funded with reference to their October 2022 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 2021 Census. For 2024/25, schools and academies will be funded with reference to their October 2023 Census data, whereas the Local Authority will receive DSG funding using the October 2022 Census dataset.

3.31 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 must adjust its proposals to reduce cost.

3.32 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.

3.33 In our annual consultation documents, we have always highlighted this 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. Since 2022/23, however, there have been greater 'negative' swings in formula funding costs. Our 2022/23 funding formula, using the October 2021 Census dataset, cost £0.95m more than using the October 2020 Census dataset. 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. Our 2023/24 funding formula, using the October 2022 dataset, cost £1.07m more than using the October 2021 Census dataset. Again, rather than adjust our formula funding proposals, we decided with the Schools Forum in January 2023 to use Schools Block reserves. In total, we have used £1.79m of Schools Block reserves in 2023/24. We have warned that, should we have a similar value of data lag cost in 2024/25, we may not have sufficient reserves available to comfortably cover the cost, and we may need to discuss other options. Changes in data will have implications for the allocations received by individual schools and academies in 2024/25. 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 of the NFF, as proposed in Decision 2.

3.34 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 2024/25, 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 2023 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.

3.35 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 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. To comply with the DfE's tightening of the Regulations regarding the National Funding Formula in 2024/25, we would not be permitted to reduce our formula factor 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. 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 £4,655 (primary) and £6,050 (secondary) per pupil will be unaffected by any affordability adjustments that we may make.

3.36 It is the Authority's view 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 and that we have a sufficient value of reserve available to deploy. Balances can only be spent once and using these to support an on-going formula funding cost issue may potentially create affordability problems for 2025/26.
- 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. Not providing an MFG at the maximum permitted 0.5%, whilst not making any other formula funding cost adjustments, would 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 consider very carefully 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, or for the funding that is allocated to support pupils with Additional Educational Needs (AEN), including pupils who share protected characteristics who strongly correlate with measures of AEN.
- 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 2024/25 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 2025,

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 2024.

3.37 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 2024/25 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 2023 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

3.38 The DfE's National Funding Formula does not yet include a directed methodology, which prescribes exactly how Growth Funding should be allocated at individual school and academy level. Local authorities in 2024/25 retain the responsibility for determining arrangements locally, albeit within tighter 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 2024/25 are set out in the documents embedded under paragraph 6. Although we have taken the opportunity to improve the clarity of these documents, our 2024/25 proposed Growth Fund arrangements are unchanged from current arrangements.**

3.39 We established back in 2019/20 a Falling Rolls Fund for our primary phase. **Our proposed Falling Rolls Fund arrangements and criteria for 2024/25 are set out in the document embedded under paragraph 7. As well as responding to the DfE's directed changes, we do propose to make some other changes to the trigger points for eligibility.** However, these changes are not assessed to be material to the actual allocation of Falling Rolls Funding to schools and academies in 2024/25. This is because we do not expect any schools or academies to be eligible for Falling Rolls Funding in 2024/25. This is explained further in paragraph 7.

3.40 This document also asks for feedback on the continuation for the 2024/25 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 2024/25 are set out in paragraph 5 and also in detail in Appendix 3. These are unchanged from current arrangements. However, we do provide early warning that we anticipate ceasing the primary phase maternity and paternity insurance scheme at the end of the 2024/25 academic year.**

Question 6 - Do you agree with the proposed criteria and methodology for the allocation of the Growth Fund to schools and academies in 2024/25? 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 2024/25? If not, please explain the reasons why not.

Question 8 – Should sums continue or cease to be de-delegated from maintained school budgets in 2024/25 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 2024/25 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 Mainstream Schools Additional Grant allocations, for each primary and secondary school and academy for the current 2023/24 financial year, compared against illustrative allocations for 2024/25 that are calculated on the Authority's proposals and using estimated October 2023 pupil numbers.

Appendix 1b is a ready reckoner, which provides a breakdown by factor of the totals (shown in columns 5 and 12 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 2024/25 allocations include the Mainstream Schools Additional Grant (MSAG), which has been merged into core formula funding. Mainstream primary and secondary schools and academies must now cease to budget for the MSAG as a separate additional allocation. All schools and academies should carefully check their 2024/25 budget scenarios (including any scenarios that are continued from existing ones) to ensure that they are not double counting the MSAG.
- The totals in Appendix 1a for 2023/24 (column 5) and for 2024/25 (column 12) are the core delegated formula funding allocations excluding business rates 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 2024/25 illustrative allocations shown in column 9 e.g. IDACI, FSM%, EAL%, Low Prior Attainment is sourced from the October 2022 Census (or with reference to the pupils that were recorded as on roll in the October 2022 Census) and is the same data that was used to calculate actual 2023/24 core formula funding allocations. **Schools and academies should remember that actual 2024/25 allocations will be calculated on updated data sourced from (or with reference to the pupils recorded on roll in) the October 2023 Census. Using updated October 2023 Census data may quite significantly change the value of formula funding received by an individual school or academy in 2024/25 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 2024/25 illustrative allocations are calculated **using an estimate of pupil numbers that will be recorded in the October 2023 Census**. This means that the cash differences between 2024/25 and 2023/24 allocations (Appendix 1a column 16) include the impact of the estimated growth or estimated reduction in pupil numbers between October 2023 and October 2022.
- The allocations received via the current split sites factor in 2023/24 (column 3) and via the new NFF split sites factor in 2024/25 (column 11) are specifically listed so that affected schools and academies can see the impact of this mandatory change.

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 2023 and October 2022 (column 18).
- The range of % uplifts that may be received by individual schools and academies next year, in total cash (column 17) and per pupil terms (column 20), incorporating estimated changes in pupil numbers between October 2023 and October 2022, but before any further pupil-level data changes that may be recorded in the October 2023 Census are brought in. To aid analysis, column 21 shows the % change in per pupil funding when the 2024/25 allocations are calculated using the same total number of pupils that were funded in 2023/24. Column 21 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 2023 Census are brought in, affect the total cash values of formula funding allocations that may be received by schools and academies in 2024/25 compared with 2023/24 (column 16).
- The schools and academies that were funded on the DfE's Minimum Levels of per pupil Funding (MFLs) in 2023/24 (column 8) and indicatively will be funded on the uplifted MFLs in 2024/25 (column 15). Schools and academies that are on the MFLs in both years will see a 2.4% per pupil increase in core formula funding in 2024/25, prior to the impact of the change in the split sites factor.

Schools and academies that were funded on the MFLs in 2023/24 have a positive figure in column 8. Schools and academies that are modelled at this time to remain on the MFLs in 2024/25 also have a positive figure in column 15.

Depending on their October 2023 Census datasets, and changes in pupil-level data, schools and academies currently modelled in Appendix 1 to be on the MFLs in 2024/25 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 2023/24. The opposite may also happen, again depending on changes in pupil-level data recorded in the October 2023 Census. Schools and academies that in 2023/24 were not funded on the MFLs may find that they come onto the MFLs in 2024/25. 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 2023 Census that reduce their per pupil funding.

To stress, as it is based on October 2022 Census data, the Appendix 1 modelling does not show the impact of October 2023 Census data changes on a school's or academy's position versus the MFL in 2024/25. This impact can only be modelled using the October 2023 Census dataset when this is provided in December.

- The schools and academies that were funded in 2023/24 on the Minimum Funding Guarantee (MFG) and that may remain on the MFG in 2024/25 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 2024/25. 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 2023/24 have a positive figure in column 7. Schools and academies that are modelled at this time to remain on the MFG in 2024/25 also have a positive figure in column 14. If the figure in column 7 is zero, then the school or academy was not on the MFG in 2023/24. If the figure in column 14 is zero, then the school or academy is modelled at this stage to be off the MFG in 2024/25.

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 2024/25 may change when the October 2023 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 2024/25,

when it was not funded on the MFG in 2023/24 and is not currently modelled to be on the MFG in 2024/25. 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 2023 Census is higher than that recorded in October 2022, may mean that a school or academy comes off the MFG in 2024/25, when it was on the MFG in 2023/24 and is currently modelled to remain on the MFG in 2024/25. This is because the increase in FSM funding is substantial enough to result in a total per pupil funding uplift in 2024/25 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 2024/25. These changes may take more than one year to have an impact.

However, to stress, because it is not based on October 2023 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 2024/25. This impact can only be modelled using the October 2022 Census dataset when this is provided in December.

- The schools and academies funded in 2023/24 on the Minimum Funding Guarantee (MFG) that may come off the MFG in 2024/25 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 7 is positive and the figure in column 14 is zero, then the school or academy is modelled on current October 2022 based data to come off the MFG in 2024/25 as a result of the NFF funding uplift. In the Appendix 1 modelling at this stage, these schools and academies may receive increases in 2024/25, 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 2023/24. This position is created because the value of MFG protection previously allocated in 2023/24 is deducted from the school's or academy's total % gain in 2024/25.

Typically, schools and academies that received only small values of MFG funding in 2023/24, may come off the MFG in 2024/25, subject to what happens with their pupil-level data to be taken from October 2023 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 2024/25, depending on the impact of changes in their pupil-level data to be recorded in the October 2023 Census. These schools and academies have zeros in all columns 7, 8, 14, and 15. 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 2023 Census data, the confirmed final values of their 2024/25 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 2024/25 is as follows:

- Primary phase: 18 out of 156 schools / academies (12%), are funded on the Minimum Funding Guarantee (at 0.50%). 25 schools / academies (16%) are funded at the £4,655 MFL value. All other schools / academies are funded above £4,655 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 £6,050 MFL value. All other schools / academies are funded above £6,050 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, 21 out of 191 schools / academies (11%) are funded on the Minimum Funding Guarantee (at 0.50%). 26 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 Andrew Redding.

5. 2024/25 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.
- 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 cessation of the DfE's 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 2024/25 over the autumn term and will take final decisions in January 2024. 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 (TBC) de-delegation in 2024/25 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 2024/25.

5.7 The following 'de-delegated' funds are held in the current 2023/24 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 (primary & secondary).

5.8 Further information on each of these funds, including the values held in 2023/24 and the criteria by which they are allocated, is given in Appendix 3.

5.9 We do not propose any amendments for 2024/25 to the criteria that are used for the allocation of de-delegated funds.

5.10 If funding is not de-delegated in 2024/25, 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 specifically receive from accessing these funds currently. In taking final decisions, the Schools Forum will consider 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, 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 continues to reduce year on year, affecting the 'critical mass' that is needed to deliver an effective cost-efficient scheme. There have been a significant number of primary phase academy conversions during 2022 and 2023, which has affected our view of the scheme.

The maternity / paternity scheme will continue in 2024/25, subject to agreement following this consultation. **However, to provide early warning and planning time, we wish to signal now that we anticipate that this scheme will cease at the end of the 2024/25 academic year, meaning that reimbursements for all existing and new claims will stop at 31 August 2025. Maintained schools should, therefore, now begin to plan on this basis, including by exploring alternative arrangements, including through external supply insurance.**

6. Schools Block Growth Fund 2024/25

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 that are 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 Local authorities continue to 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). For 2024/25, the DfE has clarified and updated its guidance on the operation of Growth Funds and has directed some new mandatory requirements. However, our assessment is that these directions and updates do not materially alter our local Growth Fund arrangements; we already fund above the now mandatory minimum value of funding per pupil and we already allocate Growth Funding in circumstances where the Local Authority asks a school or academy to provide an additional class (or classes) for basic needs purposes. We have taken the opportunity to re-draft our criteria, to make the wording of these clearer.

6.3 Our proposed Growth Fund arrangements and criteria for 2024/25 are set out in the documents embedded below. Please note that the values highlighted in red / yellow within the documents are indicative (subject to the finalisation of Decision 2).



Growth Funding
2024 - primary criteri.



Growth Funding
2024 - secondary criteri.

6.4 For reference, the total value of the Schools Block Growth Fund held in 2023/24, 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 2023, is shown in the table below:

	Primary	Secondary	Total
Existing Known Expansions	£90,030	£357,177	£447,207
Existing Bulge Classes	£124,014	£0	£124,014
New Expansions	£0	£600,000	£600,000
Pre-Opening Costs	£0	£0	£0
Diseconomies of Scale	£0	£0	£0
Total Value 2023/24	£214,044	£957,177	£1,171,221

6.5 We will confirm the total value of the Schools Block Growth Fund held for 2024/25 as part of the DSG setting process, which will be concluded with the Schools Forum in January 2024.

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. Though it is not mandatory, local authorities are permitted to create a fund to support schools and academies with falling rolls and surplus capacity. This fund is intended to provide budget support only in circumstances where pupil numbers growth (to fill surplus capacity) is expected in the near future but where a school or academy currently has surplus places and faces an unmanageable financial position in the short term, where significant new action (redundancies) would be needed, and additional costs incurred, to contain spending within budget, but where these posts would soon need to be re-established.

7.2 Falling Rolls Fund is not a mechanism for supporting schools and academies that are forecasted to see more permanent / longer-term reductions in pupil numbers because of wider demographic trends. Following the DfE's National Funding Formula consultation in 2022, we anticipated that the DfE would permit greater flexibility in the use of falling rolls fund in 2024/25, enabling us to better support primary schools and academies that are currently facing significant reductions in pupil numbers. However, this is not the case for 2024/25. Whilst the forecast timeframe for the recovery of pupil numbers has been extended from 3 years to 3-5 years, other suggested flexibilities (including using funding to support the re-utilisation of space) have not been

implemented. The DfE has indicated that the development of both falling rolls and growth funding will be incremental over time. We may, therefore, see changes after 2024/25.

7.3 Whilst the Falling Rolls Fund remains very restrictive, the DfE has amended its guidance for the 2024/25 financial year. Local authorities continue to have discretion over whether to operate a Fund, but, where they do, they are only able to provide funding where school capacity data 2022 (SCAP return) shows that school places will be required in the subsequent 3 to 5 years. This SCAP requirement replaces the previous guidance, that funding may only be used where local planning data shows that surplus places will be needed within the next 3 financial years. The DfE has also removed the requirement that schools must be Ofsted rated good or outstanding to be eligible.

7.3 Because of its restrictive nature, to date, we have not allocated funding from our Falling Rolls Fund. This is because the cause of the reduction in pupil numbers in the primary phase in Bradford is medium to longer term demographic change, rather than admission 'blip'. The Authority's forecasting continues to very clearly indicate that surplus capacity in the vast majority of schools and academies will not be needed in the next 3 to 5 years. The removal of the requirement that schools must be Ofsted rated good or outstanding will make no material difference to our Fund. Based on our current modelling, we do not envisage that primary schools or primary academies will be eligible for funding either in 2023/24 or in 2024/25. As such, any adjustments that we make to our Falling Rolls Fund are not expected to materially impact on the funding of the primary phase in these financial years.

7.4 This being said, we do propose to continue to have a Falling Rolls Fund in place in 2024/25 for the primary phase. We have amended this, where required, in response to the DfE's revised mandatory conditions and guidance. We have taken the opportunity to clarify how our Fund works, including the triggers for eligibility. Following the example criteria that the DfE has given within its guidance, we have also taken the opportunity to review the 2 key criteria that trigger eligibility. In its examples, the DfE uses triggers of 5% (for the % by which a school's number on roll must have reduced year on year) and 85% (the % a school's total number on roll must be lower than in relation to its full capacity). We currently use triggers of 3% and 90%. Given that we expect that this fund, on the restrictive terms that are currently set by the DfE, should only ever support schools and academies in exceptional circumstances, and given that we may expect further direction from the DfE on the operation of falling rolls funding in the future run up to the National Funding Formula, we propose to amend our triggers to match the DfE's examples seeking to 'future-proof' these. These amendments will also help to support the management of the overall affordability of this fund from the Schools Block in the future, should our longer-term forecast change and should schools and academies begin to become eligible for funding.

7.5 The proposed Falling Rolls Fund for 2024/25 is presented in the embedded document below.



Falling Rolls Fund
2024-25

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 Andrew Redding using the contact details shown in section 1.

8.2 A response form is included at Appendix 4. However, 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 28 November 2023**. 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 2024 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 2024/25 financial year.

9.2 Discussions on the position of the Dedicated Schools Grant (DSG), and the affordability of formula funding arrangements, for 2024/25 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 2024/25 DSG and formula funding arrangements on Wednesday 10 January 2024.

10. Equalities Impact Assessment 2024/25 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 2024/25 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 2024/25 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 2024/25 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 2024/25 (Decision 2). These uplifts are assessed to have a positive impact on the funding of all pupils. These uplifts will also 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 2024/25, 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. As we show in section 2, and in the table under 'Decision 2', we propose to uplift the core £base amount per pupil and lump sum Schools Block formula funding factors by 2.4%, prior to the addition of the merged Mainstream Schools

Additional Grant. We propose to set a minimum 0.5% 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 2.4% (prior to the addition of the Mainstream Schools Additional Grant). The factors that allocate funding on measures of Additional Education Needs (AEN) are proposed to increase between 1.8% and 3.0% (prior to the addition of the Mainstream Schools Additional Grant).

10.5 The balance of the total final value of formula funding allocated in 2024/25, 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 2023 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 2022 Census. We have explained in section 4 of this document how the distribution of formula funding in 2024/25, and the values of allocations received by individual schools and academies, may be affected by the use of the updated October 2023 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 2.4%. 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.

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 2024/25 and for the schools and academies that are placed on the MFG for the first time in 2024/25 as a result of October 2023 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 a quarter (28%) of schools and academies were funded on the MFG in 2023/24. 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 2024/25 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 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. 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 2023/24 Formulae)

This appendix contains, for reference, more technical detail on the definitions and calculations of factors that are contained within Bradford Local Authority's current 2023/24 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 2023/24) 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	25.0%	25.0%
Income Deprivation Affecting Children Index (IDACI) Factor	25.0%	25.0%
Base £APP funding (AWPU)	6.5%	4.0%
Minimum Level of Funding top-up (MFL)	48.0%	48.0%

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.

SEND Funding Floor (Mainstream Primary & Secondary)

The SEND Funding Floor formula is aimed at ensuring that no mainstream primary or secondary maintained school or academy will have to manage, from their own delegated mainstream 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 will help to protect the funding used by schools and academies to support their wider Additional Educational Needs, SEND and Alternative Provision activities. It will directly financially support 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 will also support schools and academies that may have some turbulence in formula funding as a result of in year pupil numbers changes.

Funding allocated using the Floor is re-calculated monthly for changes in the number of Education Health and Care Plans (EHCPs) on roll.

The formula for 2023/24 is as follows:

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

A = is the Full Time Equivalent (FTE) number of EHCPs on roll at a mainstream school / academy, excluding early years and post 16 students that have EHCPs, multiplied by £6,000 (which is the value of Element 2). Part A is re-calculated monthly for changes in the number Education Health and Care Plans (EHCPs) on roll.

B = is the percentage of a school's / academy's Additional Educational Needs delegated formula funding that is required to be put to the Element 2 (£6,000) cost of a school's / academy's EHCPs, before the SEND Funding Floor will provide additional financial support. There are 2 elements to the Part B calculation, the 'percentage' and what is meant by 'Additional Educational Needs delegated formula funding'. Unlike Part A, both elements of Part B are fixed at the beginning of the 2023/24 financial year and will not change.

- The 'percentage' is the phase median average percentage 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 2%. Separate percentages are used for primary and for secondary phases. The averages that are used in 2023/24 are 13.0% for the primary phase and 10.5% for the secondary phase.
- 'Additional Educational Needs delegated formula funding' is calculated by taking the following funding factors that are included within the delegated formula funding allocations received by mainstream schools / academies. For academies, this funding / these factors are within General Annual Grant (GAG) funding. For maintained schools, this funding / these factors are within the Section 251 formula 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 locally determined split sites factor operates in 2023/24 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>	£9,620.10	0.00	£11,052.56	0
<i>A</i>	0	£121.71	0	£128.43
<i>B</i>	£20,818.00	£10.34	£23,227.74	£14.44

- 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 AP 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 MFG whilst it is in receipt of the additional lump sum.
- 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 mainstream primary and secondary formula funding framework remain in place in 2024/25:

- DSG sourced formula funding allocations for mainstream primary (reception to year 6) and mainstream secondary (pre-16) will be calculated on the October 2023 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 92.25% of the delegated schools block funding via these pupil-led factors in 2023/24, and the modelling included in this consultation indicates that we continue at around this % in 2024/25.
- The existing framework for the funding of High Needs pupils continues. A High Needs pupil is still defined in 2024/25, 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, monthly, 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 2024 to calculate individual academy allocations for the 2024/25 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 2024/25.

Appendix 3: Purposes of Schools Block De-Delegated Funds Retained in 2023/24

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 2024/25, 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 service 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 previously 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 2024/25, 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 TBC de-delegation in 2023/24 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 2024/25, 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 these

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 our current arrangements for supporting maternity / paternity costs. We have warned, as happened for the secondary phase, 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 continues to reduce year on year, affecting the 'critical mass' that is needed to deliver an effective cost-efficient scheme. There have been a significant number of primary phase academy conversions during 2022 and 2023, which has affected our view of the scheme. The maternity / paternity scheme will continue in 2024/25, subject to agreement following this consultation. However, to provide early warning and planning time, we wish to signal now that we anticipate that this scheme will cease at the end of the 2024/25 academic year, meaning that reimbursements for all existing and new claims will stop at 31 August 2025. Maintained schools should, therefore, now begin to plan on this basis, including by exploring alternative arrangements, including through external supply insurance.

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 2024/25, 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. These representatives 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 2024/25, 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 previously considered a detailed assessment of the Authority's current Trade Union Facilities Time arrangements and has concluded that these arrangements are effective and 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 2024/25, 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 2024/25 are unchanged from 2023/24:

- 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. 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 eventually to 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 2024/25, 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 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 2024/25 are unchanged from 2023/24 and are as follows:

- The main factor considered 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

Since 2022/23, the Local Authority has 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 now ceased School Improvement Monitoring and Brokering Grant (SIMB). De-delegation for this purpose equated to a £4.29 per pupil contribution in both 2022/23 and in 2023/24.

The Local Authority has a programme of monitoring, intervention, and support for maintained schools. A large proportion of this programme allocates monies to reimburse Bradford schools that provide peer-to-peer school-led support to Bradford 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.

Without the continuation of funds, the Authority will not have the resources on an on-going basis to continue to financially support school improvement in maintained schools. There would be no capacity to fund schools that offer their knowledge and expertise to support other schools. No funds would be available for backfill for

schools, to enable staff to be out of schools or for the cost of support that is delivered by the Authority's Advisers. The only mechanism that would be available would be to ask schools to support other schools, for altruistic reasons, which does not have a secure basis, and which also may have detrimental impact on the supporting school. In this context, whilst the decision on de-delegation is one for the Schools Forum, was the Forum not to approve the continuation of de-delegation in any form, it is very likely that the Authority would need to consider an approach to the Secretary of State. We anticipate however, that on-going discussions with the Forum will more focus on funding the right quantity and type of school improvement support and reviewing the impact and value for money of this support.

2023/24 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 2023/24.

Fund	Primary £	Secondary £	Total Value £
FSM Eligibility Assessments	£31,108	£6,900	£38,008
Fischer Family Trust – School Licences	£24,238	n/a	£24,238
School Maternity / Paternity 'insurance'	£552,523	n/a	£552,523
Trade Union Facilities Time	£90,561	£23,252	£113,813
Trade Union Health and Safety Rep Time	£13,839	£3,553	£17,392
School Staff Public Duties & Suspensions Fund	£19,466	n/a	£19,466
School Re-Organisation Costs – Safeguarded salaries	£13,818	£1,024	£14,842
School Re-Organisation Costs – Deficit Budgets *	£0	n/a	£0
Exceptional Costs & SIFD	£54,500	n/a	£54,500
School Improvement	£89,640	£23,016	£112,656
Totals	£889,692	£57,745	£947,437

* please note that de-delegation continued to be paused in 2023/24

The values in the above table were generated in 2023/24 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'	£26.44	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	£0.66	£0.19
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	£41.09	£9.48
Total Per FSM (Ever 6)	£5.80	£5.14

* please note that de-delegation continued to be paused in 2023/24

Each maintained school has contributed from its 2023/24 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 2024/25 FINANCIAL YEAR

This form can be used to submit your response. However, we encourage you to use the web-based questionnaire 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 28 NOVEMBER 2023

Please send completed questionnaire responses to:

andrew.redding@bradford.gov.uk

School Funding Team (FAO Andrew Redding)
City of Bradford Metropolitan District Council
Britannia House (6th Floor)
Hall Ings
Bradford
BD1 1HX

Tel: 01274 432678

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 2024/25 should fully mirror the DfE's 2024/25 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 2024/25? If not, please explain the reasons why not.

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

If not, please provide further explanation here:

Question 3 - Do you agree with the proposal to continue to use our existing formula for the apportionment of BSF DSG Affordability Gap funding in 2024/25? 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 2024/25 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 2023 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 2024/25? 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 2024/25? 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 2024/25 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 Andrew Redding by Tuesday 28 November 2023:

E-mail: andrew.redding@bradford.gov.uk

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