

## Response ID ANON-VMYX-T5B1-G

Submitted to Implementing the direct national funding formula  
Submitted on 2022-09-08 14:19:06

### Introduction

What is your name?

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

Organisation

What is the name of your organisation?

Organisation:  
Sandwell Metropolitan Borough Council

What type of organisation is this?

Please pick the organisation you belong to.:  
Local Authority

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

Please select:  
Sandwell

Would you like us to keep your responses confidential?

No

Reason for confidentiality (optional):

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

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

No

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

High Neds Block (HNB) budget is under significant pressure nationally and Sandwell is not immune to this. Until there is relative stability in funding this pressure nationally, government should not place restrictions on how this flexibility should be utilised when requesting transfer of funding from Schools Block to HNB.

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

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

Yes

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

We agree it would be useful to include an indicative SEND Budget which allows individual calculations at Schools level to be easily calculated. Most importantly, the new system should reinforce the expectation that mainstream schools should maximise this notional funding to support their pupils with SEND before seeking additional high needs funding.

### Growth and falling rolls funding

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

Please limit your answer to 200 words.:

Placing further requirement will further narrow Councils ability to flex their budgets for local circumstances and removes local judgement and input from Schools community. We are in support of more flexible approach taking into account local circumstances and working closely with our Schools to derive the best outcome for our residents.

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

Yes

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

Please limit your answer to 200 words.:

Covid has impacted the entire country significantly and education is not immune from this. Our main concern therefore will be the data sets that will be used as baseline by the Department. To mitigate this, it may be worthwhile to incorporate views from diverse representation of LAs when deciding on the baseline data set.

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

Yes

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

Yes

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

Please limit your answer to 200 words.:

In principle we agree as all schools should have access to the same opportunities of funding. This should be based on place planning whether falling rolls or growth, and should not be creating unhealthy competition among schools. We will not support a system that pits schools against each other but growth/falling roll funding should be targeted at areas where there are strategic need rather than at individual schools level. In addition, there should be transparency in the criteria used and the results openly shared and reported.

### Premises funding

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

Yes

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

Yes

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

The distance criteria should be shorter

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

That is about the right amount of funding

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

That is about the right weighting

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

Unsure

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

Please limit your answer to 200 words.:

On distance criterion, the DfE should consider other factors including (but not limited to) "separated by a building of Xm2 size or more and unconnected with the school and with no connecting access other than by public highway". Limiting the split-site funding to 60% of total lump sum may not work in the odd occasion where the secondary site approaches the size of the main building.

As LA do not have full responsibility for Academy and VA, the requirement to collect information from these sources has to be made mandatory otherwise, it may result in incomplete information being provided.

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

Yes

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

Please limit your answer to 200 words.:

The DfE should allow more flexibility around exceptional premises funding e.g. in PFi/BSF where schools contribution in index marked to RPIx for example. This is placing an inordinate additional burden on those schools.

The minimum funding guarantee (MFG) under the direct NFF

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

Yes

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

Yes

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

Please limit your answer to 200 words.:

Pupil-led funding protection does not automatically protect schools where there are falling rolls and such schools do not attract falling roll funding. Any changes to the current system should allow for this discrepancy. It is even important if the DfE is going ahead with growth funding for popular schools.

The annual funding cycle

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

Unsure

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

Please limit your answer to 200 words.:

We believe that both would be of use to schools so that they can assess their DfE calculated allocations and flex those to see what factors are driving allocations.

In addition, it is important that LA and other interested parties are able to see aggregated authority level allocations for their mainstream schools to compare themselves to near neighbours.

The DfE should not use the introduction of direct NFF as an excuse to further reduce LA education funding (either in RSG or CSSB). From the reading of this consultation, the requirement on LA to supply information to the DfE/ESFA has not significantly reduced. Although APT will no longer be required, there are additional requirements to supply information to DfE/ESFA and consult wider on other changes.

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

Please limit your answer to 200 words.:

If the DfE will still be able to meet current timelines for publication of High Needs Block allocation (usually in December), we would favour the delayed option where information is provided incorporating the October Census data. This will minimise additional work currently undertaken in revalidating figures in early January. Although delaying this till December will put pressure on LA budgeting process/deadlines.

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

One single data collection

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

Please limit your answer to 200 words.: