

## Response ID ANON-F67D-REJU-D

Submitted to Fair school funding for all: completing our reforms to the National Funding Formula  
Submitted on 2021-09-28 17:24:58

### Introduction

A What is your name?

Name:  
Kay Moore

B What is your email address?

Email:  
consultation@nnpf.org.uk

C What is the name of your organisation?

Organisation:  
National Network of Parent Carer Forums

D What type of organisation is this?

Role:  
Parent or Carer

E Which local authority area are you responding from?

Local authority:  
National

F Are you happy to be contacted directly about your response?

Yes

### Confidentiality

G Do you wish for your response to remain confidential?

No

### The scope of the end state NFF

1 Do you agree that our aim should be that the directly applied NFF should include all pupil-led and school-led funding factors and that all funding distributed by the NFF should be allocated to schools on the basis of the hard formula, without further local adjustment through local formulae?

Yes

### Developing the schools NFF to support the end state NFF

2 Do you have any comments on how we could reform premises funding during the transition to the directly applied NFF?

Please comment::

### Growth and falling rolls funding

3 Do you agree with our proposal to use national, standardised criteria to allocate all aspects of growth and falling rolls funding?

Yes

4 Do you have any comments on our proposed approach to growth and falling rolls funding?

Please comment::

Growth funding and falling rolls funding in the hard NFF will need to take into consideration the number of pupils who have special educational needs so that the amount of funding allocated reflects the additional costs or potential savings to a school.

## Next steps for the transition to the end state NFF for schools

5 Do you agree that, in 2023-24, each LA should be required to use each of the NFF factors (with the exception of any significantly reformed factors) in its local formulae?

Yes

6 Do you agree that all LA formulae, except those that already 'mirroring' the NFF, should be required to move closer to the NFF from 2023-24, in order to smooth the transition to the hard NFF for schools?

Yes

7a Do you agree that LA formulae factor values should move 10% closer to the NFF, compared with their distance from the NFF in 2022-23?

Unsure

7b If you do not agree, can you please explain below.

Please comment::

8 As we would not require LAs to move closer to the NFF if their local formulae were already very close to the NFF, do you have any comments on the appropriate threshold level?

Please comment::

## Next steps for the transition to the end state NFF for schools

9 Do you agree that the additional flexibility for LAs in the EAL factor, relating to how many years a pupil has been in the school system, should be removed from 2023-24?

Yes

10 Do you agree that the additional flexibilities relating to the sparsity factor should remain in place for 2023-24?

Yes

## Central school services

11 Are there any comments you wish to make on the proposals we have made regarding ongoing central school services, including on whether in the future central school services funding could move to LGFS?

Please comment::

For children and young people with SEND the central school services are extremely important and valued for example, the Education Psychology service, school improvement.

The NNPCF have some concerns regarding the proposal that in the future central school services funding should move from the DSG to LGFS as the funding would not be ring-fenced.

12 Do you agree with the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs?

Unsure

## A consistent funding year

13 How strongly do you feel that we should further investigate the possibility of moving maintained schools to being funded on an academic year basis?

Neither agree nor disagree

14 Are there any advantages or drawbacks to moving maintained schools to being funded on an academic year basis that you feel we should be aware of?

Please comment::

## Equalities Impact Assessment

15 Please provide any information that you consider we should take into account in assessing the equalities impact of the proposals for change. Before answering this question, please refer to Annex (C) of the consultation document.

Please comment::

Parent Carer Forums report that they were not able to identify which of the national funding formula factors are most important in providing schools with funding to ensure they meet the needs of pupils with SEND.

Parent Forums are aware of the links between SEND and deprivation, EAL, low prior attainment and high pupil mobility as indicators of high costs, however, they do not fit well with low incidence, high needs costs (NAO).

## Further comments

16 Do you have any further comments on our move to complete the reforms to the National Funding Formula?

Please comment::

The NNPCF welcome reforms to the National Funding Formula that will enable fair school funding for all.

The NNPCF have the following keys messages:

1. Make sure there is enough money and spend it well

There needs to be greater clarity about the services that need to be provided across the system for children and young people with SEND including those who attend mainstream schools and who are supported by notional SEND funding at SEN Support level.

The NFF will eliminate the postcode lottery that our members currently face. However, this NFF alone will not resolve the disparity in offer across and within local areas. There is also a cultural change needed, a recognition that 'these are our children' and that SEND is everyone's responsibility.

The NNPCF would like to see a national minimum standard to be introduced in terms of what schools should provide to meet the needs of children and young people with SEND through a graduated framework.

Many interventions would not be expensive and would be covered under the category of reasonable adjustments if schools and MATs were willing/able to become more inclusive.

In order to ensure that there are sufficient funds in the system it is important for local authorities to gather data around use of SEND budgets in schools in a similar way to pupil premium. This would enable Local Areas to identify how the SEND Notional budgets are being used and to measure impact.

The NNF will provide national guidance on "what funding is available" across education settings, however, there also needs to be clear guidance on 'who pays for what' across education, health and social care for SEND pupils. This would eliminate the gaps, overlaps and disconnects in local commissioning and drive more joined up system working. Schools would know what they needed to commission themselves and what is commissioned across the Local Area.

2. Accountability

The NFF will develop a sustainable and fair school funding system for all but there needs to be corresponding accountability.

Local areas (including school partners) need to have a really good, shared understanding of local SEND needs to ensure that they can jointly prioritise, commission and deliver services that meet these needs.

Greater coproduction and transparency over the use of SEND budgets will ensure that money is being spent effectively.

We need to ensure that the money spent on individual children is spent effectively. There needs to be more accountability about how money is spent supporting each child and what the impact is in terms of their education and wider outcomes.