Response ID ANON-F6/D-REK8-H
Submitted to Fair school funding for all: completing our reforms to the National Funding Formula Submitted on 2021-09-29 08:44:55
Introduction
A What is your name?
Name: Andy Bryson
B What is your email address?
Email: andy.bryson@stockton.gov.uk
C What is the name of your organisation?
Organisation: Stockton on Tees Borough Council
D What type of organisation is this?
Role: Local authority
E Which local authority area are you responding from?
Local authority: Stockton-on-Tees
F Are you happy to be contacted directly about your response?
No
Confidentiality
G Do you wish for your response to remain confidential?
Yes
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?
No
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::
No
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?

Please comment::

 $4\ \ \text{Do you have any comments on our proposed approach to growth and falling rolls funding?}$

No

The proposed system would require the LA to use the current return for school places to identify basic need growth. Basic need growth can be predicted in overall numbers, but with parental preference it is difficult to accurately forecast where children will actually attend school.

The proposals state that only academy schools would be eligible for popularity growth funding. This is not fair, transparent or consistent. A maintained school could also see popularity growth due to a number of factors such as a new outstanding Ofsted rating, new provision such as a nursery class, post 16 or wrap care.

The timing of the additional data collection is not mentioned, and the consultation does not stipulate who would undertake this additional data collection. If the hard NFF was in place and these proposals in place, a newly converted academy would have attracted additional funding when pupil numbers increased after conversion, but a maintained school in the same position would not. This proposal described as a "standardised approach" but it is clearly not standardised for all schools that are publicly funded as maintained schools cannot access this funding.

There is a likelihood of it becoming overly complicated and bureaucratic.

Any proposals should apply consistently and fairly to all mainstream schools and schools should not be disadvantaged because they are maintained schools.

Any additional burdens for local authorities arising from the change in growth funding including additional data collation and presentation will need to be funded.

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?

Yes

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

Please comment::

this would depend on affordability in terms of the available funding, taking into account any agreed transfer to other blocks

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::

No

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::

If funding moves into the LGFS, it will no longer be ringfenced and could be subject to future year cuts due to wider council budget pressures. Local authorities need to be funded appropriately to deliver these essential statutory services.

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?

Strongly 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::

No, Stockton is strongly opposed to this proposal. The shift to funding maintained schools on an academic yearly basis would be extremely challenging. Local Authority accounts are already extremely complex and time-consuming documents to produce without the extra challenges that this would bring. If you do decide to go down this route you need to start early discussions with CIPFA so that changes to the Prudential Code can be made.

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::

No comment

Further comments

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

Please comment::

No comment