

NGA's response to the 'Implementing the direct national funding formula' consultation

Background

This consultation took place from 7 June 2022 to 9 September 2022. It sought views on implementing the direct NFF, to ensure it is carried out effectively. The consultation follows the DfE's summer 2021 consultation, 'Fair school funding for all: completing our reforms to the NFF', which NGA also [responded](#) to.

NGA's response to specific questions in the consultation

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? 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.

Yes. In principle we support the flexibility of LA seeking transfers to support relevant activities. However, we are concerned about LA having to do this due to the lack of sufficient and equitable funding.

Do you agree that the direct NFF should include an indicative SEND budget, set nationally rather than locally? If you wish to explain your answer, please do so.

Unsure. We are unsure about the value of maintaining the notional SEND budget and the concept, which seems at odds with the NFF. Those governing schools are often confused by the concept of the notional SEND budget and assume that it is a separate funding allocation.

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

No, other than noting the wider concerns raised by those governing about the impact on their budgets caused by fluctuations in pupil numbers.

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

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

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

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

We strongly believe that the approach should be equitable and accessible to all schools, irrespective of their governance structure.



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

We support this in principle but require more information regarding the process and how it will ensure a fair outcome at individual school level.

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

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?

We are supportive both of notional allocations and a calculator tool to support school financial planning.

Steve Edmonds

Director of Advice and Guidance
National Governance Association
steve.edmonds@nga.org.uk

September 2022