

Consultation Response to the EYNFF & MNS

Opened 4th July 2022

Closed 16th September 2022

Question 1

Do you agree with our proposal to update the underlying data in the additional needs factor in the EYNFF?

In principle yes, it makes sense to use the most up to date census data, but there are concerns around the approach being used. See below.

Question 2

Do you agree with our proposal to move to using the free school meals headline measure?

Yes, widening the dataset for FSM and taking into account the whole demographic, would be acceptable as long as it is reflective of the demographic profile.

Question 3

Do you agree with our proposal to update the way in which the Disability Living Allowance data is used?

Yes, in principle, funding would be targeted more using eligibility rather than claimants. Would be useful to be able to access the dataset to target DAF too.

There are however, concerns again around this being reflective of the whole demographic profile.

Question 4

Do you agree with our proposal to update the underlying data used in the area cost adjustment in the EYNFF, in particular the rateable values data and the GLM data, when available?

Yes in principle, the GLM data would seem to be a sensible proxy to use, however the data is so out of date (2013-14) it is not reflective of current circumstances.

Using up to date data, as you say you intend to use, would still be out of date by the time you use it. (data from 2021-22 being used for 2024-25) You state the delay in analysing the most up to date data is why you are still using 2013-14, the concern would be, will there be a further lag building up when the next data set has been analysed and the baseline will become a historical baseline again not reflecting circumstances at the time.

Rateable Values – yes in principle, but concerns around it only being applied to the universal element of the EYNFF and not EFE.

Question 5

Do you agree with our proposed amendments to the proxy measure for premises related costs in the EYNFF, including introducing schools rateable values data?

In principle yes, however in relation to the floor area being used. My question would be how are you measuring the floor area as there are specific calculations. Types are glass to glass or teaching areas (excluding cupboards on floors etc).

If it's fair and consistent yes.

Question 6

Do you agree with our proposed approach to mainstreaming the early years element of the teachers' pay and pensions grants?

No, the guidance is vague and the intention that LA's should make the decision about how to target goes against equity policy for hourly pupil rates. I.e. The increase in hourly rate is based on schools only historical pay and pension grant allocations, but LA's can decide on how to distribute.

To target this funding appropriately would mean introducing a quality element and data collection and verification is not only difficult but extremely time consuming. The quality element would again widen the gap between schools and PVI's and completely detract from the fundamental policy of starting from a level playing field.

This funding should remain a separate grant.

Question 7

Do you agree with our proposal to update the operational guide to encourage local authorities to take account of additional pressures that some providers might face using the existing quality supplement?

As above

Question 8

Do you agree with our proposal to update the underlying data in the area cost adjustment in the 2-year-old formula?

Same principles apply as for the 3 & 4 year old response. Agree in principle but have concerns about rationale on % proportions used.

The GLM data would seem to be a sensible proxy to use, however the data is so out of date (2013-14) it is not reflective of current circumstances.

Using up to date data, as you say you intend to use, would still be out of date by the time you use it. (data from 2021-22 being used for 2024-25) You state the delay in analysing the most up to date data is why you are still using 2013-14, the concern would be, will there be a further lag building up when the next data set

has been analysed and the baseline will become a historical baseline again not reflecting circumstances at the time. .

Question 9

Do you agree with our proposal to introduce a proxy for premises related costs into the 2-year-old formula?

Comments as 3 & 4 year olds.

Question 10

Do you agree with our proposed approach to protections in the EYNFF for 2023-24?

No – the rolling in of the TPPG and funding through MNS is included in the calculation of the floor as a minimum level of funding. This level of funding should be in addition to the floor as calculating the floor including this funding does not have the impact it is designed to have. Plus, by capping funding, this is still an indicator that there is insufficient funding within the Early Years block as a whole. Capping funding means funding due to LA's is taking too long to reach areas of country where it is needed to protect LA's who have higher levels of funding elsewhere historically.

Question 11

Do you agree with our proposed approach to protections in the 2- year-old formula for 2023-24?

Yes, but again by capping funding, this is still an indicator that there is insufficient funding within the Early Years block as a whole. Capping funding means funding due to LA's is taking too long to reach areas of country where it is needed to protect LA's who have higher levels of funding elsewhere historically.

Question 12

Do you agree with our proposal to introduce a minimum hourly funding rate and a cap on the hourly funding rate for MNS supplementary funding?

Agree on the principle of having a minimum hourly funding rate, but to ensure that MNS is outside the floor calculation.

Question 13

Do you agree with our proposed approach to rolling the teachers' pay and pensions grants into MNS supplementary funding?

Although the principle would seem right for these types of providers as they do not have economies of scale that other schools have to financially sustain the leadership and management structures within them, it still needs noting that it goes against equity policy for hourly pupil rates.

Question 14 – Equalities Impact

Do you have any comments about the potential impact, both positive and negative, of our proposals on individuals on the basis of their protected characteristics? Where any negative impacts have been identified, do you know how these might be mitigated?

Deprivation and 2YO funding impact, using underlying datasets is of benefit

Question 15

Are there any other comments that you would like to make about our proposed reforms?

We would like to re-iterate that the views of our early years sector providers, is that funding within Early Years sector as a whole is insufficient and the pressures providers are going to face in the near future such as rates and energy cost increases will have a significant negative financial impact upon them and lead to sustainability issues.

[Early years funding: changes to funding for 3 and 4 year olds - Department for Education - Citizen Space](#)

[An early years national funding formula - consultation \(education.gov.uk\)](#)

[Early Years Technical Annex \(education.gov.uk\)](#)

[Equality assessment \(education.gov.uk\)](#)