

Response ID ANON-8PBM-MTRP-T

Submitted to **Early years funding: changes to funding for 3 and 4 year olds**

Submitted on **2016-09-22 10:49:54**

Introduction

1 Welcome - would you like to provide your email address?

Email:

tim.davis@telford.gov.uk

2 Would you like to tell us the name of your organisation?

Organisation:

Telford & Wrekin Council

About you

3 We'd like to know which area of the early years sector your answers represent. Which of these categories best describes your role in the sector?

This is a drop down menu of different categories of respondent - from nursery to local authority:

Local Authority

If you have answered 'other' please provide more details::

4 In which region do you work?

A drop-down menu of the 9 regions of England:

West Midlands

5 If you are not responding as a local authority, which local authority you work in?

A list of all the local authorities in England:

6 If you are a childcare provider, do you consider yourself to work in a:

7 If you are a childcare provider, how many children can your individual setting offer places to?

Not Answered

8 If you are a childcare provider, do you offer the free entitlement to:

Page 2 - Early Years National Funding Formula

9 Should there be an early years national funding formula (to distribute money from Government to each local authority)?

Yes

10 Considering a universal base rate of funding which does not vary by local area...

Base rate (EYNFF) - Should a universal base rate be included in the early years national funding formula?:

Yes

Base rate (EYNFF) - Is 89.5% of overall funding the right amount to channel through this factor?:

Unsure

11 Considering an additional needs factor...

Add needs - metrics - Should an additional needs factor be included in the early years national funding formula?:

Yes

Add needs - metrics - Do we propose the correct set of metrics?:

Yes

Add needs - metrics - Do we propose the correct weightings for each metric?:

Unsure

12 Considering an area cost adjustment...

ACA - Should the early years national funding formula include an area cost adjustment?:

Yes

ACA - Should that adjustment be based on staff costs (based on the General Labour Market measure) and on nursery premises costs (based on rateable values)?:

No

13 If you have any comments or recommendations for alternative metrics or weightings to be used in the early years national funding formula, please explain here:

This box allows you to write an answer freely:

We are not convinced that the extremely large increase in funding that the proposed ACA delivers to settings in London and the South-East is justified. The consultation states that 'variations in average early years wage costs correlate well to the general labour market'. What exactly does 'correlate well' mean? Given that it is the main contribution to an almost doubling of funding to some areas we would have hoped to see a detailed justification rather than a single phrase.

14 To what extent do you agree with the proposed funding floor limit, so that no local authority would face a reduction in its hourly funding rate of greater than 10%?

Strongly disagree

Page 3 - Two technical questions

15 To implement the increased hourly rate for the two-year old free entitlement...

2YO - Should we retain the current two-year-old funding formula?:

Yes

2YO - Should we use the additional funding secured at the spending review to uplift local authorities' allocations based upon this?:

Yes

16 Considering the Dedicated Schools Grant, should the free entitlement be capped at 30 hours for children of eligible working parents and 15 hours for all other children?

Yes

Page 4 - A high pass-through of local authority funding to providers

17 Should Government set the proportion of early years funding that must be passed on to providers?

No

18 Do you think that 95% is the correct minimum proportion of the money that should be passed from local authorities to providers?

No, 95% is too high

19 If you would like to explain a response you've submitted on this page in more detail, please do so here:

This box allows you to write an answer freely:

The DfE is proposing a nationally driven distribution methodology whilst the DCLG is considering LAs funding this from local resources. We do not see how a national formula can operate without national funding, so the increase in restrictions on what LA can do directly contradicts the policy direction of another department. Paragraphs 185 to 188 offer no reassurance that the restrictions proposed in this consultation will not in future lead to unaffordable, nationally set early years funding in some areas.

Page 5 - How money is distributed from local authorities to childcare providers

20 Should local authorities be required to give the same universal hourly base rate to all childcare providers in their area?

No

21 Considering funding supplements that local authorities could choose to use (above the universal base rate)...

Supplements - Should local authorities be able to use funding supplements?:

Yes

Supplements - Should there be a cap on the proportion of funding that is channeled through supplements?:

No

22 If you agree that there should be cap on the proportion of funding that is channeled through supplements, should the cap be set at 10%?

Not Answered

23 Should the following supplements be permitted?

Basket of supplements - Deprivation:

Yes

Basket of supplements - Sparsity / rural areas:

Yes

Basket of supplements - Flexibility:

Yes

Basket of supplements - Efficiency:

Yes

Basket of supplements - Additional 15 hours of childcare:

Yes

24 When using funding supplements, should local authorities have discretion over the metrics they use and the amount of money channeled through each one?

Metrics & amount - supplements - Deprivation:

Yes - over the metric they use, Yes - over the amount of money

Metrics & amount - supplements - Sparsity / rural areas:

Yes - over the metric they use, Yes - over the amount of money

Metrics & amount - supplements - Flexibility:

Yes - over the metric they use, Yes - over the amount of money

Metrics & amount - supplements - Efficiency:

Yes - over the metric they use, Yes - over the amount of money

Metrics & amount - supplements - Additional 15 hours of childcare:

Yes - over the metric they use, Yes - over the amount of money

25 If you agree that efficiency (efficient business practices that provide excellent value for money) should be included in the set of supplements, do you have a suggestion of how should it be designed?

This box allows you to write an answer freely:

26 If you agree the delivery of the additional 15 hours of free childcare should be included in the set of supplements, do you have a suggestion of how should it be designed?

This box allows you to write an answer freely:

27 If you think that any additional supplements should be permitted which are not mentioned here, please set out what they are and why you believe they should be included:

This box allows you to write an answer freely:

This consultation response form leaves entirely unmentioned the subject of maintained nursery schools (MNS). A key question is if the supplementary funding proposed to be provided to LAs for MNS ceases, in as little as two years, will LAs continue to be able to choose to provide additional funds from the general EY allocation? Currently this consultation has succeeded in placing a medium term cloud of uncertainty over the future of MNS - and doesn't even invite any consultation comments on this matter! More clarity is needed as a matter of urgency, not merely in the vaguely phrased 'due course' (paragraph 149 of the consultation document).

28 Finally, for this page, if you want to explain a response you've submitted on this page in more detail, please do so here:

This box allows you to write an answer freely:

Page 6 - Funding for disabled children

29 Should there be a Disability Access Fund to support disabled children to access their free entitlement?

Yes

30 Should eligibility for the Disability Access Fund be children aged 3 or 4 which are a) taking up their free entitlement and b) in receipt of Disability Living Allowance?

Yes

31 When it comes to delivering the funding for the Disability Access Fund, is the most appropriate way the existing framework of the Early Years Pupil Premium?

Unsure

32 If you want to explain a response you've submitted on this page in more detail, please do so here:

This box allows you to write your answer freely:

Page 7 - Funding for children with special educational needs

33 To what extent do you agree that a lack of clarity on how parents / childcare providers can access financial support results in children with special educational needs not receiving appropriate support? (We mean children who do not already have an Education, Health and Care Plan)

Neither agree nor disagree

34 When it comes to establishing an inclusion fund...

SEN - inclusion fund - Should local authorities be required to establish an inclusion fund?:

Disagree

SEN - inclusion fund - Would an inclusion fund help improve the supply of appropriate support children receive when in an early years setting?:

Disagree

35 If you envisage any barriers, arising from existing practice or future proposals, to introducing a new requirement on local authorities to establish an inclusion fund, please tell us what they are and how they might be overcome:

This box allows you to write an answer freely:

36 When it comes to the SEN inclusion fund, should local authorities be responsible for deciding...

SEN - local authority role - The children for which the inclusion fund is used?:

Yes

SEN - local authority role - The value of the fund?:

Yes

SEN - local authority role - The process of allocating the funding?:

Yes

37 Where specialist SEN or SEND services are delivered free at the point of use, should they be considered as funding passed directly to providers for the purposes of the 95% high pass-through?

Agree

38 If you want to explain a response you've submitted on this page in more detail, please do so here:

This box allows you to write an answer freely:

Page 8 - Transitions to a new funding system

39 To what extent do you agree with the transition approach proposed for the Early Years National Funding Formula (money distributed from Government to local authorities)?

Disagree

40 To what extent do you agree with the transition approach proposed for the high pass-through of early years funding from local authorities to providers?

Disagree

41 To what extent do you agree that our proposals on the high pass-through of funding from local authorities to childcare providers makes the existing Minimum Funding Guarantee for the early years unnecessary?

Agree

42 To what extent do you agree with the transition approach proposed for introducing the universal base rate for all providers in a local authority area?

Disagree

43 If you want to explain a response you've submitted on this page in more detail, please do so here:

This box allows you to write an answer freely:

Page 9 - Equality Assessment

44 Please provide any representations and/or evidence on the impact of our proposals for the purposes of the Public Sector Equality Duty (Equality Act 2010). The protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race (including ethnicity); religion or belief; sex and sexual orientation.

This box allows you to write your answer freely:

This is not a response to the equality assessment but a response to Q14. No reason is given in the documents regarding why it is justifiable to keep LAs currently more than 10% above the national funding formula level at a permanently higher funding level, i.e. by proposing a maximum decrease of 10%. It therefore appears that what is proposed is not a genuinely national formula, but a means of keeping some LAs at a permanently higher level of funding.

As a general point, it is poor practice to allow comments on only some of the questions. This is bound to result in an incomplete picture of consultee opinions. It seems that the DfE is attempting to gloss over certain areas by restricting the ability to comment., or, in the case of MNS, by not even mentioning the issue in this response document.

It is also unhelpful that no ability to print a draft response is provided. Many consultees will wish to produce a draft response and then circulate for comments. The Department has made this process unnecessarily difficult.