

Appendix A

DRAFT Schools National Fair Funding Consultation response:

Question 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/ No / Unsure](#)

No

Question 2: Do you have any comments on how we could reform premises funding during the transition to the directly applied NFF? [Comments](#)

PFI Factor:

It is difficult to see how a consistent national PFI factor could possibly cover all of the intricacies of the many different PFI schemes without reference to the actual costs of each individual scheme.

We welcome the DFE comments about exploring a 'bottom up' funding model for this factor and also the separate consultation on the PFI factor due in the future. It is key that the DFE do recognise that these are complex contractual obligations and any attempt to generalise the associated funding into a per PFI school value or flat % would create affordability problems on the PFI contract.

Exceptional Circumstances:

Whilst we do not currently use this factor we would observe that a factor value limit of 1% of a schools budget is a very small level of contribution. For a medium sized primary school this would only amount to a ca. £25k contribution which may not be sufficient to support a school's additional costs which could in reality could be much more significant than this; such as additional premises costs due to listed building status.

Split Site:

It is important to recognise that there are genuine additional costs to schools as a result of operating across more than one site. It may be difficult to determine a single national split-site factor value as costs will vary depending on whether the split site is a building with classrooms or a playing field, or whether staff are required to travel between sites on a daily basis etc. Should the department wish to press ahead with nationalising this factor it should definitely be part of a separate consultation so that LAs in partnership with schools can make informed and evidenced comments & suggestions on the specific proposals once further developed.

Question 3: Do you agree with our proposal to use national, standardised criteria to allocate all aspects of growth and falling rolls funding? [Yes/ No / Unsure](#)

No.

Question 4: Do you have any comments on our proposed approach to growth and falling rolls funding? [Comments](#)

Standardised criteria would provide consistency but this would be at the cost of removing local control of this growth funding, which will have a significant detrimental impact on the LA's ability to effectively manage its statutory duty to secure a sufficiency of school places. We firmly believe that local control of this growth funding is necessary to give LAs flexibility to manage the more complex elements of school place planning and ensure places are consistently available for all children, especially in Local Areas facing rapid growth fluctuations and mobility.

Growth Funding:

If this is to go ahead then it is key to determine what 'significant' means as LAs need to be a position where they can negotiate and convince a school/academy to expand, and ensure they will receive appropriate financial support, otherwise schools will be at a financial disadvantage and will not agree to an expansion. For example, in previous instances the LA has been able to agree a staggered expansion over two years to meet rising demand, in a way that was sustainable for the school to manage. Applying a standardised criteria risks that each annual step of a staggered expansion would not be recognised as 'significant' by the DFE, because the cumulative effect would not be clearly evident in a single year and growth funding may not therefore be allocated. This will hamper a LAs ability to deliver sufficient places; risk a breach of statutory duty and potentially displace children from the school system.

As part of our secondary expansion strategy we rely heavily on schools taking temporary 'bulge' classes as we do not wish to permanently expand schools which we know will shrink in the next few years due to the low birth rate that has impacted primary schools over the last several years. It is crucial that the DFE recognise temporary expansions as having equal importance with permanent expansions (with equal financial support) as a key part of LAs' toolkits to deliver sufficient school places.

The proposal to recoup overpayments from schools in the following year (if planned growth did not materialise) raises further sustainability concerns. Schools have to plan for expansion in advance of the new year, which includes recruitment of additional staff and the creation of additional class groups. Reducing growth allocations retrospectively if numbers don't materialise will present schools with an additional financial burden, or will cause schools to hold on until the last possible minute to recruit so they can be certain funding will be secure - this potentially reduces the quality of available candidates and therefore will negatively impact on children's education.

Changes to a schools' projected pupil numbers can also be sudden and last minute and can be affected by the PAN decisions of an academy in a neighbouring LA – meaning changes would be totally outside of the school or the LA's control. This proposal would risk penalising a school that had planned appropriately with good intent, because of a decision made outside of the system – this further exemplifies why this proposal for retrospective adjustments does not fit the processes schools are working within.

The LA already does detailed school level forecasts via the SCAP return – it would be helpful; and save duplication if the DFE could work to amend the existing return to collect the relevant data rather than requiring a new additional return.

Falling Rolls:

We do not agree that there should be a requirement for supported schools to only be rated by 'good' or 'outstanding' by OFSTED and this is the key reason that a falling rolls fund was not agreed by our Schools Forum. If it can be evidenced that the place capacity will be needed again in subsequent years, then the school should be supported financially to retain its capacity. Not doing so will cause the school financial difficulties as it seeks to ensure it can continue to meet future demand pressure with reduced funding, or if unable to do so, will mean the LA will need to seek expansion from another school leading to another example of financial inefficiency as one school is paying redundancy costs whilst another received money for expansion.

It is a fact that the OFSTED inspection programme is now significantly behind the inspection schedule and will continue to be for a period of time. This means that current categorisations will not necessarily match the current performance of schools thereby not recognising the improvement journey of a school that may have been placed in a lower category than good or outstanding but has been successful in its upward trajectory and if inspected now would meet the criteria proposed.

Under the proposed criteria, very few Primary schools would be eligible for funding for Falling Rolls funding, as it is dependent upon capacity being likely to be used by mainstream within 3 years,. A 3-year cycle is too short a period for demonstrating the changes in peaks and troughs in birth rate, For example our peak of Secondary numbers is 6 years, and the decline in birth rate is at 5 years currently. We propose to extend this to a 5 year period for reusing capacity.

Popular Growth

We do not agree with the proposed approach to deal with popular growth. The position set out on 'popular growth' would not meet the definition of a national standardised criteria as it excludes maintained schools from receiving an allocation. It also does not recognise, and would undermine the ability of maintained school leadership to improve school performance, despite countless examples of this happening across the country. This could be interpreted as discriminatory.

Whilst it is recognised that the Government has articulated an intent that all maintained schools should be academised in the long term, the withholding of **necessary** financial support to a proportion of publicly funded schools on the grounds of their legal status, is in direct conflict with the stated ministerial aim of a "funding system that is fair for every school, with funding matched to a consistent assessment of need". It is therefore evident that this proposal would not be fair and risks adversely affecting the educational progress of children in maintained schools where growth is a result of its popularity (and implied success).

It also risks being viewed as a financial incentive to schools to academise, which was the position we found ourselves in previously, and which the schools system has subsequently worked hard to eradicate, to ensure a level playing field and fair treatment for all children and young people regardless of the status of school they attend.

We also query how the DFE would propose to separate out the basic need growth as opposed to popular growth? From a forecasting perspective this would be difficult to and would need checks to ensure that schools wouldn't be double funded under this criteria. For example, we have several schools in the city, where the number on roll has increased, within current PAN, however the popularity of the school (i.e. first preferences) hasn't increased.

Question 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 / No / Unsure](#)

No

Question 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 / No / Unsure](#)

No

Question 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 / No / Unsure](#)

No

Question 7b: If you do not agree, can you please explain why? [Comments](#)

Should all of the NFF Factors be compulsory from 2023/24

No, as in our previous responses we do not agree that a nationally prescribed formula for all schools is the right approach. We continue to believe that LAs have knowledge of local factors and understand the context of the local requirements of schools and therefore are best placed to distribute funding in the most effective way for the children in their authorities. Whilst Coventry does already use each of the NFF factors this is out of necessity, due to the high number of schools we have on the protection mechanism and the lack of flexibility this affords, rather than due to a view that the NFF is the correct formula.

Should LAs have to move closer to the NFF values from 2023/24

For schools who are due to gain from the NFF, having a step by step transition towards the NFF values, and having the size of those steps scaled by the current difference between LA formula values and the NFF values, would seem sensible on the face of it as it would ensure that those schools gaining from the NFF see more of those gains earlier whilst losing schools remain protected on a per pupil basis.

However, following this approach would likely create an affordability issue for some LAs that have a mix of both gaining and losing schools. This would happen because additional funding would be required to support any schools that gain from the factor value changes, whilst schools that lose from the same changes would continue to be protected by the Minimum Funding Guarantee protection. This would create a funding pressure that would not be met by additional funding from the Department, and would require LAs to either cap/scale back the funding increases of gaining schools or to reduce the funding protection for schools which do not benefit from the NFF.

We believe it should only be a requirement for schools to move 10% closer to the NFF where it can be achieved without LAs needing to increase capping/scaling for gaining schools or reducing MFG protection for losing schools vs the previous year. As set out within

the consultation document itself, changes to factor eligibility levels can affect the affordability of the funding formula – where this happens the solution should not be to force LAs to reduce schools' MFG protection levels or NFF gains in order to deliver an arbitrary % move towards the NFF.

Whilst not being directly consulted on at this time, the consultation also discusses the potential need to give "LAs greater flexibilities over the level of MFG in order to manage potential affordability pressures" and also sets out the aim that "no school will see a cash-terms loss in per pupil funding as a result of the move towards a hard NFF". We interpret this as a strong indication of an intention to scale back protection for schools that do not gain under the NFF, guaranteeing no more than flat cash per pupil protection between years (currently all schools are guaranteed a minimum 2% increase). This appears to be a very low bar for 'protection' in any terms, and is unlikely to be welcomed by an education system, that is currently working very hard to recover from a time of national crisis. We envisage a strong national response to this and advise that any further consideration affirms a commitment to per pupil funding increases for all schools so that they are not forced to identify savings and make redundancies at a time when school leaders are concentrating on recovering lost educational progress.

Question 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? [Comments](#)

Given that the majority of funding factors are 3 figure values, a 1% threshold gives a very small £10 variance level for LAs to be considered as mirroring the NFF. Even a 5% threshold would still provide a very close correlation with the NFF and would offer some additional flexibility (and affordability) should there be a significant data change to a factor's pupil data between the DFE data point and the Oct census data point (such as recent ones on IDACI and Free School Meals).

Question 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 / No / Unsure](#)

Yes

Question 10: Do you agree that the additional flexibilities relating to the sparsity factor should remain in place for 2023-24? [Yes / No / Unsure](#)

Unsure

Question 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? [Comments](#)

Firstly, we would want to bring to your attention the other relevant and ongoing Local Authority responsibilities for all schools which the consultation omits, which could lead to a misleading conclusion if not considered. In addition to admissions and monitoring school attendance, there are a number of duties including asset management, and Statutory / regulatory duties which is a wide-ranging area including strategic responsibilities for Children's Services (e.g. planning for the whole education service - not just schools), finance and funding responsibilities, audit responsibilities linked to S151 responsibilities, and other more specific duties.

The consultation also refers to funding for central services and how schools should have maximum control over 'their' funding. This implies that this funding has been taken from schools, but that is not the case. The funding for central services that was transferred into the DSG came from the former ESG, and before that it was part of the local authority budget for education central services, it could be viewed as disingenuous and misleading to imply anything other. Taking funding away from central education services, and positioning it as *additional* resource for schools, will result in a further fragmentation of the education system and we would have significant concerns about this proposition.

Further cuts to the funding for central services will significantly limit the ability to take a strategic area-based approach at a time when we believe the system needs it the most. The Covid-19 pandemic has further widened the poverty gap, which will have wide-ranging impact across the whole of society. We need to work together with all appropriate partners with a joint strategic focus to enable a proper and effective response for all children and young people. The Covid-19 pandemic has highlighted the importance of the continuing role LAs play in leading, maintaining and supporting a strong education partnership and the wider schools' system. Throughout the pandemic the LA has continued to provide high quality, timely and tangible support to all schools both individually and as part of the Education Partnership. We have also regularly provided information for the RSC and DfE for all schools not just maintained.

One of the significant flaws of this direction of travel is that the 'schools block' is being looked at and considered in isolation, without regard to the whole education system and the wider role of the LA across this system including early years and high needs and wider pupil entitlement. We know that our education partnership approach has helped us manage the high needs provision and funding challenge to date, as demonstrated by our financial position and management of high needs demand. We take our safeguarding responsibilities for all children and young people in the city extremely seriously and therefore our continued role in supporting the education partnership and jointly identifying citywide priorities is key to future success. One further example of this siloed approach is the separate conversations that are taking place about the School Improvement Brokering & Monitoring grant.

In addition, we are concerned that the questions raised in this consultation appear silent on the SEND framework. The high needs block remains very fragile as LAs balance the ongoing service demand stimulated by current Government guidance (which has been subject to national review and declared not fit for purpose), any fragmentation, diversion or dilution of this will bring further chaos to an already broken system. It seems misbalanced to overhaul a financial system without any indication of the future direction of SEND.

It is unclear how the mechanisms of de-delegation work under a national funding formula, but clearly academies are not able to de-delegate funding currently so this approach would not work for central services where we have responsibilities for all schools. If a LA has duties to provide a service then we should not be in a position where we have to negotiate with schools in order to receive that funding.

Regarding the potential transfer of funding into the LGFS. We would observe that where specific funding streams have previously been transferred into the wider local government settlement this has prevented councils maintaining any visibility on that element of funding. This has enabled Government to claim that it has maintained funding for services 'within the settlement' at the same time as reducing the overall level of funding.

A move to transfer central school services funding into the LGFS is therefore likely to represent a further erosion of 'central DSG' funding in the medium/long term, and put pressure on Local Authorities to reduce their central school services (many of which are statutory duties) or to spend additional wider LGFS money as cost/pay inflation increases on former CSSB areas.

There is no reference in the document to the fact that TPS Grant for Local Authority Centrally Employed Teachers is now part of Central Block. We have raised our concerns about this previously, both from the perspective of how the DfE will ensure that funding continues to reach LA's at the correct level and also the lack of transparency around the fact that future changes will impact services outside of the Central Block e.g. Adult Education. If a legacy grant is being considered for some historic commitment items then why can't LA's continue to receive this funding via a separate grant, maintained at the original baseline level.

Question 12: Do you agree with the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs? [Yes / No / Unsure](#)

Yes

Question 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 agree / Agree / Neither agree or disagree / Disagree / Strongly disagree](#)

Neither agree or disagree

Question 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? [Comments](#)

From an LA accounting perspective we have no strong view on whether this should or shouldn't be investigated. As long as the funding allocations for the financial year are clear then any obstacles to clear accounting protocols should not be insurmountable. We would observe that there is plenty of scope to improve the current statutory financial reporting requirements surrounding Dedicated Schools Grant and this may be an ideal opportunity to do just that.

From a school funding perspective there does not appear to be a clear enough benefit to this move to outweigh the disadvantages:

Moving maintained schools to the same funding year as academies will increase the funding lag between the point at which funding allocations are calculated vs when they are received by schools. This exacerbates the lagged funding issue faced by schools where the funding they receive for a given year does not always represent the needs of their pupil population at the time. We understand there is always a balance to be met between having the most up-to-date information and having information sufficiently far in advance to plan upon, but this move would appear only to make schools' funding information more out-of-date (not gain

additional planning time) as maintained schools already had sufficient time to plan their budgets based on current publication dates.

Maintained schools receive growth funding covering the period from when they expand (September) until their new funding allocation kicks in based on these new numbers (April). Moving them to an academic year funding basis will mean that growth funding will need to cover the entire 12 months of the year as it currently does for academies (rather than just 7 months). Whilst this in itself would not cause a net additional cost (as school budget shares will not increase in April as currently) when the DFE also looks to nationalise the Growth Fund it is key that the fund must be pro-rated up to recognise this change, otherwise the growth fund budget will not be sufficient to account for this.

Moving the funding year in-line with the academic year may support schools to more easily budget plan on an academic year basis, but there will be an added complication around profiling their spend as well as pro-rating their funding allocations. Maintained schools will still need to spend on a financial year basis, so where a school plans to front load spend in the new academic year they will need to be clear that they have sufficient funding to achieve this that as first 7/12ths of their new funding allocation may not be enough.

Question 15: Please provide any information that you consider we should take into account in assessing the equalities impact of the proposals for change.

Comments

The proposed approach to popular growth will cause an equality issue as it intends only to provide support to academies and not maintained schools who are also growing due to popularity. This will put additional financial pressure on a maintained school that would not be experienced by an identical academy, reducing opportunities for children. In Coventry taking into account the characteristics of maintained schools across the LA, this would have a detrimental and differential impact on children from high levels of social deprivation and ethnic minority backgrounds. It would also impact differentially on children identified as SEND, opening a potential challenge of discrimination.

This proposal does not support the stated ministerial aim of a “funding system that is fair for every school, with funding matched to a consistent assessment of need”. The level of education available to children and young people should not be subject to the type of school that they attend.

There is a wide range of evidence and research that demonstrates children & young people need to have their basic needs met (e.g. feeling safe, secure, good mental health, enough to eat, appropriate housing) before they can focus on their learning and educational attainment. Existing arrangements have enabled a DSG contribution to partnership working, such as early help which is greatly valued by schools, where they can join up the work they do and get support to work with some of our most vulnerable children & young people and their families. Removing this and not providing an equally sound ability for schools to contribute to such an approach will remove an equality of opportunity for affected children to be successfully supported by their school and the LA.

Question 16: Are there any further comments that you wish to make about our proposed move to complete the reforms to the NFF? [Comments](#)

Although we do not disagree with the overarching principles of the NFF in terms of equity of funding linked to specific pupil characteristics, we do not agree that a nationally prescribed formula for all schools is the right approach. We continue to believe that LAs have knowledge of local factors and the local requirements of schools and therefore are best placed to distribute funding in the most effective way for the children within their local area.

The strength of the school partnership in Coventry enables system leadership, transformation and innovation, improving outcomes for children whilst securing the efficient and effective use of public funds. In order to sustain this approach, an element of local flexibility, to address issues as a city-wide partnership is required. Examples of initiatives that evidence positive impact on school improvement and improved outcomes include; the establishment of a school to school support fund, which enables schools in difficult circumstances to access required resources with the support of peers. A second example is the collaborative work with secondary schools, which enabled the establishment of a growth fund criterion to support the needs of our growing schools in an affordable but effective approach. This will not be possible under a hard NFF system.

It is key that the DFE recognises the enormity of the role that Local Authorities have played throughout the Covid-19 pandemic. This consultation (and other separate conversations about the School Improvement Monitoring and Brokering grant) set out that the direction of travel is to one where LAs have a very limited role with Schools and only get involved as a last resort. This completely ignores the pivotal role that LAs have played during the pandemic to advise and support all schools (regardless of legal status) on matters around remote education, safe opening and covid-isolation requirements. The DFE and the RSC used LAs to digest and distribute key information to schools, and also to provide vital on the ground intelligence back to Government. This exemplifies why LAs remain a vital part of the school system and the DFE should rethink any move towards reducing that role.

It is critical that any movement to a hard NFF system takes into account the negative impact of unintended consequences, that may threaten the Government's modelling of a peer to peer support system, which is already exemplified as best practice in place in Coventry.

There are a number of themes and concepts that sit behind this consultation that we fundamentally disagree with. We have largely referred to these throughout our response, but in summary:

Full Academisation

We are unsighted on the reasons and rationale as to why full academisation of the schools' system is the government's policy direction. From a school improvement perspective there is no evidence base that demonstrates academies perform better than maintained schools. In terms of support for schools during the pandemic there are numerous examples across the country, including in Coventry, where Local Authorities provided vital ongoing direction and strategic support to *all schools* including filling the void and providing advice, when schools report that they found the DfE helpline unobtainable and unhelpful as well as the increase in documentation sent at very short timescales to schools which individually they did not have the capacity to deal with.

We are also concerned that in the long-term the MAT model is unaffordable, and will ultimately result in more resource being diverted away from frontline education (MAT pooling) without the rigorous checks and balances that you place on LAs central expenditure. There are also a number of schools that are less financially viable which from a MAT's perspective, means they may not have the will, capacity, or financial ability to support these schools through conversion.

Not all maintained schools' governing bodies believe they will be in a better position as academies, and current legislation does not require them to convert unless in specific circumstances. An effective LA brokered school-to-school support model has the ability to be as effective, and if LA-wide, has a wider range of capacity and expertise to pull from.

We are concerned that whilst we continue to work in partnership with all schools in Coventry, regardless of status; any reduction in funding levels for the Local Authority will impede our ability to strategically support the education partnership, resulting in fragmentation of the local education system and ultimately lower standards of provision for children. This would also impact on the level of support and intelligence sharing for the RSC and DfE, and ultimately our ability to address local issues and shape local context.

Funding Equity

Differential funding arrangements that distinguish mainstream schools from academies and MATs (e.g. popular growth, pooling arrangements) will not deliver equity across the system. In order to deliver a fair funding system under terms the DfE have set out, it is imperative that funding is transparent, fair and equitable at a per pupil level.

Silo thinking

One of the major flaws with the thinking behind this consultation is that it is operating in a silo without reference to the wider education system. Schools do not operate in a vacuum where they only have to focus on raising educational attainment; the children and young people that attend them are the same ones that may have special educational needs, suffer from mental health or behavioural issues, require support from LA early help services, social care, or health services and so on.

The LA not only has a number of statutory duties in relation to children and young people in the city, but also has local accountability to its citizens to create an environment where children and young people can thrive and fulfil their full potential. The work we do as an Education Partnership, and linking this with other partners across the city, is key to achieving this environment. Any reduction in the funding and role of the LA reduces our local strategic capability to create the enabling infrastructure for the Education Partnership. Failure to intervene early leads to escalating consequential costs across the wider system.

In addition, the loss of local flexibility (e.g. growth fund, high needs transfer capability) will erode the ability of LAs to deliver their statutory responsibilities.

The Covid-19 pandemic has further widened the poverty gap, which will have wide-ranging impact across the whole of society. It is critical that local areas can sustain an enabling infrastructure to promote and deliver partnership working with a joint strategic focus to enable a proper and effective response for all children and young people.

High Needs

We have already experienced the negative consequences of reduced levels of funding flexibility, and subsequently the ability of LAs to manage their DSG. The ring fencing of the schools block back in 2017-18 alongside change in SEN policy and practice has led to a number of LAs losing control over their high needs block spending, as they no longer have the levers to manage the position themselves. Whilst this is not currently Coventry's experience (because of the strength of partnership) it is widely reported that children with SEND are currently without a school place because LAs no longer have the required powers to secure local provision. This position needs to be addressed through an integrated policy approach.

This consultation recognises that the outcome of the SEND Review is now long overdue and promises further consultation on this issue, before the NFF is agreed. However, the recent Ministerial letter suggests a further significant further delay. It is in our view folly to omit SEND from significant financial policy change whilst making assumptions in the consultation about the outcome. In summary, the publication of the NFF consultation in isolation completely highlights the flaw in current policy, which is that we need an integrated system not a siloed one.

Schools Forum

The consultation identifies that the role of Schools Forum will be much-reduced role under the hard NFF. This is a disappointment because it erodes a very successful representative local decision-making body. The Schools Forum ensures that institutions from across the Local Area have their voice heard and as a collective provide a steer on the strategic city-wide issues that affect all stakeholders.

The schools Forum has been a key element to the success of our City-wide schools' partnership. We believe that diminishing the role of Schools Forum would be a mistake, because of the real value it adds to the system.

Comments on proposed Legacy Grant to cover unavoidable termination of employment and prudential borrowing costs (Q12)

We agree with the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs - however the DFE also needs to recognise that there are other significant unavoidable costs within historic commitments (and cannot be immediately unwound) which they have not included in this protection. Many Local Authorities continue to fund significant Equal Pay settlements on behalf of all schools which were capitalised and remain payable by LAs for a set period of time in line with original agreement. We strongly request that the DFE agrees to include this within the protection for Historic Commitments.

A number of LAs through 'contribution to combined budgets' have made a contribution to partnership working, such as early help which is greatly valued by schools, where they can join up the work they do and get support to work with some of our most vulnerable children & young people and their families. There is a wide range of evidence and research that demonstrates children & young people need to have their basic needs met (e.g. feeling safe, secure, good mental health, enough to eat, appropriate housing) before they can focus on their learning and educational attainment. The covid-19 pandemic has exacerbated this, and if the government are really committed to closing the attainment and progress gaps for vulnerable pupils the need for continued support and partnership should be recognised. Removing flexibility to strategically pool budgets in this way will make this harder.