Date:	Item	Type of report:			
7 October 2021 noting	9	Item for information and			
Report title:	Briefing on the Government consultation:				
		nding for all: completing our National Funding Formula			
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Executive Summary

The Department for Education (DfE) consultation; "Fair school funding for all: completing our reforms to the National Funding Formula" sets out proposals for how the government proposes to move towards a fully delivered hard National Funding Formula (NFF). The consultation was launched on 8 July 2021, with responses due by 30 September 2021. The full consultation paper can be located here.

Due to the timing of the consultation, the Council has responded with their views which are shared in this report.

Schools Forum Actions

That the Schools Forum

- Note the Council's response to the consultation, the rational of which is contained within the body of the report and summarised at Appendix A.

1. Implementation of the National Funding Formula

- 1.1 The schools NFF is a single, national formula that allocates the core funding for all mainstream schools, both maintained and academies, in England, for pupils aged 5 to 16.
- 1.2 Despite many delays since the initial announcement in March 2016, it remains the government's intention to move to a hard NFF between now and 2024/25 in which all individual schools' funding allocations are set by the national formula, rather than 150 different local formulae.
- 1.3 This consultation describes how the government intends to do so, outlining the next steps to be taken to ensure a smooth transition towards this in recognition of the significance of this change and to minimise any disruption to the schools funding system.

2 The Consultation

- 2.1 Broadly, many of the questions posed in the consultation are those of principle in respect to the introduction of the hard NFF (Questions 1, 3, 5, 6 and 7). Four questions ask for additional comments on the nature/extent of what the government is proposing (Questions 2, 8, 15 and 16) none of which is controversial and three questions (Questions 9, 10 and 12) are not circumstances that apply to Southwark.
- 2.2 There are, however, four questions that are worthy of a more detailed response:
 - Question 4 on the additional burden that a national approach to growth and falling rolls fund may create for LAs and the inequity of only making popular growth funding available to academies;
 - Question 11 on the proposals regarding pooling arrangements and ongoing central school services, including on whether in the future central school services funding could move to LGFS, noting that this will be subject to a further technical consultation; and
 - Questions 13 and 14 on the introduction of Academic Year accounting year for maintained schools.
- **3.** Completing the NFF reforms (section 3.1 of the consultation document)
- 3.1 Currently, some LAs use different factors in their local formulae to reflect additional needs in schools' allocations or allocate significantly different funding to these factors than the national formula does¹. Southwark remains one of the LAs that has maintained a significant amount of local discretion in determining the funding rates for the current NFF funding factors.
- 3.2 **Question 1** of the consultation is, therefore, a question of principle that in order to deliver an equitable funding system for all schools, should all elements of funding be distributed through a hard NFF or should an element of local adjustment through local formulae be retained.
- 3.3 Southwark's' view remains that, whilst the NFF is, in principle, a simpler and more transparent way of distributing school funding, if there was additional funding in the system to ensure there was no distributional impact away from LAs where schools traditionally have received higher funding (for good reason) then it would also be a fair system. Until that time, local discretion is essential to ensure that local issues can be agreed immediately and the schools in Southwark are not disadvantaged.

¹ After allowing for the area cost adjustment (ACA), it shows that, of 150 LAs, 105 have moved all of the factor values in their local formulae closer to the NFF over the past 3 years and of these, 73 are now mirroring the NFF funding factors almost exactly.

- 4. Developing the schools NFF to support the directly applied NFF (section 3.2 of the consultation document)
- 4.1 In order for the NFF to achieve its stated aim, that both pupil-led and school-led elements of funding are allocated by set funding values, there needs to be further consideration of those elements of schools' NFF funding that are currently based on historic spending at LA level, rather than up-to-date data on costs and needs.
- 4.2 The factors that are currently based on historic spending are elements of school-led 'premises' funding: and specifically, additional funding for PFI schools, for schools with split sites, and for schools which face costs relating to 'exceptional circumstances' (such as rental costs for their premises).
- 4.3 The DfE intend to consult separately on detailed proposals on how the NFF can better reflect the actual costs of these factors and **Question 2** of the consultation is seeking feedback/comments on this proposal to which Southwark has no comment.
- **5. Growth and falling rolls funding** (section 3.3 of the consultation)
- 5.1 Under the principles of a hard NFF, the DfE's proposal is to allocate growth and falling rolls funding on a fair and consistent basis across all eligible schools. The current arrangements have led to the adoption of a wide range of different local criteria to allocate this funding and a variety of different amounts being paid out by different local authorities.
- 5.2 **Question 3** of the consultation is, again, a question of principle on whether national, standardised criteria to allocate all aspects of growth and falling rolls funding should be adopted and without clarity about the data needed to support this work, the requirements appear onerous as the LA is expected to provide information to the DfE to inform the total allocation back to the LA.
- 5.3 **Question 4** of the consultation requests comments on the specific proposals outlined. In respect of the allocation of growth (including funding start-up costs of new schools) and falling rolls fund in order for the lagged funding system to work effectively, LAs must be able to respond to emerging issues relating to school place numbers. At the same time, the eligibility period for the falling rolls fund of three years need reconsidering, based on the turbulence in numbers caused by the last three years and anticipated in the medium term as a consequence of inward migration as a result of geopolitical changes. Further, any additional burden on LAs as a result of data collection and submission must be funded accordingly.
 - 5.4 Crucially, one more allocation is considered, where it is proposed that where schools have seen an increase in popularity specifically after being recently sponsored by a multi-academy trust which has improved the school's

- performance, funding will be available but only to academies rather than all schools.
- 5.5 It is not clear why this latter proposal only relates to academies and it clearly breaches the first principle of the NFF of fairness where each mainstream school should be funded on the same basis, wherever it is in the country, and every child given the same opportunities, based on a consistent assessment of their needs.
- 6. Next steps for the transition to the directly applied NFF for schools (section 3.4 of the consultation)
- 6.1 LAs must use some NFF factors in their local formulae (such as basic perpupil funding, and at least one of the deprivation factors), while other NFF factors (such as low prior attainment, and mobility) are optional. LAs may also use a 'looked after children' factor in their local formulae —the only non-NFF factor that LAs can use in their local formulae.
- 6.2 From 2023-24, the proposal is that all LAs should be obliged to use each of the NFF factors in its local formulae, and only those factors (which would mean that LAs would no longer be able to use a 'looked after children' factor in their formulae). The exception to this will be any NFF factors (i.e. a new formulaic approach to premises factors) that are significantly reformed in 2023-24 which would not be compulsory in the first year that they are introduced but would eventually become mandatory factors.
- 6.3 In accordance with the response to Question 1, the Council have responded 'no' to Questions, 5, 6, 7a, 9, and 10, with no comment at Questions 7b and 8. However, in anticipation of the inevitable move to the NFF, the paragraphs following each question below outline the practical implications of that move.
- 6.4 **Question 5** of the consultation, again a question of principle, asks whether each LA should be required to use each of the NFF factors in its local formulae from 2023-24 (with the exception of any significantly reformed factors).
- 6.5 Currently, Southwark does not use the FSM factor, the mobility factor nor the Looked After Children factor. In the latter case, the proposal would mean no change but with the former two factors, the following would probably need to happen from 2022/23, using the MFG to protect schools.
 - Create an FSM allocation from the existing FSM Ever 6 surplus; and
 - Use growth to create a Mobility allocation.
- 6.6 In addition, LAs have considerable flexibility over the values (in cash terms) assigned to the factors in their formulae (with some limits for example, in 2021-22 the lump sum that LAs set can be no more than £175,000, and the basic per-pupil entitlement must be at least £2000 for 28 primary, and £3000 for Key Stage 3 and Key Stage 4). Only the minimum per pupil levels are compulsory for each local authority to use, at given values.

- 6.7 Question 6 of the consultation, another question of principle, asks 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.
- 6.8 This discussion has already been had at the Southwark School Forum in anticipation of the 2022/23 funding allocation as this is the last year of known DSG growth and moving towards the cash values is much more manageable whilst funding is being added. In recognition that next year may be the last opportunity to makes changes that soften the eventual move to the NFF, whilst also providing guaranteed growth per pupil, the following options for 2022/23 were mooted:
 - To adopt an approach of using DSG growth to bring the Southwark formula into increasing alignment with the NFF; and
 - To use the growth to "fill from the bottom". Essentially increasing those Southwark allocation rates that are furthest below the NFF rates.
- 6.9 Supplementing the proposal to move towards the NFF factor cash values, is a proposal on the pace of change require to minimise any turbulence in individual schools' funding. The proposal is from 2023/24, each LA would have to bring each of its local formula factors at least 10% closer to the NFF factor value, compared to how far the factor was from the NFF value in 2022-23. As above, any premises factors which are allocated according to a newly formulaic basis, as opposed to historic spending, in the NFF in 2023-24 would be exempt from these requirements.
- 6.10 Some schools will gain as a result of local funding formulae moving closer to the NFF – while others will be protected from cash-terms losses in their perpupil funding by the Minimum Funding Guarantees (MFGs) within local formulae. These protections will remain in place during the move towards a hard NFF.
- 6.11 After an initial 10% movement closer to the NFF in 2023-24, and subject to the impact of this movement, the aim is to move at least 15% closer to the NFF in 2024-25 and at least 20% closer in 2025-26.
- 6.12 **Question 7a** of the consultation asks whether the LA formulae factor values should move 10% closer to the NFF, compared with their distance from the NFF in 2022-23. **Question 7b** of the consultation, specifically requests an explanation if the LA does not agree with the 10% with **Question 8** of the consultation seeks any feedback on the appropriate threshold level in the case where LAs would not be required to move closer to the NFF if their local formulae were already very close to the NFF.
- 6.13 **Appendix B** illustrates the extent of the movement in the formula factor vales that would be required if the 2021/22 formula was the base year with **Appendix C and D**, illustrating a 15% and 20% movement, respectively.

- 6.14 As indicated above, Southwark are already contemplating a gradual move towards the formula factors and cash values from 2022/23, which would further reduce any turbulence. However, the most significant movement would be felt in the Lump Sum element of the formula and it is imperative that some method of guaranteed minimum changes to individual school funding levels is retained to ensure that (particularly the many 1FE) schools within Southwark are not disproportionately affected by the introduction of the hard NFF with the significantly lower cash values for the lump sum element.
- 6.15 In the second stage of the consultation on the hard NFF, the DfE will seek feedback on whether, as a result of requiring LA formulae to move closer to the NFF from 2023-24, there should also be greater flexibility for LAs over the level of MFG, in order to manage potential affordability pressures or whether this will not be necessary, given LAs' flexibility to cap and scale gains. As above, our aim is that the protections should continue to ensure that no school will see a cash-terms loss in per-pupil funding, as a result of the move towards a hard NFF.
- 6.16 The Minimum Funding Guarantee when first introduced was set at a positive rate, quickly moving to a negative rate which limited the reduction in funding that a school can face per pupil. A zero MFG rate would freeze per pupil funding levels with a positive MFG rate guarantees a minimum per pupil increase in funding.
- 6.17 The final proposals in respect of the next steps of moving towards a hard NFF are in relation to current flexibilities for the allocation of English as an Additional Language (EAL) funding and Sparsity. The proposal is for the for the removal of the current flexibility in determining the number of pupils eligible for English as an Additional Language (EAL) funding to restrict it to use the NFF's 'EAL3' measure, in which pupils attract this funding if they are recorded on the census as having entered state education in England during the last three years, and their first language is not English.
- 6.18 **Question 9** of the consultation seeks agreement to this removal and as Southwark already uses the NFF's EAL3 there is no impact.
- 6.19 **Question 10** of the consultation deals with the final proposal to retain the sparsity flexibility which is not an issue for London LAs.
- 7. **MATs' pooling of their funding** (section 4.1 of the consultation)
- 7.1 In 2013, Multi Academy Trusts (MATs) were granted the ability to pool General Annual Grant (GAG) funding. Pooling of GAG is defined as 'the freedom to amalgamate a proportion of GAG funding for (all of a MAT's) academies to form one central fund'. This allows a Trust to pool some of the funding provided for all of the pupils for which it is responsible and distribute it between its constituent academies.
- 7.2 The consultation states it is important to note that this freedom is specifically linked to the MAT structure, and responsibility that academy trusts have –

with each trust representing a unified governance structure sitting across each of its constituent academies and playing a key role in delivering the department's school improvement strategy. It goes on to state that this is not true for other 4participants in the sector there is no proposal for any equivalent to MAT pooling in other part of the education system.

- 7.3 There should be a consistent approach to the schools funding system to all schools. The extension of these arrangements to create local flexibility to pool resources amongst maintained schools would also assist LAs in continuing to support and improve the standard of education for children and young people, particularly in harnessing the benefits of federations of maintained schools.
- **8. Central school services** (section 4.2 of the consultation)
- 8.1 The consultation states that moving towards a hard NFF creates a strong case for change in how funding for central school services should work. There is no doubt that the school funding role that LAs currently have will change with the introduction of a hard NFF as there will be less flexibility to determine how the remaining DSG allocated to them is used. The transition to a hard NFF also presents an opportunity to review the variation in how central school services are currently provided and funded.
- 8.2 Currently, ongoing services that are delivered centrally (either by LAs, or by academy trusts) fit into three broad categories:
 - Local authorities' ongoing responsibilities for all schools
 - De-delegated central functions for schools that local authorities (for maintained schools) and MATs (for academies) are responsible for.
 - Optional traded services for all schools
- 8.3 The DfE intends to conduct a more technical consultation on the future of central school services to determine:
 - which services best sit within each of the three categories; and
 - whether there is scope to set out a clearer list of services to be funded centrally, alongside a greater move towards de-delegated and traded services.
- 8.4 Whilst LA statutory responsibilities for all schools centrally will continue to be funded, duties that are not statutory may also be centrally funded as well (for example some admission services which are optional but might be more appropriate for the LA to continue to provide, thereby retaining their strategic oversight function).

- 8.5 One non statutory area that we will wish to treat separately is the existing scheme whereby DfE purchases centrally copyright licences for all state-funded schools and LAs act as local agents for the scheme. Depending on what changes are decided on for central school services, we will if necessary include funding for the copyright licence scheme in the schools block in the same way as growth funding.
- 8.6 It is possible that, after reviewing central school services, there may be a decrease in services remaining with the LA that are centrally funded with more services de-delegated or traded.
- 8.7 Under such a scenario, the DfE would consider whether the LA's funding for those should become part of MHCLG's Local Government Finance Settlement (LGFS) rather than a reduced CSSB block. This could provide helpful flexibility to LAs, if particularly if the simple distribution methodology used for the CSSB formula does not accurately match their need to spend.
- 8.8 **Question 11** of the consultation seeks further comments on the above, including on whether in the future central school services funding could move to LGFS. Southwark will await the further consultation to take clearer position on this proposal and not overly concerned how central school services are funded, but the extent to which they continue to be funded.
- 8.9 Central school services also includes a historic commitments element, relating to continuing expenditure by LAs on commitments entered into before 2013, on activities which since that date have been deemed not to be appropriate for local authorities to fund directly from the DSG. Southwark does not receive any historical commitment funding,
- 8.10 **Question 12** of the consultation seeks agreement on whether the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs is acceptable?
- **9.** A consistent funding year (section 4.5 of the consultation)
- 9.1 The consultation is also exploring the appetite for a change in funding year for maintained schools, from a financial year to an academic year, as part of the shift towards a hard NFF.
- 9.2 The DfE recognises that moving maintained schools to being funded on an academic year basis would have the potential to cause some complications with accounting and financial reporting and Question 13 of the consultation seeks a measure of the strength of feeling that the government should further investigates this possibility.
- 9.3 In addition, **Question 14** of the consultation requests further narrative regarding the pros and cons of this proposal.

- 9.4 Southwark Council disagrees with this proposal due to the administrative burden it would impose on Schools (disproportionally affecting smaller school with less capacity to bear this burden) and the Local Authority in terms of the financial and management accounting requirements for schools funding.
- **10.** Equalities impact assessment (Annex C of the consultation)
- 10.1 The DfE's assessment is that the hard NFF will create a fairer and more consistent distribution of funding that is more closely aligned to need, and is essential to support opportunity for all children, irrespective of their background, ability, need, or where in the country they live. Further, the NFF does not seek to target specific groups of pupils simply because they are protected by the Equality Act, but instead targets funding to those groups which the evidence demonstrates face barriers to their educational achievement.
- 10.2 There is recognition that there is some inherent uncertainty about the effects of moving to a hard NFF, that it is likely that the 'hardening' of the funding formula will direct further funding at schools with a higher proportion of SEN pupils, and the proposals for a hard NFF will have implications for High Needs funding.
- 10.3 **Question 15** of the consultation asks what additional information that should be taken into account in assessing the equalities impact of the proposals for change with Southwark offering no further comment.

11. Further comments

- 11.1 Finally, **Question 16** of the consultation merely asks for any further comments on our move to complete the reforms to the NFF.
- 11.2 This is where the Council has taken the opportunity to express their views on the NFF more clearly: The general view is that a NFF is, in principle, an acceptable proposal. However, until the government recognises that there is insufficient funding available for all schools the balance of simplicity of the formula and fairness remains skewed, resulting in London boroughs being disproportionately impacted by the introduction of a hard formula. It is recognised that no change is being proposed until 2023/24 and then a two-year phased approach reduces any potential turbulence that individual schools may experience in their budget allocation. However, this is a critical time where London primary schools, already struggling with insufficient funding to cover increases in wages and running costs, are experiencing a significant decline in pupil numbers and the viability of many of these schools are at risk.

12. Conclusion

12.1 Southwark will continue to take the approach that local flexibility in the allocation of the schools funding formula is, and remains, the fairest way to allocate funding in accordance with the needs of the pupils of Southwark.

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?

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 comment 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?

4. Do you have any comments on our proposed approach to growth and falling rolls funding?

In respect of the allocation of growth (including funding start-up costs of new schools) and falling rolls fund – in order for the lagged funding system to work effectively, LAs must be able to respond to emerging issues relating to school place numbers. At the same time, the eligibility period for the falling rolls fund of three years need reconsidering, based on the turbulence in numbers caused by the last three years and anticipated in the medium term as a consequence of inward migration as a result of geopolitical changes.

Without clarity about the data needed to support this work, the requirements appear onerous as the LA is expected to provide information to the DfE to inform the total allocation back to the LA. And any additional burden on LAs as a result of data collection and submission must be funded accordingly.

Further, one more allocation is considered, where it is proposed that where schools have seen an increase in popularity specifically after being recently sponsored by a multi-academy trust which has improved the school's performance, funding will be available but only to academies rather than all schools.

It is not clear why this latter proposal only relates to academies and it clearly breaches the first principle of the NFF of fairness - where each mainstream school should be funded on the same basis, wherever it is in the country, and every child given the same opportunities, based on a consistent assessment of their needs.

Next steps for the transition to the end state NFF for schools

Please refer to section 3.4 of the consultation document.

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

Please comment: No comment

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 comment

- 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
- 10. Do you agree that the additional flexibilities relating to the sparsity factor should remain in place for 2023-24?
- Yes No Unsure

Central school services

Please refer to section 4.2 of the consultation document.

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: There should be a consistent approach to the schools funding system to all schools. The extension of pooling arrangements to create local flexibility to pool resources amongst maintained schools would also assist LAs in continuing to maintain and improve standards of education, particularly in harnessing the benefits of federations of maintained schools.

Not overly concerned how central school services are funded, but the extent to which they continue to be funded.

12. Do you agree with the proposal for a legacy grant to replace funding for unavoidable termination of employment and prudential borrowing costs?

A consistent funding year

Please refer to section 4.5 of the consultation document.

- 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 nor disagree [○] Disagree
- 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: Strongly disagree to this proposal due to the administrative burden it would impose on Schools (disproportionally affecting smaller schools with less capacity to bear this burden) and the Local Authority in terms of the financial and management accounting requirements for schools funding.

Equalities Impact Assessment

Please refer to Annex C of the consultation document.

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:

The general agreement that a NFF is, in principle, an acceptable proposal. However, until the government recognises that there is insufficient funding available for all schools – the balance of simplicity of the formula and fairness remains skewed, resulting in London boroughs being disproportionately impacted by the introduction of a hard formula. It is recognised that no change is being proposed until 2023/24 and then a two-year phased approach reduces any potential turbulence that individual schools may experience in their budget allocation. However, this is a critical time where London primary schools, already struggling with insufficient funding to cover increases in wages and running costs, are experiencing a significant decline in pupil numbers and the viability of many of these schools are at risk.

Factor Description				Local Factor Value		
	Factor Type	2021-22 NFF Factor Value	Actual 2021-22 Local Factor Value	given movement towards the NFF	Minimum NFF Factor Value	Maximum NFF Factor Value
Basic Entitlement	Primary AWPU	3,697	4,511	4,430	3,697	4,430
Basic Entitlement	KS3 AWPU	5,213	6,466	6,340	5,213	6,340
Basic Entitlement	KS4 AWPU	5,875	6,466	6,407	5,875	6,407
FSM6	Pri	681	1,164	1,116	681	1,116
FSM6	Sec	994	1,419	1,377	994	1,377
FSM	Pri	545	0	54	54	545
FSM	Sec	545	0	54	54	545
IDACI A	Pri	734	589	604	604	734
IDACI A	Sec	1,024	1,549	1,497	1,024	1,497
IDACI B	Pri	562	597	594	562	594
IDACI B	Sec	805	1,236	1,193	805	1,193
IDACI C	Pri	527	520	520	520	527
IDACI C	Sec	746	1,074	1,041	746	1,041
IDACI D	Pri	485	324	340	340	485
IDACI D	Sec	687	664	666	666	687
IDACI E	Pri	308	169	183	183	308
IDACI E	Sec	491	191	221	221	491
IDACI F	Pri	255	163	172	172	255
IDACI F	Sec	367	139	162	162	367
Low Prior Attainment	Pri	1,296	481	563	563	1,296
Low Prior Attainment	Sec	1,965	1,714	1,739	1,739	1,965
EAL	Pri	651	273	311	311	651
EAL	Sec	1,758	1,486	1,513	1,513	1,758
Lump Sum	Pri	139,453	175,000	171,445	139,453	171,445
Lump Sum	Sec	139,453	175,000	171,445	139,453	171,445
Sparsity	Pri	53,271	0*	5,327	5,327*	53,271*
Sparsity	Sec	82,867	0*	8,287	8,287*	82,867*
Mobility	Pri	1,065	0	107	107	1,065
Mobility	Sec	1,527	0	153	153	1,527

These values account for the local authority ACA * Not all local authorities have schools eligible for sparsity funding.

Factor Description	Factor Type	2021-22 NFF Factor Value	Actual 2021-22 Local Factor Value	Local Factor Value given movement towards the NFF	Minimum NFF Factor Value	Maximum NFF Factor Value
Basic Entitlement	Primary AWPU	3,697	4,511	4,389	3,697	4,389
Basic Entitlement	KS3 AWPU	5,213	6,466	6,278	5,213	6,278
Basic Entitlement	KS4 AWPU	5,875	6,466	6,377	5,875	6,377
FSM6	Pri	681	1,164	1,092	681	1,092
FSM6	Sec	994	1,419	1,356	994	1,356
FSM	Pri	545	0	82	82	545
FSM	Sec	545	0	82	82	545
IDACI A	Pri	734	589	611	611	734
IDACI A	Sec	1,024	1,549	1,470	1,024	1,470
IDACI B	Pri	562	597	592	562	592
IDACI B	Sec	805	1,236	1,171	805	1,171
IDACI C	Pri	527	520	521	521	527
IDACI C	Sec	746	1,074	1,024	746	1,024
IDACI D	Pri	485	324	348	348	485
IDACI D	Sec	687	664	667	667	687
IDACI E	Pri	308	169	190	190	308
IDACI E	Sec	491	191	236	236	491
IDACI F	Pri	255	163	176	176	255
IDACI F	Sec	367	139	173	173	367
Low Prior Attainment	Pri	1,296	481	604	604	1,296
Low Prior Attainment	Sec	1,965	1,714	1,752	1,752	1,965
EAL	Pri	651	273	330	330	651
EAL	Sec	1,758	1,486	1,526	1,526	1,758
Lump Sum	Pri	139,453	175,000	169,668	139,453	169,668
Lump Sum	Sec	139,453	175,000	169,668	139,453	169,668
Sparsity	Pri	53,271	0*	7,991	7,991*	53,271*
Sparsity	Sec	82,867	0*	12,430	12,430*	82,867*
Mobility	Pri	1,065	0	160	160	1,065
Mobility	Sec	1,527	0	229	229	1,527

These values account for the local authority ACA * Not all local authorities have schools eligible for sparsity funding.

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Basic Entitlement	KS3 AWPU	5,213	6,466	6,215	5,213	6,215	
Basic Entitlement	KS4 AWPU	5,875	6,466	6,348	5,875	6,348	
FSM6	Pri	681	1,164	1,067	681	1,067	
FSM6	Sec	994	1,419	1,334	994	1,334	
FSM	Pri	545	0	109	109	545	
FSM	Sec	545	0	109	109	545	
IDACI A	Pri	734	589	618	618	734	
IDACI A	Sec	1,024	1,549	1,444	1,024	1,444	
IDACI B	Pri	562	597	590	562	590	
IDACI B	Sec	805	1,236	1,150	805	1,150	
IDACI C	Pri	527	520	521	521	527	
IDACI C	Sec	746	1,074	1,008	746	1,008	
IDACI D	Pri	485	324	356	356	485	
IDACI D	Sec	687	664	668	668	687	
IDACI E	Pri	308	169	197	197	308	
IDACI E	Sec	491	191	251	251	491	
IDACI F	Pri	255	163	181	181	255	
IDACI F	Sec	367	139	185	185	367	
Low Prior Attainment	Pri	1,296	481	644	644	1,296	
Low Prior Attainment	Sec	1,965	1,714	1,764	1,764	1,965	
EAL	Pri	651	273	349	349	651	
EAL	Sec	1,758	1,486	1,540	1,540	1,758	
Lump Sum	Pri	139,453	175,000	167,891	139,453	167,891	
Lump Sum	Sec	139,453	175,000	167,891	139,453	167,891	
Sparsity	Pri	53,271	0*	10,654	10,654	53,271*	
Sparsity	Sec	82,867	0*	16,573	16,573*	82,867*	
Mobility	Pri	1,065	0	213	213	1,065	
Mobility	Sec	1,527	0	305	305	1,527	

These values account for the local authority ACA * Not all local authorities have schools eligible for sparsity funding.