

## Response ID ANON-S3AV-R7YH-7

Submitted to Early years funding - extension of the entitlements  
Submitted on 2023-08-31 12:41:35

### Introduction

What is your name?

Name::

Nikki Sealy

What is your email address?

Email::

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Are you responding as an individual or on behalf of an organisation?

Organisation

Which of these options best describes you or your organisation?

Type of Organisation::

Local Authority

If 'Other', please provide further detail::

London Borough of Lewisham

If you are responding on behalf of an organisation, what is the name of your organisation?

Name of Organisation::

London Borough of Lewisham

What local authority area are you or your organisation based in? (If you do not wish to provide this information, please select 'prefer not to say')

Local Authority Area::

Lewisham

Would you like your responses to remain confidential?

No

Reason for Confidentiality (Optional)::

### Section 1: National funding distribution for entitlements for children aged 2-years-old and under

1 Do you agree that we should introduce IDACI as a new proxy, and use it alongside FSM as a basket of measures for deprivation in the additional needs factor in the new national funding formula for 9-month-olds to 2-year-olds?

No

Do you have any additional comments? (Please limit responses to 200 words):

IDACI has far too many flaws including (but not limited to )

- Infrequency of IDACI data revision
- Doesn't recognise that especially in areas such a London, many properties with affluent post codes are rented to deprived families -so effectively ignored from the calculation
- Areas of new developments (Lewisham is one), suffer when this proxy is used as the postcodes are not recognised
- It does not account for housing costs more generally being higher in London than elsewhere as a consequence the funding to boroughs like Lewisham is lower than would have been expected.

Better data can be used from for example health around birth rate and needs. Or other indicators of deprivation such as LIFT (Low income family tracker) data

2 Do you agree that we should continue to use EAL and DLA as proxies in the additional needs factor in the new funding formula?

Unsure

Do you have any additional comments? (Please limit responses to 200 words):

DLA is not always representative of SEND in Early Years. Also families should be able to apply for DLA at an earlier point if their child has a disability and want to access an early years place as an under 2. It is also not awarded fairly and accurately, the award often depends on how good families are with filling in lengthy forms, e.g. a family experiencing digital poverty and/or having limited literacy skills might be disadvantaged. We have seen clear inequity re DLA awards.

It might be worth factoring in Public Health data from GP's/ Health Visitors re developmental checks and subsequent developmental delays of young children.

We have a concern around the accuracy of schools recording of EAL. Probably better options of establishing need from health and birth records—maybe even DWP?

3 Do you agree with our proposed approach to the area cost adjustment in the new national funding formula?

Unsure

Do you have any additional comments? (Please limit responses to 200 words):

Area cost adjustment is crucial but must be realistic and revised annually to keep pace with changes, especially in the current high inflation market. There needs to be an assessment of the true cost of employing like for like staffing and other cost structures e.g if a teaching assistant in the north of England is costing £10 an hour, but due to London living wage costs say £13 per hour, the difference needs to reflect this true cost. Equally the same applies to non staffing costs associated costs. The adjustment must also accurately reflect additional locality pressures, house prices etc.

4 Overall, do you agree with our proposed approach of following the same structure and weightings for the new national funding formula as in the existing 3-and-4-year-old formula?

No

Do you have any additional comments? (Please limit responses to 200 words):

We don't believe the funding received by Lewisham is sufficient to meet the actual costs. We continue to be the 3rd lowest funded Inner London authority with difference of £2.40 in hourly rate between us and highest funded LA, Camden. The funding Lewisham receives relative to its neighbouring boroughs is also insufficient . The table below notes that Lewisham receives £6.33 which compared to the majority of London boroughs is not compatible. The listing below suggests that the 3&4 year old funding is in itself not fair and equitable. As such if the 2 year old (and below) funding is processed on this basis, than our funding will continue to be not fair and not equitable.

Camden £8.73  
Hackney £6.54  
Hammersmith and Fulham £8.42  
Haringey £6.16  
Islington £8.05  
Kensington and Chelsea £8.36  
Lambeth £7.50  
Lewisham £6.33  
Newham £6.12  
Southwark £7.06  
Tower Hamlets £8.33  
Wandsworth £6.97  
Westminster £8.09

5 Do you agree that we should extend DAF eligibility to all children accessing the entitlements from April 2024?

Yes

Do you have any additional comments? (Please limit responses to 200 words):

DAF funding should be provided to support all age groups where the need is identified. We would however recommend the eligibility criteria is reviewed to include children under 2 who will be entitled to access a funded place from April 24.

6 Do you agree that we should extend EYPP eligibility to all children accessing a free childcare entitlement from April 2024?

Yes

Do you have any additional comments? (Please limit responses to 200 words):

## Section 2: Impact of proposals

7 Do you agree with this approach?

Unsure

Do you have any additional comments? (Please limit responses to 200 words):

Lewisham continues to be disadvantaged by this approach. There should also be some flexibility to allow for childminders to be paid under a different approach ie an average of the 3 rates rather than controlled by age of child. The current approach means that CMs are likely to stop caring for 3&4 yr olds as the rate is so much lower. The sudden reduction in hourly rate will have a significant impact on CMs and their ability to take on assistants as the cost to employ remains the same whatever the age of the children.

### Section 3: Local authority funding formulae for childcare entitlements

8 Do you agree a pass through rate of 95% should be applied to each funding stream in 2024-25: the 3-and-4-year-old universal and 30 hours offer; the two-year-old disadvantaged and working parent offers; and the 9 months to two year-old offer?

Yes

Do you have any additional comments? (Please limit responses to 200 words):

As there will be a significant increase in workload this needs to be sustained over time to ensure sufficient capacity and resource within the LA.

9 Do you agree that the same list of allowable supplements should be applied to every entitlement funding stream, capped at a maximum 12 percent of planned funding for that entitlement?

Yes

Do you have any additional comments? (Please limit responses to 200 words):

Agree that the LA (in agreement with stakeholders) should have flexibility to target funding mirroring the supplements.

The supplements/factors should remain discretionary as LA's will be best placed to support/target need.

We don't agree that there should be any artificial caps, LA and stakeholders have long established partnerships and are best placed to target funding to needs. We agree approach allocations should be based on local criteria/formula.

10 Do you agree that the deprivation supplement should be mandatory for every entitlement funding stream?

Unsure

Do you have any additional comments? (Please limit responses to 200 words):

Being able to accurately target deprivation would be ideal, the question is how, and what reliable data/information is easily available. The bigger issue here is how deprivation is measured/targeted. As previously stated, we do not support IDACI as a measure of deprivation. Key stage 1 data for FSM is also very misleading due to the universal infant free school meals initiative.

11 Do you agree with our proposal that local authorities should establish a special educational needs inclusion fund for children aged 9 months to 2-years-old who are taking up the entitlements?

Yes

Do you have any additional comments? (Please limit responses to 200 words):

We believe (as in the case of the 3 & 4 year old funding), an element of the hourly rate should be used to support the inclusion fund.

We don't agree that a separate pot for 2 year olds should be established—it should all form part of one collective pot managed by the LA to support EY children.

The inclusion fund should also work in harmony with the High needs block, and should allow higher rates of support/funding for young children identified as having significant and likely lifelong needs, not only cater for 'emerging needs'.

12 What more can be done to support local authorities and providers to reduce bureaucracy and streamline SENIF processes whilst also ensuring the system remains fair and financially sustainable?

Please provide your answer below: (Please limit responses to 200 words):

Would suggest greater clarity in SEND code of practice. SENIF was established to meet emerging needs, but is increasingly being used to support children with very high needs prior to an EHCP being allocated. Currently in Lewisham an EHCP is required to allocate a child a special school place, Ensure that current developments such as the SEND Improvement plan (on the back of the green paper), local inclusion plans and partnerships as well as anticipated change in legislation such as SEN Code of Practice, factor in more clarity.

13 Would local authorities and providers find it helpful for the Department to be more prescriptive about the operation of local SENIFs?

No

Do you have any additional comments? (Please limit responses to 200 words):

What is required is greater clarity rather than a prescriptive approach.

### Section 4: Equalities Impact Assessment

14 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?

Please provide comments below. Please limit responses to 200 words.:

It would be helpful if the DfE could specify a minimum amount of 'funded hours only' places that each setting providing early entitlements must provide. ie a proportion of the number of places they are registered for. This becomes even more important as funding is provided for an increased number of children. Providers increasingly supplement the funded hours element by adding conditions around the purchase of additional hours. This could either be by making their funded hours offer virtually unusable eg: 3.00-6.00pm daily or by making it a condition of a place being offered.

### Any Other Comments

15 Are there any other comments that you would like to make about our proposals set out in this consultation?

Please provide comments below. Please limit responses to 200 words.:

The timing of this consultation is not helpful as it crosses over with school summer holidays and many interested parties/stakeholders have not been able to respond within the given timeframes.

Whilst webinars were offered, the short notice made it very difficult for people to attend. They were also very controlled environments that made any real interaction problematic and many left many questions unanswered. The FAQ sheets did not respond to 'more challenging points' or provide any new information.

We would have appreciated the opportunity to seek views from our partners across the local area ensuring this is a co-produced and collaborative response to the consultation.