



Bournemouth, Christchurch and Poole

Proposed Changes to the Early Years Single Funding Formula for the Free Early Entitlement for 2, 3 and 4 Year Olds for April 2022 – March 2023

Outcomes and Analysis of the Consultation

12 January 2022

The Early Years Single Funding Formula consultation paper and online link for response was emailed to 314 childcare providers registered for early education funding within Bournemouth, Christchurch and Poole (BCP) on 14 December 2021, and then on 4 January 2022. Four briefing events were held online on 15 December (x2), 5 and 7 January. The consultation close date was 12pm, 11 January 2022.

Total issued 314

Type of Setting	Total Issued	Response (Number)	Response (%)
All Respondents	314	94	30%
Childminders	160	41	26%
Day Nursery	73	28	38%
Pre School	62	24	39%
School Nursery	13	1	8%
Independent Nursery	5	0	0%
After School Club	1	0	0%

Overall, 30% of the sector returned feedback on the consultation. The sector feedback for only groups and school based settings in isolation is 37%.

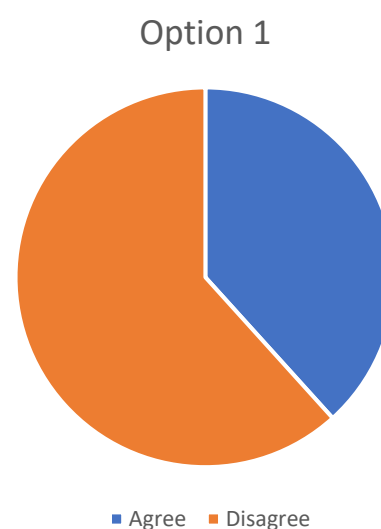
The outcome from each question asked within the consultation is summarised below, with a brief summary and feedback left by providers to each specific question and option. A full copy of provider responses per question is supplied as an appendix to this document.

Question 1, Option 1:

Please indicate your support for your preferred option presented in this consultation. In selecting your preferred option, you may wish to consider the impact of the proposed change in rates on your sustainability and your capacity to meet the demands of children with additional needs.

Using the increase in funding from the DfE to raise the provider base rate by 8p per hour for 3 and 4 year olds and 12p per hour for eligible 2 year olds. SEND rates to be maintained at £2.00 per hour for Tier 1 and £6.30 per hour for Tier 2

Type of Setting	Agree	Disagree
All Respondents (94)	36 (38%)	58 (62%)
Childminders (41)	22 (54%)	19 (46%)
Day Nursery (28)	8 (29%)	20 (71%)
Pre School (24)	6 (25%)	18 (75%)
School Nursery (1)	-	1 (100%)
Independent Nursery (0)	-	-
After School Club (0)	-	-



Feedback from providers

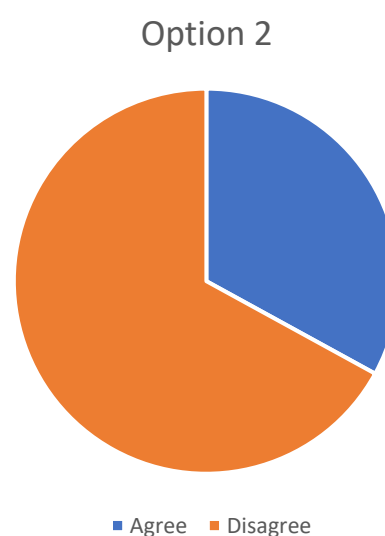
Several providers shared concerns that the increase in the base rate proposed in Option 1 is not sustainable and doesn't compare to the rises forthcoming in wage and pension costs. Per the feedback, option 1 and keeping the base rate uplift to the minimum therefore risks short and medium term sustainability. Others highlighted those parents of children with SEND have access to other funding streams that may mitigate a lower tier funding Inclusion Fund. Several commented on the fact that the vast majority of families are penalised in terms of the EY funding rate paid for their child in order to balance overspend in Inclusion. Comments from those disagreeing with Option 1 cited that the proposal in option 2 gave a reasonable balance to the needs of the provider and the child.

Question 1, Option 2:

Please indicate your support for your preferred option presented in this consultation. In selecting your preferred option, you may wish to consider the impact of the proposed change in rates on your sustainability and your capacity to meet the demands of children with additional needs.

Using the increase in funding from the DfE to raise the provider base rate by 12p per hour for 3 and 4 year olds and 16p per hour for eligible 2 year olds and reducing SEND rates to £1.60 per hour for Tier 1 and £5.04 per hour for Tier 2

Type of Setting	Agree	Disagree
All Respondents (94)	31 (33%)	63 (67%)
Childminders (41)	18 (44%)	23 (56%)
Day Nursery (28)	8 (29%)	20 (71%)
Pre School (24)	4 (17%)	20 (83%)
School Nursery (1)	1 (100%)	-
Independent Nursery (0)	-	-
After School Club (0)	-	-



Feedback from providers

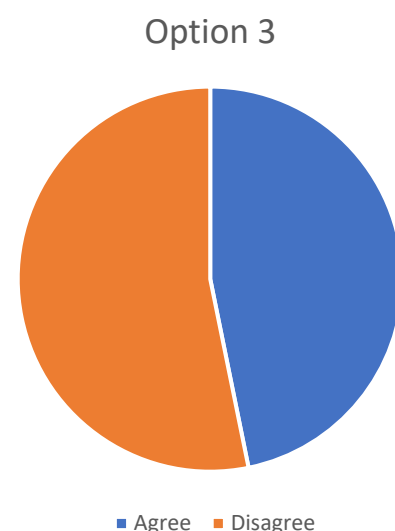
As this is the first option that reduces the SEND tier funding rate several providers disagreed with option 2 as it impacts the children that need it most. Some providers however highlight that increasing the base rate further, per this option, supports all children and SEND children indirectly. Conversely some commentary suggested an increase in SEND funding would be preferred.

Question 1, Option 3:

Please indicate your support for your preferred option presented in this consultation. In selecting your preferred option, you may wish to consider the impact of the proposed change in rates on your sustainability and your capacity to meet the demands of children with additional needs.

Using the increase in funding from the DfE to raise the provider base rate by 17p per hour for 3 and 4 year olds and 21p per hour for eligible 2 year olds and reducing SEND rates to £1.10 per hour for Tier 1 and £3.46 per hour for Tier 2

Type of Setting	Agree	Disagree
All Respondents (94)	44 (47%)	50 (53%)
Childminders (41)	17 (41%)	24 (59%)
Day Nursery (28)	12 (43%)	16 (57%)
Pre School (24)	15 (62%)	9 (38%)
School Nursery (1)	-	1 (100%)
Independent Nursery (0)	-	-
After School Club (0)	-	-



Feedback from providers

This option presented to providers reduces the SEND tier funding the most and the common message from those not supporting the option is the SEND rate reduction goes too far and will be damaging to the outcomes of children with needs. Another suggests whether children that are perhaps borderline assessed as with SEND require funding from Inclusion (removal of Tier 1 funding). There is also a suggestion that SEND funding for 2 year olds could be removed, as difficult as that may be, as it's not a statutory duty with a suggestion made that the local authority must have a Special Education Needs Inclusion Fund (SENIF) for all 3 and 4 year olds with SEND, and that, BCP Council does not have to using funding from the early years block to fund its SENIF, that the SENIF could be fully or partially funded from the high needs block of the Designated Schools Grant allocation. The high needs block is considerably overspent; however it would send a powerful message to central

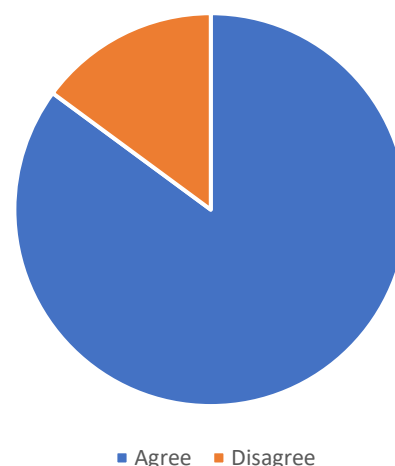
government that SEND funding levels across all age groups are inadequate. Reference is also made by providers that regardless of a maximum DfE uplift to the base rate it still does not come close to the true value of childcare funding per hour

Question 2:

Do you support the proposal to make no other changes from 2021-22 to the EYSFF for 2022-23 (no change to the existing allocation to Deprivation Supplement and Central Spend)?

Type of Setting	Agree	Disagree
All Respondents (94)	80 (85%)	14 (15%)
Childminders (41)	34 (83%)	7 (17%)
Day Nursery (28)	26 (93%)	2 (7%)
Pre School (24)	19 (80%)	5 (20%)
School Nursery (1)	1 (100%)	-
Independent Nursery (0)	-	-
After School Club (0)	-	-

Make no other changes to EYSFF



Feedback from providers

Providers that left feedback to this question on the whole reflected on the overall funding rate from government, questioning the level being paid in the first instance. Some commented on the need for more deprivation funding whilst another expressed that SEND shouldn't be lower to supplement other children.

Question 3:

Please use this section to provide any additional comments you wish to make.

The majority of providers shared their comments within answers to Q1, however some providers wished to express further views on the EYSFF. Several relayed that the base rates in themselves were already too low regardless of any increase

forthcoming through this consultation. A provider reflected on the requirement that any additional charges added to funded hours need to be voluntary, and that the providers themselves should be empowered to charge freely against funded hours, or the funding itself is commensurate to the cost of supply. One provider expressed particular concern over staffing challenges and attracting the quality staff required to provide an outstanding service to children. Others shared that SEND funding must be prioritised.

Questions received during the consultation

Several specific provider questions have been shared during the consultation with answers forwarded as follows:

Please could you confirm what an 8pph/12pph increase would be as a percentage for the 2, 3 and 4 year old rates and whether you are predicting a contingency to account for any over or under spend at the end of the financial year?

- That would be a 1.9% increase on the base rate for both age categories. We have not budgeted for a contingency; we continue to set a budget that passes on as much of the funding from central government as we can. The number of hours we are funded for each year does not always match up to the number of hours paid to providers as funding is based solely on the January census. Fluctuating numbers through the year normally balance out and there are often variances one way or another. The percentage of the EYSFF that we have proposed to retain next year has fallen in this proposal as we have not increased the value of the monetary amount required.

If there is an under spend what will happen with the money?

- Forecasts would suggest any underspend this year is unlikely and in fact we are expecting an overspend, it's likely however that this year providers will receive more funding than was given to us by central government. As in previous years any under or overspend would be combined with the overall Dedicated Schools Grant position. The intention is to set a budget that broadly balances so under and overs, year to year, balance out. The aim is therefore to budget well so there is no need to reduce the formula in future years whilst ensuring we pass on as much as we can to providers.

How much of the High Needs element of the dedicated schools grant is spent supporting children aged 0-5?

- Portage and Early Years SEN Team – £616k
EHCPs for 0-5 children not in mainstream settings - £120k
EHCPs for children attending EY mainstream settings - £46k
Plus, any share of SALT, HVSS and other central services accessed by pre-school children

With regards to marketing please can you let me have some evidence to show how that part of the budget was spent?

- To reach and engage as many families with an eligible 2 year olds as possible the Family Information Service (FIS) team print and post firstly a 2 year old's postcard (approx. 4,000 per year printed labelled and posted along with an information letter). Where access to parent's email or phone number is available the FIS team will email message and SMS text message to those parents with further information regards their entitlement and the positive nature of the offer. The FIS team are also the line of contact for general parent enquiries and brokerage needs for eligible 2 year old's, independently of the 2 year old DWP postcard process. Majority of retention goes towards staffing and licences for the funding system.

How have the Council measured their effectiveness in this area?

- BCP Council have one of the highest take-ups of vulnerable 2 year old's in England, whereby the total number of DWP list eligible households is compared with the total number of children accessing 2 year old's early education for the same point in time. The most recent data shows an 84% take-up and BCP sit within the top 20 LAs through the DfE's termly Operational Survey Data Collection (not published and DfE request that the detail is not shared beyond the LA, it is simply data collated to support ministers ongoing understanding and support LA's understanding of how their local offer is faring nationally). The extreme targeting of families that are engaged several times is an area that is not currently monitored but a potential area to be enhanced going forward.

Appendix

Consultation provider comments in full (anonymised where necessary)

Q1. Providers that did not support Option 1

Childminder	Rate for 3 and 4 year olds is too low
Childminder	Further Gov funding
Childminder	We are struggling financially with low funding, the staff wages are increasing and our ratio is small, creating a loss each month. Send funding should be increased but not by the amount shown, you will find many childcare settings closing because they are unable to meet the needs. This will also cause discrimination towards poorer families.
Childminder	I don't know
Childminder	Additional funding should be supported by the government
Childminder	Raising funding by 8p is like nothing.
Childminder	Send should get full funding
Childminder	With rising costs to sustain the business I need to access the greatest amount of funding possible for the majority demographic of those children who will be accessing the funding in my setting.
Childminder	I believe that the level being provided as a base rate is far too low for 3 and 4 years olds and will ultimately mean setting like mine have no option but to stop offering funding
Childminder	I would like to see the base rate increase by more than this to help maintain the provision for the majority of children.
Childminder	I went with the middle option as I feel SEND clients can access other financial help if required. I do feel that the money given as extra should be accountable to show what the money has been spent on.
Childminder	I feel that the base rate should be more evenly distributed because some children can be borderline SEND
Childminder	There should be extra funding available separately to support SEND so that all children can enjoy free childcare without the need for practitioners to ask for contributions from parents to meet their basic hourly rate. It's a difficult issue to address but there is always going to be shortfall unless more money is made available to support families and protect the income of childcare providers. I am voting in the middle so that both SEND and other 3-4 year olds benefit equally.
Childminder	Because the hourly rate in the whole doesn't cover the rate we charge as a childminder
Childminder	There does seem to be increasing numbers of children with SEND and do agree additional funding is needed.
Childminder	I feel that SEND get a very high percentage of the government funding - maybe some funds from other childcare pots can be used to subsidise it. I feel option 2 is a fair distribution if the overall funding.
Childminder	Parents asked to use funding for child
Day Nursery	<p>The base rate needs to increase otherwise the pre-school is not viable and we will close. As managers and owners, we would be better off working for someone else then continuing to stay open. Our workload has increased massively in terms of reporting and responsibilities. Children have been seen virtually for last two years and many issues missed by health which are then picked up by the pre-school.</p> <p>This rate will barely cover the minimum wage increases (there is a 59p per hour minimum wage increase - there are four two years to each adult with an increase of 12p per house this equals 48p an hour so will not cover this). All our bills are increasing and this is not sustainable.</p>

	<p>You are asking us, as owners, to fund SEND Inclusion and essentially, we lose money on each SEND child we take. Base rate + top up rate, does not cover the cost of a place.</p> <p>Would you be willing to take a pay cut to help the SEND Inclusion Funding? That is what we are being asked. Why should we as providers fund it.</p> <p>We are a term time setting and nearly all of our children are fully funded. We will have no choice but to review our policy on resource charging if we wish to remain open next year.</p>
Day Nursery	Local Authorities Statutory responsibility
Day Nursery	The increase in base rate for 2yr 3/4yr olds will make up for the decrease in SEND rate
Day Nursery	Not all settings are eligible to claim SEND payments-the majority of my funding income is 3 and 4 year old funding
Day Nursery	This increase is unfair on the majority of families.
Day Nursery	At this setting we currently only have 1 child receiving SEND funding. Therefore, it would be more beneficial for sustainability and to help reduce costs for the majority of parents whose children attend by increasing the base rate more.
Day Nursery	Due to lockdown our levels of SEND children have increased. We need the funding to be able to ensure all children receive an inclusive learning environment however nurseries need funding to do this. To ensure the staff are well trained and have access to all the resources not to the detriment.
Day Nursery	Option 2 seems fair for all
Day Nursery	<p>We agree to set a formula which allows providers to better forecast funding and a business plan.</p> <p>We support SEND funding for every hour a child attends. However, this cannot be at the expense of the rest of the children within our provision as ALL children need to achieve their potential. We disagree with further resourcing for children with High Needs to be allocated from the Early Years Block as this is already at breaking point. As a setting, we are one of the first points in identifying and supporting children with additional needs through to diagnosis and ECHP completion. This is paid for by us as a business thus saving BCP Council a great deal of money as does every other provider in the borough. Therefore, siphoning off funding from the Early Years Block to 'prop up' the High Needs Block is something we cannot support.</p>
Day Nursery	Over the Covid period we have had very limited SEND provision from the Borough, although we do appreciate that it has been a very difficult time. Therefore Option 2 is a more agreeable rate to assist with in house provision and time spent on SEND.
Day Nursery	The issue around the SEND funding is not just growth in the requirement, but poor use of the existing budget. If the existing money were better deployed, with greater understanding of how it is being used, there would be less demand for contributions from other budgets. I would also like to understand if the money taken from the Early Years budget is used for Early Years SEND children or just added to the general SEND pot?
Day Nursery	As we already at a huge loss as it is
Day Nursery	The money for SEND children is not enough regardless of any options to pay for a member of staff it is below the minimum wage rate. With increased costs facing providers this will only add to the worries we all have for remaining solvent There should be a separate send fund to the 3 and 4 year old funding - a government issue? a local issue?
Day Nursery	there should be separate funding for SEND
Preschool	<p>Providers need all of the 2022/2023 increase from central Government to increase the base rates as much as possible for all funded children.</p> <p>Provider sustainability is seriously under threat from a significantly underfunded base rate. Government's own figures suggest that in 2020/2021 the base rate was underfunded by £2.60 per hour. Underfunding has been a significant contributing factor in the closure of some 4000 early years settings over the past 2 years. The</p>

	<p>more settings that close the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely impacted.</p> <p>Recruitment and retention pose a significant threat to the sector with an Early Years Alliance report in October 2021 showing that more than eight in 10 settings are finding it difficult to recruit staff. Moreover, a significant proportion of providers are having to limit the number of, or stop taking on, new children. Furthermore, there are concerns within the sector that staffing shortages are likely to force settings to close permanently. The more settings that experience staffing challenges the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely affected.</p> <p>Sustainability and recruitment and retention problems are also set to be exacerbated by the increased costs providers will need to find in April 2022 to cover statutory increases in wages bills as minimum wage levels and employer national insurance contribution levels increase. Alongside these increases further cost pressures as a result of general inflation and increases in the costs of consumables should not be underestimated.</p> <p>Even if the base rates were increased by the full 17p per hour and 21p per hour allocations this would still leave a considerable base rate funding shortfall. That being said, a base rate at the highest possible level is the best mechanism that we currently have to help providers remain sustainable. The more sustainable providers are the more likely it is that the Council will have enough providers to ensure that they are able to meet their statutory duty in respect of the provision of free places across the borough. Moreover, the more sustainable providers are, then the more able they will be to meet the needs of the most vulnerable children and families including those children with SEND.</p> <p>The local authority must have a Special Education Needs Inclusion Fund (SENIF) for all 3 and 4 year olds with SEND who take up their free entitlement. Whilst it is desirable, the local authority DO NOT have a statutory duty to fund the SEND needs of funded 2 year olds.</p> <p>Whilst it may seem unpalatable in these financially challenging times to not fund the SEND needs of funded 2 year olds it would give the Council the option of increasing provider base rates to the maximum whilst still meeting their statutory duties. Furthermore, it would send a powerful message to central government that SEND funding levels must be addressed if the most vulnerable children in society are to be supported.</p> <p>BCP Council does not have to using funding from the early years block to fund its SENIF. Again, in the interests of ensuring that provider base rates can be increased to the maximum to aid sustainability the SENIF could be fully or partially funded from the high needs block of their Designated Schools Grant allocation. Whilst being fully aware that the high needs block is considerably overspent, again it would send a powerful message to central government that SEND funding levels across all age groups are inadequate.</p> <p>It is acknowledged that current levels of SEND funding for children in early years settings are insufficient. As a result of this providers are already having to limit the number of SEND children that they can safely meet the needs of. This mean that there is already a real possibility that the overall capacity of the local childcare market to support these children is already diminished. SEND funding at anything less than it costs to properly deliver appropriate SEND support will not increase the number of SEND places available at early years settings within the borough. Increasing the SENIF without the guarantee of increasing early years SEND places is therefore not an acceptable option.</p>
Preschool	Settings cannot run with such a small rise in hourly rate.
Preschool	The bulk of our funding comes from the base rates and with a difficult year behind we really need to look at sustainability see
Preschool	Be more inclusive for children who don't reach thresholds but still need extra support.

Preschool	As settings generally have more children on base rate the extra money plus EYPP can be used to assist their SEND children
Preschool	I feel more money should go to the children who are in everyday, as it is difficult enough to get any funding for the children requiring SEN funding.
Preschool	Even by increasing by 17p per hour there is still a considerable amount for SEND, we as a setting have SEND children but would still benefit more from the increased hourly rate for all children. Without this increase there is the possibility we may be forced to reduce more days, or close all together.
Preschool	The base rate has been set too low to meet the requirements of the nursery. We will not be sustainable under option 1. Within our setting to meet the difference on the SEND funding we will just have to become creative and make it work.
Preschool	In our setting: staff turnover is very low. They are highly qualified and experienced in their roll, especially in SEN work. We strongly feel that the key to an inclusive setting where the needs of all children are met, are childcare practitioners who are valued for the work they do under difficult circumstances e.g., low pay. If staff feel valued, they will be committed to ongoing training to carry out their SEN work. For this reason, we have chosen option 3.
Preschool	With the increases we are facing from April including the raise in minimum wage and living wage, we need the increase to go on our base rate to be able to afford to stay open in the future. Budgets need to be looked at for the SEN funding and a solution that does not leave settings facing closure must be found.
Preschool	We already subsidise all SEND children with or without additional funding. The proportion of SEND children to 2,3 and 4 year olds would mean we would not benefit. Changes to the NMW/NLW over the past 5 years and going forward mean that we are grossly underfunded. We need to increase the income as much as possible to remain at all sustainable.
Preschool	By taking option one we would really struggle to meet the wage increase that the government has imposed from April 2022. Which would mean that as a preschool we would struggle to stay open due to ratio and staff. This in turn means less choices for parents of SEN children to find placements if settings are unable to operate. We appreciate that this sector is vastly underfunded and the difficult choices, but we have to think of our staff and the wage costs and the desire to stay open for our local children. The only other option available to early years is if we were allowed to top up the session fees to all children who are funded (excluding SEN, EYPP, deprivation and Two's Too funded). This would be an enormous help to us all.
Preschool	I think that many Early Years providers will not be able to sustain their businesses in line with living wage rises etc. Especially as 'top-up' fees are discouraged. Quality staffing is crucial to inclusive practice and many staff have a number of roles and responsibilities within each provision. These responsibilities are often recognised through pay so more of a balance is needed.
School Nursery	Option 2 - would give the setting more funding which means that we are better placed to support the SEN with the reduced level of funding. I recognise that this is not the perfect solution but none of the option offered will solve the crisis we are in - only more funds from central government and a true uplift in the rates paid will achieve this.
Preschool	We feel that with the money provided for send in option 2 is enough to achieve desired outcomes for special needs as well as being able to claim a DAF payment.
Preschool	No suggestions

Q1. Providers that did not support Option 2

Childminder	3 a d 4 year old rate too low
Childminder	Further Gov funding
Childminder	To avoid more closures and discrimination, funded payments should be fair.
Childminder	I don't know

Childminder	Additional funding should be supported by the government
Childminder	Again, 12p is not enough.
Childminder	This is a joke it is rob Peter to pay Paul
Childminder	With rising costs to sustain the business I need to access the greatest amount of funding possible for the majority demographic of those children who will be accessing the funding in my setting.
Childminder	If funding rates for all children are increased this will indirectly support settings with children with SEND
Childminder	Specialist equipment for children with SEND is far more expensive
Childminder	More send funding required
Childminder	SEND funds should not be reduced to accommodate an increase as this will be at a detriment to some parents/providers.
Childminder	I don't see how we can support the SEND provision by cutting the money allocated to it other than lobby the government to give you more. This would be my 2nd preferred option.
Childminder	I believe the SEND funding should receive the majority of funding
Childminder	If you need more funding for SEND, then I will take your word for it.
Childminder	I am aware from networking with other provisions in my local area that there is an increase in children with SEND attending settings. Whilst this does not apply to my setting personally, I would prefer any increase to be put into this area as there is obviously a requirement for it and I do not think this area of funding allocation should be decreased.
Childminder	I will welcome the funding increase mentioned in Option 1 and I agree that SEND rates would stay the same.
Childminder	I am fully aware that there are a lot of children not getting the support they need.
Childminder	Whilst like the majority of providers, I would like the funding rate as high as possible for 2,3&4 year olds, as for each hour I deliver I lose out compared to my standard hourly rate, I appreciated there is an increasing number of children drawing on the SEND pot of money and therefore I believe to close the disadvantage gap there shouldn't be a decrease in funding, which is why reluctantly I have agreed to option 1, even though it makes me financially worse off.
Childminder	No reduction
Day Nursery	<p>The base rate needs to increase otherwise the pre-school is not viable and we will close. As managers and owners, we would be better off working for someone else than continuing to stay open. Our workload has increased massively in terms of reporting and responsibilities. Children have been seen virtually for last two years and many issues missed by health which are then picked up by the pre-school.</p> <p>This rate will barely cover the minimum wage increases (there is a 59p per hour minimum wage increase - there are four two years to each adult with an increase of 12p per house this equals 48p an hour so will not cover this). All our bills are increasing, and this is not sustainable.</p> <p>You are asking us, as owners, to fund SEND Inclusion and essentially, we lose money on each SEND child we take. Base rate + top up rate, does not cover the cost of a place.</p> <p>Would you be willing to take a pay cut to help the SEND Inclusion Funding? That is what we are being asked. Why should we as providers fund it.</p> <p>We are a term time setting and nearly all of our children are fully funded. We will have no choice but to review our policy on resource charging if we wish to remain open next year.</p>
Day Nursery	Local Authorities Statutory responsibility

Day Nursery	The increase in base rate for 2yr 3/4yr olds will make up for the decrease in SEND rate
Day Nursery	Not all settings are able to claim SEND
Day Nursery	This increase is unfair on the majority of families. We would still be able to offer sufficient SEND financial support with the lower rate, of course depending on the availability of EY practitioners to support children with SEND. At the higher rate of 3&4 year old funding, we can pay more to our amazing staff, who will then in turn want to stay in the sector.
Day Nursery	Same as above - at this setting we currently only have 1 child receiving SEND funding. Therefore, it would be more beneficial for sustainability and to help reduce costs for the majority of parents whose children attend by increasing the base rate more.
Day Nursery	As SEND is increasing in numbers of children it should be spent at ground level enabling staff to help the children directly.
Day Nursery	As per option 1. Should not reduce SEND funding
Day Nursery	The system of assessing each child individually seems to work well. The amount for tier 1 and tier 2 needs to be increased to allow staffing levels to be increased. The NLW is rising 6.6% and funding increase does not match this. It is very hard to recruit good staff with the low amount given to us from BCP.
Day Nursery	This whole consultation is loaded to prevent settings from being able to voice the real crisis financially within early years. To pitch better base rates for all families against the funding for children with additional needs within all 3 options is extremely manipulative. To say we are dismayed by this approach is an understatement. Sadly, the only option we can see is the high needs block must be used to support the increase in SEND. It is not acceptable that Early Years basic funding rates are being consistently disseminated as this is already preventing settings from supporting all families appropriately (staffing crisis) and sustainably.
Preschool	<p>Providers need all of the 2022/2023 increase from central Government to increase the base rates as much as possible for all funded children.</p> <p>Provider sustainability is seriously under threat from a significantly underfunded base rate. Government's own figures suggest that in 2020/2021 the base rate was underfunded by £2.60 per hour. Underfunding has been a significant contributing factor in the closure of some 4000 early years settings over the past 2 years. The more settings that close the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely impacted.</p> <p>Recruitment and retention pose a significant threat to the sector with an Early Years Alliance report in October 2021 showing that more than eight in 10 settings are finding it difficult to recruit staff. Moreover, a significant proportion of providers are having to limit the number of, or stop taking on, new children. Furthermore, there are concerns within the sector that staffing shortages are likely to force settings to close permanently. The more settings that experience staffing challenges the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely affected.</p> <p>Sustainability and recruitment and retention problems are also set to be exacerbated by the increased costs providers will need to find in April 2022 to cover statutory increases in wages bills as minimum wage levels and employer national insurance contribution levels increase. Alongside these increases further cost pressures as a result of general inflation and increases in the costs of consumables should not be underestimated.</p> <p>Even if the base rates were increased by the full 17p per hour and 21p per hour allocations this would still leave a considerable base rate funding shortfall. That being said, a base rate at the highest possible level is the best mechanism that we currently have to help providers remain sustainable. The more sustainable providers are the more likely it is that the Council will have enough providers to ensure that they are able to meet their statutory duty in respect of the provision of</p>

	<p>free places across the borough. Moreover, the more sustainable providers are, then the more able they will be to meet the needs of the most vulnerable children and families including those children with SEND.</p> <p>The local authority must have a Special Education Needs Inclusion Fund (SENIF) for all 3 and 4 year olds with SEND who take up their free entitlement. Whilst it is desirable, the local authority DO NOT have a statutory duty to fund the SEND needs of funded 2 year olds.</p> <p>Whilst it may seem unpalatable in these financially challenging times to not fund the SEND needs of funded 2 year olds it would give the Council the option of increasing provider base rates to the maximum whilst still meeting their statutory duties. Furthermore, it would send a powerful message to central government that SEND funding levels must be addressed if the most vulnerable children in society are to be supported.</p> <p>BCP Council does not have to using funding from the early years block to fund its SENIF. Again, in the interests of ensuring that provider base rates can be increased to the maximum to aid sustainability the SENIF could be fully or partially funded from the high needs block of their Designated Schools Grant allocation. Whilst being fully aware that the high needs block is considerably overspent, again it would send a powerful message to central government that SEND funding levels across all age groups are inadequate.</p> <p>It is acknowledged that current levels of SEND funding for children in early years settings are insufficient. As a result of this providers are already having to limit the number of SEND children that they can safely meet the needs of. This mean that there is already a real possibility that the overall capacity of the local childcare market to support these children is already diminished. SEND funding at anything less than it costs to properly deliver appropriate SEND support will not increase the number of SEND places available at early years settings within the borough. Increasing the SENIF without the guarantee of increasing early years SEND places is therefore not an acceptable option.</p>
Preschool	Be more inclusive for children who don't reach thresholds but still need extra support.
Preschool	As settings generally have more children on base rate the extra money plus EYPP can be used to assist their SEND children
Preschool	As above we except that taking the maximum increase on the base rate will lower the SEN funding we receive for eligible children however we need to survive to be able to help any SEN children in the future.
Preschool	We already subsidise all SEND children with or without additional funding. The proportion of SEND children to 2,3 and 4 year olds would mean we would not benefit. Changes to the NMW/NLW over the past 5 years and going forward mean that we are grossly underfunded. We need to increase the income as much as possible to remain at all sustainable.
Preschool	The requirement for additional SEND payments should be broader to cover the different levels of SEN including one to one.
Preschool	<p>Provide more funding for quality Early Years send support.</p> <p>Don't reduce funding when a child make progress, they are only progressing because of the additional funding that provides additional adult support.</p> <p>Provide funding for lower need send, recognise that for some children funding intensive early intervention can close the gap between them and their peers before school starts, as well as being what is best for the child and family, this would save money longer term too!</p> <p>Give better training and more regular support from sendos</p> <p>Don't base funding solely on SOGS assessment many children who need high levels of additional support do not show needs accurately on SOGS e.g. behavioural support, social and emotional support</p>

Preschool	<p>To continue providing the high level, quality education to our children including our SEN children then Option 1 is best as any reduction in the SEN rate will significantly reduce the quality of the education we provide and we would struggle to provide adequate support for these vulnerable children need.</p> <p>Our SEN children don't have a voice and parents find it hard enough to get appropriate support for their children if this is reduce further then setting will struggle to provide any SEN support. We need to be their voice and to not allow them to be forgotten or to let them fall through the cracks.</p> <p>I have written 6 EHC needs assessment request forms (there is a high need for SEN support at the moment) and the support these children need is critical to their development and to the progress they have been making. In each EHC I break down how we spend the money to support the children and most of the time we are funding some of the SEN support ourselves as the SEN rate doesn't cover it all.</p> <p>If money is taken away from these vulnerable SEN children, then it will be detrimental to their development and wellbeing. These children will struggle to make progress without the high level of adult support that can only just be provided on what we receive now.</p>
Preschool	We are unable to support children with SEND on such a low level of funding.
Preschool	I feel SEN funding should remain at current level as any decrease will impact in providers being able to fulfil child's needs.
Preschool	No suggestion

Q1. Providers that did not support Option 3

Childminder	2 year old funding too high at the expense of 3 and 4 year old funding which is too low
Childminder	This would reduce the send funding to much
Childminder	Although a nice increase on the base rate the cut to SEND funding is too steep.
Childminder	I don't know but do border line children need the money
Childminder	The money for SEND is too low
Childminder	I am not in a position to be able to answer this question with the knowledge that I have. It's a complicated issue that would need many hours of study. I just feel that it should be addressed separately from 'normal' childcare which the government has advertised as free. At this time voting in the middle means that we all benefit just a little more.
Childminder	By opting for option 2 feels fair to give more children better quality childcare with slightly more funding than we're getting at the moment.
Childminder	SEND funding is essential for their development
Childminder	More send funding required
Childminder	I don't see how we can support the SEND provision by cutting the money allocated to it (especially by this amount) other than lobby the government to give you more
Childminder	I don't agree with cutting the rates
Childminder	Hopefully maintaining the SEND rate will enable to provide for children's needs by training enough practitioner to help provide for children's individual needs.
Childminder	These children need the support while they are young and too many slips through the net.
Childminder	The disadvantage gap needs closing, which has to be done by passionate, dedicated, highly professional practitioners, who willingly work with these children, but need the financial support for suitability. Otherwise, we will continue to lose settings.

Childminder	No reduction
Childminder	There should be some increase in the send fund as these are children in most need of support.
Childminder	I have no suggestions
Day Nursery	<p>The base rate needs to increase otherwise the pre-school is not viable and we will close. As managers and owners, we would be better off working for someone else than continuing to stay open. Our workload has increased massively in terms of reporting and responsibilities. Children have been seen virtually for last two years and many issues missed by health which are then picked up by the pre-school.</p> <p>This rate will barely cover the minimum wage increases (there is a 59p per hour minimum wage increase - there are four two years to each adult with an increase of 12p per hour this equals 48p an hour so will not cover this). All our bills are increasing and this is not sustainable.</p> <p>You are asking us, as owners, to fund SEND Inclusion and essentially, we lose money on each SEND child we take. Base rate + top up rate, does not cover the cost of a place.</p> <p>Would you be willing to take a pay cut to help the SEND Inclusion Funding? That is what we are being asked. Why should we as providers fund it.</p> <p>We are a term time setting and nearly all of our children are fully funded. We will have no choice but to review our policy on resource charging if we wish to remain open next year.</p>
Day Nursery	Extra money will be applied to the base for ALL children as they also need to reach their full potential. The base rate is the only reliable source of income for funded children and will provide us with some stability. However, we as providers should not be expected to subsidise a lack of funding from the Government for the High Needs Block (we as Early Years providers are not a financial drain on the High Needs Block as we donate our own time and resources).
Day Nursery	The base rate for 2 3 and 4 year old needs to be more to be more for us to be able to afford to remain open .
Day Nursery	As per option 1. Should not reduce SEND funding
Day Nursery	As above. High needs block. Send a message to the Government BCP.
Preschool	<p>Providers need all of the 2022/2023 increase from central Government to increase the base rates as much as possible for all funded children. Provider sustainability is seriously under threat from a significantly underfunded base rate. Government's own figures suggest that in 2020/2021 the base rate was underfunded by £2.60 per hour. Underfunding has been a significant contributing factor in the closure of some 4000 early years settings over the past 2 years. The more settings that close the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely impacted.</p> <p>Recruitment and retention pose a significant threat to the sector with an Early Years Alliance report in October 2021 showing that more than eight in 10 settings are finding it difficult to recruit staff. Moreover, a significant proportion of providers are having to limit the number of, or stop taking on, new children. Furthermore, there are concerns within the sector that staffing shortages are likely to force settings to close permanently. The more settings that experience staffing challenges the more likely it is that the overall capacity of the childcare market (including the local childcare market) to support children with SEND will be adversely affected.</p> <p>Sustainability and recruitment and retention problems are also set to be exacerbated by the increased costs providers will need to find in April 2022 to cover statutory increases in wages bills as minimum wage levels and employer national insurance contribution levels increase. Alongside these increases further cost pressures as a</p>

	<p>result of general inflation and increases in the costs of consumables should not be underestimated.</p> <p>Even if the base rates were increased by the full 17p per hour and 21p per hour allocations this would still leave a considerable base rate funding shortfall. That being said, a base rate at the highest possible level is the best mechanism that we currently have to help providers remain sustainable. The more sustainable providers are the more likely it is that the Council will have enough providers to ensure that they are able to meet their statutory duty in respect of the provision of free places across the borough. Moreover, the more sustainable providers are, then the more able they will be to meet the needs of the most vulnerable children and families including those children with SEND.</p> <p>The local authority must have a Special Education Needs Inclusion Fund (SENIF) for all 3 and 4 year olds with SEND who take up their free entitlement. Whilst it is desirable, the local authority DO NOT have a statutory duty to fund the SEND needs of funded 2 year olds.</p> <p>Whilst it may seem unpalatable in these financially challenging times to not fund the SEND needs of funded 2 year olds it would give the Council the option of increasing provider base rates to the maximum whilst still meeting their statutory duties. Furthermore, it would send a powerful message to central government that SEND funding levels must be addressed if the most vulnerable children in society are to be supported.</p> <p>BCP Council does not have to using funding from the early years block to fund its SENIF. Again, in the interests of ensuring that provider base rates can be increased to the maximum to aid sustainability the SENIF could be fully or partially funded from the high needs block of their Designated Schools Grant allocation. Whilst being fully aware that the high needs block is considerably overspent, again it would send a powerful message to central government that SEND funding levels across all age groups are inadequate.</p> <p>It is acknowledged that current levels of SEND funding for children in early years settings are insufficient. As a result of this providers are already having to limit the number of SEND children that they can safely meet the needs of. This mean that there is already a real possibility that the overall capacity of the local childcare market to support these children is already diminished. SEND funding at anything less than it costs to properly deliver appropriate SEND support will not increase the number of SEND places available at early years settings within the borough. Increasing the SENIF without the guarantee of increasing early years SEND places is therefore not an acceptable option.</p>
Preschool	As above statement.
Preschool	Option 3 will not support the growth in the numbers of children requiring SEN inclusive childcare and education and their needs.
School Nursery	Option 2 - would give the setting more funding which means that we are better placed to support the SEN with the reduced level of funding. I recognise that this is not the prefect solution but none of the option offered will solve the crisis we are in - only more funds from central government and a true uplift in the rates paid will achieve this.
Preschool	This option for send is simply too low.
Preschool	<p>To continue providing the high level, quality education to our children including our SEN children then Option 1 is best as any reduction in the SEN rate will significantly reduce the quality of the education we provide and we would struggle to provide adequate support for these vulnerable children need.</p> <p>Our SEN children don't have a voice and parents find it hard enough to get appropriate support for their children if this is reduce further then setting will struggle to provide any SEN support. We need to be their voice and to not allow them to be forgotten or to let them fall through the cracks.</p> <p>I have written 6 EHC needs assessment request forms (there is a high need for SEN support at the moment) and the support these children need is critical to their</p>

	<p>development and to the progress they have been making. In each EHC I break down how we spend the money to support the children and most of the time we are funding some of the SEN support ourselves as the SEN rate doesn't cover it all.</p> <p>If money is taken away from these vulnerable SEN children, then it will be detrimental to their development and wellbeing. These children will struggle to make progress without the high level of adult support that can only just be provided on what we receive now.</p>
Preschool	We are unable to support children with SEND on such a low level of funding.
Preschool	Decrease in SEN funding should not be allowed.

Q2. Do you support the proposal to make no other changes from 2021-22 to the EYSFF for 2022-23 (no change to the existing allocation to Deprivation Supplement and Central Spend)?

Childminder	This funding should be separate pot
Childminder	Childcare settings are struggling. We cannot maintain care without higher rates.
Childminder	Increase in 3 - 4 year olds
Childminder	Concerned that send funding is not receiving sufficient funding
Childminder	The deprivation supplement may need additional allocation by the 22/23 term as financially a lot more families may be in a worse position and to keep in line with the economy/inflation.
Childminder	I would like a higher increase in 3 & 4 years funding & less for send
Day Nursery	The funding is wholly inadequate
Day Nursery	I completely disagree with all of this. Why should the SEND funding be so low just so other's benefit. How are setting meant to be fully inclusive with SEND funding cut which is already lower than the national living wage. The raise should be 12 and 16 p per hour however the SEND money should not be compromised by this. Funding raised 12p and 16p per hour and no effect to the SEND payments. Lets ensure all children have access to high levels of learning and not to the nurseries detriment. With the national minimum wage rising so much nurseries need the increase in funding to recruit high level practitioners.
Preschool	We need more funding
Preschool	Deprived areas need extra funding as families can't afford any voluntary additional costs. Eg consumables, extra curricular activities
Preschool	We have no idea to the wage increase that the government will impose.
Preschool	There needs to be a change and it needs to be an increase in funding to support ALL children with SEN whatever their level of need

Q3. Please use this section to provide any additional comments you wish to make

Childminder	The 3 and 4 year old funding rate is too low
Childminder	The Gov and LA should be more transparent explaining what allocated funding monies gets filtered off to pay LA "other" needs
Childminder	Please take into consideration. Higher bills, higher food bills, staff wage increase, pensions, insurances. We need help to offer equal care to each child without suffering severe losses.
Childminder	The bulk of funding is 3/4yr olds so that makes up large proportion of our income so best rise for that is better for us
Childminder	All these questions sorry are a joke it clearly rob Peter to pay Paul we are losing far too many people in child care across the board, childminder are losing money with funding are not coving there hourly rate

Childminder	The demographic of need may shift and if this is the case there may be a greater need to support SEND in the setting. Therefore, further consultation to review the shift in the coming year will be required to ensure settings have the appropriate funding year on year.
Childminder	Not being able to ask parents for the shortfall in a direct way is humiliating. Disguising it as consumables which not all children use is not fair practice. Making it a voluntary contribution puts the practitioner in a precarious position. If childcare is advertised by the government as free, then that is what it should be without jeopardising the livelihood of settings. Or simply allow practitioners charge the top up.
Day Nursery	<p>The base rate needs to increase otherwise the pre-school is not viable and we will close. As managers and owners, we would be better off working for someone else then continuing to stay open. Our workload has increased massively in terms of reporting and responsibilities. Children have been seen virtually for last two years and many issues missed by health which are then picked up by the pre-school.</p> <p>This rate will barely cover the minimum wage increases (there is a 59p per hour minimum wage increase - there are four two years to each adult with an increase of 12p per hour this equals 48p an hour so will not cover this). All our bills are increasing and this is not sustainable.</p> <p>You are asking us, as owners, to fund SEND Inclusion and essentially, we lose money on each SEND child we take. Base rate + top up rate, does not cover the cost of a place.</p> <p>Would you be willing to take a pay cut to help the SEND Inclusion Funding? That is what we are being asked. Why should we as providers fund it.</p> <p>We are a term time setting and nearly all of our children are fully funded. We will have no choice but to review our policy on resource charging if we wish to remain open next year.</p>
Day Nursery	We really need to be supported with the extra funding for two three and four year olds which is so necessary for the sustainability of the nursery
Day Nursery	We need to look at the bigger picture right now and that is keeping good staff at an affordable rate for parents. If the government keep insisting this is FREE, then we need to receive the increased rate across the majority of families. I am a parent of a SEN child, so fully aware of additional costs involved.
Day Nursery	We would urge the council to look at other areas of its reserves/budget to increase support in Early Years, as the support from the DfE does not cover national minimum wage increases or run the risk of losing sufficiency capacity.
Day Nursery	<ul style="list-style-type: none"> • Nursery businesses need to breakeven or make a profit in order to remain sustainable. • Any profit is used to invest in training for staff and learning resources for the children. • Knowledgeable, qualified staff maintain and improve quality, reducing attainment gaps and therefore outcomes for children. • High quality Early Years education gives all children the best chance to fulfil their potential. • Numbers of Level 3 qualified staff are decreasing. • We are finding it difficult as a training provider and Early Years provision to attract new trainees to the sector as funding for Early Years courses is almost non-existent and Career Development Loans are now discontinued. • Early Years staff are not valued at the same level of remuneration as a primary reception teacher - teaching exactly the same Early Years Foundation Stage. • There is no financial incentive for our staff to continue their professional development and increase their responsibilities as the difference between the Living Wage and salaries for higher qualified staff is being gradually depleted. We are not able to maintain an increase across the board for all staff. Therefore, our motivated and dedicated staff are feeling undervalued, underpaid and are seeking employment

	<p>outside the Early Years sector i.e., retail.</p> <ul style="list-style-type: none"> • Early Years in general are struggling to recruit qualified staff. • Business rates are crippling our sector and should be addressed by local government.
Day Nursery	<p>Consultation as always too quick and at the busiest time of year when most people on holiday or at present suffering from covid /omicron.</p> <p>Can you please tell us what an 8 pence per hour increase would be and a 12 pence per hour would be as a percentage for the 2, 3 and 4 year old rates and are you predicting a contingency to account for any over or under spend at the end of the financial year? Providers need to know this and have a say should be carried out every year as providers situations change i.e., number of send children differs yearly</p> <p>How much of the Higher Needs element of the dedicated schools grant is spent supporting children 0-5?</p>
Day Nursery	Should not reduce SEND funding
Day Nursery	<p>The funding level and the low amount paid will always be an issue. Until level of funding is equal to the cost of running the nursery, sustainability will be an ongoing concern.</p> <p>The sector is undervalued and underfunded and struggling to maintain high standards.</p>
Day Nursery	<p>The funding level and the low amount paid will always be an issue. Until level of funding is equal to the cost of running the nursery, sustainability will be an ongoing concern.</p> <p>The sector is undervalued and underfunded and struggling to maintain high standards.</p>
Day Nursery	<p>Option 1 - no choice but to agree to this option but are extremely concerned by this crisis for settings.</p> <p>Option 2 - no choice</p> <p>Option 3 - no choice</p> <p>Question 9 - no choice.</p> <p>The alternative we have considered very seriously was to not agree to any of the options to send a message that this has to be addressed. Stealing from the inadequate pot which affects all early years families to support SEND underfunding is not acceptable.</p> <p>EYSFF is not fit for purpose due to the diversity of early years provision and chronic under funding.</p> <p>It appears that settings have lost the battle with regard to the funding entitlement being promoted by central and local Government as free. BCP needs to understand that without drastic change to how early years is funded there will no longer be enough provision for children in general. Funding must be linked to inflation and increase in minimum wage. Also, the PVI sector should be recognised as such and be able to charge appropriately to be financially viable. SEND provision must be considered within a separate finding mechanism and not versus providing for all children.</p>
Preschool	<p>Options 2 and 3 of the Council's consultation document include the following text:</p> <p>"Early Years Additional SEND Payments are paid to support a setting in meeting the requirements of the Graduated Response for children who have a SEND. These payments are a contribution towards the specialist training, enhances in staffing ratios, adjustment to environment and resources which a setting may put in place to meet the specific needs of a child with SEND. A reduction in the rate of these payments will place a higher financial burden on settings, who will still be required to make reasonable adjustments to comply with their statutory duty under the SEND Code of Practice. This is not the preferred option of BCP Council. "</p> <p>The Council makes it clear that current SEND tier rates are a "contribution" towards the costs of supporting the specific needs of children with SEND. The expectation is clear that providers should be making up the difference between the Council's</p>

	<p>“contribution” and actual costs. Whilst no one would wish to see a reduction in SEND “contributions” from the Council, continuous underfunding and increases in costs, especially statutory increases in costs that providers have not control over make sustainability the most significant threat to early years providers. These budget pressures make it highly likely that providers will no longer be able to make up the difference between the Council’s “SEND contribution” and actual SEND support costs whatever the rate. Making up financial shortfalls is well beyond the remit of “reasonable adjustments” and as such could result in a net loss of early years SEND places.</p> <p>Moreover, it is somewhat insulting that BCP Council endeavour to remind providers of their responsibilities under the code of practice when given that Government are content to underfund both the sector and SEND in general and BCP consider it more important to deliver a balanced budget rather than fund SEND funding levels and provider base rates at appropriate levels.</p> <p>For the reasons listed this setting therefore does not agree with any of the options put forward by BCP Council for this consultation.</p> <p>Government guidance: Early years entitlements: local authority funding of providers operational guide 2022 to 2023 Published 25 November 2021 – Particularly Section 5.3 https://www.gov.uk/government/publications/early-years-funding-2022-to-2023/early-years-entitlements-local-authority-funding-of-providers-operational-guide-2022-to-2023</p>
Preschool	If we are to be able to provide all of the essential childcare that the government are talking about to parents. We need to be supported!!
Preschool	<p>This is such short notice.</p> <p>Email sent on Tuesday for meeting on Wednesday, less than 24 hours’ notice, when we are dealing with Christmas parties, nativities, Christmas songs and activities, staff off, as their children are ill or isolating and everything else that comes with the end of term. Not to mention the start of term on 11th January.</p> <p>ALL OF THE MONEY THAT COMES FROM CENTRAL GOVERNMENT SHOULD GO TO THE CHILDREN IT IS INTENDED FOR, THEN PARENTS WILL BE LESS CROSS WITH US & EXTRA FEES.</p> <p>I have a majority of non-SEND Children and will remain to take the same number of SEND as I have always, I will use the base rate to support this.</p>
Preschool	With all the increasing in outgoings i.e., wages, pensions, rent, insurance, and general outgoings, lots of settings in the area have been forced to close recently unless we get the increase, we will see more settings closing.
Preschool	We wish there was more money from the government to support all children within our setting, so we have chosen the best option for our setting. We do understand it is not the BCP fault, but we are hoping to stay sustainable.
Preschool	If option 3 is favoured, we will not make any changes to how we manage our SEN intake, we are already subsidising our SEN support as the current rate is not enough so we will continue to do so. having the maximum increase on the base rate will ensure the Pre-Schools survival and we will use all funds to support all children.
Preschool	We already subsidise all SEND children with or without additional funding. The proportion of SEND children to 2,3 and 4 year olds would mean we would not benefit. Changes to the NMW/NLW over the past 5 years and going forward mean that we are grossly underfunded. We need to increase the income as much as possible to remain at all sustainable.
Preschool	We feel that by increasing the base rate for all children (2, 3 and 4 years) we would be able to make a huge difference in the resources and activities we can offer all children in the setting, regardless of needs. There are many children with delayed speech that are not eligible for tier 1 funding. Therefore, a higher base rate will enable us to help that fulfil their potential.

Preschool	Support Early Years to provide quality SEND provision should be a priority for funding
Preschool	I agree that the SEND rates should be maintained towards supporting the SEND inclusion funding, but I also feel that as a charity-run setting we need to ensure that we can stay operational, so I feel that we should receive the most in the hourly rate (option 3). However, I understand that as usual, Early Years can't have both.