CCN Consultation Response

COUNTY COUNCILS NETWORK

Provisional Local Government Finance Settlement 2021/22

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Summary

1. The County Councils Network (CCN) represents 36 English local authorities that serve counties. CCN's membership includes both upper tier and unitary authorities who together have over 2,500 councillors and serve over 26m people (47% of the population) across 86% of England. CCN develops policy, shares best practice and makes representations to government. CCN is a member-led organisation which works on an inclusive and all-party basis.

2. We welcome the consultation on the provisional local government finance settlement. Please note, this consultation response also covers the proposals and questions in relation to the *COVID-19 funding for local government in 2021-22: consultative policy paper*. These consultations come at the end of a year that has witnessed unprecedented financial challenges for councils as a result of the COVID-19 pandemic.

3. CCN has worked pragmatically and constructively throughout this financial year with the Government to secure significant additional resources to respond to a dramatic rise in unplanned expenditure, lost income and falls in tax revenues. We welcome the support provided, and this settlement does provide further financial reassurance in relation to meeting additional costs and lost income next year.

4. However, the financial picture remains uncertain and extremely challenging. The latest national lockdown, which is witnessing much higher rates of COVID-19 infections in shire counties than throughout the entire pandemic, will add further cost pressures for the remaining months of this year and into next. As outlined in our response, we do raise concerns that the income compensation scheme for council tax will potentially provide significantly less compensation than first anticipated.

5. Moreover, while we welcome the additional resources and revenue raising flexibilities provided next year, these have done little to address significant underlying challenges that were present before the impact of COVID-19. It is critical that a full three-year spending review is conducted later this year, alongside the completion of the fair funding review and wider reforms to local government finance.

6. Before addressing the questions, we provide some important overview points in relation to the immediate challenges posed by the current lockdown. We also highlight issues to consider in relation to the longer-term funding of councils at what we hope will be a full three-year Spending Review in 2021.

Overview

Core Spending Power Proposals 2021/22

7. CCN response to the Spending Review outlined in extensive detail the financial challenges facing our member councils in the next financial year. Revised funding forecasts showed for 2021/22 CCN member councils faced a £2.3bn funding shortfall. This included £1.4bn of

underlying funding pressures that pre-dated the impact of COVID-19, alongside potential council tax and business rates deficits of £870m.[1]

8. Shortly before the announcement of the Spending Review and provisional settlement, CCN published the results of its Autumn Budget survey. This showed that for 2021/22, only one in five CCN member councils were confident they could deliver a balanced budget next year without 'dramatic' reductions to services.

9. This settlement does provide some certainty by ensuring a roll-over of all existing grants for councils alongside some resources to meet the underlying pressures on council budgets that pre-dated the impact of COVID-19. While this, alongside the proposals for COVID-19 funding support next year, will reduce the severity and impact of service reductions next year, **CCN member councils still face a significant funding gap that they will need to close next year. This will continue to result in reductions to services and use of reserves to fill the shortfall**.

10. It is important to recognise that the funding increases are partly funded by using the returned New Homes Bonus surplus to fund the £300m increase in social care grant and provision of a new £111m lower tier services grant. As we outline below, we believe it would have been fairer if the government had returned the NHB surplus via settlement funding assessment (SFA), in line with previous commitments by Government, while fully funding the £300m increase in social care grant from new resources.

11. This reality is that our member councils only benefit from MHCLG's stated increases in core spending power if councils increase council tax to the full 5%. CCN and our member councils support the flexibilities within the provisional settlement in relation to council tax. However, many county authorities are very reasonably taking the view that, despite the underlying financial pressure they face, in the current economic circumstances facing residents it is not feasible to increase Band D council tax by 5%.

12. Our current understanding from engaging member councils is that many of our councils will implement the full increase next year, with many deferring part of the adult social care precept to 2022/23. It is for these reasons we outline below that not only is the government overstating the increase in core spending power, it has also resulted in an approach to equalisation, applied to the £300m social care grant, that wrongly assumes councils will fully implement the precept.

COVID-19 – Income compensation

13. The most significant, and welcome, aspects of this settlement relate to the additional support provided for COVID-19 related pressures. These measures may increase the confidence in our member councils of being able to deliver a balanced budget in 2021/22 in the absence of dramatic reductions to services.

14. Our Budget Survey showed that council tax deficits caused by the pandemic were the single biggest factor driving concerns over the ability of our councils to balance budgets next year, closely followed by continuing unplanned expenditure due to COVID-19.

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[1] CCN. Submission to Comprehensive Spending Review 2020. http://www.countycouncilsnetwork.org.uk/download/3248/

15. In light of this, we are pleased the Government have recognised that the additional financial challenges posed by the pandemic will continue into the next financial year. CCN has led calls for the government to introduce an income guarantee system for lost council tax and business rates.

16. CCN therefore supports the introduction of the Local Tax Income Guarantee scheme. It will provide essential support to local authorities suffering losses in tax income in 2020-21. Whilst we would prefer full compensation for tax income losses, the 75% compensation rate is reasonable and means that the majority of the tax losses will be funded by central government rather than the local taxpayer.

17. Our concern, however, is that the compensation scheme works differently for council tax compared to business rates. For business rates, any losses in income compared to budget will be eligible for compensation. This includes any reduction in payable taxation as well as any increase in bad debt. In other words, it funds an authority's estimate of the amount that they will be unable to collect as at 31 March 2021. In contrast, the scheme for council tax assumes that the collection rate in 2020-21 will be exactly the same as the budgeted rate. It will not fund any collection losses if these are greater than the budgeted amounts.

18. No justification is given in the consultation for the different approaches. We can only surmise that there is data from previous years showing that the amounts of council tax written-off by councils is lower than the amounts of business rates. If there is, we would like to see the evidence and justification published. Our view is that data from previous years has only limited relevance to 2020-21. The economic impacts have been so much greater this year, that previous years' collection patterns are almost irrelevant.

19. The different approaches are particularly concerning for shire county councils. Our authorities receive a much higher share of council tax income compared to their share of business rates income, as well as relying on council tax more than any other part of the sector. As a result, tax losses for shire county councils will receive compensation at a lower rate than for other types of authority.

20. The consultation on COVID-19 support in 2021/22 does not ask for specific feedback on the proposed details of the scheme. **We would urge MHCLG to engage further with local authorities to develop a way of providing compensation for the inevitable higher rates of unpaid council tax.** CCN will be working with Pixel Financial Management over the coming weeks to assess the potential impact of the government's proposals and would ask that the department engage in our analysis.

COVID-19 – Cost Pressures

21. In addition, the Government are right to recognise that COVID-19 expenditure pressures would continue into the next financial year, including 'legacy cost' arising from embedded pressures such as higher provider fees in social care. The £1.55bn provided allows councils to plan their budgets for the next financial year and meet additional costs.

22. While these measures provide some certainty and stability for the next financial year, at the time of the provisional local government settlement it was not known that a new national lockdown would be introduced; one in which it's likely to result in severe social and economic restrictions for the remainder of this financial year and into next, with particular implications for CCN member councils. We expect costs for the remainder of 2020/21 to rise

at a steeper rate than previously estimated in December's Delta return, potentially widening the gap between estimated costs and financial support provided by government.

23. The Government states in the consultation on COVID-19 funding and support for 2021/22 that councils should '*plan on the basis of not receiving any additional funding*' beyond that announced at the Spending Review.

24. However, CCN continue to maintain that the government should meet all costs incurred as a result of the pandemic, and in light of the latest lockdown, **Government will need to be prepared to provide further grant funding to support member councils in the final three months of this financial year**. Moreover, it will also need to reconsider whether the £1.55bn is sufficient to meet costs during the first quarter of 2021/22 and higher legacy costs caused by the latest wave of the pandemic.

25. In considering further funding for the current financial year, and also planning for costs incurred in 2021/22, Government will need to carefully consider the fairest approach to distribution that reflects current rates of infections and thus increased council costs.

26. Unlike previous waves of COVID-19, infection rates are now significantly higher in our member councils compared to other types of local authority. As a result of significantly higher infection rates in county areas, particularly in the east and south east of England, the distribution of additional local authority costs is also likely to change.

27. There is no consultation question on the distribution of the £1.55bn COVID grant funding. This seems like an omission because there is a very strong argument that the RNF should be reviewed and/ or updated in light of the latest lockdown and the significant difference in the spread of infection rates across the country.

28. The RNF has been determined using regression against the actual spending patterns in local authorities for the period April to May 2020. Whilst the methodology was widely accepted when it was developed (including by CCN), the type, scale and distribution of spending will have changed in the subsequent six months, and looking ahead to the final three months of 2020/21.

29. If the government were to provide additional resources for the coming months, CCN asks that MHCLG updates its RNF calculations to use the latest expenditure data. At the very least, MHCLG should share the effect of updating the RNF calculations, and consider re-basing grant allocations if the variations are material.

Spending Review 2021/22

30. Our submission to the Comprehensive Spending Review set out that our member councils face an underlying cumulative funding gap (excluding the impact of COVID-19) of £6.5bn between 2021/22 - 2024/25. CCN are currently in the process of updating our spending need and funding gap projections with PriceWaterhouseCoopers (PwC).

31. As a result of underlying financial pressures, coupled with uncertainty on the additional pressures created by COVID-19 in future years, our Budget Survey showed that four in five CCN member councils (86%) were not confident they could deliver a balanced budget from 2022/23 onwards without dramatic reductions to services. This demonstrates that the medium-term financial picture for councils remains extremely challenging.

32. It is absolutely critical that this year's provisional local government settlement is the last one-year settlement, with the government undertaking a full spending review to address the underlying funding pressures facing councils through a long-term funding envelope which genuinely meets the financial pressures on councils.

33. CCN recognise that resolving the financial challenges facing councils will be closely linked to proposals on the future funding of adult social care, which the government have committed to publish later this year. CCN is undertaking a dedicated programme of work to support the development of these proposals,[2] and we urge the government to engage in forthcoming reports by Newton Europe and Demos on the reform as they develop these critical proposals.

34. Alongside this, in our Comprehensive Spending Review Submission we set out that government should seek to undertake reform to the wider local government finance system, in particular, urgently reforming New Homes Bonus and considering alternative funding arrangements to the proposals to extend business rates retention.

35. While the immediate course of the pandemic remains uncertain over the first quarter of 2021, including the financial implications for councils, the roll out of mass vaccinations should enable long-term planning by the Treasury and a full three-year spending review to take place.

36. Alongside an overall sustainable funding settlement for local government and financial reform, it is imperative that fairer funding for councils is a priority for MHCLG as it engages in the Comprehensive Spending Review later this year. This will help to reduce the inequalities in funding that have become entrenched between local authorities in London and authorities across the rest of the county. Easing the historic imbalances in the distribution of local government finances is a key plank of progressing the levelling-up agenda.

37. CCN and its members have long called for the completion of the Review of Relative Needs and Resources, more commonly known as the Fair Funding Review (FFR). The final stages of the Review of Relative Needs and Resources development and implementation by MHCLG has now been subject to significant delays. CCN has expressed its disappointment, but the provision of back-to-back one-year settlements, and subsequent scale of the coronavirus impact on council finances, meant delays to the reforms were necessary.

38. The Review of Relative Needs and Resources has made considerable progress under previous administrations, with CCN responding to the consultation in 2019, setting out our support for the direction of travel. An immense amount of work has gone into ensuring this much-needed reform progressed, with all councils agreeing that the current method of funding councils is wholly out of date.

39. However, as we come out the other side of this Covid-19 crisis, CCN believe that the government must again renew their commitment to proceed with the review at pace. Our member councils remain united on the need for the government to ensure resources are distributed fairly between councils, which recognises the historical under-funding of our

[2] https://www.countycouncilsnetwork.org.uk/new-paper-outlines-counties-four-main-themes-to-guide-social-care-reform/

member councils, higher costs of delivering services in rural areas and enable fairer council tax levels across the country.

40. Ahead of the latest delay to reforms, CCN strongly challenged assertions that the FFR would unfairly, and disproportionately, favour shire counties.[3] This followed reports that the new adult social care funding formula, developed as part of the Review of Relative Needs and Resources, would lead to a significant reduction in funding for metropolitan authorities.[4]

41. CCN has always maintained that it is important that when we consider the potential impact of the review of relative needs and resources, no single factor is considered in isolation. The outcome of the review will be dependent on the interaction between the foundation formula, independently developed adults and children's social care formulae, and key issues such as council tax equalisation and a new area cost adjustment.

42. In early 2020, CCN commissioned Pixel to model the potential impact of the FFR for different classes of authorities based on the latest information on government proposals and available data. This modelling was paused due to the outbreak of Covid-19 and the subsequent delays to the reforms, with the research due to be resumed and completed in the coming weeks.

43. Initial findings, previously shared with MHCLG,[5] shows metropolitan authorities are likely to be overall gainers from the FFR, as are CCN member councils. Counties would see the largest cash gains but would remain significantly lower funded on a per head basis compared to other parts of local government. The most significant losers are still likely to be inner London boroughs. CCN are continuing to develop this modelling with Pixel Financial Management.

Table 2: Overall change in Settlement Funding Assessment (SFA)	Current SFA (£/m)	Revised SFA (£/m)	Change (£/m)	Change (%)	Revised RNF per head (£)
Metropolitan districts	3,902	4,151	249	6.4%	342
CCN authorities	3,541	3,867	326	9.2%	149
Non-CCN authorities	2,299	2,387	89	3.9%	254
Inner London boroughs	1,269	953	-316	-24.9%	287
Outer London boroughs	1,356	1,252	-104	-7.7%	215

44. CCN has always maintained that councils of all shapes, sizes and political colours could benefit from a fairer distribution of resources. In doing so, we have stressed the need to focus on all aspects of the review, not isolated factors.

45. While these are only initial results of our independent modelling, based on a number of evidence-based assumptions, they show that the FFR has the potential to deliver a fairer settlement for CCN member councils, metropolitan and unitary boroughs, benefiting councils in the midlands, the north, and south, towns, cities, rural areas and coastal communities. They challenge common assertions that the review will disproportionately benefit shire counties at the expense of metropolitan boroughs.

[3] CCN media response: https://www.countycouncilsnetwork.org.uk/fair-funding-review-in-the-media-ccn-response/
[4] https://www.theguardian.com/society/2020/jan/25/former-red-wall-areas-could-lose-millions-in-council-funding-review
[5] Pixel (2020) Impact of new adult social care funding formulae on members of the County – initial findings of fair funding review research http://www.countycouncilsnetwork.org.uk/download/3160/

46. **Over the coming weeks CCN believe that Government must restate a commitment to implement the Review of Relative Needs and Resources in 2022/23.** A final consultation and indicative allocations under the formula must be published in 2021.

47. We recognise that in light of the financial pressures created by Covid-19, additional consideration will need to be given to the most appropriate indicator for deprivation within the foundation formula and that longer transitional arrangements will be needed to ensure a sustainable funding settlement over the course of a full Spending Review period. CCN will continue to work with Government and the wider sector to form as much consensus as possible over reform.

Question 1: Do you agree with the Government's proposed methodology for the distribution of Revenue Support Grant in 2021-22?

48. CCN agrees with the proposal to apply inflation to the Revenue Support Grant (RSG) in 2021-22.

49. However, the allocations of RSG (and Settlement Funding Assessment) are now over 8 years old and need to be replaced as a matter of urgency. The Government has promised to implement its Review of Relative Needs and Resources and this is the second year in which it has been delayed. It is essential that a firm commitment is given to implementing the FFR in 2022/23.

50. More generally, it is disappointing that the increase in RSG (plus the additional cap compensation section 31 grant) was only 0.55%. Whilst this matches the headline increase in Consumer Price Inflation (CPI), it does not address local government's funding gap.

Question 2: Do you agree with the proposed package of council tax referendum principles for 2021-22?

51. CCN supports the proposal to increase the threshold for Band D increases to 5% for all our member authorities. It is helpful that the full 3% adult social care precept increase can be spread over 2 years, and we are expecting many of our authorities to take advantage of this flexibility.

52. By deferring some or all of the increase, it means that many county authorities will not benefit from the increase in Core Spending Power that is indicated in the settlement. Many county authorities are very reasonably taking the view that, in the current economic circumstances, it is not feasible to increase Band D council tax by 5%. The burden on council tax payers in county areas is already very high (average Band D amongst our members is significantly higher than the national average). Many will therefore have to rely on the very small increases in grant funding to meet very substantial funding pressures.

53. The proposed approach shows the risks of relying on council tax rather than grant increases to fund local services. The Government is now placing an increasing burden for funding local services onto the local taxpayer: grant funding will only increase by £150m in 2021-22, with the remainder expected from an increase in council tax yield. We have estimated that 82% of the increase in Core Spending Power (CSP) in 2021-22 will come from council tax increases. There is a limit to future Band D increases within a largely unreformed council tax system, where Band D levels vary so much across the country.

Question 3: Do you agree with the Government's proposals for the Social Care Grant in 2021-22?

54. CCN has some concerns with the proposals for the new £300m social care grant. As we have mentioned already in our response to question 2, many county authorities will not apply the full ASC precept increase in 2021-22 but will defer some or all of the increase to 2022-23.

55. By assuming that all authorities will use the full 3% increase in the equalisation assumptions, the grant allocations overstate the amount of precept income that will be generated by county authorities. It is reasonable to apply some equalisation, but we are concerned that the methodology overstates the likely level of income. For many of our member authorities, the full potential increase in precept has been equalised. The problem is compounded by the assumption that there will be continued tax base growth in 2021-22, when the reality is that collection rates will be much reduced.

Question 4: Do you agree with the Government's proposals for iBCF in 2021-22?

56. CCN has the same concerns about the iBCF grant methodology as it does for the £300m social care grant (question 3). Some form of equalisation is reasonable – but the methodology continues to apply a higher amount of equalisation than was actually generated by the precept in previous years. Now that the Government knows the actual precept income, CCN would expect the actual amount to be applied.

Question 5: Do you agree with the Government's proposals for New Homes Bonus in 2021-22?

57. CCN has long argued for reform to the New Homes Bonus (NHB) and, at a time of reduced funding for the sector, has continually questioned whether it represents the best use of resources. There is little evidence that NHB incentivises housebuilding and leads to an unfair distribution of resources; both between tiers and across regions.

58. Previous reviews by governments have shown that NHB has failed on its key policy objectives, such as being spent on 'local community priorities' and to support the delivery of infrastructure to mitigate development. The government's consultation on the policy, *Sharpening the Incentive*, showed that only 10% is spent on infrastructure, despite increasing infrastructure gaps in county areas. The 80-20% split of money from the bonus in favour of district councils, further hampers the county's ability to invest in infrastructure to match new housing.[6]

59. The high share for district councils, and the top-sliced nature of the funding, has also imbalanced the local government funding system in two-tier areas. The funding that has been used in this way would have been much better employed supporting the financial pressures in children's and adults' services, which in turn would allow counties to dedicate a larger proportion of their budgets to housing and growth enabling services such as transport, infrastructure and economic development.

60. We welcome the government recommitting to reform as part of the provisional settlement and we would urge the Government to move quickly with its proposals for replacing the NHB

[6]**MHCLG** (2015) New Homes Bonus: sharpening the incentive https://www.gov.uk/government/consultations/new-homes-bonus-sharpening-the-incentive-technical-consultation

scheme. These proposals have been promised for a number of years and their development is now urgent. They ought to be developed and implemented alongside the Review of Relative Needs and Resources in 2022-23.

61. We recognised in our Spending Review submission that given the impact Covid-19 on council finances, and the need to ensure stability in the short-term, it is unlikely the Government would be a in position to make changes to NHB in the 2021/22 local government settlement.

62. While we, therefore, accept the proposals, CCN is concerned about how the Government has used the "returned surplus" that has resulted from the reduction in NHB payments in 2021-22. NHB is part-funded from a top-slice of Revenue Support Grant, and it was always stated by MHCLG in previous local government finance settlements that any unused amounts would be returned to local government pro rata to the original top-slice [the 2013-14 Start-Up Funding Assessment]. This has very clearly not happened in 2021-22 – with county authorities disadvantaged more than any other type of authority as a result.

63. The £278m surplus that should have been returned back to local government has effectively been used to fund other grant increases within the settlement (£4m Rural Services Delivery Grant, £111m Lower Tier Services Grant, £150m social care grant, £13m Revenue Support Grant). It is an important principle that the Government honours its commitments. Not doing so undermines trust in the way the Government manages the local government funding system.

64. The approach taken by the Government also overstates the increase in grant funding that has been made available in the settlement. Only £150m in new resources has been given to authorities, and of this, county authorities have received a very small share.

65. The decision to divert the NHB returned surplus has had distributional consequences for county authorities. We estimate that the shire counties received £20m less in the new settlement grants than they would have done had the NHB returned surplus been allocated using the 2013-14 SUFA (Table 1). This shows the combined effect of the way that shire counties have lost-out in the allocation of grants in 2021-22.

Table 2 – Exemplification of settlement grants compared to NHB "returned surplus"

	Total - 2021-22 new settlement grants	Share of 2021-22 settlement grants	SUFA 2013-14 (%)	Share of "notional" New Homes Bonus returned surplus	Variance	Variance (%)
Inner London boroughs	31.3	11%	10%	26.6	4.7	18%
Outer London boroughs	22.7	8%	9%	24.8	-2.1	-9%
Shire counties	31.5	11%	19%	52.1	-20.6	-40%
Shire districts	48.6	17%	4%	10.7	38.0	356%
Metropolitan districts	78.3	28%	26%	72.4	5.9	8%
Unitary authorities	63.9	23%	21%	58.5	5.4	9%
Fire authorities	1.1	0%	4%	10.4	-9.3	-89%

GLA	0.7	0%	8%	22.6	-21.9	-97%
TOTAL	**278.2**	**100%**	**100%**	**278.1**	0.1	0%

Question 6: Do you agree with the Government's proposal for a new Lower Tier Services Grant, with a minimum funding floor so that no authority sees an annual reduction in Core Spending Power?

66. We would raise concerns that the most significant funding pressures are in upper-tier services, particularly adult and children's social care. We believe that these pressures should have been prioritised for the distribution of additional resources, particularly in light of underlying funding pressures being exasperated by the financial impact of COVID-19. While CCN's unitary members will benefit from the introduction of this grant, county councils will not.

67. An alternative approach – with much more merit – would be to distribute the grant based on "needs" (e.g. the Settlement Funding Assessment). That the grant is funded from resources that have been freed-up from reduced NHB payments makes the argument for using SFA (or similar) particularly strong and would have ensure both our unitary and county council members benefited from the distribution of this funding.

68. Our objections to the "damping" element within the grant are less strong, even though all the recipients of this element are shire districts. There is a good argument for ensuring that no authority receives a reduction in Core Spending Power, and CCN supports well-designed damping arrangements. We would prefer it, however, if this kind of approach was developed in advance; the "damping" in this grant seems to be an ad hoc or temporary arrangement.

Question 7: Do you agree with the Government's proposals for Rural Services Delivery Grant in 2021-22?

69. The increase in Rural Services Delivery Grant (RSDG) is only £4m (with no change in the distribution methodology). CCN supports the increase in RSDG, even though the amount is very small indeed. The additional grant will make very little difference to rural authorities' actual financial circumstances.

Question 8: Do you have any comments on the Government's plan not to publish Visible Lines?

70. We support the decision not to publish Visible Lines.

<u>COVID-19 funding for local government in 2021-22: consultative policy paper</u>

Question 1 - Do you agree with our proposed approach to distributing the £670m of local council tax support grant? If not, why, and do you have an alternative proposal?

71. CCN broadly agrees with the methodology used to distribute the Local Council Tax Support (LCTS) grant in 2021-22.

72. It is reasonable to base the allocations on total working-age claimants. The cost of the LCTS schemes are currently under-funded within SFA and it is logical to make funding

available for the full cost to local government. However, we are aware that this approach will not necessarily direct resources at those authorities with the largest increases in claimants since March 2020 (i.e. those that have been most severely affected by the pandemic). To help address this concern, we would support using the latest available data (Q4 2020-21).

73. CCN supports adjusting the payments for the average Band D per dwelling.

Question 2 – Do you agree that we should use 2020-21 budgeted income as a baseline for the SFC scheme? If not, we welcome alternative proposals.

Question 3 – Do you agree that we should use a quarter of 2020-21 baseline budgets to assess SFC losses? If not, we welcome alternative proposals.

74. CCN supports continuing the current Sales, Fees and Charges (SFC) compensation scheme unchanged into the first quarter of 2021-22. Continuing with existing baselines will make the system simpler to operate in 2021-22, and we cannot see it resulting in any "losers".

75. There will be issues for some authorities if the baseline for Q1 2021-22 is simply 25% of the full-year amount. We are not aware of specific issues but would urge MHCLG to allow some flexibility if authorities can show that they would be significantly disadvantaged if they have a different income profile.

Question 4 – Do you have views for how we ask local authorities to report their COVID-related pressures in 2021-22? Do you have a view on the frequency of the collection cycle in 2021-22? We welcome your views and alternative proposals on the above.

76. We do not have a strong view, but we would support the continued collection of some form of data to determine whether further funding is required.