

Written evidence submitted by NAHT, School leadership Union

1. NAHT welcomes the Committee's inquiry into the ['Condition of School Buildings'](#) given the essential nature of sufficient school capital funding to the success of our education system, and the critical situation that now exists in terms of the condition and safety of many parts of the school estate.
2. NAHT is one of the largest professional associations for school leaders, representing members across Northern Ireland, England, Wales and the Channel Islands. We represent more than 35,000 head teachers, executive heads, CEOs, deputy and assistant heads, vice principals and school business leaders. Our members work across: the early years, primary, special and secondary schools; independent schools; sixth form and FE colleges; outdoor education centres; pupil referral units, social services establishments and other educational settings.
3. In addition to the representation, advice, and training that we provide for existing senior leaders, we also support, develop, and represent the senior leaders of the future, through NAHT Edge, the middle leadership section of our association. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere.

Background

4. The dire situation with school buildings is well documented, including by the Department for Education's itself, who in their annual report for the financial year 2021-22¹, identified the condition and safety of school buildings as a **'significant risk.'**
5. Their report clearly highlighted that the situation had worsened during the year and was unlikely to improve during 2022, due to a lack of *"increased condition funding"*.
6. The findings from last week's National Audit Office (NAO) report², serve to further underline the serious situation that far too many school buildings are in. The report highlighted that:
 - a. **Nearly 40% are of school buildings are past their estimated initial design life**
 - b. **700,000 pupils are learning in a school that the responsible body or DfE believes requires major rebuilding or refurbishment**
7. The **chronic underinvestment** in recent years means that there is now considerable risk of parts of the school estate failing and putting pupils and school staff at significant risk.

¹ Department for Education consolidated annual report and accounts 2021 to 2022

² [Condition of school buildings \(2023\)](#)

8. And this is no theoretical risk. There have already been several well-documented recent “near miss”³ ceiling collapses in schools which, by chance, were closed to pupils at the time.
9. It is **simply unacceptable** that some children and staff are potentially being put at risk. The government must ensure their safety as an absolute priority. The consequences of a serious incident like a school building collapse are unimaginable.
10. We cannot stress enough our level of concern that the Government still does not have a plan to address the immediate issue of urgent capital need for schools in imminent danger of collapse with the immediacy it requires, let alone tackle the wider issue of capital funding to ensure education buildings are fit for the future.
11. This is before we consider the further impact that climate change (e.g. flooding, overheating) is likely to have on the condition of the school estate; which might not just create damage in and of itself but also increase the safety risk of known issues. For example, flooding in schools with asbestos could result in the release of asbestos from areas considered previously inaccessible and therefore considered by the Health & Safety Executive (HSE) as being able to be managed ‘in situ.’
12. Alongside the serious and often immediate health and safety concerns, the disrepair of the school estate can also have a negative impact on several important measures, including pupil attainment levels and teacher retention; can adversely affect pupils’ experience, especially those struggling academically or those with special educational needs and disabilities. **And this is accepted by the Department for Education, itself.**⁴
13. Yet Government appears, at best, not to recognise the urgency, and at worst, deliberately ignoring the situation – potentially leaving pupils and staff at risk.
14. As we highlight below, the Government’s ten-year School Rebuilding Programme requires schools to compete for funding and only 50 a year can be successful. **At that rate, it would take more than 400 years for every state school to be rebuilt.**
15. NAHT urges the Government to develop an **ambitious, long-term, school rebuilding strategy** to ensure that every pupil is taught in a building that is safe, accessible, and fit for purpose.

The Department for Education’s understanding of the condition of school buildings

16. NAHT recognises the changes the Department has implemented to its data collection processes. The Condition Data Collection (CDC and CDC2)

³ <https://www.kentonline.co.uk/gravesend/news/emergency-closure-of-school-185945/> or <https://www.plymouthherald.co.uk/news/plymouth-news/plymouth-primary-school-remains-open-5925720> or <https://www.bbc.co.uk/news/uk-england-london-59309196>

⁴ [Condition of school buildings \(2023\)](#)

provide far greater insight than the previous Property Data Survey (PDS) process provided for.

17. However, NAHT remains concerned that the Department's insight relies solely on visual inspections, which by default mean that only visible building condition is assessed, and the surveys are unable to identify any critical structural repairs.
18. We therefore believe that the CDC2 programme does not currently provide the detailed level of information needed to build up a comprehensive understanding of the condition of the school estate, at a national and school level.
19. This is an issue on two levels:
 - a. Firstly, the risk that high priority safety issues, such as those like RAAC or asbestos will not be identified, potentially putting pupils and staff at risk.
 - b. Secondly, that this incomplete information is used to guide the Department (and by default Treasury) in allocating 'appropriate' levels of capital funding for schools and/or Responsible Bodies.
20. Below we outline some of the key areas of concern in the estate, in terms of health and safety, and the limited oversight the Department still seems to have around these.
21. The concerns around RAAC have highlighted how the aging school estate, and the number of buildings coming to the end of (or far beyond) their intended lifespan, is likely to continue to throw up safety issues. Worryingly, many of these may not even be a known risk yet.

Reinforced autoclaved aerated concrete (RAAC)

22. Schools report building issues they uncover and ensure pupils do not access affected areas if there may be an immediate risk. However, many will be unaware what materials were used in their buildings – and RAAC will not be immediately visible. Immediate threats due to structural weaknesses may also not be clear.
23. As outlined in the latest NAO report, as far back as 1999⁵, the Standing Committee on Structural Safety (SCOSS) recommended that those responsible for buildings, including schools, with pre-1980 RAAC plank roofs should have these roofs inspected.
24. In 2018, the Department was notified of a sudden collapse of a school roof, which contained RAAC. This was followed in 2019, by the Office of Government Property issuing a warning note, that SCOSS **recommends all RAAC planks installed before 1980 be replaced**.
25. Yet it was another **two years**, before the Department for Education concluded that they did not hold sufficient information to even **assess the risk from RAAC**, and it was not until 2022 that a voluntary questionnaire to Responsible Bodies was circulated.

⁵ *ibid*

26. At the time of writing, the Department still doesn't hold a full response rate to the RAAC questionnaire, meaning it still does not hold a complete picture of the risk of RAAC within the school estate.
27. It has also not committed to a date by when all RAAC will be removed from the school estate, despite similar commitments being made by other Government Departments⁶.

Asbestos

28. There remains no complete national register of asbestos location in schools, although based on the Department for Education (DfE)'s Asbestos Management Assurance Report (2019) as many as **83.5% of schools still have asbestos on site**.
29. Pupils, teachers and non-teaching staff in schools are therefore still exposed to the potential dangers of asbestos on a daily basis. They are at a disproportionately high risk of asbestos-related illness and death, compared with other professions, given the very high prevalence of asbestos in the school estate.
30. Furthermore, the shared occupancy by adults and young people can lead to a higher risk of asbestos disturbance than in other workplaces and even normal school activities can routinely disturb asbestos. This leads to increased risk for everyone in the school environment; adults and young people alike.
31. The risk is further exacerbated by the state of the crumbling school estate; this makes it even harder, or impossible, to avoid asbestos fibres being released as the buildings deteriorate.
32. Given the lack of any central record of where asbestos is to be found, it is not clear how HSE can regulate effectively nor how DfE can know what level of support and funding is required. This has implications for funding, removal, and oversight at a national level.
33. Furthermore, there is no ring-fenced funding available to schools for the otherwise prohibitively expensive process of asbestos removal.
34. NAHT are also concerned that the oversight of asbestos in the school estate has now been rolled into the CDC2 collection. We believe that this is not as detailed as the original AMAP survey⁷, nor does it provide the same level of transparency with the sector, thus not providing the clear picture needed on the state of asbestos and its management in the education sector.

System-builds

35. There are an estimated 13,800 system-built blocks: with just over 3,500 of these highlighted by the Department for Education as being of particular concern⁸.

⁶ [New Hospital Programme – media fact sheet - Department of Health and Social Care Media Centre \(blog.gov.uk\)](#)

⁷ [Asbestos data collections](#)

⁸ [Condition of school buildings \(2023\)](#)

36. Some system-built blocks such as CLASP buildings are a particular risk for asbestos due to their design and construction⁹, and the way they deteriorate. This is well-known within the Department, yet as outlined above, little work to remove asbestos from the school-estate has been done.
37. As the NAO report notes¹⁰, the DfE is intending to conduct research to better understand the safety risks of system-built blocks. However, the initial wave will only focus on 200 buildings, across 2023 and 2024.
38. Aside from the limited scale of this research, it is concerning that, almost half-way through 2023, the Department has still yet to procure any specialists to carry out the assessments¹¹. This makes it extremely unlikely that the Department will meet even the very limited target set around better understanding risk in system-builds.

Fire safety and combustible materials for external use

39. Currently BB100¹², non-statutory guidance on fire safety for schools, sets out that '*all new schools should have fire sprinklers installed except in a few low risk schools.*' (page 12 para 1.6.) One would, therefore, expect the vast majority of new schools to have been fitted with sprinklers over that period but this appears not to be the case.
40. According to the Government's own data obtained via a Freedom of Information request, 248 new schools have been constructed since 2015, of which only 21 had sprinklers installed. Of the 468 major school refurbishments since 2015, only 69 had sprinklers installed. This equates to just 8.5% of new schools built since 2015 and 14.7% of majorly refurbished schools built since 2015 having sprinklers. This can hardly be described as representing 'a few low-risk schools.'
41. In early 2021, the [DfE released a consultation](#) looking to update some of the rules around building fire design for new schools. Despite a governmental response being expected in 2021, they still haven't responded – **nearly two years on**.
42. This is particularly concerning, when it's reported that some schools not only have combustible cladding but that others are still being built using known combustible material¹³, which was only banned in buildings over 18m in height.
43. NAHT believe that **all** school buildings, regardless of height, should be included in the ban. Even in buildings where other fire precautions are well-maintained and which are not used for overnight accommodation, the presence of combustible cladding on a school building may have ramifications for the existing fire evacuation procedures. For example, it may be prudent to relocate an evacuation assembly area further away from a particular building that is clad with such a material, even when such a building is low rise, or to consider the safety of existing evacuation routes.

⁹ [Asbestos in schools 'CLASP' Working Group \(hse.gov.uk\)](#)

¹⁰ [Condition of school buildings \(2023\)](#)

¹¹ [ibid](#)

¹² [Building Bulletin 100: design for fire safety in schools](#)

¹³ [Dozens of new school buildings in England 'have combustible insulation' | Planning policy | The Guardian](#)

44. What is further shocking, is that the Government does not hold a central register of which schools and buildings have combustible material in their building structure. NAHT therefore reiterates our call for the Government to conduct a survey of all school buildings to determine whether any other inappropriate sort of cladding has been used in their construction.

Capacity

45. The latest figures on school capacity, highlighted that around 18% of state-funded schools were at or in excess of capacity in 2021/22¹⁴. This is particularly an issue in secondary schools, where the demographic bulge has now moved into.
46. Given that the condition of some schools means that some parts of their estate are unsafe to use, an effective understanding of capacity is important not just from a place-planning perspective but for use and management of the school estate. Yet special schools have only been included in the School Capacity (SCAP) survey for the first time in 2023.
47. Whilst this could provide additional, invaluable data, we are already hearing from members that the results are demonstrating how oversubscribed they are, not just by a few pupils but by significant percentages. This clearly has safety concerns and combined with the budgetary pressures that impact on staffing levels, some leaders of special schools are left questioning if they can remain open for a full week safely.
48. We also note that the survey does not consider the specific types of SEND the setting may be supporting. Yet clearly the numbers of children and young with SEND a building may be able to support well is affected by the type of SEND support being provided, as this has implications for staffing numbers, types of equipment and specific spaces for medical support, for example.
49. This is also not just an immediate risk, but also when managing the impact of climate change, for example in terms of overheating – makes things even more difficult, for our most vulnerable learners.

The Department for Education's arrangements for allocating funding

50. The enormous shortfall in the capital funding of the school estate is now well-documented. This is perfectly articulated in the recent NAO report¹⁵ - **“In recent years, funding for school buildings has not matched the amount DfE estimates it needs, contributing to the estate's deterioration”**.
51. In 2021, the Department for Education's estimated a shortfall in investment in schools' capital to be at least **£11.4 billion**.¹⁶
52. Note that this amount is only to bring the school estate up to what was considered an **acceptable** level and does **not include the cost of rectifying structural or asbestos-related issues**.

¹⁴ [School capacity \(2023\)](#)

¹⁵ [Condition of school buildings \(2023\)](#)

¹⁶ [Condition of School Buildings Survey \(2021\)](#)

53. Despite this, between 2009-10 and 2021-22, Department for Education capital spending declined by **37% in cash terms** and **50% in real terms**¹⁷.
54. Nor does it reflect the high levels of inflation we've experienced over the last 18 months, or any more extensive work needed to support the school estate towards the ambitions outlined in the Department for Education's climate strategy¹⁸; so is likely to be a significant under estimation of what is truly needed to create a school estate that supports a world-class education system, fit for the future.
55. Notwithstanding the overwhelming insufficiency of the overall quantum of capital funding, as outlined earlier, NAHT believes there are also some fundamental issues around the mechanisms for capital funding calculations and allocations, which further exacerbate the funding pressures in schools.

School Condition Allocations (SCA)

56. Anecdotal evidence from members correlates with the exploratory analysis conducted by the NAO¹⁹, which suggested that the CDC-driven condition bands do not fully correlate with indicators of actual condition need in schools, resulting in schools receiving less funding than their actual need.
57. We also remain concerned that despite positive updates to the SCA eligibility for special schools to better reflect their lower pupil numbers, the current SCA threshold still means that many special school academies are not eligible for SCA and are left to apply for the Condition Improvement Fund (CiF), with the associated issues outlined below.

Condition Improvement Fund (CiF)

58. In the 2023-24 financial year, only 19 per cent of schools — or 859 out of the more than 4,500 eligible — successfully secured funding, a Financial Times analysis of official data has shown. This was down from 25 per cent the previous year and represents a record low in the number of schools to receive funding through the CiF scheme since it was launched in 2014²⁰.
59. Our members continue to tell us that they find it very difficult to access CiF; typically, this is due to capacity and a lack of access to technical expertise to develop an effective bid.
60. It cannot be right that some parts of the sector are required to 'bid' for capital funding, with only around a 30% chance of success, while others are provided a share of a set amount, without needing to 'bid'.
61. And over recent years, we've seen CiF bids be subject to additional requirements, or annual changes to criteria, many of which make it harder for schools to access this money. For example:

¹⁷ [School buildings and capital funding \(England\) 2023](#)

¹⁸ [Sustainability and climate change strategy](#)

¹⁹ [Condition of school buildings \(2023\)](#)

²⁰ [Schools in England warn pupil safety at risk as repair funds dwindle | Financial Times \(ft.com\)](#)

- a. For the year 2020 to 2021, additional new criteria relating to Executive Pay and school resource management advisors was included, despite it having no relevant bearing on the condition of a school(s) estate
 - b. The guidance for 2022-23, increased the amount schools have to contribute to the project to more than 30% of their projects' costs via reserves/loans to get the maximum six points available.
62. At a time of ongoing budget pressures, and against the backdrop of an aging and crumbling estate, **this is simply unconscionable**.
63. NAHT believes there is a need for greater transparency in any capital funding process that requires schools to 'bid' for additional support. This should include the opportunity to appeal a decision and allow the school to submit additional or alternative evidence which demonstrates a different level of condition and/or need than that suggested by departmental analysis.

Maintained schools and PFI

64. Maintained schools are impacted not just by the overall quantum of funding, but also the impact that that general fundings cuts to Local Authorities has had. These cuts have significantly reduced LAs ability to support schools in effectively managing the school estate.
65. For those members covered under the PFI scheme – we have heard members concerns that the scale of work required, across large swathes of schools in a locality, will not be completed by the end of the contract, leaving many PFI schools left to manage expensive repairs going forward.

The effectiveness and efficiency of funding for school buildings

66. Whilst this is ultimately a question for the Department, it is important to highlight that the chronic underfunding schools have faced over the last decade has resulted in many of them having to adopt a “make do and mend” approach, and to be in a constant state of struggle to ensure the school(s) is able to remain functioning and open.
67. We are aware from our members that there is a backlog of building repairs, across the system, and that responsible bodies and schools are having to prioritise elements of school buildings in the worst condition. This means there is less to spend on effectively maintaining the other buildings and enhancing or developing their estate.
68. This approach is limited; creating a vicious cycle of short-term 'patch-ups' that are inefficient and often result in more costs (and greater disruption) in the long-term.
69. Worryingly we have also heard anecdotal examples from members of new build settings which have swiftly required retrofitting of additional building adaptations to meet pupil needs, or because of poor construction. For example, sound-proofing buildings, which had originally been built with cheaper materials, that then meant external noises, such as heavy rain, impacted on children and young people with sensory sensitivity, ultimately negatively affecting their learning environment.

70. This is completely astounding and is not only extremely wasteful but is yet another significant impact on children and young people's education. When new builds / upgrades are progressed, materials and accessibility must be a central consideration.

Conclusion

71. In considering the condition of the school estate, it is vital that this is viewed in tandem to governmental ambitions around sustainability and climate change. Investing in school buildings will play a critical part on our journey towards net zero.
72. As well as considering how to reduce the contribution of the school estate to climate change, it is essential that work is undertaken to ensure that the school estate is fit to withstand, and adapt to, the changing climate conditions. For example, the DfE estimates that nearly half of schools (10,710) are at risk of flooding, which is expected to increase to at least 13,662 by the 2050s, or 16,394 in the worst-case scenario²¹.
73. The DfE's climate strategy reflects aspects of this, and work is underway to consider the resilience of the school estate to climate change effects. However, for this to be successful it must be appropriately resourced, and schools must be supported with funding, resources and access to experts.
74. We urge the committee to insist on the need to fund maintenance and rebuilding the school estate appropriately, reflecting Government and schools' own estimates of the **real cost** of getting the estate up to a minimum **acceptable** level; with longer-term plans to create an estate fit for the future.
75. This is an essential issue for the safety and welfare of the children and staff in our schools, and this must happen as a matter of urgency before a wholly preventable disaster occurs.

July 2023

²¹ [Sustainability and climate change: a strategy for the education and children's services systems - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/921212/sustainability_and_climate_change_a_strategy_for_the_education_and_childrens_services_systems.pdf)