



Department
for Education

APPENDIX M

Consultation Response Form

Consultation closing date: 30 April 2014
Your comments must reach us by that date

Fairer schools funding in 2015-16

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

| | |
|---|--------------------------|
| Please tick if you want us to keep your response confidential. | <input type="checkbox"/> |
| Reason for confidentiality: | |
| | |

| | |
|---|-------------------------------------|
| Name: David Allen | |
| Please tick if you are responding on behalf of your organisation. | <input checked="" type="checkbox"/> |
| Name of Organisation (if applicable): London Borough of Havering | |
| Address: Learning & Achievement Mercury Gardens, Mercury House, Romford, Essex RM1 3DW | |

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box that best describes you as a respondent.

| | | |
|---|---|---|
| <input type="checkbox"/> Maintained school | <input type="checkbox"/> Academy | <input checked="" type="checkbox"/> Local authority |
| <input type="checkbox"/> Governor | <input type="checkbox"/> Bursar | <input type="checkbox"/> Parent |
| <input checked="" type="checkbox"/> Schools forum | <input type="checkbox"/> Trade union organisation | <input type="checkbox"/> Other |

Please Specify:

This is joint response from the Local Authority and the Schools Forum.

1 Do you agree that the existing distribution of schools funding is unfair?

| | | |
|---|-----------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|---|-----------------------------|-----------------------------------|

Comments:

There are large variations in the Guaranteed Unit of Funding (GUF) per pupil received by local authorities. This has been the case both before and after the 2013/14 School Funding Reforms.

2 Do you agree with our proposed choice of characteristics to which to attach minimum funding levels?

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

Comments:

The characteristics proposed do not take into account differing circumstances in LAs, the separation of the DSG into the three main blocks and Schools Block funding that has been held centrally.

For example, for many years before the 2013/14 School Funding Reforms Havering has been the 2nd lowest funded borough in London. In 2013/14 the funding was separated into the 3 main blocks of Schools, High Needs and Early Years and because Havering received relatively less through the Early Years and High Needs blocks there was relatively more in the Schools block.

Similarly, Havering holds centrally relatively low amounts in its Schools block leaving a greater amount to distribute to schools. Other LAs may release some of this funding to schools during the year.

Any changes in funding distribution should take into account the whole of the DSG, pressures on school places and financial pressures in schools and not just the funding allocated to schools using the proposed characteristics.

Given our proposal to set minimum funding levels such that we can afford to fund all local authorities at those levels or above in 2015-16, do you agree with the proposed values of the minimum funding levels?

3 a) Age Weighted Pupil Unit

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 b) Deprivation

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 c) Looked-after children

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 d) English as an additional language

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 e) Low prior attainment

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 f) Lump sum

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

3 g) Sparsity

| | | |
|------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Sure |
|------------------------------|--|-----------------------------------|

Comments:

It is not agreed that using the above characteristics is the best way to allocate additional funding. Many schools are facing additional pressures such as a 2.3% increase in teachers' pension contribution from September 2015 but only those schools within the LAs receiving additional funding from the £350m will be able to fund the additional costs.

The values attached to each of the above factors will vary because of local circumstances. Some LAs may have taken the decision to hold greater sums centrally than others therefore reducing the funding that is distributed to schools.

It is not fair that these LAs should have their lower values "topped up" when their schools may receive additional funding from centrally held Schools or High Needs Block budgets.

In some circumstances, although the values that some LAs apply to the funding factors may be higher than average, not all schools may benefit because their LA has introduced capping arrangements. The published funding factor values may therefore be misleading.

4 Do you agree that labour market cost differences should be taken into account as we allocate the £350m?

Agree Disagree Not sure

Comments:
The lower protection limit means that the 23 'cheapest' areas have their Labour Cost Adjustment raised to 1.000 which reduces the relative difference between higher cost areas such as London and the cheaper cost areas. This has the effect of transferring funding from expensive to less expensive areas.

5 Do you agree this should be calculated using the hybrid approach we have set out?

Agree Disagree Not sure

Comments:

6 If you do not agree that we should use a hybrid approach, what would you prefer we used?

| | | |
|---|---|---|
| <input type="checkbox"/> Use teacher pay bands only | <input type="checkbox"/> Use a general labour market measure only | <input checked="" type="checkbox"/> Use an alternative method |
|---|---|---|

Comments:

The Minimum Funding Levels (MFL) do not reflect the higher costs of London LAs. For example, the outer London average value for AWPU's are:

Primary £3,203, KS3 £4,352 and £4,817 which are all greater than the proposed MFL. This should be reflected in calculation of the ACA.

Also, the actual average teacher salaries in London are greater than the notional averages used in the proposed model.

Sparsity Review

7 We introduced a sparsity factor for the first time in 2015-16. How helpful has this factor been in ensuring that sufficient funding is targeted at small schools serving sparsely populated areas?

| | | |
|---------------------------------|-------------------------------------|--|
| <input type="checkbox"/> Useful | <input type="checkbox"/> Not useful | <input checked="" type="checkbox"/> Not sure |
|---------------------------------|-------------------------------------|--|

Comments:

No school in Havering benefitted from the sparsity factor.

8 Do you think it would be useful to revise the criteria for the sparsity factor to take into account the average number of pupils in each year group, rather than the number of pupils in the school? If so, how?

| | | |
|---------------------------------|-------------------------------------|--|
| <input type="checkbox"/> Useful | <input type="checkbox"/> Not useful | <input checked="" type="checkbox"/> Not sure |
|---------------------------------|-------------------------------------|--|

Comments:

9 Are there any other changes you would like to suggest to improve the operation of this factor, and why?

Comments:N/A

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

| | |
|---------------------------------------|--|
| Please acknowledge this reply. | |
| E-mail address for acknowledgement: | |

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

 Yes No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 30 April 2014

Ministerial and Public Communication Division, Level 2, Department for Education, Mowden Hall, Staindrop Road, DARLINGTON DL3 9BG

Send by e-mail to:

SchoolFunding.CONULTATION@education.gsi.gov.uk