



Department
for Education

Appendix 2

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:	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Central Bedfordshire School Forum	
Address: richard holland richard.holland@btinternet.com Chairperson of Central Bedfordshire School Forum Priory House Monk Walk Chicksands, Shefford SG17 5TQ	

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 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:

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
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Comments:

The evidence that the current distribution of school funding is unfair is overwhelming; this has been repeatedly acknowledged by government.

Fair funding will only be achieved by introducing a formula-based approach covering the whole of DSG i.e. mainstream schools, Early Years and High Needs.

The methodology proposed for 2015/16 produces some obvious anomalies, with many low-funded authority areas receiving little or no benefit.

We do not understand why LAs in the higher part of the funding league table are gainers, whilst LAs that are obviously more poorly funded have small gains or receive nothing at all to bridge the existing funding gap.

The Department will be aware that schools are facing major cost increases at a time of 'flat cash' funding settlements, particularly:

- September 2014's 1% pay increase for teachers
- The anticipated increase to non-teaching staff pay – which as yet remains unknown.
- The increase in the employer's superannuation contribution from 14.1% to 16.4% from September 2015
- The introduction of a flat rate state pension from April 2016, the impact of which will be to increase schools' costs of in excess of 2% for teaching staff and most ancillary staff.
- For schools with sixth forms, a continuing reduction in sixth form funding
- Energy, fuel and other cost increases

We urge that these cost pressures are fully taken into account in the Spending Review for 2016-17 onwards.

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

Yes

No

Not Sure

Comments:

We agree with the proposed choice of formula factors for Schools Block funding.

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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 b) Deprivation

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 c) Looked-after children

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 d) English as an additional language

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 e) Low prior attainment

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 f) Lump sum

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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3 g) Sparsity

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

We agree that these are the correct factors and we understand that the formula value for each factor has been based on weighted averages and these will be updated for 2014/15 local funding formulae.

The proposed methodology and current criteria for distributing funding for the sparsity factor does not reflect true sparse schools and does not encourage small schools to merge.

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

<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

We do not understand the rationale for adjusting for labour market costs – they are already fully taken into account in the main funding distribution between local authorities.

We can see no case for supplementary funding for area costs.

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

<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

Please see response to question 4.

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
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Comments:

None of the additional funding should be allocated for labour market costs.

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 checked="" type="checkbox"/> Not useful	<input type="checkbox"/> Not sure
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Comments:

We agree that sparsity is potentially a useful means of targeting funding at small rural schools. Many authorities have not introduced a sparsity factor for 2014/15, taking the view that further work is needed on producing a viable model. We would welcome an evaluation by the Department on the approaches local authorities with different characteristics have adopted for 2014/15.

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 checked="" type="checkbox"/> Useful	<input type="checkbox"/> Not useful	<input type="checkbox"/> Not sure
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We believe the number of pupils in each year group is a relevant factor, however, size of year groups impact all schools not just small schools. There are already existing inequalities between the per pupil funding of small schools and larger schools.

We believe the lump sum should be sufficient to cover the fixed costs of schools.

Funding should be targeted at geographical locations, the current criteria of 2/3 miles is not a sparse school.

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

Comments:

We believe there are a number of issues on sparsity that still need to be addressed:

- We strongly favour using road distance rather than “as the crow flies”
- Adjustments need to be made where the ‘next nearest school’ is also counted as sparse
- We remain concerned about the impact of a distance threshold where one pupil moving house means a school may qualify for sparsity in one year but not the next.

We are also conscious that the needs of rural communities vary widely across the country and even within local authority areas. This argues strongly for local authorities having discretion on how the factor is applied locally – we do not believe the Department for Education needs to regulate in this area.

We would also ask the Department to note the relationship between the pattern of schools in rural areas and the cost of home to school transport; this needs to be fully reflected in the main funding settlement for local authorities.

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?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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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