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View your response

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Respondent Information Questions

Please mark an X in one box below that best describes you as a respondent.

- Maintained School
- Academy
- Teacher
- Individual Local Authority
- Schools Forum
- Local Authority Group
- Teacher Association
- Other Trade Union / Professional Body
- Early Years Setting
- Governor Association
- Parent / Carer
- Other

Please Specify:

Consultation Questions

1 **Chapter 1 -The National Funding System**

In paragraphs 1.8 to 1.14 we discuss two ways we are considering using to calculate the schools block:

- a) A formula based on the schools within the area and the pupils within those schools ("School-level");
- b) A formula based solely on the pupils within the area ("local authority-level").

Would you prefer the formula to be based on

a) a notional budget for every school; or

b) the pupils in each local authority area?

- School Level
- LA level

- Neither
- Not Sure
- No Response*

Comments: Greater transparency is one of the aims of the school funding reform. A school based calculation will achieve this. The inclusion of academies runs counter to the principle of autonomy which inspired many of us to convert in the first place. Paragraph 3.10 expresses a commitment to giving schools, 'greater control over their budgets and enable them to spend their money where they know it will make the best impact on the education of their pupils. preserving the link with the LA means that LA priorities will have affected the budget and will limit the scope for academies to act autonomously. We are disappointed that the radical nature of the original proposal has been lost and that , instead of a national funding formula for schools, a national funding formula for local authorities is being proposed.

2 Chapter 2 - The Schools Block - system

Local flexibility

In paragraphs 2.6 to 2.9 we discuss local funding formulae and propose reducing the number of formula factors which local authorities can apply. We suggest that the local formula factors could cover:

- a. Basic entitlement per pupil (currently Age-Weighted Pupil Units)
- b. Funding for additional educational needs (e.g. deprivation, SEN)
- c. Rates
- d. Exceptional site factors (e.g. split site, PFI and rent)
- e. Lump sums for schools

Do you agree that these are the right formula factors to retain at a local level?

- All
- Some
- None
- Not Sure
- No Response*

Comments: Any modification of the formula should be limited to exceptional circumstances that have not been included in the national formula. Deprivation has already been weighted in the national formula. Further changes of this kind erode the principle of similar schools being funded in a similar way.

3 What other factors, if any, should be able to be used at local level or could any of these factors be removed?

Answer:

4 Paragraphs. 2.12 to 2.14 discuss primary/secondary ratios:

Question 4: Do you think that setting a range of allowable primary / secondary ratios around the national average is the right approach to ensure that there is consistency across the country?

- Yes
- No
- Not Sure
- No Response*

Comments: The principle of moving towards a fixed national ratio is welcome. However, this should reflect total spend per sector and not just AWPU. We share the opinion of the f40 group that the figure of 1:1.27 quoted in 2.14 is flawed because it takes no account of the number of pupils in each key stage and is based upon a historical average. There needs to be some mechanism for updating it to reflect demographic changes.

5 Arrangements for Academies

Paragraphs. 2.17 to 2.22 discuss options for the future of calculating Academies' budgets. Option (i) suggests that local authorities could calculate budgets for all schools in the area and then tell the EFA how much Academies should be paid: Option (ii) that the EFA could calculate Academies' budgets

Do you think we should implement option (i) or (ii) when calculating budgets for Academies?

- (i)
- (ii)
- Other
- Not Sure
- No Response*

Comments: The EFA should do the calculation so that it will be possible to discern patterns and inconsistencies from the cumulative national data.

6 Ensuring accountability and fairness

Paragraphs 2.23 to 2.26 discuss options to improve the working of Schools Forums - whether the main groups on the Forum should all separately have to approve a proposed formula and whether the Forum should have more decision making powers.

Do you think these options would help to achieve greater representation and stronger accountability at a local level?

- Yes
- No
- Not Sure
- No Response

Comments: The proposal to ensure that each constituent group has to approve a proposed formula would go some way to ensuring that due regard is given to each group's interests. However, academies are a very broad grouping in Warwickshire: a mixture of old style and new style, selective and non-selective and it would be important to us the any representative structure reflected this diversity. We would welcome the opportunity for individual academies to vote on whether they wish to accept the national NFF budget or participate in the local funding allocation.

7 Paragraphs 2.27 to 2.31 discuss functions the EFA could provide to provide scrutiny and challenge at a national level; either (i) checking compliance or (ii) acting as a review body

Do you think we should implement option (i), (ii), both or neither?

- (i)
- (ii)
- Both
- Neither
- Not Sure
- No Response

Comments: We see a value in the EFA having a compliance and review role. This would protect minority groups. restricting the capacity of local formula to deviate from the national formula would do even more to reduce the potential for dispute.

8 Arrangements for Free Schools

Paragraphs 2.33 to 2.35 discuss arrangements for the funding of Free Schools:

If we introduce the new system in this spending review, do you think that (i) Free Schools should remain on the Free School methodology for 2013-14 and 2014-15 or (ii) move straight away to the overall funding system?

- (i)
- (ii)
- Not Sure
- No Response

Comments:

9 **Chapter 3 - The Schools Block - formula content**

In paragraphs 3.3 to 3.6 we discuss formula content and propose that the new formula could consist of:

- A basic per-pupil entitlement
- Additional funding for deprived pupils
- Protection for small schools
- An Area Cost Adjustment (ACA)
- English as an Additional Language (EAL)

Are these the right factors to include in a fair funding formula at a national level?

- All
- Some
- None
- Not Sure
- No Response

Comments: We are concerned that additional funding for small schools may mean that schools which are not really financially viable are able to avoid federation or closure and that this may compromise provision for other students. We support the principle of additional funding for disadvantaged students but we are concerned that the cumulative impact of all the measures including the pupil premium be looked at. there is a risk that schools with relatively small numbers of deprived students could have their funding so squeezed that they struggle to provide a basic entitlement. We support additional funding for EAL students but feel that this should be restricted to their first two years in school. Once these students have mastered English, they often make excellent progress and don't need further support.

10 Deprivation

Paragraphs 3.14 to 3.17 discuss possible indicators for deprivation we could use in a national formula

Question 10: Do you agree that we should use Ever FSM to allocated deprivation funding in the national formula? Should this be Ever 3 or Ever 6?

- Ever 3
- Ever 6
- Neither
- Not Sure
- No Response*

Comments: Ever 6 years because this would cover a student throughout the 11-16 sector. Despite all we do to encourage parents to claim FSM, we know that a number of eligible parents stop claiming when their child transfers to secondary school.

11 Small school protection

Paragraphs 3.19 to 3.28 discusses funding protection for small schools, suggesting that a £95,000 lump sum would be sufficient to provide protection, that it should be applicable to primary schools only and should adopt Middle Super Output Areas to derive the sparsity factor. If a local authority formula is used a choice between a lump sum payment and a sparsity measure is offered and there is also discussion on whether the threshold for eligibility should be narrowed so that sparsity funding is focused on the most sparsely populated areas.

If we have a school-level formula, do you agree that £95,000 is an appropriate amount for a primary school lump sum?

- Yes
- No
- Not Sure
- No Response*

Comments: Funding for small schools may encourage some that ought to federate or close to remain open and so compromise the financial health of all.

12 **Do you agree that the lump sum should be limited to schools with Year 6 as the highest year-group?**

- Yes
- No
- Not Sure
- No Response*

Comments:

13 **If we have a local authority-level formula, should we use a primary school lump sum or the sparsity measure?**

- Primary School Lump Sum
- Sparsity Measure
- Neither
- Not Sure
- No Response*

Comments:

14 **If we have a sparsity measure, do you think we should narrow the sparsity threshold as described above?**

- Yes
- No
- Not Sure
- No Response*

Comments:

15 Area Cost Adjustments

Paragraphs 3.29 to 3.33 (and annex D) discuss approaches to calculating the area cost adjustment.

Which option should we use to calculate the Area Cost Adjustment: the current GLM approach or the combined approach?

- GLM Approach
- Combined Approach
- Other
- Not Sure

No Response

Comments:

16 **English as an Additional Language and Underperforming Ethnic Groups**

Paragraphs 3.34 to 3.38 considers what further factors of underachievement there might be for school age pupils and proposes the inclusion of an EAL factor in a national formula.

Do you agree that we should use an EAL factor in the national formula?

- Yes
 No
 Not Sure
 No Response

Comments: But we should avoid double awards so if it's in the national calculation it shouldn't also be in the local one and it should be limited to the first two years after a child joins the English educational system

17 **Do you agree that this should cover the first few years only? How many years would be appropriate?**

- Yes
 No
 Not Sure
 No Response

Comments: Two.

18 **Transitional Arrangements**

Paragraphs 3.39 to 3.41 discuss transitional arrangements.

Question 18: Do you think we should:

•(a) Continue with a maximum decrease of -1.5% per pupil each year and accept that this will mean very slow progress towards full system reform; or

•(b) Continue with a -1.5% per pupil floor in 2013-14 but lower it thereafter so that we can make faster progress?

- (a)
 (b)
 Neither
 Not Sure
 No Response

Comments: It is very difficult for 11-18 schools to answer this question as we don't know what further changes may be made to post 16 funding. There needs to be some modelling of the cumulative affect of all the funding changes on 11-18 schools. The resultant turbulence of the combined changes threatens standards and the range of the offer to students in KS4 and 5.

19 **Chapter 4 - Central services and defining responsibilities**

Paragraphs 4.1 to 4.7 discuss the development of a funding model, having first defined the respective responsibilities of maintained schools, Academies and local authorities. The model would clarify what elements of funding would be delegated to schools or centrally retained for maintained schools, if there is local discretion.

Do you agree that some of these services could be retained centrally if there is local agreement by maintained schools?

- Yes
 No
 Not Sure
 No Response

Comments:

20 Paragraphs 4.8 to 4.13 set out details of the funding blocks which make up the funding model and their functions. Funding blocks for schools, High Needs Pupils, early years, central services and formula grant are proposed.

Do you agree that the split of functions between the blocks is correct? If not, what changes should be made?

- Completely Correct
 Broadly, but some changes required
 No
 Not Sure
 No Response

Comments:

21 Chapter 5 - Future arrangements for the Local Authority Central Spend Equivalent Grant (LACSEG)

Paragraphs 5.1 to 5.9 discuss the future of LACSEG

Do you think the funding for LA LACSEG should be moved to a national formula basis rather than using individual LA s251 returns?

- Yes
- No
- Not Sure
- No Response*

Comments: We would welcome this as it offers better stability and predicability.

22 Do you think the distribution mechanism should be changed to one that more accurately reflects the actual pattern of where Academies are located?

- Yes
- No
- Not Sure
- No Response*

Comments: We think this would be difficult to administer as the pattern is constantly changing.

23 Chapter 6 - Children and Young People Requiring High Levels of Support

Principles

Paragraph 6.7 sets out the high level principles behind the proposals for funding children and young people with high levels of need.

Is this the right set of principles for funding high needs children and young people?

- Yes
- No
- Not Sure
- No Response*

Comments:

24 A Base Level of Funding for High Needs SEN

Paragraphs 6.11 to 6.18 discuss proposals to set a base level of funding to reflect high needs SEN.

Would it be appropriate to provide a base level of funding of around £10,000 per pupil or place to all specialist SEN and LD/D settings, with individualised top up above that?

- Yes
- No
- Not Sure
- No Response*

Comments:

25 Is £10,000 an appropriate level for this funding?

- Yes
- No - too high
- No - too low
- Not Sure
- No Response*

Comments:

26 Applying this approach to post-16

Paragraphs 6.19 to 6.21 discuss proposals for high-needs funding for pupils post -16.

Is the idea of a base rate of funding helpful in the post-16 context?

- Yes
- No
- Not Sure
- No Response*

Comments:

27 **Should local authorities be directly responsible for funding high level costs over £10,000 for young people in post-16 provision in line with their commissioning responsibilities?**

- Yes
- No
- Not Sure
- No Response*

Comments:

28 **Do the proposed funding arrangements create risks to any parts of the post-16 sector?**

- Yes
- No
- Not Sure
- No Response*

Comments:

29 **Funding by Places or Pupil Numbers**

Paras 6.22 to 6.26 discuss whether institutions providing for high needs children and young people should be funded on the basis of planned places or pupil numbers. It also sets out four options for doing so.

Should institutions providing for high needs children and young people be funded on the basis of places or pupil numbers?

- Places
- Pupil Numbers
- Not Sure
- No Response*

Comments:

30 **Are any of options a-d desirable?**

- (a)
- (b)
- (c)
- (d)
- (None)
- (Not Sure)
- No Response*

Comments:

31 **Funding Special and AP Academies and Free Schools**

Paragraphs 6.27 to 6.39 discuss how funding for special and AP Academies and Free Schools should be managed in the short term and, in the longer term, whether funding should be through the EFA or the commissioner.

Question 31: For the longer term, should we fund Special and AP Academies and Free Schools:

- a) with all funding coming direct from the commissioner?**
- b) with all funding coming through the EFA and recouped from the commissioner?**
- c) through a combination of basic funding from the EFA and top-up funding for individual pupils direct from the commissioner?**

- (a)
- (b)
- (c)
- Neither
- Not Sure
- No Response*

Comments:

32 **If we go for the combination funding approach, should we pass all funding through the EFA for a limited period while the school is establishing itself before moving to this approach?**

- Yes

- No
- Not Sure
- No Response*

Comments:

33 Constructing the High Needs Block for Local authorities

Paragraphs 6.40 to 6.47 proposes a new formula for determining the High Needs Block building on the research carried out for the Department by PricewaterhouseCoopers in 2009.

Given there is no absolute method of determining which pupils have high needs, and given local variation in policy and recording, is this approach to determining proxy variables acceptable?

- Yes
- No
- Not Sure
- No Response*

Comments:

34 Do you agree that deprivation is linked more to AP rather than the wider SEN needs?

- Yes
- No
- Not Sure
- No Response*

Comments:

35 Paragraphs 6.48 to 6.49 suggest the need for substantial transitional arrangements in moving to a new formula as the formula will fail to reflect the spend of local authorities on high need pupils.

Do you agree that in the short term we should base allocations to local authorities for the high needs block largely on historic spend?

- Yes
- No
- Not Sure
- No Response*

Comments:

36 *Post-16*

Paragraph 6.50 proposes aligning pre- and post-16 funding for high needs pupils over time.

Do you agree that post-16 funding should also become part of the local authority's high needs block over time, but that there might be a particular need for transitional arrangements?

- Yes
- No
- Not Sure
- No Response*

Comments:

37 What data should ideally underpin the funding allocations both initially and for a potential high needs block arrangement?

Answer:

38 Issues Specific to Alternative Provision

Paragraphs 6.51 to 6.56 highlight issues specific to AP provision but suggest that AP should continue to be treated alongside SEN for funding purposes.

NB: Questions 38 is displayed together with question 39 in the document.

Should AP continue to be treated alongside high needs SEN for funding purposes?

- Yes
- No
- Not Sure
- No Response*

Comments:

39 **What differences between them need to be taken into account?**

Answer:

40 **Early Years**

Paragraphs 7.5 to 7.8 set out current arrangements for early years funding and discuss whether the Early Years Single Funding Formula could be made simpler

Do you agree we should aim for a simpler EYSFF? If so, how?

- Yes
- No
- Not Sure
- No Response*

Comments:

41 Paragraphs 7.9 to 7.11 sets out options for improving the focus on tackling disadvantage and improving consistency in the support offered to disadvantaged children.

How could we refine the EYSFF so that it better supports disadvantaged children?

Answer:

42 **Bringing more consistency to free early education funding**

Paragraphs 7.12 to 7.15 consider two options for continuing to fund local authorities for free early education: on the basis of their current spend or on the basis of a formula,

Do you agree we should allocate funding to local authorities on the basis of a formula?

- Yes
- No
- Not Sure
- No Response*

Comments:

43 Paragraphs 7.16 to 7.18 discuss how a formula to local authorities for funding early years would operate.

Do you agree a formula should be introduced based largely on the same factors as the schools formula?

- Yes
- No
- Not Sure
- No Response*

Comments:

44 **Bringing greater transparency to free early education funding**

Paragraphs 7.19 to 7.20 discuss what has been done so far to improve transparency and our plans for the future:

We would be grateful for views on whether anything else can be done to improve transparency.

Answer:

45 **Pupil Premium**

Paragraphs 8.1 to 8.8 set out two options for extending the coverage of the pupil premium to include pupils previously eligible for Free School Meals: an 'ever 3' measure or an 'ever 6' measure which extend cover to those eligible for FSM at some point in the last three or six years

What is your preferred option for determining eligibility for the Pupil Premium from 2012-13? Should it be based on the Ever 3 or Ever 6 measure?

- Ever 3
- Ever 6
- Neither
- Not Sure
- No Response*

Comments:

46 Paragraphs 8.9 to 8.10 seek views on other issues for calculating the pupil premium, such as whether to reflect differences in funding already in the system

What is your preferred approach for calculating the Pupil Premium?

Answer: We would prefer that the premium is the same rate all over the country. Using an Area Cost Adjustment would be a return to the funding inequalities which these reforms are seeking to address.

47 Timing for implementation

Paragraphs 9.1 to 9.4 consider the issue of when to begin the process of moving to a new funding formula.

Do you think we should implement the proposed reforms in 2013-14 or during the next spending period?

- 2013 - 14
- Next Spending Period
- Neither
- Not Sure
- No Response*

Comments: If the modelling could be done upfront, schools would have plenty of time to plan for change.

48 Have you any further comments?

Answer: We continue to be concerned that there is no joined up thinking re funding for 11-18 schools.
