



Department
for Education

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: Richard Webb	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Portsmouth City Council	
Address: Civic Offices Guildhall Square Portsmouth, PO1 2EA	

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
---	-----------------------------	-----------------------------------

Comments:

The Schools Block 'Guaranteed Units of Funding' (GUF) vary for each Local Authority. The current values range from £3,949.94 to £7,014.38 (excluding the city of London). If these values were applied to Portsmouth we would lose £14.85m or gain £55.6m respectively.

The current GUF values are also based on historic funding allocations and reflect the decisions made during the baseline exercise, (in preparation for the transition to the National Fair Funding Formula) in determining the level of funding to be included within the Early Years and High Needs blocks. For those Authorities who transferred more funding to either of the Early Years or High Needs Blocks, their current GUF will potentially be lower than those Authorities who did not and will ultimately benefit from these proposals.

The current method of allocating high needs funding, is also creating financial pressures, particularly within Portsmouth, due to the increased number of children with highly complex Special Educational Needs requirements. In order to continue to provide funding to meet the needs of these children it has been necessary to apply the flexibility provisions within the regulations to move funding between the different blocks.

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

Yes No Not Sure

Comments:

The proposed 'Minimum Funding Level' (MFL) model proposes to use data from the school revenue funding proforma, completed by each of the Local Authorities. The reasons we disagree with this proposal are:

- The MFL model does not include all of the funding factors within the pro-forma (i.e rates, PFI or Growth Fund and Falling Rolls fund allocations)
- The calculation fails to recognise the central expenditure items supported by the DSG allocation (e.g. Admissions, Schools Forum, Licences)
- The model fails to recognise that the Schools Block funding also supports other areas of DSG expenditure - particularly the pressures within the High Needs budgets.
- The model fails to recognise the potential historic inequalities arising from previous funding decisions and the adjustments made by local authorities in the baseline exercise in moving to the new funding arrangements.

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

Yes No Not Sure

3 b) Deprivation

Yes No Not Sure

3 c) Looked-after children

Yes No Not Sure

3 d) English as an additional language

Yes No Not Sure

3 e) Low prior attainment

Yes No Not Sure

3 f) Lump sum

Yes No Not Sure

3 g) Sparsity

Yes No Not Sure

Comments:

We disagree with the proposals for the following reasons:

- Taking an average of the funding allocations made by Local Authorities through the chosen funding factors, fails to reflect the local pupil characteristics. For example within Portsmouth a significant proportion of our funding is targeted through the Deprivation and Prior Attainment factors. The proposal to use a national average figure, results in a significantly lower funding allocation within the MFL model, compared to our actual funding allocations. The reason for allocating higher levels of funding through the deprivation and prior attainment factors was to support these pupil as well as to minimise turbulence in schools funding. Historically schools had received targeted funding (including grants) because of the deprivation and prior attainment pupil characteristics in their area.
- Nationally there is a significant variation for lump sum funding rates used by each Local Authority (ranging from below £80k to over £190k), therefore using an average is unlikely to be an appropriate proxy.

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

Agree

Disagree

Not sure

Comments:

We have already highlighted concerns in respect of the proposed model and the underlying data used. Therefore the application of an Area Cost Adjustment to the results from this model is difficult to support.

An alternative to the area cost adjustment (based on labour costs) would be an area deprivation adjustment, so that funding is targeted to support pupils in areas of deprivation or with the greatest prior attainment need.

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

<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> 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 type="checkbox"/> Use an alternative method
---	---	--

Comments:

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?

Useful

Not useful

Not sure

Comments:

Portsmouth City Council does not use the Sparsity Factor and is therefore unable to comment.

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?

Useful

Not useful

Not sure

Comments:

Portsmouth City Council does not use the Sparsity Factor and is therefore unable to comment.

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

Comments:

Portsmouth City Council does not use the Sparsity Factor and is therefore unable to comment.

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.

X

E-mail address for acknowledgement: Richard.webb@portsmouthcc.gov.uk

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