Review of 2013-14 School Funding Arrangements

Response Form

The closing date for responding is 26 March 2013.

Your comments must reach us by that date.

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential. \Box

Name:

Lynn Franklin

Organisation (if applicable):

Southampton City Council

Address:

Civic Centre (OGS) Southampton SO14 7LY

If you have an enquiry related to the policy content of the review document you can email <u>Funding.REVIEW2013-14@education.gsi.gov.uk</u>

Section 1: Are we moving towards national consistency?

Question 1: Should we set a minimum threshold for the pupil-led factors and, if so, at what level?

If the DfE is still committed to moving towards a national funding formula it would be useful to set a minimum threshold based on national figures.

Question 2: On what basis did local authorities decide on the quantum or proportion of funding to target to deprived pupils?

Southampton's deprivation funding was based on 12/13 levels in the current formula. The Schools Forum has targeted growth funding at deprivation for several years.

Question 3: On what basis did local authorities decide on the per-pupil amounts for the prior attainment factors?

Again, these are based on current levels of funding. Historically these levels have been based on an allocation per "step" based on numbers of pupils with SEN in the city.

Section 2: Areas of concern and possible changes for 2014-15

Prior Attainment

Question 4: Do you agree that local authorities should continue to use EYFSP data as an attainment-related proxy or should we consider use of a different indicator to identify low cost SEN in primary schools? If so, what indicator?

Yes - EYFSP data would be the best proxy indicator as this aligns to the use of prior attainment elsewhere.

Pupil mobility

Question 5: Would it help to allow an additional weighting to be given if a school experiences in-year changes to pupil numbers above a certain threshold? If so, where should this threshold be set?

It would be helpful to recognise exceptional situations where high numbers of pupils move in and out of a school, e.g. schools with high numbers of pupils with parents in the military.

The lump sum

Question 6: In areas with large numbers of small schools, could the problem of having a fixed lump sum be overcome by reducing the relevant AWPU?

Not an issue in Southampton.

Question 7: Would having the ability to apply a separate primary and secondary lump sum avoid necessary small schools becoming unviable? If so, how should we deal with middle and all-through schools?

Question 8: We said in June that we would review the level of the lump sum cap (currently £200,000) for 2014-15 in order to establish whether it is the minimum cap needed to ensure the sustainability of necessary small schools. If we continued with one lump sum for both primary and secondary, what would be the minimum level of cap needed to ensure the sustainability of necessary small schools? If we had separate lump sums for primary and secondary, what secondary, what would be the minimum cap needed for each in order to ensure the sustainability of necessary small schools?

Question 9: Would using a school-level sparsity measure to target a single lump sum, based on distance between pupils and their second nearest school, avoid necessary small rural schools becoming unviable?

Question 10: What average distance threshold would be appropriate?

Question 11: If we had a sparsity measure, would it still be necessary to have a lump sum in order to ensure that necessary schools remain viable? Why? What is the interaction between the two?

Question 12: What alternative sparsity measures could we use to identify necessary small schools in rural areas?

Question 13: Would the ability for both schools to retain their lump sums for one or two years after amalgamation create a greater incentive to merge?

Yes. However schools which merge will make significant savings in the short term, e.g. one Headteacher, Business Manager etc which should be an incentive in itself.

Targeting funding to deprived pupils

Question 14: If you think local authorities will be unable to use the allowable deprivation indicators in order to prevent significant losses to schools with a high proportion of deprived pupils, why do you think that is the case?

Changing the way we allocate additional funding for pupils with statements has moved money away from more targeted funding per pupil, towards proxy indicators e.g. prior attainment. Currently schools with pupils with low incidence statements only pay for the first five hours of LSA support. Under the new process, they will need to fund the first 12 hours of LSA support (which equates to $\pounds 6,000$). This could penalise those schools with high numbers of low incidence statements but good results, unless additional allocations are made from the High Needs block.

Service Children

Question 15: Do you have any evidence that service children (once we account for deprivation, mobility and pastoral care through the Pupil Premium) require additional funding in order to achieve as well as non-service children?

No.

Other groups of pupils

Question 16: Have the 2013-14 reforms prevented local authorities from targeting funding to groups of pupils that need additional support? If so, which?

Schools with falling rolls

Question 17: In cases where a population bulge is imminent, what is preventing good and necessary schools from staying open?

Some of our Secondary schools are experiencing falling NORs but are forecast to be full in a few years time. They have been particularly affected by the removal of our Real Term Protection factor that ensured funding levels remained at least 95% of last years funding. The MFG, which operates at a pupil level, does not protect these schools. Some secondary schools have seen their funding drop by up to 8% mainly due to NOR falls.

Question 18: Are there any other circumstances in which falling rolls are unavoidable in the short term?

Section 3: Options for adjusting high needs funding in 2014-15 and beyond

Question 19: Would a formula factor that indicates those pupils who receive top-up funding be a useful addition to help deal with the funding of high needs?

Yes

Question 20: To address the variation in base funding between neighbouring local authorities, how fast should local authorities be required to move towards the £6,000 threshold? Should it be made a requirement from 2014-15?

Yes

Question 21: Should the Department play an active role in spreading good practice and model contracts/service level agreements?

Yes

Question 22: Do you have ideas about how the pre and post-16 high needs systems might be brought closer together?

The introduction of EHC Plans to replace statements and Section 139A Moving On Plans from September 2014 should enable these systems to be brought closer together.

Section 4: Schools Forums

Question 23: Do you think that Schools Forums are operating more democratically and transparently? If not, what further measures could the Department take in order to improve this?

It is useful to publish all papers on our website. However there was no evidence to suggest that our Forum was particularly undemocratic or opaque before the changes were implemented.

Thank you for taking the time to let us have your views.

Completed questionnaires and other responses should be sent to the address shown below by 26 March 2013.

Send by e-mail to: Funding.REVIEW2013-14@education.gsi.gov.uk

Send by post to:

Anita McLoughlin Funding Policy Unit 4th Floor Sanctuary Buildings Great Smith Street London SW1P 3BT