

Consultation on School Funding 2011-12: Introducing a Pupil Premium

Consultation Response Form

The closing date for this consultation is: 18
October 2010

Your comments must reach us by that date.

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://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.

Reason for confidentiality:

Name

Organisation (if applicable) Hampshire County Council

Address:

Appendix 1

If your enquiry is related to the policy content of the consultation you can contact either:

Juliet Yates on: telephone: 020 7340 8313 e-mail:

juliet.yates@education.gsi.gov.uk, or

Ian McVicar on: telephone: 020 7340 7980 e-mail:

ian.mcvicar@education.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on telephone: 0870 000 2288 or email:

consultation.unit@education.gsi.gov.uk

Appendix 1

Please select **ONE** category which best describes you as a respondent:

<input type="checkbox"/> School	<input type="checkbox"/> Schools Forum	<input type="checkbox"/> Governor Association
<input type="checkbox"/> Teacher	<input type="checkbox"/> Local Authority Group	<input checked="" type="checkbox"/> Individual Local Authority
<input type="checkbox"/> Teacher Association	<input type="checkbox"/> Other Trade Union/Professional Body	<input type="checkbox"/> Early Years Setting
<input type="checkbox"/> Campaign Group	<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Other

Please Specify:

Appendix 1

1 Do you agree it is right to give a higher premium to areas that currently receive less per pupil funding? [Paras 24 - 27]

Yes

No

Not Sure

Comments:

The exclusion of special school pupils from the premium is neither explained nor justified.

It is suggested that the per pupil premium will contain an Area Cost Adjustment that is not the same as that currently used to underpin the spend-plus methodology. A new ACA methodology should not be introduced for the per pupil premium so that there is consistency and stability. However the existing ACA methodology, derived from that used for formula grant distribution, should be changed to treat Hampshire and the Isle of Wight separately. There is no ACA rationale for combining the two areas and if the Government wishes to provide additional funding for the Isle of Wight for costs arising from its island status, that funding should be met nationally and not, as at present, solely by the Hampshire area.

The paper indicates the development of a new longer term formula for DSG. It is expected that if a different ACA is proposed as part of this work that there will be full consultation on such proposals. That would then give an opportunity to bring the ACA for the pupil premium in line with any DSG changes. In the meantime the ACA for the premium should be that used within the existing DSG for developments during 2008-2011.

2 What is your preferred deprivation indicator for allocating the pupil premium? [Paras 29 - 50]

FSM - in year

FSM ever - 3 year

FSM ever - 6 year

Out of Work Tax Credit

ACORN/MOSAIC

Other (not listed)

Not Sure

Comments:

This is transparent, recognises the impact of variability and supports early intervention and equivalence between phases.

3 Do you agree the coverage of the pupil premium should include Looked After Children? [Paras 51 - 54]

Yes

No

Not Sure

Comments:

The cash value for Looked After Children should be higher than the main premium to reflect the higher costs and greater attainment gap.

All looked after children in education up the age of 16 should be covered whether they are in primary, secondary or special schools or in early years or alternative provision.

The premium experienced at school level for such children should be the same for children in the same class regardless of in care authority. This could be achieved by either setting an uniform premium and distributing it to in care authorities or by having a premium variable between authorities and distributing it via educating authority.

4 What are your views on the operation of the Looked After Children element of the pupil premium? In particular, how might the funding arrangements work at local authority level for pupils educated outside of the local authority with caring responsibility? [Paras 55 - 60]

Comments:

Hampshire's experience with a local school based termly premium for looked after children has shown that the matching of looked after children data and pupil data can be time consuming initially but data does improve over time. The termly allocation mechanism retains a close link between the change in the child's status and extra funding to support educational provision and reduce the attainment gap. Accordingly there is a preference for the system to be based on funding the educating authority rather than the caring authority with termly allocation to schools and monitoring overseen by the virtual headteacher for the education of looked after children.

5 Do you think the coverage of the pupil premium should be extended to include additional support for Service children? [Paras 61 - 66]

Yes

No

Not Sure

Comments:

Additional funding for children from service families was introduced in Hampshire some years ago. The rationale for this development included the unique challenges faced by service children as described in paragraph 62 of the consultation paper, the mobility issues, the impact of both these factors on the other children in the school. Although there had always been funding for pupil mobility in the local formula it became clear that this did not pick up the specific issues affecting children of service families sufficiently well.

Thus the inclusion of service children within a pupil premium mechanism, albeit at a different rate, is firmly supported.

6 Should the pupil count for three year olds, used to allocate DSG for 2011-12, reflect actual take up or continue to reflect a minimum of 90% participation where lower? [Paras 75 - 76]

Actual Take-Up

90% Minimum

Not Sure

Comments:

7 Should the pupil count used to allocate DSG for 2011-12 continue to reflect dual subsidiary registrations for pupils at pupil referral units? [Paras 77 - 78]

Yes No Not Sure

Comments:
Double counting is not good practice and providing funds are retained within the DSG control total and redistributed the effect should not be too pronounced for most authorities.

8 Do you support our proposals for additional support for schools catering for Service children? [Para 79]

Yes No Not Sure

Comments:

The impact at school level of a large number of service children leaving due to armed forces movements can indeed be severe. As an authority with many substantial armed forces establishments within its borders this proposal is warmly welcomed.

9 Do you support our proposals for home educated pupils? [Para 80]

Yes

No

Not Sure

Comments:

The pressure from some home educators for support well above the 10% of the per pupil DSG amounts would increase pressures on the rest of the Schools Budget. The government needs to make it clear that there is not generous funding available for supporting such cases and that the use of the discretion by local authorities will be affected by the budget position.

10 Do you think that there should be a cash floor at local authority level in 2011-12? [Para 85]

Yes

No

Not Sure

Comments:

These cash floors have undermined the principle of pupil led funding and in practice have only benefitted a few smaller authorities at the expense of the majority of authorities.

Should there be changes to the distribution of DSG from 2012 or a later date future transition arrangements may require cash floors at local authority level.

11 Have you any further comments?

Comments:

The priority given to the per pupil premium is welcomed.

However the indication that there is likely to be a new distribution method for Dedicated Schools Grant (DSG) from 2012/13 onwards is not helpful to medium term planning by schools and local authorities.

An announcement of a three or four year national total for DSG following the Spending Review announcement in October 2010 is of reduced value if the distribution to local authorities is only known for 2011/12.

Any changes to area cost adjustment for DSG such be the subject of further consultation as part of the wider changes to DSG distribution .

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

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

Yes

No

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

Appendix 1

If you have any comments on how DfE consultations are conducted, please contact Donna Harrison, DfE Consultation Co-ordinator, tel: 01928 794304 / email: donna.harrison@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 18 October 2010

Send by post to: School Funding Consultation 2011-12, Funding and Technology Unit, Department for Education, Level 3, Sanctuary Buildings, Great Smith Street, London SW1P 3BT.

Send by e-mail to: dsg.consultation@education.gsi.gov.uk