



Department  
for Education

# **Analysis of and response to the schools national funding formula consultation**

**September 2017**

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## Introduction

On 14 December 2016, we launched the second stage of our consultation on a national funding formula for schools and central school services.

We asked 17 questions on the following areas:

- Our overall approach to constructing the national funding formula for schools
- The detailed formula design proposals
- Our proposals for the central school services block

This document forms part of the government's response to the second stage schools national funding formula consultation, and is in three parts. The first part summarises our second stage consultation proposals. The second part describes the responses and key themes we received on these proposals and confirms our decisions on the basis of these responses. The third part is a detailed question-by-question analysis which sets out the responses received on each individual question and summarises our decisions on the basis of these responses.

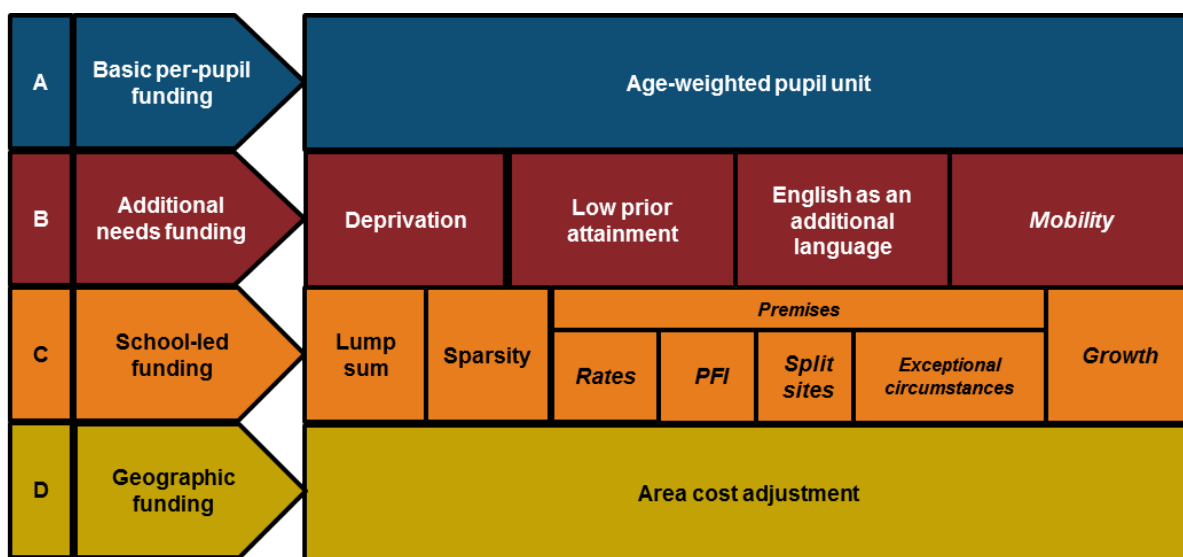
Full details on the final national funding formula for schools and central school services can be found in the policy document on the national funding formula for schools and high needs which is published alongside this document.

# Part 1 - Summary of consultation proposals

## The schools national funding formula

1. In the second stage of our consultation on a national funding formula for schools, we confirmed we would be using 13 factors in the formula, as set out in Figure 1.

**Figure 1: The building blocks and factors in the proposed national funding formula for schools**



**NB This is not designed to scale.**

2. The key proposals for the national funding formula for schools included:

### Across the whole formula, to:

- maintain the primary to secondary ratio in line with the current national average
- maximise the proportion of funding allocated to pupil-led factors compared to the current system, so that as much funding as possible is spent in relation to pupils and their characteristics

### With regard to basic per-pupil funding, to:

- reflect that the majority of funding is used to provide a basic amount for every pupil, but that some of this funding is, at present, specifically supporting pupils from disadvantaged backgrounds. To do this, we proposed to increase the total spend on the additional needs factors in the national funding formula

- continue to increase the basic rate as pupils progress through the key stages

**With regard to additional needs funding, to:**

- increase total spend on the additional needs factors (socio-economic deprivation, low prior attainment and English as an additional language) to recognise that some basic per-pupil funding is currently supporting pupils from disadvantaged backgrounds, as mentioned above
- have a substantial deprivation factor, alongside the pupil premium, to ensure schools with pupils from a socio-economically disadvantaged background attract significant extra funding. Within this, include a greater weighting towards areas with high concentrations of ordinary working families who do not typically qualify for free school meals (FSM) deprivation funding, through the use of a significant area-level deprivation factor (using the Income Deprivation Affecting Children Index, IDACI). This helps support all those whose background may create a barrier to their education, not only those with a history of free school meal (FSM) eligibility
- increase substantially the weighting of the low prior attainment factor, because attainment data is one of the strongest indicators of how children are likely to do later, and we want to target funding to schools to help all pupils catch up
- have an English as an additional language factor, increased in terms of total spend in comparison to the current system because the national funding formula will fund all eligible pupils consistently
- protect local authorities' current spend on mobility, while we develop a more sophisticated mobility indicator for use in the national funding formula, as discussed in our response to the stage one consultation

**With regard to school-led funding, to:**

- provide every school with a lump sum, but at a lower level than the current national average so that we can direct more funding to the pupil-led factors
- provide small and remote schools with additional funding, over and above the lump sum, to recognise that they can face greater challenges in finding efficiencies and partnering with other schools
- fund rates and premises factors (private finance initiative (PFI); split sites; exceptional circumstances) in 2018-19 on the basis of historic spend but with

an adjustment to the PFI factor so that it is automatically uprated in line with inflation, using the RPI[X] measure<sup>1</sup>

- fund the growth factor on an historic basis for 2018-19 and seek views through this consultation on what we think would be a better approach for the long term, using lagged growth data

**With regard to geographic funding, to**

- recognise the higher salary costs faced by some schools, especially in London, by making an area cost adjustment. We confirmed we would use the hybrid area cost adjustment methodology, which takes into account variation in both the general and teaching labour markets

**To ensure sufficient stability, we also proposed:**

- to build in an overall ‘funding floor’ so that no school would face a reduction of more than 3% per-pupil overall as a result of the national funding formula

**And during transition, we proposed:**

- the minimum funding guarantee (MFG) of minus 1.5% per-pupil in any year would continue, in order to provide additional stability for schools
  - schools would attract gains of up to 3% per-pupil in 2018-19, and then up to a further 2.5% in 2019-20.
3. Figure 2 shows the proposed weightings (the percentage of the total budget spent on each factor) and total spend through each factor as set out in the second stage of our consultation. Also included are the individual factor values (i.e. amount per-pupil or school) that followed from the proposed weightings.

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<sup>1</sup> RPI[X] is the retail price index all items excluding mortgage interest. For more information, please see <https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/chmk/mm23>

**Figure 2: the factor values and weighting proposed for the national funding formula in the second stage of our consultation**

Factor		Proposed weighting for the national funding formula	Total we propose to spend through factor in the formula. NB These include area cost adjustment funding		Per-pupil/school funding under the proposed national funding formula. NB These exclude area cost adjustment funding.			
					Primary		Secondary	
Basic per-pupil funding (£ per pupil)		72.5%	£23,255m		KS1	£2,712	KS3	£3,797
					KS2		KS4	£4,312
Deprivation (£ per pupil)	Ever6 FSM	9.3%	£1,746m	£2,985m	£540		£785	
	Current FSM		£980		£1,225			
	IDACI A		£575		£810			
	IDACI B		£420		£600			
	IDACI C		£360		£515			
	IDACI D		£360		£515			
	IDACI E		£240		£390			
	IDACI F		£200		£290			
Low prior attainment (£ per pupil)		7.5%	£2,394m		£1,050		£1,550	
English as an additional language (£ per pupil)		1.2%	£388m		£515		£1,385	
Mobility (allocated to LAs on basis of historic spend)		0.1%	£23m		N/A			
Lump sum (£ per school)		7.1%	£2,263m		£110,000		£110,000	
Sparsity (£ per school)		0.08%	£27m		£0 - £25,000		£0 - £65,000	
Premises (allocated to LAs on basis of historic spend)	Rates	1.8%	£569m		N/A			
	PFI							
	Split sites							
	Exceptional circumstances							
Area cost adjustment			£792m		A multiplier that is applied to certain factors. Shown in italics because it is already included in the total spend through each factor.			
Explicit spend on growth (allocated to LAs on basis of historic spend)		0.5%	£167m		N/A			
		Total	£32,071m					

Figure 2: this table shows the weightings we proposed for each factor in the national funding formula; the total spent through each factor in our published illustrative national funding formula allocations; and the per-pupil or per-school amounts that follow from the proposed weightings for each factor.

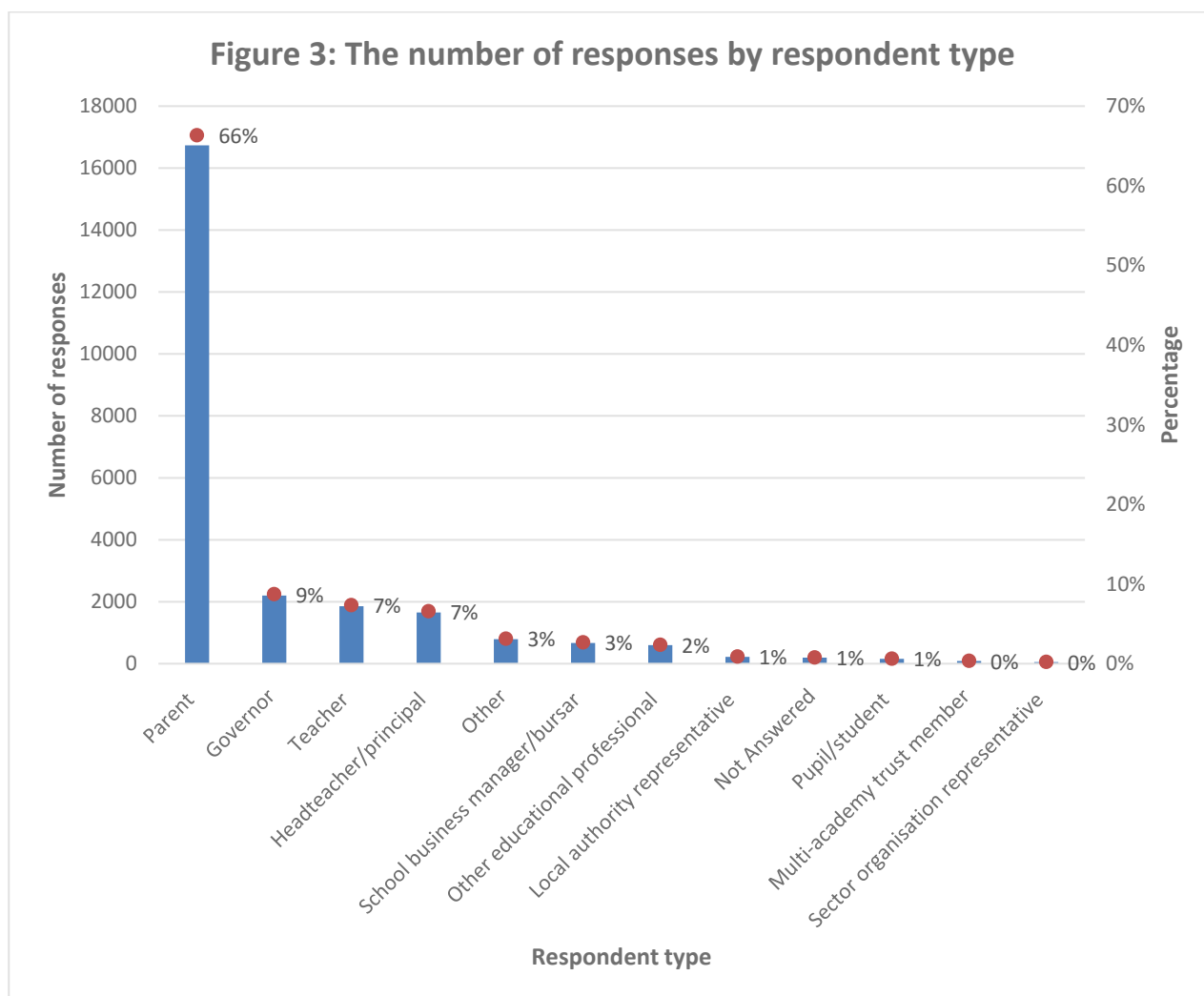
## The central school services block formula

4. In the second stage of our consultation, we confirmed that we would create a central school services block within the dedicated schools grant (DSG) to reflect the ongoing local authority role in education. Funding will be provided for two distinct elements, which will be handled separately within the formula: ongoing responsibilities and historic commitments.
5. For ongoing responsibilities which local authorities hold in respect of both maintained schools and academies, we proposed the majority (90%) of funding be calculated on a per-pupil basis. We also proposed to include a deprivation factor to recognise the importance of particular central services for schools in areas with high levels of socio-economic deprivation.
6. For historic commitments, we confirmed that funding will be allocated to local authorities based on evidence, with the expectation that historic commitments will unwind over time.
7. We proposed to put in place a protection on the central school services block which would minimise reductions to 2.5% per pupil in 2018-19 and 2019-20 to ensure a manageable transition for all local authorities. Gains would be set annually and depend on the precise composition of the central school services block in each year.

## Part 2 - Key findings from the consultation and our decisions

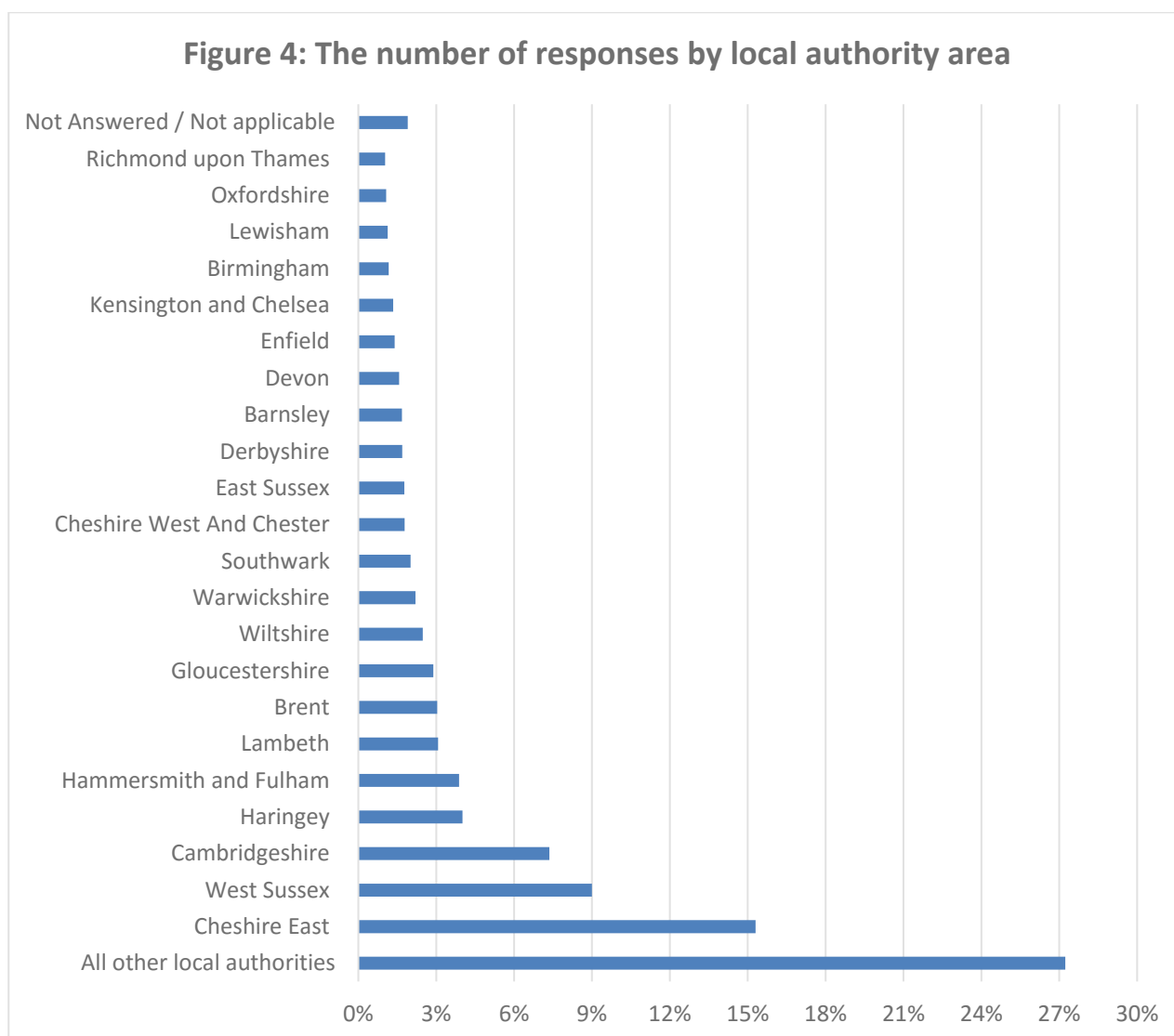
### Number of responses received

8. In total there were **25,222 responses** to the consultation on the schools national funding formula. The largest proportion of responses received were from those who identified themselves as parents (66%). 9% of the respondents said they were governors, 7% teachers and 7% head teachers or principals.



**Figure 3: this chart shows the number of respondents to the second stage of our consultation, according to their self-identified profession, or their relationship to the education sector.**

9. Almost a third (31%) of responses were received from three specific local authority areas: Cheshire East (15%), West Sussex (9%) and Cambridgeshire (7%). 22 local authorities account for 71% of total responses received, as shown in Figure 4 below.



**Figure 4: This chart shows the percentage of respondents to the second stage of the consultation, according to their local authority.**

10. Across the regions, the largest proportion of responses was from London, making up 28% of the total received. 1% of respondents were from the North East; 22% from the North West; 3% from Yorkshire and the Humber; 4% from the East Midlands; 5% from the West Midlands; 9% from the East of England; 16% from the South East; and 9% from the South West. Note that the regional proportions will be significantly affected by the high response rates from Cheshire East, West Sussex and Cambridgeshire.

11. A full list of the representative organisations that responded can be found at Annex 1 of this document.

12. Some respondents answered just a subset of questions. Throughout this document, the proportion of respondents agreeing or disagreeing with a proposal are given as a proportion of all 25,222 respondents, rather than of those who answered the question.

13. Percentages have not been weighted to take account of responses from representative bodies or campaigns (identical responses from certain areas). Throughout the document, when we quote the proportion of respondents who agreed or disagreed with our proposals, we take account of all responses received. Where results are significantly impacted by high volumes of campaign responses, we will note this in the explanation.
14. Throughout this document, the percentages do not always total 100% due to rounding.
15. During the consultation period, Department for Education ministers and officials attended a wide range of externally organised conferences and events, and local authority regional school finance meetings. They also held numerous meetings with funding stakeholders including members of parliament, as well as the department's School and Academy Funding Group<sup>2</sup> and the Service-level Working Group for Education and Children's Services<sup>3</sup>. As well as the findings from the online consultation, the discussion at these meetings and events has influenced the final decisions and where relevant has been reflected in the responses set out in Part 3.

## Key themes

16. Overall, respondents supported a number of the key proposals and much of the basic design of the formula. Detailed summaries of responses and decisions on each of the main proposals can be found in Part 3. Information on the final national funding formula can be found in the policy document on the national funding formula for schools and high needs, which is published alongside this document.
17. There were several key themes that were raised across multiple questions. These themes are summarised below.

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<sup>2</sup> The School and Academy Funding Group (SAFG) exists to advise the department on matters relating to all aspects of school funding, in the context of the wider policy objectives for schools. It is made up of key stakeholders from a number of organisations with a focus on education and/or funding.

<sup>3</sup> The Service Working Group on Education and Children's Services (SWGECS) facilitates exchanges between local authority finance representatives and the DfE on matters concerned with revenue and capital expenditure on education and children's services.

## Overall funding in the system

18. The overall level of funding for schools was raised in response to nearly every question in the consultation. It was a common theme in questions relating to the different pupil-led factors, where many respondents called for an increase to the basic per-pupil funding rate for all pupils or a reweighting away from the additional needs factors towards basic per-pupil funding in order to deliver an increase to basic per-pupil funding.
19. We want schools to have the resources they need to deliver a world class education for their pupils. This is why, in July, we announced an additional £1.3 billion for schools and high needs across 2018-19 and 2019-20, in addition to the schools budget set at the 2015 Spending Review. This funding will be delivered across the next two years as we transition to the national funding formula.
20. As a result of the additional investment, core funding for schools and high needs will rise from nearly £41.0 billion in 2017-18 to £42.4 billion in 2018-19, and to £43.5 billion in 2019-20. The additional investment for the national funding formula will allow us to:
- increase the basic amount that every pupil will attract in 2018-19 and 2019-20
  - continue to protect funding for pupils with additional needs, as we proposed in the second stage of our consultation
  - increase the percentage of funding allocated to pupil-led factors, as we proposed in the second stage of our consultation
  - provide a minimum per-pupil funding level over the next two years. For secondary schools this will be £4,800 in 2019-20 with a transitional amount of £4,600 in 2018-19; and for primary schools this will be £3,500 in 2019-20, with a transitional amount of £3,300 in 2018-19
  - for the next two years, provide for up to 3% gains per pupil for underfunded schools, and a minimum cash increase of 1% per pupil by 2019-20, compared to their baseline, in respect of every school.

## The balance between fairness and stability

21. There was particular support for the proposal to include a funding floor to limit overall reductions as a result of the formula. Some respondents cited the cost pressures facing schools and called for the floor to be further increased so that no school would lose funding as a result of the formula.

22. We recognise that stability is vital for schools and that is why we have raised the funding floor in the national funding formula so that all schools attract at least a 1% cash increase per pupil by 2019-20, compared to their baseline, as mentioned above. We are also using the additional funding to ensure that those schools that have been underfunded will be allocated per-pupil gains of up to 3% a year in both 2018-19 and 2019-20. Our previous proposal had capped gains at 2.5% in 2019-20.
23. Further information on the transition to the new funding system can be found in the policy document on the national funding formula for schools and high needs, which is published alongside this document.

### **The need for minimum per-pupil funding**

24. We heard a consistent message throughout the consultation that we could do more through our formula to support those schools that attract the lowest levels of per-pupil funding.
25. We have listened carefully, and have decided to both raise the basic amount that each pupil attracts and target additional funding to the lowest funded schools. The national funding formula will provide at least £4,800 per pupil for every secondary school and £3,500 per pupil for every primary school in 2019-20. In 2018-19 the formula will provide a transitional minimum amount of £4,600 in respect of secondary schools and a transitional minimum amount of £3,300 for primary schools.
26. We believe this will help ensure that every school has the resources it needs to provide appropriate support to every one of its pupils.
27. Further information on the minimum per-pupil funding and how it will be phased in can be found in the policy document on the national funding formula for schools and high needs which is published alongside this document.

## Part 3 – Question level analysis

### Question 1: Balance between fairness and stability

**Q.1 In designing our national funding formula, we have taken careful steps to balance the principles of fairness and stability. Do you think we have struck the right balance?**

	Total	Percentage
Yes	1352	5%
No	23500	93%
Not Answered	370	2%

### Summary of responses

The vast majority of respondents to this consultation provided a response and supporting comments for this question. Although the question was about the balance of fairness and stability, many respondents took the opportunity to express their views on the total size and sufficiency of the schools budget.

There was broad support for the principle of having a formula. Respondents cited current unfair distribution of funding to similar schools and a number of headteachers welcomed the transparency that a national funding formula would bring and believed it would be a step in the right direction. 93% of respondents however, felt that we had not struck the right balance between fairness and stability in the proposals, largely due to their concerns about the overall amount of funding available for schools.

Many respondents felt that rather than redistributing current funding there should be an increase in the overall budget for school funding. Campaign responses from a number of local authorities also called for an increase in the overall budget.

In line with this, respondents also felt that the basic per-pupil amount was not high enough. A number of parents suggested the basic per-pupil amount (or “age-weighted pupil unit” – AWPU) should act as the core base for funding so that every school can operate effectively, regardless of the intake. Some respondents wanted to see reference to the cost of running a school and believed that until we determined the minimum amount required for a school to deliver the core provision there should be no cuts made to school funding. They felt that staffing costs were not accounted for in the formula and the lack of funding being directed to meeting these costs would force schools to make job cuts. We heard calls for a minimum level of per-pupil funding for secondary schools; a number of values were suggested, with the most commonly quoted figure being £4,800.

The removal of the Education Services Grant (ESG) was also cited as having a negative impact on school funding.

Another key theme raised in this question was deprivation. Some respondents felt that the weighting of the factors used in the formula gave an increased and disproportionate emphasis to deprivation and prior attainment. With pupil premium levels remaining the same, some local authority representatives were concerned that too much overall funding is being directed for deprivation. Furthermore, clarification was sought on what schools should be using increased deprivation funding for as opposed to the pupil premium.

Some respondents felt that there was insufficient consideration in the funding formula for small rural schools. There were concerns that small schools are unable to sustain any reductions. Some respondents felt that the formula is biased to inner city areas such as London, and rural schools would suffer as a result, particularly if they were not eligible for sparsity funding.

There were mixed views on the proposal for including a 'floor' in the formula. As set out in Part 2, many respondents supported the proposal to include a funding floor to limit overall reductions as a result of the formula. They felt that it would ensure stability as it would limit the budget reductions that individual schools would have to manage. However they argued that the floor should be set at a higher level in order to limit losses further.

Others felt the proposed floor would lock in historical differences in funding between schools, and would therefore make the new formula unfair. They argued that if relatively high-funded schools would face a maximum reduction of 3% per pupil, this would limit the scope of gains for underfunded schools and would maintain the current inequality that exists and therefore compromise the principle of fairness.

A number of respondents also discussed the area cost adjustment (ACA). Respondents raised concerns that the ACA calculation was flawed as it only compared local salary costs and did not take into account the economic costs faced by each area.

There was a general recognition among many respondents that the impact of the proposed funding formula served to highlight the unfairness of the current system. They felt change was needed to ensure the best possible outcomes for all children and the move to a new national funding formula should not be delayed.

## **Government response**

As set out in Part 2, in July we announced an additional £1.3 billion in schools and high needs across 2018-19 and 2019-20 to support the introduction of the national funding formulae. On top of the existing schools funding settlement from the 2015 Spending Review, this will maintain funding in real terms per pupil to 2019-20. The introduction of the national funding formula and the additional investment will together give schools a firm foundation that will enable them to continue to raise standards, promote social

mobility and give every child the best possible education and the best opportunities for the future.

The additional investment means we can improve our formula in the following ways:

- We are increasing the basic amount that every pupil will attract in 2018-19 and 2019-20, compared to the formula proposals we set out in the stage 2 consultation. We are increasing the age weighted pupil unit for primary pupils to £2,747, for key stage 3 pupils to £3,863 and for key stage 4 pupils to £4,386 so that all schools can benefit.
- We are increasing the level of the funding floor from our stage 2 proposals. We are going further than our commitment that no school will lose from the formula and will instead provide a cash increase of at least 1% per pupil by respect of every school in 2019-20, compared to its baseline.
- We are introducing a minimum funding level of £4,800 per pupil for secondary schools and a minimum funding level of £3,500 per pupil for primary schools in 2019-20, to support the lowest funded schools. This is to recognise that funding for additional needs is distributed on the basis of proxy indicators that do not necessarily pick up all pupil needs. These new minimum levels of per-pupil funding will be phased in quickly over the next two years. In 2018-19, the formula will provide a transitional minimum amount of £4,600 in respect of secondary schools, and a transitional minimum amount of £3,300 for primary schools.

We have considered carefully the calls for the department to undertake a bottom-up costing review in order to determine the national funding formula, and reviewed evidence provided by a number of sector representatives and individual schools.

Our view remains that there is no 'one size fits all' model for running a school, on which we could justifiably base a national funding formula. Schools are – and should be – run in a way which reflect their varied circumstances and the experience and priorities of their leadership and school community. Constructing such a model would require government to make arbitrary decisions on questions like the appropriate class size and pupil to teacher ratio – decisions on which experts in the education sector do not necessarily agree and for which there is unlikely to be an answer that is appropriate in all circumstances. The responses we received during the consultation confirmed that there is no consensus on what would constitute a minimum level of funding that is required to provide an adequate education. Accordingly, we continue to think it would not be appropriate for the government to base the school funding system on an activity-led model. Instead, our national funding formula distributes funding in a manner that reflects policy objectives, evidence and the agreed principles for funding reform.

We have also considered the concerns raised about the ACA and the view that it does not recognise a number of cost drivers for schools, especially in rural areas. In the [first stage of our consultation](#), we sought views on different possible methodologies for

calculating the ACA. After reviewing the responses to that consultation, we confirmed that we would use the ‘hybrid’ methodology which takes into account labour market variation in both the general labour market and the teacher labour market. For more information about the area cost adjustment, please see the [government response to the first stage of our consultation](#) and for a list of the area cost adjustment scores by local authority area, please see the [annex published alongside the second stage of our consultation](#).

The government believes that all pupils, regardless of birth or background, should receive an excellent education wherever they are. Central to this is ensuring all schools have access to high-quality teachers throughout England. In May this year we published further analysis of teacher supply, retention and mobility at a local level. This analysis includes information on movement in and out of the sector, characteristics associated with in-school and in-system retention and teacher mobility between schools and geographic areas. For more information please see the [teachers analysis compendium](#).

We have more teachers in our schools than ever before and the number of teachers has kept pace with changing numbers of pupils. There are more than 457,000 teachers in state-funded schools throughout England –15,500 more than 2010. We are spending over £1.3 billion up to 2020 to attract new teachers into the profession. This investment in training the next generation of teachers demonstrates the government’s commitment to make sure that all schools are able to recruit the teachers they need.

## Question 2: Primary/Secondary ratio

**Q.2 Do you support our proposal to set the primary to secondary ratio in line with the current national average?**

	Total	Percentage
Yes	9966	40%
No – the ratio should be closer (i.e. primary and secondary phases should be funded at more similar levels)	7732	31%
No – the ratio should be wider (i.e. the secondary phase should be funded more than 29% higher than the primary phase)	2292	9%
Not Answered	5232	21%

## Summary of responses

Our proposal to set the national funding formula ratio between the primary and secondary phases in line with the current national average of 1:1.29 received the most support of the three options proposed.

Respondents who agreed with the proposed ratio raised similar issues to the respondents who wanted a ratio that would allocate more funding to secondary schools than the current average. The most common point raised amongst these respondents was that secondary schools should be more highly funded than primary schools due to the greater complexity of the secondary curriculum and the need for secondary schools to have a wider range of facilities, such as IT suites and science labs. Many of these respondents also referred to the cost and importance of examinations and the role of secondary education in career progression.

Respondents that wanted a ratio that is more generous to the primary phase raised the importance of early intervention and the role of primary schools in providing the foundation on which secondary education is built. Some respondents also raised concerns over the role of primary schools in identifying and supporting pupils who have particular needs (and who, after assessment, would attract additional funding through the high needs national funding formula). Conversely, a small number of those who requested more funding for primary schools referred to their need for IT and science facilities and the importance of primary school tests.

There was a small number of misunderstandings with this question. Some respondents referred to sixth form funding and the costs associated with A-levels. Funding for students in sixth forms, whether in sixth form colleges or in secondary schools, is allocated through a separate post-16 formula.

## **Government response**

We have considered carefully the arguments put forward in favour of tilting the formula more towards the primary or the secondary phase and have concluded that the best option is to maintain the current national average distribution of funding between the primary and secondary phases.

In our proposal we cited evidence on the impact of investment across phases that found that the impact of additional spend is similar across primary and secondary. The review concluded that early investment needs to be backed up by later investment, otherwise the impact fades, and that there is no strong case to make significant change to the current balance between the phases<sup>4</sup>.

At this stage we have decided that there is not sufficient evidence to support either narrowing or widening the ratio and that basing the ratio on the current national average

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<sup>4</sup> Gibbons, S and McNally, S, 'The effect of resources across school phases: a summary of the recent evidence', 2013

will provide valuable ongoing stability to the school system. The national funding formula therefore has a national primary to secondary ratio of 1:1.29.

This is a national ratio. At individual local authority level, the ratio produced by the national funding formula will vary: for example, a local authority with many small primary schools will see a lower ratio as the primary phase would attract more funding through the lump sum, other things being equal. This means that, under the national funding formula, there will be a range of primary to secondary ratios in the allocations received by individual local authorities, reflecting their local circumstances.

In addition, under a 'soft' formula approach in 2018-19 and 2019-20, local authorities will continue to be responsible for setting a local ratio through their process of local consultation. They are able to set different ratios from the 1:1.29 ratio, and/or different to the ratio suggested in the allocation they receive under the national funding formula, if that is the local decision.

## Question 3: Pupil-led funding

### Q.3 Do you support our proposal to maximise pupil-led funding?

	Total	Percentage
Yes	8378	33%
No – you should further increase pupil-led funding and further reduce school-led funding	1571	6%
No – you should keep the balance between pupil-led funding and school-led funding in line with the current national average	5778	23%
No – you should increase school-led funding compared to the current national average	4949	20%
Not Answered	4546	18%

## Summary of responses

In the consultation we proposed a small increase to the proportion of funding allocated through the pupil-led factors (i.e. factors that are paid on a per-pupil basis) in comparison to the school-led factors (i.e. the lump sum, sparsity, mobility and premises factors), in order to maximise the proportion of funding that is directly attributable to the pupils in the school.

Overall 33% of respondents supported our proposal to maximise pupil-led funding. Some felt it would particularly support pupils facing barriers to their education. Others commented that the proposal would enable pupils to achieve other qualifications through

a broader curriculum and contribute towards reducing the attainment gap between disadvantaged pupils and their peers.

Many of these respondents expressed the view that one set of funding should not be reduced in favour of the other and commented that support shown for pupil-led funding should not be at the expense of small or rural schools. This sentiment was expressed by both small and rural schools as well as larger schools concerned about the impact on neighbouring smaller schools. These respondents requested flexibility in the implementation of the national funding formula to ensure stability for these schools.

Many respondents thought that schools attracting less pupil-led funding and schools with pupils located in more affluent areas should not be penalised. These respondents suggested that the basic per-pupil amount should be set higher so that in conjunction with the lump sum it would meet the fixed costs of each school. Similarly, many respondents thought that the lump sum should be subject to inflationary increases each year, along with recognition of both inner and outer London localised specific costs.

Of those who disagreed, the majority expressed a preference for keeping the pupil-led to school-led balance in line with the current average so that schools in non-deprived areas and students with high levels of attainment would not be discriminated against.

Some respondents questioned the impact of this proposal on the viability of small/rural schools. They discussed particularly the impact on small schools with low numbers of pupils with additional needs. Some respondents were concerned that our proposals would put these schools at a financial disadvantage and that this could result in school closures that would negatively affect local communities. Some respondents argued we should increase school-led funding in order to reflect costs that do not necessarily vary with pupil numbers.

## **Government response**

We continue to believe that the great majority of funding should be related to schools' pupil cohorts and their characteristics. In the interests of securing a funding system where funding is matched transparently to need and relates to the characteristics of the pupils in that school, we will maximise spending on pupil-led factors.

We have considered carefully the concerns that were raised in the consultation responses – for example the risk of a detrimental impact on small rural schools, or on schools with fewer disadvantaged pupils. We have confirmed that we will be providing local authorities with funding calculated on the basis of every school receiving at least a 1% per-pupil cash increase by 2019-20. We are also introducing a minimum per-pupil level of funding for primary and secondary schools to increase stability and recognise pupils' additional needs that may not be picked up through the proxy factors in the formula. By continuing the 'soft' formula system (where we use the national funding formula to calculate the amount of funding going to local authorities, and local authorities

then determine final allocations for schools locally) we will also ensure a more stable transition onto the national funding formula.

We recognise that some schools are necessarily small because they are remote and do not have the same opportunities as other schools to grow or make efficiency savings. These schools can be especially important to their local communities and ensure children do not have to travel long distances to school. The sparsity factor in the formula is designed to provide important support for these schools.

As a result of the changes we have introduced since the second stage of consultation, rural primary schools will attract average gains of 3.8% compared to 1.7% under the stage 2 proposals, and rural secondary schools will attract average gains of 4.0% compared to 0.6% under the stage 2 proposals.

## Question 4: Proportion of funding allocated to additional needs

**Q.4 Within the total pupil-led funding, do you support our proposal to increase the proportion allocated to the additional needs factors<sup>5</sup>?**

	Total	Percentage
Yes	4981	20%
No – allocate a greater proportion to additional needs	2587	10%
No – allocate a lower proportion to additional needs	11194	44%
Not Answered	6460	26%

## Summary of responses

We proposed increasing total spend on the additional needs factors compared to the current system, to recognise that some basic per-pupil funding is currently supporting pupils from disadvantaged backgrounds.

Respondents to the consultation recognised the importance of supporting schools whose pupils have additional needs. Some respondents who agreed with this proposal felt it would be a positive move towards bridging the achievement gap between pupils. This

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<sup>5</sup> The additional needs factors are deprivation, low prior attainment, English as an additional language and mobility.

pointed was raised by several representative organisations.

However, many felt that they could not support this proposal in the context of the overall schools budget. They argued that unless the overall core schools budget was increasing, it would be more important to increase basic per-pupil funding as, without sufficient basic per-pupil funding, schools would be unable to cover their basic costs. A number of respondents argued that the proportion should remain at the same level that is explicitly allocated to deprivation within local authorities' formulae.

Some respondents felt that the proposed distribution of funding could have a detrimental impact on those pupils that do not qualify for funding through the additional needs factors. The need for more research was a common response in relation to this proposal. A small number of respondents felt there was insufficient evidence that additional funding for pupils' additional needs would necessarily lead to better outcomes for those pupils.

Some respondents felt our proposals to increase the proportion allocated to additional needs factors would reflect the needs of pupils from ordinary working families. They argued that much of deprivation is hidden and that allocating a higher percentage of funding would better recognise this. However, where support was not shared for this proposal, some respondents commented that there is no evidence that the additional needs factors would capture pupils from ordinary working families and that the department should undertake more research before any changes are implemented.

A number of respondents were concerned that the proposals would result in "double funding" of deprivation in the school funding system, as pupils from a disadvantaged background would attract additional funding to their school through the pupil premium and through the additional needs factors of the formula. Many questioned how deprivation funding through the national funding formula differed to funding from the pupil premium, particularly since both draw on the same free school meals data. Along with this, a number of responses asked for a better definition of who falls under the additional needs category.

## **Government response**

The government believes that all children should have an education that unlocks their potential and allows them to go as far as their talent and hard work will take them. That is key to improving social mobility. We are protecting additional needs funding in the national funding formula in order to recognise additional needs in a broad sense. In 2018-19, this means 17.8% of total funding will be distributed through the additional needs factors.

Evidence shows that pupils with additional needs are more likely to fall behind and therefore need extra support if they are to reach their full potential. We have broadened the reach of additional needs factors within the national funding formula by applying them

consistently across the country; by using the full 6 IDACI bands; and by giving a significant weighting to both IDACI and low prior attainment (LPA), in addition to the traditional Ever6 FSM and FSM measures. We have also recognised the actual spending on deprivation by local authorities, as this is sometimes hidden in higher basic per-pupil funding in areas with high proportions of deprived pupils.

The pupil premium is an additional grant targeted towards eligible pupils. Additional needs funding in the national funding formula is proxy funding intended for pupils with a range of needs, including special educational needs (SEN). We continue to believe there is a strong case for both elements of funding and therefore the pupil premium will continue to support those who need it. The pupil premium totals nearly £2.5 billion in 2017-18 and will continue to be maintained alongside the national funding formula.

However, in relation to the concerns expressed in response to this question on the sufficiency of basic per-pupil funding, as announced in July, we have increased the core schools budget by £1.3 billion across 2018-19 and 2019-20. Funding per pupil for schools and high needs will be maintained in real terms for the remaining two years of the Spending Review. As mentioned above, we have therefore been able to increase the funding we are allocating to basic per-pupil funding while continuing to protect additional needs funding.

## Question 5: Weightings for additional needs factors

**Do you agree with the proposed weightings for each of the additional needs factors?**

### i) Deprivation - Free School Meals (FSM) at 5.4%

	Total	Percentage
Allocate a higher proportion	3084	12%
The proportion is about right	4307	17%
Allocate a lower proportion	9584	38%
Not Answered	8247	33%

## Summary of responses

Across each of the additional needs questions, many respondents recognised the importance of supporting pupils with additional needs. As set out in Question 4, many respondents felt that the overall weighting of funding for additional needs in the formula was too great in the context of the overall schools budget or that the proposals would result in 'double funding' of deprivation (i.e. that students who attracted deprivation

funding through the formula would also attract the pupil premium).

A number of respondents pointed out perceived flaws with using FSM eligibility as an indicator for deprivation. A common concern was that the introduction of Universal Infant Free School Meals (UIFSM) has resulted in lower registrations for FSM. A large number of parents, local authorities and schools were concerned that with fewer parents registering for meals the measure would not accurately identify deprivation.

Some respondents argued that the FSM measure is overused, and called for a higher proportion to be allocated through IDACI instead.

Respondents who wanted a higher proportion allocated to FSM argued that there are higher costs associated with educating a child from a deprived background. These respondents supplied evidence including listing the types of activities that can support such children. These respondents particularly noted that children from low-income families often needed a higher level of pastoral care and early intervention to tackle the long term challenges which result from deprivation.

Respondents also welcomed the factor now explicit recognition that it costs £440 per year to provide free school meals to an eligible pupil.

## **Government response**

The additional funding announced in July will allow us to increase the basic amount that every pupil will attract in 2018-19 and 2019-20, compared to the proposals set out in the second stage of our consultation, without reducing the total funding allocated for additional needs.

We believe that it is important that deprivation, as a subset of additional needs, has substantial weighting within the formula. In order to capture an accurate picture of deprivation we will use both FSM and IDACI in order to identify both pupil and area based deprivation. While we are still spending the same amount on the FSM factor in cash terms compared to our original proposals, the proportion has dropped from 5.4% to 5.2% as a result of the additional funding which has been added to basic per-pupil funding.

We have reflected on the IDACI banding following our analysis of the consultation responses and stakeholder engagement, and in particular on the concerns raised about the accuracy of the measure in capturing deprivation. We have therefore made a sensible minor technical adjustment to increase the band C unit value slightly, so that it sits halfway between bands B and D. This will better reflect the higher levels of deprivation faced by children living in band C areas, compared to those in band D areas.

We do not accept that this approach results in 'double funding' of deprivation. The sums allocated through the national funding formula effectively maintain existing local authority

investment in additional needs and have been set with the funding provided through the pupil premium in mind. Improving social mobility is a high priority for the government and so it is vital that the national funding formula and pupil premium, in combination, adequately support schools to help children from deprived backgrounds to succeed. The pupil premium will continue to ensure schools have a specific focus on raising the attainment of these pupils, while the deprivation factor in the formula will act as a broader proxy measure, working in combination with other additional needs factors in the formula, for schools that are most likely to need extra resources to support their pupils to reach their full potential.

## ii) Deprivation - Income Deprivation Affecting Children Index (IDACI) at 3.9%

	Total	Percentage
Allocate a higher proportion	3133	12%
The proportion is about right	5285	21%
Allocate a lower proportion	8121	32%
Not Answered	8683	34%

## Summary of responses

As with the previous question, some respondents misunderstood the question or said they did not have enough information to make an informed judgement. The overall quantum of funding and the perceived 'double funding' of deprivation were recurring concerns in this question.

A number of respondents pointed out perceived flaws in the IDACI methodology, including the revaluation of IDACI bands. A large number of respondents argued that the revaluation process every five years causes excessive turbulence in the measure at these points. This was a common concern from local authorities, many of whom highlighted that they have been able to manage this turbulence locally but under a 'hard' national funding formula they will be unable to do so.

Some respondents expressed concern about how IDACI measures deprivation. Some rural respondents were concerned that IDACI does not effectively capture rural deprivation, arguing the areas are too large to represent rural areas with small but diverse populations accurately. Conversely, some urban respondents were concerned that IDACI does not reflect deprivation in cities as the areas are too small to identify by a postcode. A number of respondents also expressed concern that IDACI does not accurately reflect deprivation as it does not pick up new housing developments and social housing.

Respondents who expressed concern about the accuracy of the measure frequently

called for a lower proportion of funding to be allocated according to IDACI and a higher proportion of funding to be allocated according to FSM.

Some respondents who were supportive of the measure were concerned that reducing funding for the highest IDACI bands would reduce funding for students living in the most deprived communities. These respondents argued that these students should attract a higher level of funding in order to give them equality of opportunity with their peers.

Respondents that were supportive of IDACI also gave evidence as to the higher cost of supporting children from deprived backgrounds, including listing the types of activities that can support such students.

## **Government response**

We have decided to proceed with our proposal to distribute 3.9% of total funding through an IDACI factor. No single deprivation measure will adequately fund deprivation, which is why we continue to believe we should use a basket of indicators in order to ensure that schools attract adequate funding. We also recognise that IDACI raises some methodological challenges but believe it is a robust index that can be successfully used in combination with other factors. It has been used by many local authorities in their local funding formulae for a number of years.

It is important to note that IDACI measures the level of deprivation in the area where a child lives and matches each area to a band. The postcode of the pupil is then used to calculate an area based level of deprivation. The school's catchment area does not determine the level of IDACI funding it attracts, which was a common misunderstanding among respondents.

We have thought carefully about how we treat the IDACI bands in a national funding formula. Currently, local authorities can allocate different levels of funding for up to 6 IDACI bands. Local authorities make different decisions about the number of bands they use and how they weight them. Of the 122 local authorities that use IDACI in their formula, 49 assign funding to all 6 bands. By using all 6 IDACI bands in the formula, we capture more than 44% of pupils in schools. While the individual experiences of these pupils will vary widely, as a group, they are more likely to suffer the effects of deprivation to some extent, while not necessarily qualifying for free school meals. Allocating funding to all IDACI bands means that every pupil who lives in a deprived area will attract additional funding to their school, whether or not they live in one of the 49 local authorities which choose to use all IDACI bands currently. Reflecting current local authority practice, we will apply different unit values to each IDACI band, so pupils attract more funding if they live in a more deprived area.

While area level IDACI scores are updated on a five-year cycle, pupil-level IDACI data is updated annually. This means that if new pupils join, or if existing pupils change their

home address, this will be captured in the data and in any funding allocated through the IDACI measure the following year. We recognise that the 2015 update generated significant turbulence in budgets. In response, we reset the IDACI bands ahead of local authorities setting their budgets for 2017-18 so that they captured a similar proportion of pupils as they did before the 2015 update. The IDACI scores for each area will be constant for 5 years since the last update. We are conscious of the danger of turbulence in our national funding formula and will consider ways to smooth the introduction of new IDACI data.

### iii) Low prior attainment (LPA) at 7.5%

	Total	Percentage
Allocate a higher proportion	2753	11%
The proportion is about right	5368	21%
Allocate a lower proportion	8096	32%
Not Answered	9005	36%

## Summary of responses

Of the respondents that answered this question, there was a balance between those arguing that the proposed weighting was right or should be higher (32%), and those arguing for a lower weighting (32%).

Many respondents were concerned that there was a significant overlap between LPA and SEN pupils and that funding both would double fund those pupils.

Some respondents were concerned that the proposed increase in weighting for the LPA factor would adversely influence relationships between primary and secondary schools within a local area. They argued that improvements to results in the primary phase would result in a reduction of funding to secondary schools. Secondary schools, in particular, were concerned that having successful feeder primary schools would impact their funding.

A large number of respondents were concerned that the changes in national assessments made LPA an unreliable measure causing too much volatility in funding levels. Some local authorities gave evidence to show how the fluctuation in this measure has recently affected funding for schools in their area. Schools were concerned that raising attainment, a key goal for all schools, would result in a sudden drop in funding.

A significant number of parents thought that including LPA as a factor would incentivise low attainment and penalise successful schools. Some respondents also thought the inclusion of an LPA factor would lead to some schools gaming the system.

Respondents that were supportive of the measure argued that there are higher costs associated with supporting a student with LPA. Respondents also noted the importance of closing the attainment gap and argued that investing in the LPA factor would help achieve this.

## Government response

We continue to believe that prior attainment data is an important tool for schools to identify pupils who are likely to need extra support. Research has shown that a pupil's prior attainment is the strongest predictor of their likely later attainment<sup>6</sup>. We will therefore increase funding to LPA, as proposed in the second stage of our consultation.

It should be noted that while we are still spending the same amount on the LPA factor in cash terms, the proportion has dropped from 7.5% to 7.4% as a result of the additional funding which has been added to basic per-pupil funding.

We recognise that pupils with SEN are more likely to have LPA, and therefore attract funding as a result of this factor. The inclusion of the LPA factor will direct additional funding to schools likely to be supporting pupils with SEN in mainstream provision, and that will help those schools to meet the additional costs to provide for these pupils. Mainstream schools are expected to cover the first £6,000 of additional costs associated with catering for pupils with SEN (ie costs above the provision provided to all pupils at the school). The LPA factor therefore provides a helpful proxy to support schools with pupils with SEN, rather than providing “double funding”.

We appreciate respondents' concerns about the effect that reforms to national assessments may have on the stability of the LPA factor. The consultation 'Primary assessment in England' confirmed that the Early Years Foundation Stage Profile (EYFSP) will remain in place, which means that the EYFSP will continue to form the basis of the primary LPA factor for 2018-19 and 2019-20. We are currently reviewing responses to the primary assessment consultation and will respond in due course. We will keep the primary LPA factor under review as proposals on primary assessment evolve.

We recognise that some respondents expressed concern about the risk of perverse incentives, with schools deliberately pursuing low attainment or failing to collaborate in order to obtain higher levels of funding through the formula. However we believe this risk

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<sup>6</sup> Taggart B and others, UCL Institute of Education, University College London, + Birkbeck, University of London, University of Oxford, 'Effective pre-school, primary and secondary education (EPPSE 3-16+)', 2008; Sutherland A, Ilie S, Vignoles A, RAND Europe and the University of Cambridge, '[Factors associated with achievement: key stages 2 and 4](#)', November 2015

is very small. The robust accountability system that we have in place is designed to ensure that all schools are held to account for providing their pupils with an excellent education and to maximise their chances of success.

#### **iv) English as an additional language (EAL) at 1.2%**

	<b>Total</b>	<b>Percentage</b>
Allocate a higher proportion	3112	12%
The proportion is about right	9411	37%
Allocate a lower proportion	5497	22%
Not Answered	7202	29%

### **Summary of responses**

A majority of those who answered the question felt that the proposed weighting was about right. Many of those respondents however, wanted the detail of the measure to be further refined. A large number of respondents were concerned about the methodology for EAL, particularly determining EAL eligibility. EAL funding is distributed on the basis of a school census question that identifies any child with a mother tongue other than English, not just those who are acquiring English as a second language. This means that bilingual pupils attract EAL funding when it is not necessarily needed. Respondents also thought that EAL students often already attract funding from deprivation factors, acting as a proxy for EAL.

The length of time students are eligible for funding was also a concern for respondents. Some respondents said three years was too long as intensive support was only needed at the beginning, and it could then be tapered off. Others respondents were concerned that three years was too short and some secondary schools would never attract funding for EAL students who continued to need support.

Respondents arguing for a lower amount to be allocated to EAL often argued that EAL students tended to attain well compared to their non-EAL peers once they had caught up.

### **Government response**

We continue to believe that it is important to include an EAL factor in the formula as EAL creates additional costs for schools. We will therefore direct 1.2% of total funding through the EAL factor, as proposed in the second stage of our consultation.

The department's school census now requires schools to report annually on the written and spoken English language proficiency of their individual EAL pupils, using a five-point scale that ranges from "new to English" through to "fluent". This is answered on the basis

of teacher assessment, not through a national test. This may allow us to better identify pupils who are in the early stages of English proficiency and who therefore need more support than those who are bilingual. As set out in the second stage of our consultation, we will keep this data under review to assess its appropriateness for inclusion in the funding system in the future.

We recognise that some respondents expressed concern about the length of time for which pupils would attract EAL funding. We continue to believe that EAL3 (that is, funding for the first three years after a pupil with EAL joins the education system) is more appropriate than EAL1 or EAL2 (funding for the first year or first two years). As set out in the first stage of our consultation, we believe that it is right to apply a longer-lasting measure given that some pupils will need sustained support over a longer period of time. The use of EAL3 within the national funding formula is not intended to suggest every pupil receiving such support will require it for three years; some students will require support over a longer period, and some shorter.

## Question 6: Mobility

### **Q.6 Do you have any suggestions about potential indicators and data sources we could use to allocate mobility funding in 2019-20 and beyond?**

A large proportion of respondents chose not to respond or did not include substantive comments. There over 9,000 comments received on this question.

### **Summary of responses**

In the stage one government response we confirmed that the national funding formula would have a mobility factor to recognise the additional administrative costs of pupil churn in-year, but that we would fund local authorities for it on the basis of historic spend in 2018-19 while we developed a better measure to allocate funding in future. In the stage two consultation, we sought views and suggestions on how a mobility factor could operate in future.

Fewer respondents shared a view on this question than other questions. Many of those who responded noted that they did not feel they held enough knowledge on pupil mobility to make a suggestion. Some felt that until we have a fairer universal funding factor for mobility that is open and transparent, this factor should not be included in the national funding formula.

Of those who shared views and suggestions, a key theme was whether we could use school census data from each term rather than each year as a data source to allocate mobility funding. Respondents suggested that doing so could lead to greater accuracy in identifying the schools and areas with the highest level of pupil turnover during the year. As a result, schools with the highest levels of turnover could attract additional funding to

help support the significant impact that mobility has such as administrative costs for schools.

Some respondents suggested mobility funding should be counted as a 'pupil-led' rather than 'school-led' factor, and funding should be distributed on the basis of individual pupil data rather than an overall average turnover rate for the school.

Respondents argued that schools in areas where regiments are relocated experienced a significant turnover of pupils during the year. Some were concerned that, without mobility funding, such schools would struggle to keep a stable number of staff in the school.

## **Government response**

The purpose of the mobility factor is to target additional funding to the schools with the highest levels of pupil turnover outside the usual points of entry, in recognition of the additional burdens this places on schools. The costs to schools associated with in-year pupil mobility were highlighted consistently during the first stage consultation. We listened to these concerns, and we are including a mobility factor in the national funding formula to recognise that some schools face additional pressures. It is counted as pupil-led funding, along with other additional needs factors.

An important issue, in developing a mobility indicator for use in the national funding formula, is that the underpinning data that we currently hold is not sufficiently robust for local authorities that do not currently use this as a factor. An interest was expressed by some respondents to be involved in our plans to review the mobility factor. We have taken note of all of the suggestions that have been made and will be looking into ways in which we can work with external stakeholders to address this issue for the longer-term.

In 2018-19 local authorities will receive mobility funding on the basis of historic spend. This means that only local authorities who have used the factor in the past will receive the associated funding. It is then for local authorities to distribute it to their schools through their local formula. We recognise the impact on local authorities that did not include a mobility factor in 2017-18 and will therefore miss out on funding for 2018-19. We will work with stakeholders to explore options for bringing in an improved mobility factor in the near future.

## **Question 7: Lump sum**

**Do you agree with the proposed lump sum amount of £110,000 for all schools?**

### **For primary schools**

	Total	Percentage
Allocate a higher proportion	9740	39%
The proportion is about right	5014	20%
Allocate a lower proportion	2545	10%
Not Answered	7923	31%

## For secondary schools

	Total	Percentage
Allocate a higher proportion	10455	41%
The proportion is about right	4908	19%
Allocate a lower proportion	897	4%
Not Answered	8962	36%

## Summary of responses

Over a third of respondents did not answer the question. A majority of those who answered supported a higher value for the lump sum for both primary schools and secondary schools.

There was some support for having a single sum for both primary and secondary schools. Some respondents suggested the lump sum value should be varied; however, there was no consensus about whether secondary or primary schools should attract more funding. Some suggested it should be varied by school condition or size and that there should be local flexibility in setting the amount.

Some respondents suggested raising the lump sum to the national average. There were concerns about whether the lump sum and basic per-pupil funding are sufficient for schools that do not attract significant amounts of funding through the additional needs factors. Specific concerns were raised about small schools, especially those that would attract less funding through the lump sum factor than they did under the local funding formula.

Conversely, a few respondents argued the lump sum should be reduced over time and brought into the basic per-pupil funding to encourage efficiency.

There was a call from some respondents to define the fixed costs the lump sum is intended to cover, with some suggesting using an activity-led model. Many respondents seemed to believe the lump sum was intended to cover capital costs or specific salary

costs, with a few believing it is intended to cover all labour or capital costs.

Many respondents recognised that the lump sum provided greater funding stability. A number of respondents also recognised that increasing the lump sum would likely lead to the reductions in the basic per-pupil funding.

## Government response

Having carefully considered the consultation responses, we remain committed to providing the lump sum of £110,000 to all primary and secondary schools. At the moment there is insufficient evidence to vary the funding based on either the stage of education or other school characteristics.

Given the responses summarised above, it is important that we clarify that the lump sum is not intended to be used or to be sufficient for any specific expenditure. It is rather intended to reduce the fluctuations in funding due to changes in pupil-led factors by providing a fixed basic amount not related to those factors. As many respondents recognised, this is particularly important for schools that have relatively low pupil numbers but relatively high fixed costs.

As we have stated in our stage 1 consultation response, we do not think it appropriate to specify exactly how schools are supposed to spend this funding or to base it on an activity-led model, as schools should be free to choose an operating model most suitable to their particular circumstances.

Having considered responses to the stage 2 consultation we have adjusted the formula to ensure that every school will attract more funding per pupil. In 2018-19, the formula will provide as a minimum, a 0.5% per-pupil cash increase in respect of every school; and by 2019-20, an increase of 1%, compared to baselines. The historical lump sum will be included in the baseline, so allocations for schools whose lump sum payments were much higher than £110,000 will be protected by this decision.

We are also ensuring that all schools will attract a minimum level of per-pupil funding through the formula. We believe this will address concerns about funding for schools that are due to attract a reduction in their lump sum and/or do not attract a lot of funding through the additional needs factors. As a result of the changes we have introduced, rural primary schools will attract average gains of 3.8% compared to 1.7% under the stage 2 proposals, and rural secondary schools will attract average gains of 4.0% compared to 0.6% under the stage 2 proposals.

We are also committed to supporting a more productive and efficient school system and will continue our support for schools and school leaders to improve their efficiency and make best use of their resources.

## Question 8: Sparsity

**Do you agree with the proposed amounts for sparsity funding of up to £25,000 for primary and up to £65,000 for secondary, middle and all through schools?**

### For primary schools

	Total	Percentage
Allocate a higher amount	3878	15%
This is about the right amount	7449	29%
Allocate a lower amount	3467	14%
Not Answered	10428	41%

### For secondary schools

	Total	Percentage
Allocate a higher amount	3332	13%
This is about the right amount	7393	29%
Allocate a lower amount	3489	14%
Not Answered	11008	44%

## Summary of responses

Over 40% of all respondents did not answer this question. The majority of respondents accepted that small and remote schools need an element of additional funding, with many supporting a higher level of sparsity funding.

Some respondents expressed concern that some small rural schools do not currently qualify for sparsity funding and suggested distributing the same total amount of funding to a larger number of schools at a lower rate. Some also suggested that funding should be distributed based on the degree of rurality rather than sparsity.

In particular the method of measuring distances ‘as-the-crow-flies’ received criticism with some respondents calling for a more accurate measure to reflect actual travel times.

Some respondents argued that sparsity factor is unnecessary given the lump sum funding. Others supported distributing funding purely based on pupil-led factors.

A number of respondents were concerned about the efficiency of small schools, arguing that sparsity funding might promote inefficient use of resources and act as a disincentive

for academies to join multi-academy trusts. Many suggested investment in transport to allow pupils to attend bigger schools further away.

## Government response

We remain committed to providing funding through both the sparsity and lump sum factors. As we stated in our stage 1 response, we recognise that some schools are necessarily small and do not have the same opportunities to grow or make efficiency savings. Together with the lump sum, sparsity provides important support for these schools. We believe that together with the lump sum, this is an appropriate level of funding.

The funding is tapered to avoid cliff edges, where small pupil number changes would otherwise result in schools moving from significant additional funding to no sparsity funding. There is also a floor in the sparsity factor so that the smallest remote schools attract the full sum.

We acknowledge that the current use of 'as-the-crow-flies' distances in distributing sparsity funding can be improved. We will use it to distribute sparsity funding in 2018-19, but will investigate the possibility of refining this method to reflect actual journey distance in the future.

We decided not to include a separate rurality factor as suggested by some respondents. Given available evidence, we believe that a combination of sparsity, lump sum and pupil-led factors captures the funding needs of rural schools. Should new and compelling evidence of distinct rural deprivation not covered by these factors become available in the future, we would review it and consider revising our funding formula.

The additional funding we are investing through the formula will ensure every school, including all rural schools, will attract more funding. In 2018-19, the formula will provide, as a minimum, a 0.5% per-pupil cash increase in respect of every school; and by 2019-20, an increase of 1%, compared to baselines. This means all rural schools will attract more funding than under our original proposals. As set out above, the additional funding means that rural primary schools will attract average gains of 3.8% compared to 1.7% under the stage 2 proposals, and rural secondary schools will attract average gains of 4.0% compared to 0.6% under the stage 2 proposals.

We are also committed to supporting a more productive and efficient school system and will continue our support for schools and school leaders to improve their efficiency and make best use of their resources.

## Question 9: Growth

**Q.9 Do you agree that lagged pupil growth data would provide an effective basis for the growth factor in the longer term?**

### Summary of responses

A large proportion of respondents chose not to respond to this question or did not include substantive comments. There were almost 13,000 substantive comments.

The second stage consultation document proposed that for 2018-19 we would allocate funding for growth in pupil numbers to local authorities on the basis of historic spend in line with our approach for the premises and mobility factors. This would represent a significant improvement on the current arrangements where growing local authorities receive no additional support. In the consultation we explored different options for funding growth in the longer term, including using school capacity survey (SCAP) data and Office for National Statistics (ONS) population projections. Our proposal for the longer term was to have a growth factor based on lagged pupil growth data: this would fund local authorities for the growth in pupil numbers experienced in the previous year, ensuring growth was funded in full on a consistent basis across local authorities, just one year after the growth occurred.

There was some support for the use of lagged or historic pupil growth for funding growth after 2018-19 with respondents recognising this would ensure growth was funded accurately, albeit one year later. However, many respondents thought we should have a more extensive review considering other options such as funding growth in real time or using a combination of projections and in-year adjustments. Some respondents also suggested using alternative data sources, such as birth rates or housing data.

Some respondents raised concern about using lagged or historic growth for funding new or growing schools.

Some respondents also raised concerns about the impact on fast growing areas of using lagged growth as they felt these areas would be consistently underfunded for the growth they were experiencing.

### Government response

As set out in the consultation document, we will use historic spend on growth for 2018-19 and we will continue to look at the options for funding growth for 2019-20 and beyond. We believe there is still considerable merit in our proposal to use lagged growth as this provides certainty in the allocations prior to the financial year commencing and ensures every local authority is funded on a consistent and fair basis, according to the actual growth they experienced. However, we will also work with local authorities and others to

explore further the options of using projections and in-year adjustments or funding growth directly in real time according to a national unit rate prior to finalising the approach for 2019-20 and beyond.

Our proposal to use lagged or historic growth data relates to funding for local authorities, which is then distributed to schools. It is not related to how funding is allocated to schools – including those that are new or growing schools. Local authorities will continue to be responsible for funding growth at school level through their growth fund or through additions to the pupil count from the preceding October. New and growing schools will continue to be funded based on agreed estimates. Further information on our proposals for new and growing schools can be found at Question 12.

## Question 10: Principle of the funding floor

**Do you agree with the principle of a funding floor?**

	Total	Percentage
Yes	13505	54%
No	8171	32%
Not Answered	3546	14%

### Summary of responses

There was general support for the principle of a funding floor, with over half of respondents agreeing with this. Regardless of support or opposition to the floor, many respondents used this space to argue that there is not enough money for schools. A high proportion of respondents to this question were from areas where there were campaigns related to the national funding formula and nearly half of the respondents that were not in support of a floor were concentrated in three local authority areas (Cambridgeshire, West Sussex and Cheshire East).

Respondents who supported a funding floor argued that stability in the system was important, and that large losses would be unmanageable for schools to accommodate alongside cost pressures. Respondents also thought that more money should be allocated to schools, arguing that the overall amount was not sufficient.

Respondents who disagreed with the principle of a funding floor argued that a floor builds in historic unfairness by protecting overfunded schools at the expense of underfunded schools. They argued this was done by preventing underfunded schools from gaining as much or as quickly as they would without a floor. They thought the minimum funding

guarantee (MFG) of minus 1.5% per pupil per year was sufficient protection for schools, and suggested that the floor should be phased out over time to make the formula fairer.

## Government response

We believe that both stability and fairness are integral to introducing a national funding formula. Schools need to have stability in order to plan ahead and manage their finances. We listened carefully to the many concerns we heard during the consultation period from schools and local areas that would have lost money through our proposed formula.

All schools will therefore attract a cash increase of at least 1% by 2019-20 through the formula, compared to their baselines. Within local formulae, local authorities will continue to apply the MFG, and will have a new flexibility over the level of the MFG locally. Following consultation, local authorities will be able to fix the level of the MFG between minus 1.5% and 0% per pupil.

We understand the concerns from some respondents that the funding floor would restrict the gains they will see under the formula, and the national funding formula will provide for gains for underfunded schools of up to 3% per pupil in each of 2018-19 and in 2019-20.

## Question 11: Level of the funding floor

**Do you support our proposal to set the funding floor at minus 3%?**

	Total	Percentage
Yes	2249	10%
No – the floor should be lower (i.e. allow losses of more than £% per pupil)	6281	25%
No – the floor should be higher (i.e. restrict losses to less than 3% per pupil)	10976	44%
Not Answered	5516	22%

## Summary of responses

The responses to this question were broadly similar to those in Question 10 and many respondents referenced their answers to the previous question. Most respondents thought that the floor should be higher, and therefore restrict losses to less than 3% per pupil.

Respondents who supported setting the floor at minus 3% tended to support the proposal because it provided schools facing losses under the proposals with stability to plan ahead and to manage change. Respondents felt that losses of greater than 3% could be unmanageable and unsustainable for schools.

Respondents who felt the floor should be higher argued that there is not enough money for schools and/or that schools are already facing pressures,. They reasoned that this meant schools should be protected from future losses by a higher floor. There were a significant number of responses quoting figures on the losses specific institutions were forecast to lose, suggesting that even with a funding floor of minus 3%, losses would be unmanageable or unsustainable. There were also comments suggesting that a minus 3% floor would make small schools unsustainable.

As noted above, respondents who thought the floor should be lower argued that the funding floor built unfairness into the formula and continued to overfund some schools by locking in historic funding.

There were some areas where respondents were unclear on our proposals. Some respondents were unclear how long the funding floor would apply for, and what would happen if the floor was removed.

A few respondents suggested varying the level of protection so that schools facing the greatest reductions would see their funding reduced faster than those facing small reductions. There was no consensus on an alternative to the minus 3% floor, with respondents suggesting alternative floors between 0 and 10%. Some respondents argued the floor should be set according to a minimum level of per-pupil funding of £4,800.

## **Government response**

As set out above, we will increase the funding floor from minus 3% per pupil, so that every school will attract at least a 1% per pupil cash increase by 2019-20 over its 2017-18 baseline, while providing for gains of up to 3% per pupil for underfunded schools in 2018-19 and 2019-20.

## **Question 12: New and growing schools**

**Q.12 Do you agree that for new or growing schools (i.e. schools that are still filling up and do not have pupils in all year groups yet) the funding floor should be applied to the per-pupil funding they would have received if they were at full capacity?**

	Total	Percentage
Agree	9423	37%
Disagree	6571	26%
Not Answered	9228	37%

## Summary of responses

Overall there was support for this proposal.

Many respondents who agreed with the proposal felt it would ease the transition for schools from new and growing to full. However, some respondents stated that the proposal was appropriate only if the new school was in an area of high pupil growth.

Respondents who disagreed were concerned that this would lead to overfunding of new and growing schools at a detriment to existing schools.

Some respondents believed that school that were adding a new phase (such as an infant school, adding a junior school) should be classified as a new and growing school.

There was a campaign from some local authorities that supported the proposal but expressed concern about overfunding and requested local flexibility to disapply the MFG in exceptional circumstances.

## Government response

As set out in the consultation document, we will apply the funding floor for new or growing schools with reference to their “if full” per-pupil baseline: the funding they would have received per-pupil in 2017-18 if they were at full capacity. This means that new and growing schools will attract at least 1% of funding per pupil above their “if full” baseline by 2019-20.

This will ensure that these schools are treated in a comparable way to other schools in the calculation of the funding floor. The funding floor calculation takes account of the change to the total of pupil-led and school-led funding on a per-pupil basis, in a similar way to the current minimum funding guarantee calculation used by local authorities. Using 2017-18 data for new and growing schools would skew this calculation, as, while a school is still filling up, the school-led funding is significantly bigger on a per-pupil basis than for full schools. Thus any change in the school-led funding captured in the baseline for the funding floor would be divided by a small number of pupils, either penalising the growing school (if the national funding formula lump sum is higher than their local authority’s current lump sum) or unfairly overfunding it (if the national funding formula lump sum is lower than their local authority’s current lump sum). The fairest approach for

new and growing schools is therefore to use their “if full” baseline for the funding floor calculation.

New and growing schools will continue to be funded under the national funding formula for the current number of pupils in their schools: the use of the “if full” baseline is only for the purposes of calculating the funding floor. For some new and growing schools, the level of the funding floor will actually be lower than their current per-pupil funding. This is because growing schools experience higher per-pupil funding in their early years, as their school-led funding is divided by a smaller number of pupils. As the school’s pupil numbers grow, their school-led funding will remain the same, and so the overall per-pupil level of funding will decrease.

New and growing schools that will see a fall in their per-pupil funding under the national funding formula will be protected by a year on year limit on change to per-pupil funding of minus 1.5% per pupil. New and growing schools that will see an increase in the per-pupil funding under the national funding formula will not be subject to the gains cap. This is consistent with existing regulations, which exempt new and growing schools from any cap on gains in local formulae. When local authorities calculate actual allocations for new and growing schools, they must be funded on estimated numbers and, as stated above, are exempt from any cap on gains in the local formula. Local authorities will also be able to ask to disapply the local minimum funding guarantee as they do now if they feel that is appropriate.

For the purposes of the national funding formula, we will define new and growing schools as maintained schools, free schools, or academies that the local authority has told us:

- have opened within the last 7 years,
- do not have pupils in all year groups yet, and,
- have an “if full” pupil count that is at least 15 pupils greater than their 2017-18 pupil count.

For further information on the calculation of the funding formula for new and growing schools, please refer to the annex on new and growing schools, which has been published alongside the technical notes.

## Question 13: Minimum funding guarantee (MFG)

**Q.13 Do you support our proposal to continue the minimum funding guarantee (MFG) at minus 1.5%?**

	Total	Percentage
Yes	7386	29%
No – the minimum funding guarantee should be lower (i.e. allow losses of more than 1.5% per pupil in any year)	4644	18%
No – the minimum funding guarantee should be higher (i.e. restrict losses to less than 1.5% per pupil in any year)	9081	36%
Not Answered	4111	16%

### Summary of responses

Respondents who agreed with our proposal stated that it would provide stability, and would enable schools to plan their budgets ahead. Those in favour of our proposals also stated that the proposed MFG provides adequate protection to schools that are losing. Local authority representatives were particularly supportive of our proposal.

Respondents who wanted a lower (less generous) MFG thought that continuing at minus 1.5% per pupil would protect schools that are currently overfunded, and prevent gains being allocated to underfunded schools quickly enough. Some respondents thought the floor should be removed because the MFG was sufficient to protect schools which would see reductions to their budget as a result of the formula.

Respondents who wanted the MFG to be higher (more generous) were concerned about the difficulties for schools losing under the formula, and the turbulence the formula could cause to those schools.

Many respondents also argued for no losses – suggesting there should not need to be a MFG, and requesting a ‘levelling up’ of funding (i.e. a 0% floor).

### Government response

We have listened carefully to the concerns raised during the consultation period, especially the request that no school should lose as a result of the national funding formula. The national funding formula will provide for a cash increase of at least 1% in respect of all schools by 2019-20, compared to their baseline.

Under a ‘soft’ formula, local authorities will remain responsible for determining schools’ budgets according to their local formulae. The MFG will therefore continue to allow local authorities some level of flexibility to reflect local circumstances and to help smooth the

transition towards the national funding formula. We are introducing a new limited flexibility to allow local authorities to set an MFG of between 0% and minus 1.5% per pupil, to allow them to set a more protective MFG in their local formulae if they choose to do so.

## **Question 14: Other considerations**

### **Q.14 Are there any further considerations we should be taking into account with the schools national funding formula?**

No quantitative data was collected on this question. There were almost 18,000 substantive comments.

### **Summary of responses**

This question gave respondents a further opportunity to comment on our proposals for schools funding. A number of campaigns were received on this question, relating specifically to overall funding in the system and cost pressures, which could result in a reduced curriculum or school hours, teacher redundancies and an increased reliance on parental donations.

There was a strong support for minimum levels of per-pupil funding for schools. While a range of figures was quoted, several campaigns suggested that the minimum should be £4,800 per pupil for secondary schools.

Many respondents asked about how and when the formula would be reviewed and how schools and parents would be involved in this review. Related to this, there was a request for stability in the system so schools could plan their budgets properly, with a suggested three year review period.

There were several local campaigns which requested the area cost adjustment be changed to include further local costs, such as water rates, teacher recruitment and retention rates and higher living costs.

### **Government response**

Most of the responses to this question were also raised in relation to other questions, and we have responded to them elsewhere in this document.

As set out in Chapter 1 of the policy document on the national funding formula for schools and high needs which is published alongside this document, the national funding formulae will distribute funding to schools and local authorities on a more rational basis. The formulae as set out in the policy document will be the basis for allocations in 2018-19

and 2019-20, supported by the additional investment announced to Parliament in July. Spending plans beyond 2019-20 will be set in a future Spending Review.

## **Question 15: Central school services block – deprivation factor**

**Do you agree that we should allocate 10% of funding through a deprivation factor in the central school services block?**

	<b>Total</b>	<b>Percentage</b>
Yes	5044	20%
No – A higher proportion should be allocated to the deprivation factor	1767	7%
No – A lower proportion should be allocated to the deprivation factor	2593	10%
No – There should not be a deprivation factor	4300	17%
Not Answered	11518	46%

### **Summary of responses**

A large proportion of respondents did not answer this question.

Around 84% of local authorities who responded to this question agreed with the principle of having a deprivation factor, whilst around 47% of local authorities who responded to this question agreed with our proposal to allocate 10% of funding for ongoing functions through a deprivation factor.

Within the group of respondents who agreed with our proposal, many argued that local authorities in deprived areas are likely to incur higher costs, which should be reflected in the formula.

Of those who would like a higher proportion to be allocated to deprivation, some said that local authorities with high levels of deprivation would have disproportionately high costs associated with education welfare services.

Many respondents who said that they would like a lower proportion of funding to be allocated to deprivation argued that the majority of services covered by the central school services block are not affected by deprivation and, therefore, the proposed proportion of 10% is too high.

Some respondents argued that a deprivation factor is not needed for the central school services block formula as deprivation is already included in the schools block formula.

## Government response

We will pursue the proposal set out in the consultation as we believe it is the fairest and most appropriate way to recognise the importance of particular central services for schools, specifically education welfare services, in areas with high levels of socio-economic deprivation.

It is important to note that the central school services block is separate from the schools and high needs blocks of funding. This block provides funding for local authorities in respect of the duties they carry out on behalf of all pupils, both in maintained schools and academies. The number of academies will therefore not affect this funding.

The central school services block provides funding for local authorities, rather than schools. The schools block is a separate funding stream to the central school services block. The schools block funding stream is for schools to ensure they can provide an excellent education for all pupils. The central school services block will be given to local authorities to reflect the ongoing local authority role in education.

## Question 16: Central school services block – protection

**Do you support our proposal to limit reductions on local authorities' central school services block funding to 2.5% per pupil in 2018-19 and in 2019-20?**

	Total	Percentage
Yes	5423	22%
No – allow losses of more than 2.5% per pupil per year	2477	10%
No – limit losses to less than 2.5% per pupil per year	5854	23%
Not Answered	11468	46%

## Summary of responses

A large proportion of respondents did not answer this question.

Of the local authorities that responded, approximately 38% agreed with our proposal to limit losses to 2.5% per pupil per year, and approximately 55% said that losses should be limited to less than 2.5%.

Respondents who agreed with our proposals said that this would provide stability and allow local authorities to plan in the longer term, while still redressing historical inequalities in a timely manner.

Respondents who want losses to be limited to less than 2.5% said that they believed any loss of funding should be in line with the minimum funding guarantee for schools of minus 1.5%. Some respondents also suggested that, as the Education Services Grant (ESG) general duties rate has been removed, reductions to the central school services block should be capped at 0%.

Of those who believe that losses greater than 2.5% should be allowed, many respondents argued that restricting losses to 2.5% would perpetuate unfairness in the system and would limit gains for local authorities which stand to gain under the national funding formula.

## **Government response**

Having considered the consultation responses, we have concluded we will pursue the proposal to limit reductions to the central school services block to 2.5% per pupil in 2018-19 and 2019-20.

It is important that we move towards a formulaic distribution at a manageable pace to avoid excessive changes to local authority budgets. This is why we will pursue a gradual transition, with a protection for local authorities that face a reduction in their overall allocations.

We understand that some respondents would like to see the protection set in line with the minimum funding guarantee of minus 1.5% per pupil, however we believe that local authorities which have been spending considerably more than other local authorities should be able to adjust their spend to bring them in line with other local authorities that spend less delivering the same services.

## **Question 17: Central school services block – other considerations**

**Are there further considerations we should be taking into account about the proposed central school services block formula?**

No quantitative data was collected on this question. There were over 6,000 substantive comments.

## **Summary of responses**

A campaign from Cambridgeshire suggested that the highest-funded local authorities should see greater decreases in their budgets and the lowest-funded local authorities should see greater increases, effectively resulting in a tapered protection for the central school services block.

Some respondents requested clarity regarding the future use of funding for historic commitments that have wound down.

Some respondents suggested that current arrangements, in which schools are able to pool funding so that the local authority can provide certain services, should be allowed to continue in the interests of efficiency.

Some respondents, particularly those from London, argued that the area cost adjustment was insufficient for the costs of providing services within the capital.

Respondents were also concerned about the overall levels of funding for the central school services block, saying that the removal of the Education Services Grant (ESG) general duties rate will result in pressures on central services overall.

## **Government response**

After consideration, we have concluded that no further changes should be made to the central school services block.

While we appreciate that there would be some benefits to a tapered protection, it would also create a complex formula which risks confusion in the system. On balance we have decided that we want to maintain the simplicity of the central school services block formula.

As set out in the second stage of our consultation, in 2018-19 we expect local authorities to recycle funding that is no longer needed for historic commitments into schools, high needs or early years. We will set out our long-term intention for funding released from historic commitments at a later point.

On the subject of pooled arrangements, under a soft national funding formula in 2018-19 and 2019-20, local areas will be free to continue using these as they have done before. We will consider if it is appropriate to make adjustments to the way these arrangements work at a later date.

On the subject of the area cost adjustment, the General Labour Market (GLM) method takes into account the labour costs in different areas, and therefore should reflect the additional costs of employing staff in metropolitan areas.

It should be noted that whilst the ESG general funding rate has now been phased out, funding previously delivered through the ESG retained duties rate will continue to be distributed through the central school services block.

The department recognises that local authorities will need to use other sources of funding to cover the costs of the duties that were previously covered by the ESG general funding rate. This has been reflected in the [School and Early Years Finance \(England\) Regulations 2017](#), which allowed local authorities to retain some of their maintained

schools' DSG to cover the statutory duties that they carry out on behalf of maintained schools. Further information on this can be found as part of the [Schools Revenue Funding Operational Guide](#).

## Equalities analysis

There were 5,838 responses were received on the equality analysis. The vast majority of responses received were unrelated to the protected characteristics identified in the Equality Act 2010 for the public sector equality duty. Of those that do mention protected characteristics the main issues that were raised are:

- **Age** – some respondents were concerned that reductions in funding suggested by our proposals could potentially incentivise premature retirement of older teachers in favour of younger, potentially less costly teachers.
- **Sex** – some respondents were concerned that the attainment gap between boys and girls could result in funding levels which disproportionately benefit a particular sex.
- **Race** – some respondents expressed concern that the introduction of the national funding formula for schools could adversely affect ethnic minority groups.

A response to the concerns raised and an equalities analysis for the final formula can be found in the Equalities Impact Assessment document, which is published alongside this document.

## **Annex 1 – List of organisations that responded to the second stage of consultation**

This list of stakeholder organisations was drawn from the online form submitted. This list may not be exhaustive as other organisations may have engaged and contributed to the consultation response through other channels such as meetings with ministers and through other forms of correspondence.

Achieving for Children

Association of Colleges

Association of Liverpool Special Schools Headteachers

Association of London Directors of Children's Services

Association of School and College Leaders (ASCL)

Association of Secondary Headteachers in Essex (ASHE)

Association of Teachers and Lecturers (ATL)

Association of Directors of Children's Services (ADCS)

Barnsley Metropolitan Borough Council

Bedford Borough Council

Birmingham Association of School Business Management

Birmingham City Council

Blackburn with Darwen Borough Council

Blackpool Council

Bolton Council

Borough of Poole

Bournemouth Borough Council

Bracknell Forest Council

Brighton & Hove City Council

Bristol City Council

Buckinghamshire County Council

Bury Council

Calderdale Metropolitan Borough Council

Cambridgeshire County Council

Cambridgeshire Primary Heads Association

Catholic Education Service  
Central Bedfordshire Council  
Cheshire East Council  
Cheshire West and Chester Association of Governing Bodies  
Cheshire West and Chester Council  
Cheshire West Association of Secondary Headteachers  
City of Bradford Metropolitan District Council  
City of York Council  
Cornwall Council  
Coventry City Council  
Cumbria County Council  
Derby City Council  
Derbyshire County Council  
Devon Association of Primary Headteachers (DAPH)  
Devon Association of Secondary Headteachers (DASH)  
Devon County Council  
Diocesan Board of Education  
Diocese of Hereford  
Doncaster Metropolitan Borough Council  
Dorset County Council  
Durham County Council  
East Riding of Yorkshire Council  
East Sussex County Council  
Education Datalab  
Education Policy Institute (EPI)  
Essex County Council  
Essex Primary Headteachers' Association  
Freedom and Autonomy for Schools National Association (FASNA)  
Gateshead Council  
Gloucestershire County Council  
GMB Trade Union  
Gosport Borough Council

Grammar School Heads' Association (GSHA)  
Halton Local Authority  
Hampshire County Council  
Haringey Council  
Hartlepool Borough Council  
Hertfordshire County Council  
Hull City Council  
Institute for Fiscal Studies  
Isle of Wight Council  
Kent County Council  
Kirklees Council  
Knowsley Metropolitan Borough Council  
Lancashire County Council  
Lead Association for Catering in Education (LACA)  
Leeds City Council  
Leicester City Council  
Leicestershire County Council  
Lincolnshire County Council  
Liverpool Governors' Forum  
Local Government Association (LGA)  
London Borough of Barking and Dagenham  
London Borough of Barnet  
London Borough of Bexley  
London Borough of Brent  
London Borough of Bromley  
London Borough of Camden  
London Borough of Croydon  
London Borough of Ealing  
London Borough of Enfield  
London Borough of Hackney  
London Borough of Hammersmith & Fulham  
London Borough of Haringey

London Borough of Harrow  
London Borough of Havering  
London Borough of Hillingdon  
London Borough of Hounslow  
London Borough of Islington  
London Borough of Lambeth  
London Borough of Lewisham  
London Borough of Merton  
London Borough of Newham  
London Borough of Redbridge  
London Borough of Richmond upon Thames  
London Borough of Sutton  
London Borough of Tower Hamlets  
London Borough of Waltham Forest  
London Councils  
London Diocesan Board for Schools  
Luton Borough Council  
Manchester City Council  
Mayor of London  
Medway Council  
Milton Keynes Council  
NALDIC, the national subject association for English as an additional language  
National Association of Head Teachers (NAHT)  
National Association of School Business Managers (NASBM)  
National Association of Schoolmasters Union of Women Teachers (NASUWT)  
National Governors' Association  
National Network of Parent Carer Forums  
National Teaching and Advisory Service  
National Union of Teachers (NUT)  
Newcastle City Council  
Norfolk County Council  
North East Lincolnshire Council

North Lincolnshire Council  
North Somerset Council  
North Tyneside Council  
North Yorkshire County Council  
Northamptonshire County Council  
Northern Association of Support Services for Equality and Achievement (NASSEA)  
Northumberland County Council  
Nottingham City Council  
Nottinghamshire County Council  
Oldham Council  
Oxfordshire County Council  
Oxfordshire Education Scrutiny Committee  
Peterborough City Council  
Plymouth City Council  
Portsmouth City Council  
Rochdale Borough Council  
Royal Borough of Greenwich  
Royal Borough of Kensington and Chelsea  
Royal Borough of Windsor & Maidenhead  
Rutland County Council  
Salford City Council  
School-Home Support (SHS)  
SCHOOLS NorthEast  
Sefton Metropolitan Borough Council  
Sheffield Association of School Governing Bodies  
Sheffield City Council  
Shepway District Council  
Shropshire Council  
Slough Borough Council  
Solihull Metropolitan Council  
Somerset Association of Secondary Headteachers  
South Cambridgeshire District Council

South Gloucestershire Council  
South Tyneside Council  
Southampton City Council  
Southwark Council  
Southwark Diocesan Board of Education  
Special Interest Group of Municipal Authorities (SIGOMA)  
St Helens Council  
Staffordshire County Council  
Stockport Council  
Stockton-on-Tees Borough Council  
Suffolk Secondary Heads' Association  
Suffolk County Council  
Sunderland City Council  
Surrey County Council  
Surrey Governors' Association  
Surrey Secondary Headteachers' Phase Council  
Swindon Borough Council  
Teach First  
Telford & Wrekin Council  
The Bell Foundation  
The f40 Group of Local Authorities  
The Sutton Trust and Education Endowment Foundation  
Thurrock Council  
Torbay Local Authority  
Trafford Council  
UNISON  
Voice, the union for education professionals  
Wakefield Council  
Wandsworth Council  
Warrington Borough Council  
West Berkshire Council  
West Sussex County Council

West Sussex Governors' Association

Westminster City Council

Wigan Council

Wiltshire Association of Secondary and Special school Headteachers

Wiltshire Council

Wirral Council

Wokingham Borough Council

Wolverhampton City Council

Worcestershire County Council



Department  
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