

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

## Consultation Response Form

The closing date for this consultation is: 18  
October 2010

Your comments must reach us by that date.

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

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

Reason for confidentiality:

Name Kathy Evans  
Organisation (if applicable) Children England  
Address: Unit 25, 1st Floor, Angel Gate  
City Road  
London EC1V 2PT

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

Juliet Yates on: telephone: 020 7340 8313 e-mail:  
[juliet.yates@education.gsi.gov.uk](mailto:juliet.yates@education.gsi.gov.uk), or

Ian McVicar on: telephone: 020 7340 7980 e-mail:  
[ian.mcvicar@education.gsi.gov.uk](mailto:ian.mcvicar@education.gsi.gov.uk)

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

[consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk)

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

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

Please Specify:

Children England is a charity. We are the leading membership organisation for the children, young people and families' voluntary sector. With member organisations working in all parts of the country ranging from small local groups to the largest household names in children's charities, Children England is in a unique position to use the collective voice of the voluntary sector to achieve positive change for children. Children England provides capacity building, support and information to its members and the wide range of voluntary sector organisations working with children, young people and families. It does this by building active networks, promoting good practice, stimulating policy debate and ensuring that the issues that matter most to its members are taken up with decision makers.

Our members work every day with the disadvantaged children for whom the Pupil Premium is designed for. We believe that their expertise and passion have a key role to play in raising the attainment levels of England's children.

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

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We agree with the Government that, subject to an Area Cost Adjustment, all local authorities should receive equivalent per pupil funding. However, this issue is distinct from that which the Pupil Premium is designed to rectify and should be dealt with accordingly.

Given that the Pupil Premium is to be distributed as a separate grant from the DSG so as to be 'clearly identifiable', it seems odd to cloud its purpose by also using it as a mechanism for levelling out local variances of the DSG. Either it is separate from the DSG or it is not. Widening the scope of the Pupil Premium to incorporate this completely separate aim will necessarily have the effect of lessening the focus on raising the attainment of disadvantaged children. It will give license to head teachers in areas receiving lower than average DSG settlements to raise spending on all their students rather than using the Pupil Premium primarily for the disadvantaged children for whom the support is intended.

Not only will this unnecessarily obscure the aim of the Pupil Premium, but it is also a rather haphazard way of equalising the DSG. Resolving funding variances independently would allow for a far more targeted approach and would prevent the conceptual and operational confusion that this conflation of issues will inevitably result in.

However, if the Government does choose to go ahead with this methodology then a minimum Pupil Premium value is essential. This minimum must accurately reflect the increased cost to schools (even ones that are already well funded) of providing additional support to disadvantaged pupils. Otherwise, the Pupil Premium will cease to perform its role as an admissions lever effectively.

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

<input type="checkbox"/> FSM - in year	<input type="checkbox"/> FSM ever - 3 year	<input checked="" type="checkbox"/> FSM ever - 6 year
<input type="checkbox"/> Out of Work Tax Credit	<input type="checkbox"/> ACORN/MOSAIC	<input type="checkbox"/> Other (not listed)
<input type="checkbox"/> Not Sure		

Comments:

We strongly believe that an area based measure such as Out of Work Tax Credit, ACORN or MOSAIC would not be appropriate for the Pupil Premium. We agree with the Government that the premium should be attached to individuals. Otherwise we will be left with a perverse incentive structure that makes wealthy pupils living in disadvantaged areas more financially attractive to schools than disadvantaged pupils living in wealthy areas.

Of the FSM measures, Children England believe that 6 Year FSM is the most appropriate indicator. Firstly, it provides the greatest financial certainty for schools who will know in the vast majority of cases whether pupils who are currently eligible for the Pupil Premium will still be eligible in following academic years. This will enable them to plan and budget multi-year support programmes. As the eligibility table on page 13 of the consultation document shows, 6 Year FSM is the most stable of the FSM indicators with only a 3% tail off in student numbers from peak to end compared with 6% and 5% for 3 year FSM and FSM respectively.

Secondly, attainment appears to be more closely correlated with whether a child has ever been eligible for FSM than if they are currently eligible for FSM. The KS4 achievement graph shows that even pupils who have been eligible for FSM for only one year between Y6 and Y11 still do barely half as well as those who have never been eligible for FSM. Deprivation causes long term education scars, not just temporary blemishes. This is particularly important to remember in the current economic climate. As the economy recovers and unemployment rates drop, children are likely to be lifted out of FSM eligibility. The Pupil Premium must recognise that these pupils still require extra support. It is for this reason that we are comfortable with the lower additional funding attached to each pupil under this indicator. It is more important that all children who deserve extra financial support receive it, even if that level of support is slightly lower.

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

Yes

No

Not Sure

Comments:

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

Comments:

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

Yes

No

X Not Sure

Comments:

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

Actual Take-Up

90% Minimum

Not Sure

Comments:

This appears to be a sensible policy change though the Government should consider transition arrangements for those local authorities with significantly less than 90% participation who face large funding cuts.

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

Yes

No

Not Sure

Comments:

As above, this appears to be a sensible policy change though the Government should consider transition arrangements for those PRUs with high numbers of dual registrations who face large funding cuts.

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

Yes

No

Not Sure

Comments:

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

Yes

No

Not Sure

Comments:

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

Yes

No

Not Sure

Comments:

We agree with the Government that funding should more closely follow pupils though think that some protection should be given to local authorities with rapidly declining populations so that remaining pupils are not adversely affected by deep cuts.

11 Have you any further comments?

Comments:

While we appreciate the reasoning behind allowing schools to spend the pupil premium as they see fit, it is important that there are robust accountancy requirements. This will both prevent inappropriate uses of the Pupil Premium, such as bonuses for senior staff, and help to determine the effectiveness and value for money of different interventions.

We also believe that schools should be encouraged to involve the voluntary sector in the provision of additional support for pupils receiving the Pupil Premium. Voluntary sector organisations already work with these disadvantaged children, understand the educational barriers they face beyond the school gate and as such are well placed to tackle low attainment levels.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply**

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

X Yes  No

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

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

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

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

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

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

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

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

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

**Thank you for taking time to respond to this consultation.**

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

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

Send by e-mail to: [dsg.consultation@education.gsi.gov.uk](mailto:dsg.consultation@education.gsi.gov.uk)