

A consultation on school funding reform: Proposals for a fairer system

Consultation Response Form

The closing date for this consultation is:

11 October 2011

Your comments must reach us by that date.

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

Name Lesley Lodge

Chartered Institute of Public Finance and Accountancy (CIPFA)

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Address: Policy and Technical, CIPFA, 3 Robert Street, London WC2N 6RL

If you have an enquiry related to the policy content of the consultation you can contact either

Ian McVicar on: Telephone: 020 7340 7980 e-mail: ian.mcvicar@education.gsi.gov.uk
or

Juliet Yates on: Telephone: 020 7340 8313 e-mail: juliet.yates@education.gsi.gov.uk,

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Consultation Unit by e-mail:

consultation.unit@education.gsi.gov.uk, by Fax: 01928 794 311, or by telephone: 0870 000 2288.

Please tick the box that best describes you as a respondent.

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

If 'Other' Please Specify:

Chapter 1 - The National Funding System

In paragraphs 1.8 to 1.14 we discuss two ways we are considering using to calculate the schools block:

- a) A formula based on the schools within the area and the pupils within those schools (“School-level”);
- b) A formula based solely on the pupils within the area (“local authority-level”).

Question 1: Would you prefer the formula to be based on

a) a notional budget for every school; or

b) the pupils in each local authority area?

<input type="checkbox"/> School level	<input checked="" type="checkbox"/> LA level	<input type="checkbox"/> Neither	<input type="checkbox"/> Not Sure
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Comments:

CIPFA welcomes the decision not to move to a national funding system and for LAs to have some local flexibility over the funding formula for all schools in its area including Academies and Free Schools, albeit in a limited way. This fits the Government’s localism agenda.

The formula should be based on (b) as CIPFA considers that LAs should have the greatest amount of flexibility in agreeing the local funding formula with its schools and schools forum to reflect the local area’s circumstances.

CIPFA believes that (a) - issuing notional budgets to schools - would be especially challenging for those schools, eg some smaller schools, where financial management capacity is limited.

Chapter 2 - The Schools Block - system

Local flexibility

In paragraphs 2.6 to 2.9 we discuss local funding formulae and propose reducing the number of formula factors which local authorities can apply. We suggest that the local formula factors could cover:

- a. Basic entitlement per pupil (currently Age-Weighted Pupil Units)
- b. Funding for additional educational needs (e.g. deprivation, SEN)
- c. Rates
- d. Exceptional site factors (e.g. split site, PFI and rent)
- e. Lump sums for schools

Question 2: Do you agree that these are the right formula factors to retain at a local level?

<input checked="" type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None	<input type="checkbox"/> Not Sure
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Comments:

We agree that the formula factors listed represent the main determinants of spending by schools and appear to provide sufficient flexibility. It may be though that the removal of factors could lead to turbulence for some schools and we suggest that some mechanism is needed to recognise the current distribution of grants. Local flexibility could allow a local distribution of this sum that is acceptable to schools forums.

Question 3: What other factors, if any, should be able to be used at local level or could any of these factors be removed?

Comments:

CIPFA suggests school size and pupil mobility could be added at local level. One issue not mentioned in the consultation is that of class size at key Stage 1- LAs are allowed to deal this with through the funding formula but how will it be dealt with under these proposals?

Paragraphs. 2.12 to 2.14 discuss primary/secondary ratios:

Question 4: Do you think that setting a range of allowable primary / secondary ratios around the national average is the right approach to ensure that there is consistency across the country?

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

CIPFA suggests that further analysis of the variances associated with the primary/secondary ratio is required. Some of the differences in the size of the ratios between authorities may be due to factors such as sparsity. We suggest the ratios should be kept under review to allow for changes, so that targeted funding will continue to reach the relevant sector. In our view it will be important that the transitional arrangements allow sufficient time for schools to respond.

Paragraphs. 2.17 to 2.22 discuss options for the future of calculating Academies' budgets. Option (i) suggests that local authorities could calculate budgets for all schools in the area and then tell the EFA how much Academies should be paid; and Option (ii) that the EFA could calculate Academies' budgets using a pro-forma provided by local authorities setting out their formula factors.

Question 5: Do you think we should implement option (i) or (ii) when calculating budgets for Academies?

<input checked="" type="checkbox"/>	<input type="checkbox"/> (i)	<input type="checkbox"/> (ii)	<input type="checkbox"/> Other	<input type="checkbox"/> Not Sure
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Comments:

In CIPFA's view, option (i) would have the advantages of openness and transparency, so supporting accountability and would be more efficient.

Clearly though the local authority will need timely and complete pupil data for all schools, including Academies and Free Schools.

If option (ii) is chosen, and the EFA calculate Academy budgets, the budgets should be published to ensure accountability.

Ensuring accountability and fairness

Paragraphs 2.23 to 2.26 discuss options to improve the working of Schools Forums - whether the main groups on the Forum should all separately have to approve a proposed formula and whether the Forum should have more decision making powers.

Question 6: Do you think these options would help to achieve greater representation and stronger accountability at a local level?

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

Whilst CIPFA can understand why schools forums should be given the proposed powers which most have effectively now, we can foresee some interesting developments as the number of academies increase, eg all secondary school LA are academies whereas the majority of primary schools are not. Is the DfE planning any changes to the current rules around representation including Early Years, Special Schools and post 16 partnerships?

Paragraphs. 2.27 to 2.31 discuss functions the EFA could provide to ensure scrutiny and challenge at a national level. They are (i) checking compliance and/or (ii) acting as a review body.

Question 7: Do you think we should implement option (i), (ii), both or neither?

(i) (ii) Both ✓ Neither Not Sure

Comments:

CIPFA does not support proposals which are likely to increase bureaucracy and therefore believes neither option should be implemented. The current Section 251 forms could adequately capture the information required for checking compliance

Arrangements for Free Schools

Paragraphs 2.33 to 2.35 discuss arrangements for the funding of Free Schools:

Question 8: If we introduce the new system in this spending review, do you think that Free Schools should (i) remain on the Free School methodology for 2013-14 and 2014-15 or (ii) move straight away to the overall funding system?

(i) ✓ (ii) Not Sure

Comments:

In CIPFA's view it would be more equitable to ensure funding for Free Schools is distributed according to the same methodology as local authority schools and academies. Therefore we would prefer option ii).

Chapter 3 - The Schools Block – formula content

In paragraphs 3.3 to 3.6 we discuss formula content and propose that the new formula could consist of:

- A basic per-pupil entitlement
- Additional funding for deprived pupils
- Protection for small schools
- An Area Cost Adjustment (ACA)
- English as an Additional Language (EAL)

Question 9: Are these the right factors to include in a fair funding formula at a national level?



All

Some

None

Not Sure

Comments:

Yes - subject to our comments in response to the questions below

Deprivation

Paragraphs 3.14 to 3.17 discuss possible indicators we could use in a national formula for reflecting deprivation.

Question 10: Do you agree that we should use Ever FSM to allocate deprivation funding in the national formula? Should this be Ever 3 or Ever 6?

Ever 3

Ever 6

Neither



Not Sure

Comments:

CIPFA understands why FSM is the preferred option to use as a proxy for deprivation but free school meals take-up does not provide a consistent national picture of deprivation and in our view the DfE should consider other measures such as the universal credit as it is introduced.

Small school protection

Paragraphs 3.19 to 3.28 discusses funding protection for small schools, suggesting that a £95,000 lump sum would be sufficient to provide protection, that it should be applicable to primary schools only and should adopt Middle Super Output Areas to derive the sparsity factor. If a local authority formula is used a choice between a lump sum payment and a sparsity measure is offered and there is also discussion on whether the threshold for eligibility should be narrowed so that sparsity funding is focused on the most sparsely populated areas.

Question 11: If we have a school-level formula, do you agree that £95,000 is an

appropriate amount for a primary school lump sum?

Yes

No

Not Sure

Comments:

If a lump sum is the way forward then it should be sufficient to cover the fixed costs in a primary school

Question 12: Do you agree that the lump sum should be limited to schools with Year 6 as the highest year-group?

Yes

No

Not Sure

Comments:

There is a case for small secondary school recognition via lump sums. Many LAs have this. The Year 6 treatment does not allow for middle schools. We would prefer this to apply to all schools where youngest year group is Year 5 or younger

Question 13: If we have a local authority-level formula, should we use a primary school lump sum or the sparsity measure?

Primary School lump sum

Sparsity Measure

Neither

Not Sure

Comments:

A sparsity measure would better reflect the costs of small rural schools

Question 14: If we have a sparsity measure, do you think we should narrow the sparsity threshold as described above?

Yes

No

Not Sure

Comments:

On balance, we would support a narrowing of the sparsity measure. This should give a better focus for limited resources on schools in rural areas. It does not seem appropriate that schools in some London boroughs could benefit from the wide sparsity measure (per Annex C).

Area Cost Adjustments

Paragraphs 3.29 to 3.33 (and annex D) discuss approaches to calculating the area cost adjustment.

Question 15: Which option should we use to calculate the Area Cost Adjustment: the current GLM approach or the combined approach?

GLM Approach

Combined Approach

Other

Not Sure

Comments:

This will affect Las differently and CIPFA would refer the DfE to responses from individual authorities.

English as an Additional Language and Underperforming Ethnic Groups

Paragraphs 3.34 to 3.38 considers what further factors of underachievement there might be for school age pupils and proposes the inclusion of an EAL factor in a national formula.

Question 16: Do you agree that we should use an EAL factor in the national formula?

Yes

No

Not Sure

Comments:

Again, CIPFA would refer the DfE to responses from individual authorities.

Question 17: Do you agree that this should cover the first few years only? How many years would be appropriate?

Yes

No

Not Sure

Comments:

CIPFA would refer the DfE to responses from individual authorities. We think there could be issues around the practicalities of collecting the necessary data.

Transitional Arrangements

Paragraphs 3.39 to 3.41 discuss transitional arrangements to minimise turbulence.

Question 18: Do you think we should:

(a) Continue with a maximum decrease of -1.5% per pupil each year and accept that this will mean very slow progress towards full system reform; or

(b) Continue with a -1.5% per pupil floor in 2013-14 but lower it thereafter so that we can make faster progress?

(a)

(b)

Neither

Not Sure

Comments:

CIPFA supports the aim of implementing the changes promptly, especially given that proposals for reform have been under discussion for several years now but we recognise that in practice budget turbulence can be difficult for schools to manage.

Chapter 4 - Central services and defining responsibilities

Paragraphs 4.1 to 4.7 discuss the development of a funding model, having first defined the respective responsibilities of maintained schools, Academies and local authorities. The model would clarify what elements of funding would be delegated to schools or centrally retained for maintained schools, if there is local discretion.

Question 19: Do you agree that some of these services could be retained centrally if there is local agreement by maintained schools?

Yes

No

Not Sure

Comments:

Yes we agree that funding for some services could be retained centrally. Local authorities can achieve efficiencies in the procurement and delivery of services which are not achievable at individual school-level

Paragraphs 4.8 to 4.13 set out details of the funding blocks which make up the funding model and their functions. Funding blocks for schools, High Needs Pupils, early years, central services and formula grant are proposed.

Question 20: Do you agree that the split of functions between the blocks is correct? If not, what changes should be made?

Completely Correct

Broadly, but some changes required

No

Not Sure

Comments:

We consider that the split is correct but this is mainly a question for the local authorities.

Chapter 5 - Future arrangements for the Local Authority Central Spend Equivalent Grant (LACSEG)

Paragraphs 5.1 to 5.9 discuss the future arrangements for the calculation of LACSEG.

Question 21: Do you think the funding for local authority LACSEG should be moved to a national formula basis rather than using individual LA section 251 returns?

Yes

No

Not Sure

Comments:

CIPFA set out its concerns in our response to the consultation on LACSEG for 2011/12 and 2012/13, (the one which closed in August). In that response, we applauded the earlier statement that “becoming an academy should not bring about a financial advantage or disadvantage to a school.” CIPFA also believes that the transfer of funding to academies should aim to leave the local authority with sufficient resources to carry out its functions for its remaining schools and other statutory services. We would reiterate our comment that a possible way forward for dealing with the detail of the concerns around LACSEG might be for the DfE to set up a working group across local government, including say the YPLA and the LGG to work through the issues on a line by line basis. CIPFA would be happy to contribute to the work of such a group.

Question 22: Do you think the distribution mechanism should be changed to one that more accurately reflects the actual pattern of where Academies are located?

Yes

No

Not Sure

Comments:

See our answer to Q21

Chapter 6 - Children and Young People requiring high levels of support

Principles

Paragraph. 6.7 sets out the high level principles behind the proposals for funding children and young people with high levels of need.

Question 23: Is this the right set of principles for funding children and young people with high needs?

Yes

No

Not Sure

Comments:

Yes, we welcome these principles. However, their implementation will come at a cost.

A Base Level of Funding for High Needs SEN

Paragraphs 6.11 to 6.18 discuss proposals to set a base level of funding to reflect high needs SEN.

Question 24: Would it be appropriate to provide a base level of funding per pupil or place to all specialist SEN and LD/D settings, with individualised top up above that?

Yes

No

Not Sure

Comments:

Yes this proposal would appear to ensure a fair approach to funding provision. We would welcome more detail on the level of support this funding would provide:

Question 25: Is £10,000 an appropriate level for this funding?

Yes

No – too high

No – too low

Not Sure

Comments:

It is difficult for us to comment on exact level appropriate without a definition of what is included in this base. We would welcome clarity on how this sum will be updated and reviewed in the spending review period and thereafter

Applying this approach to post-16

Paragraphs 6.19 to 6.21 discuss proposals for funding high needs pupils to post -16 pupils.

Question 26: Is the idea of a base rate of funding helpful in the post-16 context?

Yes

No

Not Sure

Comments:

We support the extension of the principle to post-16 provision – but see the concerns in responses to questions 23 -25 above

Question 27: Should local authorities be directly responsible for funding high level costs over £10,000 for young people in post-16 provision in line with their commissioning responsibilities?

Yes

No

Not Sure

Comments:

Yes - to ensure consistency and coherent provision across the age range

Question 28: Do the proposed funding arrangements create risks to any parts of the post-16 sector?

Yes

No

✓

Not Sure

Comments:

LAs will be better placed to answer this. If funding shortfalls in SEN block grant are not addressed, there may be financial risks for some providers if LAs need to reduce costs in order to subsidise post 16 placements

Funding by Places or Pupil Numbers

Paras 6.22 to 6.26 discuss whether institutions providing for high needs children and young people should be funded on the basis of planned places or pupil numbers. It also sets out four options for doing so.

Question 29: Should institutions providing for high needs children and young people be funded on the basis of places or pupil numbers?

✓ Places

Pupil Numbers

Not Sure

Comments:

On balance we think they should be funded on the basis of places. It is difficult for small schools to manage the volatility of placement numbers and special schools tend to be small by nature.

Question 30: Are any of options (a)-(d) desirable?

(a)

(b)

(c)

(d)

None

✓ Not Sure

Comments:

In our view (b) or (d) would be preferable to (a) or (c) because they provide a base level of security while also reflecting some variations in actual numbers.

Funding Special and AP Academies and Free Schools

Paragraphs 6.27 to 6.39 discuss how funding for special and AP Academies and Free Schools should be managed in the short term and, in the longer term, whether funding should be routed through the Education Funding Agency (EFA) or the commissioner.

Question 31: For the longer term, should we fund Special and AP Academies and Free Schools:

- a) with all funding coming direct from the commissioner?
- b) with all funding coming through the EFA and recouped from the commissioner?
- c) through a combination of basic funding from the EFA and top-up funding for individual pupils direct from the commissioner?

(a)

(b)

(c)

Neither

Not Sure

Comments:

We support (a) as involving less bureaucracy. (b) and (c) would involve LAs and the EFA in administrative costs in tracking pupils and funding.

Question 32: If we go for the combination funding approach, should we pass all funding through the EFA for a limited period while the school is establishing itself before moving to this approach?

Yes

No

X Not Sure

Comments:

As above, we do not support the combination funding approach. If it is however adopted, funding should be passed through the EFA only for a limited period.

Constructing the High Needs Block for local authorities

Paragraphs 6.40 to 6.47 propose a new formula for determining the High Needs Block building on the research carried out for the Department by PricewaterhouseCoopers in 2009.

Question 33: Given there is no absolute method of determining which pupils have high needs, and given local variation in policy and recording, is this approach to determining proxy variables acceptable?

Yes

No

Not Sure

Comments:

If this approach is adopted, the DfE will need to be clear which proxies they are using, how up to date they are, when will they be reviewed etc and to ensure there are no perverse incentives.

Question 34: Do you agree that deprivation is linked more to AP rather than the wider SEN needs?

Yes

No

Not Sure

Comments:

Paragraphs 6.48 to 6.49 suggest the need for substantial transitional arrangements in moving to a new formula as the formula will fail to reflect the spend of local authorities on high need pupils.

Question 35: Do you agree that in the short term we should base allocations to local authorities for the high needs block largely on historic spend?

Yes

No

Not Sure

Comments:

We think that in the short-term it will probably be necessary to protect allocations, to prevent significant turbulence, by basing them on historic spend.

Post-16

Paragraph 6.50 proposes aligning pre- and post-16 funding for high needs pupils over time.

Question 36: Do you agree that post-16 funding should also become part of the local authority's high needs block over time, but that there might be a particular need for transitional arrangements?

Yes

No

Not Sure

Comments:

Yes, to ensure consistency (as per our response two Question 27). It would be helpful for LAs to be consulted further on the potential problems identified in the consultation paper - before implementation.

Question 37: What data should ideally underpin the funding allocations both initially and for a potential high needs block arrangement?

Comments:

We find it difficult to comment without further details about this proposal.

Issues Specific to Alternative Provision

Paragraphs 6.51 to 6.56 highlight issues specific to AP provision but suggest that AP should continue to be treated alongside SEN for funding purposes.

NB: Questions 38 is displayed together with question 39 in the document.

Question 38: Should AP continue to be treated alongside high needs SEN for funding purposes?

Yes

No

Not Sure

Comments:

LAs will be better placed to comment.

Question 39: What differences between them need to be taken into account?

Comments:

LAs will be better placed to comment.

Early Years

Paragraphs 7.5 to 7.8 set out current arrangements for early years funding and discuss whether the Early Years Single Funding Formula could be made simpler:

Question 40: Do you agree we should aim for a simpler EYSFF? If so, how?

Yes

No

Not Sure

Comments:

While CIPFA support the principle of simplifying the EYSFF, in practice the disturbance involved is likely to be problematic.

Paragraphs 7.9 to 7.11 sets out options for improving the focus on tackling disadvantage and improving consistency in the support offered to disadvantaged children.

Question 41: How could we refine the EYSFF so that it better supports disadvantaged children?

Comments:

The Income Deprivation Affecting Children Index (IDACI) could be useful in this context.

Bringing more consistency to free early education funding

Paragraphs 7.12 to 7.15 consider two options for continuing to fund local authorities for free early education: on the basis of their current spend or on the basis of a formula.

Question 42: Do you agree we should allocate funding to local authorities on the basis of a formula?

✓ Yes

No

Not Sure

Comments:

CIPFA supports the use a formula for allocating funding – the challenge is in getting the formula right.

Paragraphs 7.16 to 7.18 discuss how a formula to local authorities for funding early years would operate.

Question 43: Do you agree a formula should be introduced based largely on the same factors as the schools formula?

Yes

No

Not Sure

Comments:

CIPFA supports this approach, in that it provides consistency and transparency. However, we understand that nursery provision has more frequent changes in rolls, and may therefore need a more flexible approach.

Bringing greater transparency to free early education funding

Paragraphs 7.19 to 7.20 discuss what has been done so far to improve transparency and our plans for the future.

Question 44: We would be grateful for views on whether anything else can be done to improve transparency.

Comments:

CIPFA supports the aim of increasing transparency, but increased transparency should not be at the expense of greatly increased administration costs and workloads.

Pupil Premium

Paragraphs 8.1 to 8.8 set out two options for extending the coverage of the pupil premium to include pupils previously eligible for Free School Meals: an 'ever 3'

measure or an 'ever 6' measure which extend cover to those eligible for FSM at some point in the last three or six years.

Question 45: What is your preferred option for determining eligibility for the Pupil Premium from 2012-13? Should it be based on the Ever 3 or Ever 6 measure?

Ever 3

Ever 6

Neither

Not Sure

Comments:

As per our response to Question 10, CIPFA understands why FSM is the preferred option to use as a proxy for deprivation but free school meals take-up does not provide a consistent national picture of deprivation and in our view the DfE should consider other measures such as the universal credit as it is introduced.

If it is a choice between Ever 3 and Ever 6, then our preferred option would be Ever 6. However, there should be a weighting towards the infant years, otherwise funding is simply moved money to secondary – contrary to the principles of early intervention.

Ideally, the funding should be on top of the current DSG and not taken from the DSG.

Paragraphs 8.9 to 8.10 seek views on other issues for calculating the pupil premium, such as whether to reflect differences in funding already in the system.

Question 46: What is your preferred approach for calculating the Pupil Premium?

Comments:

Different approaches will advantage and disadvantage authorities differently. In our view, the important thing is that the DfE should be consistent and coherent in their funding methodologies

Timing for implementation

Paragraphs 9.1 to 9.4 consider the issue of when to begin the process of moving to a new funding formula.

Question 47: Do you think we should implement the proposed reforms in 2013-14 or during the next spending period?

<input type="checkbox"/> 2013-14	<input checked="" type="checkbox"/> Next Spending Period	<input type="checkbox"/> Neither	<input type="checkbox"/> Not Sure
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Comments:

A new funding system has been under discussion and subject to consultation for several years and we are aware that LAs will mostly be keen to see the implementation of reforms as soon as possible. However, this needs to be balanced with the need to avoid significant turbulence in funding allocations for LAs and schools during transition. On balance therefore we support implementing the proposed reforms from the next Spending Period.

Question 48: Have you any further comments?

Comments:

As per our response to Question 21, we suggest that a possible way forward for dealing with the detail of the concerns around LACSEG might be for the DfE to set up a working group across local government, including say the YPLA and the LGG to work through the issues on a line by line basis. CIPFA would be happy to contribute to the work of such a group.

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 Carole Edge, DfE Consultation Co-ordinator, tel: 01928 738060 / email: carole.edge@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 11 October 2011

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

Send by post to:

Consultation Unit
Area 1C
Castle View House
Runcorn
Cheshire
WA7 2GJ