

DE Resource Budget 2023-24 Equality Impact Assessment Consultation

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) is a trade union and professional association representing over 24,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation.
3. When considering the impact of any proposals on different groups, it is ASCL's policy to consider not only the nine protected characteristics included in Section 75 of the Northern Ireland Act 1988, but also other groups which might be disproportionately affected, particularly those who are socio-economically disadvantaged. We have answered any equality impact questions on this basis.

B. Key points

4. ASCL has significant concerns about the impact of shrinking resource budgets on educational outcomes for all children and young people. With inflation and energy costs at levels unprecedented in recent times, schools are under huge financial pressure. What is needed is a funding boost to prevent further cuts in provision.
5. A flourishing education system is fundamental to the performance, growth and productivity of any country. Education funding represents investment in economic growth. It is ASCL's view that the distribution of the national education budget should be transparent and that schools should have three-year settlements. Single year allocations limit the strategic planning process for leaders, especially in the current harsh financial landscape.
6. The interim report, [Independent Review of Education in Northern Ireland](#), concludes that the education system is not adequately funded. Real terms spend per pupil reduced by 10% in the seven-year period prior to the Covid pandemic. There has been a significant decline in investment in education and skills, including a real-terms reduction in spending on higher education, further education and industry skills of around one third over the period between 2010/11 and 2019/20.

7. According to the [Institute for Fiscal Studies \(IFS\)](#), spend per pupil in Northern Ireland is the lowest across all four UK jurisdictions, at £6400 in 2021/22 (Wales £6600, England £6700, Scotland £7600).
8. We are concerned that this consultation has failed to acknowledge the impact that the current recruitment crisis will have on schools' ability to identify areas for efficiency savings. Statistics published by the [Northern Ireland Statistics and Research Agency \(NISRA\)](#) indicate that, for the academic year 2022/23, only 80% of vacancies across all schools had been filled by November 2022, and only 65% of special school vacancies had been filled.
9. [NISRA](#) reports that more than 62% of teachers took a period of sickness absence, and that 66% of absences were for periods of 20 days or more.
10. In order to put teachers in front of classes in academic year 2022/23, [NISRA](#) indicates that schools spent over £103 million on substitution staff. That equates to one teaching day in five being led by substitute staff.

C. Answers to specific questions.

Question 1: Are there any data needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 5 and 6 of the EQIA consultation document? If so, what are they? Please provide details

11. Yes. See paragraphs 12 – 14 below for details.
12. Paragraphs 8-10 above highlight the capacity issues across the system. We would urge the Department of Education (DE) to reflect this in their impact assessment. Limited capacity in schools will have significant impact on mitigation strategies. For example, removal of support programmes including (but not limited to) Engage and Healthy Happy Minds should be considered in the context of increasing concerns around children's mental health:
 - a. According to the [November 2022 report by the Childrens Commissioners of Northern Ireland, Scotland and Wales](#), between 2019/20 and 2020/21 referrals to CAMHS from Emergency Departments increased by 24%.
 - b. In their monitoring report, [One Year On](#), the Northern Ireland Commissioner for Children and Young People (NICCY) report that in April 2022 there were 313 more children waiting to access child psychology services than in April 2021 – a worrying increase of 185%.
13. We acknowledge the impact assessment on each of the nine Section 75 categories, including multiple identities. However, we are not convinced that the cumulative impact on the multiple identities group of the withdrawal of several initiatives at the same time has been properly assessed.
14. Children and families with multiple identities may have been supported by a number of different programmes, including Engage, Healthy Happy Minds and North Belfast Primary Principals Support Programme (NBPPSP). These support programmes (amongst others) have now all ceased. The mitigations in section 7 of the consultation consider each programme in isolation only.

Question 2: Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 6 of the EQIA Consultation document? If so, what are they?

15. Yes. See paragraph 16 for details.
16. Section 6 acknowledges major negative impacts from budget reductions to School Holiday Food Grants in four of the Section 75 characteristics. However, its impact has not been referenced at all in the multiple identities assessment. We think that cessation of this grant will have a major negative impact on this group.

Question 3: Please state what action you think could be taken to reduce or eliminate any adverse impacts in seeking to manage the Department's resource budget?

17. The Department should focus on early and appropriate interventions. These can prevent learning difficulties from developing.
18. The Department should ensure that decisions are evidence-based and that decision makers have a clear understanding of the impact of reducing education funding in the medium and long term.
19. Decision-making groups should include a range of stakeholders, including school and college leaders.
20. The Department should be transparent about the flow of funding from DE to individual schools.
21. The Department must consider the cumulative impact of inadequate funding and significant staff recruitment shortfalls on education provision.

Question 4: Are there any other comments you would like to make in regard to the consultation process generally?

22. As previously stated (see paragraph 3), we will always consider the impact of socio-economic disadvantage alongside equality categories. We would urge the DE to consider the impact on socio-economically disadvantaged children and young people of the spending decisions taken for 2023/24. We would particularly highlight the following:
 - a. In [Northern Ireland, an estimated 23% of children in 2019/20](#) were living in relative poverty (after housing costs).
 - b. [The Child Poverty Strategy 2016-2019](#) aimed to reduce child poverty and, despite being extended to May 2022, has not led to a decrease in the number of children in poverty.

D. Conclusion

23. In the interim report, [Independent Review of Education in Northern Ireland](#), an excellent education system is defined as one that should:
 - a. put the needs of learners first
 - b. promote community cohesion
 - c. equip learners at every stage of life with the knowledge, skills and attitudes to make a positive contribution to society and the economy

24. ASCL strongly recommends that the DE should evaluate decisions about resource allocation and the impact of those decisions against these criteria.
25. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way it can.

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