

Government consultation on implementing mandatory minimum per pupil funding levels

Response of the Association of School and College Leaders

A. Introduction

- 1 The Association of School and College Leaders (ASCL) represents over 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers 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 young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. 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. It is our view that a national formula for distribution is the most effective way of identifying where the most acute funding issues are.

B. ASCL's position

- 3 We welcomed the implementation of a national funding formula (NFF) in 2017/18. We accept that (legislative requirements aside) a soft formula transition has been necessary to limit the turbulence that reforms to distribution methodology will inevitably expose, but our position remains the same. ASCL requires local authorities to take clear and obvious steps towards full implementation of the NFF for all so that transparency and fairness in school budgets and high needs funding enables certainty in long-term financial planning.
- 4 It is with some frustration that we note that the October 2019 Queen's Speech did not include provision for the changes in primary legislation that are required to fully implement a hard national funding formula.
- 5 However, we acknowledge that government has again confirmed their intention to move to a hard formula. We look forward to continuing to work constructively with DfE colleagues in determining how a hard formula will operate in practice.
- 6 We have always been clear on our expectations of minimum per pupil funding (MPF) levels and how these should manifest in a national distribution methodology. The basic per pupil funding that a school receives should be sufficient to deliver a broad and balanced curriculum without subsidy from additional needs funding. In our view, minimum per pupil funding calculations should not include additional needs or school led funding.
- 7 The MPF calculation is the driver for the commitment to 'levelling up' made in the September 2019 spending round. The current MPF approach means that schools whose cohort tend to demonstrate fewer of the characteristics associated with the

additionality factors within the NFF will benefit the most. In other words, schools with less challenging intakes will tend to attract more of this funding.

- 8 Our comments and responses to the specific questions below are based on the premise that the proposal is a step closer to a more transparent and predictable distribution. Our broad agreement cannot be taken as a change in our position on what MPF should mean.

C. The MPF proposal

- 9 We support the policy intention to make the use of the MPF factor mandatory in local formulae.
- 10 We welcome this approach and see it as an effective mechanism for moving closer to a hard NFF in the absence of changes to primary legislation.
- 11 ASCL is pleased to see that, in 2020/21, technical changes are being introduced which bring consistency to the MPF calculation for all schools, including those with non-standard year groups.

D. Responses to specific questions

Question 1: Do you agree that, in order to calculate mandatory minimum per pupil funding levels, all local authorities should follow the NFF methodology?

- 12 We agree that the NFF and local formulae calculation methodology should be the same. Whilst our substantive position is that MPF should not include additional needs factors, to vary the current national approach would undermine the principles of transparency and predictability that must exist within a national formula. ASCL sees this as a necessary step towards national distribution, but will continue to question the equity of the MPF calculation at national level.

Question 2: Do you agree that any requests from local authorities to disapply the use of mandatory MPF levels should only be considered on an exceptional basis in the context of unaffordability?

- 13 We can neither agree nor disagree with this question. Distribution and sufficiency are different and must not be conflated.
- 14 Our broad agreement with the proposal in Question 1 is based on its focus on distribution. Question 2 is about sufficiency.
- 15 In the interests of transparency, we hope that the DfE will share some detail of the number of authorities that make requests to disapply the mandatory minimum per pupil funding levels in 2020/21, and also whether the disapplication is granted.
- 16 ASCL welcomes the increased investment in schools and high needs announced in September. We acknowledge that this proposal is a consequence of the additional investment. A properly funded education system should be able to deliver at least adequately on both schools and high needs provision.

F. Conclusion

- 17 I hope that this response is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

Julia Harnden
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