



Government consultation

Reforming how local authorities' school improvement functions are funded

Launch date: 29 October 2021

Respond by: End of 26 November 2021

Question 1:

We believe that instances of councils exercising formal intervention powers remain relatively low, and that since its introduction, this grant has primarily supported improvement functions such as early support and challenge to improve individual school performance, which overlaps with wider (non-core) improvement provision.

Do you agree that this is the case? If not, please explain.

f40 answer

Thank you for the opportunity to respond to this consultation, however, f40 believes it is not the right time to make changes to the SIMB grant. With the upcoming White Paper reviewing the role of local authorities in education, we feel it would be beneficial to defer changes to the grant until such time as outcomes of the White Paper are known. We believe there is insufficient time to consult schools and School Forums regarding the proposal and any implementation from the 2022-23 financial year in order to meet the 21 January 2022 deadline of submitting the Authority Pro-forma Tool.

While local authorities may not be using the grant to exercise formal intervention powers, we believe they are using it to focus on outcomes, with local authorities best placed to prioritise school improvement, at whatever stage it may be needed. Formal intervention powers should be a last resort. Early intervention is in the best interests of pupils, rather than waiting for failure, so we believe local authorities are using the grant to the best effect in order to prevent poor outcomes. Without this grant, some of this early intervention work will not be possible.

Question 2:

We are proposing to (i) remove the Grant (Proposal 1), and (ii) enable councils to de-delegate funds via their schools forum to ensure they are sufficiently funded to exercise all of their improvement activities, including all core improvement activities (Proposal 2).

Do you agree that, taken together, these proposals will allow councils to continue to ensure they are adequately funded for core improvement activities; and, therefore, do not impose a new burden? If not, please explain.

f40 answer

If maintained schools choose not to replace the funding via their Schools Forum this will become a burden on local authorities and lead to a greater risk of failure in schools, resulting in poorer pupil outcomes. The use of the grant does achieve wider school improvement, often benefitting academies, the RSC, as well as maintained

schools. It does not feel appropriate that maintained schools pick up the full cost of this work alone.

While we appreciate schools have been provided with additional funding, we are concerned that placing an additional burden on them may be extremely difficult to absorb. This is at a time when they are facing increased cost pressures, including the increase in National Insurance to pay for the Health and Social Care Levy, the increase in minimum teachers' pay to £30,000, rising energy costs and other inflationary and demand costs.

Question 3:

Bearing in mind Proposals 1 and 2, are there any aspects of our guidance to councils on their role in school improvement which could usefully be clarified to aid understanding of what councils are accountable for with respect to improvement and how it should be funded? (For example, our Schools Causing Concern guidance.)

f40 answer

We believe the guidance should recognise the much wider definition of school improvement and that the grant should be provided to reflect this, as stated in our answer to question 1.

The consultation makes reference to adopting an approach of de-delegation and then, from a regulation perspective, removing it from the list of allowable de-delegations and incorporating it into the list of areas, which can be subject to a top-slice from all maintained schools. This highlights the confusion and complexities in this area and strengthens the case for a wider review of the approaches to top-slice and de-delegation of maintained school budgets. One of the drivers behind this change is to increase consistency with the MAT approach, therefore, simplification and standardisation could be considered, removing the term "de-delegation" and adopting a top-slice approach for all, with a consistent range of allowable purposes for all.

Question 4:

The Public Sector Equality Duty (PSED) requires that public bodies consider the potential effects of key decisions on groups with protected characteristics. The relevant protected characteristics for the purposes of the PSED are: sex; race; disability; religion or belief; sexual orientation; pregnancy or maternity; gender reassignment; and age.

Please let us know, providing evidence where possible, if you believe any of the proposals set out in this consultation will have the potential to have an impact on specific groups, in particular those with relevant protected characteristics.

f40 answer

Some of the school improvement activities undertaken support the Equality Duty, such as initiatives to tackle racism and other protected characteristics in maintained and academy schools. Removal of this grant may put these activities at risk.