



**Department
for Education**

Consultation Response Form

**Consultation closing date: 19 June 2014
Your comments must reach us by that date**

**Savings to the Education Services Grant for
2015-16**

If you would prefer to respond online to this consultation please use the following link: 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.	<input type="checkbox"/>
Reason for confidentiality:	

Name:	
Please tick if you are responding on behalf of your organisation.	<input type="checkbox"/>
Name of Organisation (if applicable): Lewisham Schools Forum	
Address: Laurence House	

Catford
SE6 4RU

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box the best describes you as a respondent.

<input type="checkbox"/>	Maintained schools	<input type="checkbox"/>	Academies	<input type="checkbox"/>	Local authorities
<input type="checkbox"/>	Governors	<input type="checkbox"/>	Bursars	<input type="checkbox"/>	Parents
<input checked="" type="checkbox"/>	School forums	<input type="checkbox"/>	Trade union organisations	<input type="checkbox"/>	Other

Please Specify:

In responding to the questions in this consultation, we ask you to pay particular attention to any potential impacts on the protected characteristics set out in the Equality Act 2010 (sex, race, disability, age, religion or belief, sexual orientation, pregnancy and maternity, and gender reassignment).

School Improvement

- 1 a) How could the clarification of the role of local authorities in school improvement in Section 4.2 help local authorities to make savings?

Comments:

Clarification needs to be given about the expectations of school improvement offer in light of the new Ofsted inspection framework and the new regional arrangements for supporting school improvement in academies. An understanding of these expectations will enable LAs to ensure they have the appropriate capacity to address those expectations and undertake what they and schools locally agree upon for school improvement. It will also enable decisions to be taken about activities that are no longer expected to be performed by LAs nor inspected by OfSTED.

The benchmarking data provided demonstrates a wide range of costs without an understanding of what lies behind those figures. The data does not reveal where authorities only perform intervention activities and those that have extensive trading activities and where school improvement responsibilities have been passed to schools. There appears to be some evidence that the latter may be generating a surplus from it which is offsetting other centrally managed costs. It may well be some of statistics are skewed by the costs of school improvement being located in schools' budgets.

Missing within the ESG is the need for an area cost adjustment to reflect the additional cost of London weighting and the need to be able to retain staff in London where costs of living (housing) are increasingly problematic.

- 1 b) Is further clarification or guidance from the Department on the role of the local authority in school improvement needed in order to have a clear set of expectations?

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

Yes. In order to ensure to match expectations and accountability there needs to be further guidance. This needs to be match to the resources provided through the ESG.

- 1 c) In addition to the examples set out in Section 3.2 of the consultation document, how else could local authorities provide school improvement more efficiently?

Comments:

School improvement could be provided by collaborations of local authorities with sharing of services for school improvement work such as Tri-Boroughs arrangement. Intervention work could be done through such mechanisms but there is a need to be able to act quickly once the decision to intervene has been made. It is not clear if school collaborative arrangements would always be able to act in this way.

- 1 d) What level of saving is it possible for your local authority to make on school improvement? If cost pressures on school improvement have changed recently, please describe below.

Comments:

The current arrangements of funding school improvement via a straight per pupil allocation across the country takes no account in London of the area cost adjustment thus making savings more difficult. Rather than view this purely as a savings exercise clarity needs to be provided on the expectations especially with failing schools before it is possible to take a view whether savings are possible. However we believe our service is at a level for intervention work that further savings would be possible only if it was assumed a lesser level of intervention would be needed in the future.

- 1 e) If your local authority's expenditure is above the median (£31 per pupil) for this service, can you help us understand why this is?

Comments:

In the data for the period shown our costs were above the median however in 2014/15 they will some 16% below that benchmark as a result of measures planned some time ago.

- 1 f) What would prevent your local authority from reducing costs to match the lowest spending 25% of local authorities (up to £19 per pupil)?

Comments:

At this time we believe that would provide insufficient funding for the level of school intervention activity that needs to be undertaken.

Statutory and regulatory duties

2 a) Which statutory and regulatory duties require greater clarification or guidance?

Comments:

Some of the statutory and regulatory duties overlap with other ESG heading and other functions of local authority as they are multi dimensional organisations. There will always be a certain level uncertainty at where cost of some services has been shown. They could be here or under the more specific headings

It is therefore difficult to set targets for this area in isolation from other areas. Given the costs will reflect how a Local Authority has organised its services and there activities relating to the core function of the local authority, it raises some doubts about how practically these costs can be shared across local authorities boundaries

2 b) In addition to the methods set out in the case studies in Section 3.2, how else could local authorities fulfil statutory and regulatory duties more efficiently?

Comments:

The most likely way to make savings is by persuading schools to meet some of these costs when purchasing related services via service level agreements. Collaboration with other LAs is another route to pursue efficiencies however as work undertaken by the senior leadership of the LA is key in delivering some of these responsibilities then in reality collaborative arrangements may only be practicable in built up urban areas.

- 2 c) What level of saving is it possible for local authorities to make on statutory and regulatory duties? If cost pressures on statutory and regulatory duties have changed recently, please describe below.

Comments:

As the level of spending varies by LA then its not possible to make a single generic response to this. The current arrangements of funding via a straight per pupil allocation of the country takes no account in London of the area cost adjustment which makes savings more difficult to deliver. The role of local authorities in managing and supporting the schooling system has been subject to significant pressure due to the demand for places in schools and the system wide work with the local community to identify and deliver acceptable solutions. Similarly the annual changing of the funding system and arrangements for schools is above and beyond the level required for maintenance of the system.

- 2 d) Do you think that the Department needs to change its expectations of local authorities with regard to statutory and regulatory duties in order for savings to be realised? If so, how?

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

This document sets out the duties under statutory and regulatory to a great level of detail. So much so that with the multi dimension nature of local authorities it would be unrealistic for the services to be costed at this level.

Costs have to be split between the education and the remainder of management of the children's service and corporate functions. Given the costs will reflect how a Local Authority has organised its services it raises some doubts about how practically these costs without impacting on non education services can be reduced in isolation.

2 e) If your authority's expenditure is above the median (£48 per pupil) for this service, can you help us understand why this is?

Comments:

Non applicable

Not applicable

2 f) What would prevent your local authority from reducing costs to match the lowest spending 25% of local authorities (-£6¹ to £28)?

Comments:

Education welfare services

3 a) Why do you think there is such significant variation in spending on education welfare?

Comments:

Lewisham performance figures show secondary attendance benchmarking low overall against other London and inner London authorities. Primary performance figures have been consistently high. Both phases have shown reduced overall and persistent absence year on year. Persistent absence is defined as missing 15% or more sessions. The latest figures published by the DfE, for autumn 2012 and spring 2013, showed Lewisham was 4th best among London authorities in

¹ We do not know at this stage why this local authority has recorded a negative planned expenditure on this service and we will explore this during the consultation period.

terms of overall absence in primary schools, and 8th best in terms of primary persistent absence. Lewisham was ranked 24th in terms of secondary overall absence and 25th in terms of secondary persistent absence. Comparisons were with 33 London boroughs. Nationally, we are in the top quartile for both secondary and primary overall absence.

A response to poor absence performance can be to recruit more staff to work with the young people not attending school and their families. The growth in the school population is a significant additional burden which may lead LAs to increase spending in this area.

The increased focus on fining parents for non-attendance of their children is a further factor that can impact resourcing levels.

Finally, the extent to which schools contribute to service costs through charges or undertaking the work themselves

3 b) How do you think local authorities could provide this service more efficiently?

Comments:

The service that is currently provided is as follows

Preparing court cases

Court appearances

Training on court procedures

Tracking of attendance of vulnerable groups

Children missing not on roll or excluded

Support or challenge

Attendance checks on poorly performing schools

Monitoring performance checks although schools can buy in further support

Expenditure reduction can be achieved by a reduction in the scope of service to focus on court related work and for schools to be responsible for more of the case work with individual pupils and their families.

3 c) What level of saving could your local authority make to education welfare? If cost pressures on education welfare have changed recently, please describe below.

Comments:

In 2013/14 and 2014/15 the LA has implemented changes that will reduce the expenditure on the service by £500k. This is to be achieved through a concentration on court related work that schools cannot undertake and by schools entering into a traded service for support or by undertaking the work themselves.

3 d) Is further clarification or guidance from the Department needed about our expectations in respect of education welfare services? If so, why?

Yes No Not Sure

Comments:

3 e) If your authority's expenditure is above the median (£14 per pupil) for this service, can you help us understand why this is?

Comments:

The service that currently remains

Preparing court cases

Court appearances

Training on court procedures

Tracking of attendance of vulnerable groups

Children missing not on roll or excluded

Support or challenge

Attendance checks on poorly performing schools

Monitoring performance checks although schools can buy in further support

See the response to 3c above as to how expenditure is being reduced.

The savings would need to be made around the support and challenge of school

3 f) What would prevent your local authority from reducing costs to match the lowest spending 25% of local authorities (£0 to £9)?

Comments:

The savings would need to be made around the support and challenge of schools

We would question how realistic the lower quartile figures are as a target for spending. We are surprised that a Local Authority can operate this service at no cost when there is still a statutory function of court proceedings that schools cannot pursue. The retained

duties from academies convey a duty on Local Authorities in this respect. If this is not the case or it can be delivered through schools then we believe further clarity is needed. LAs that show as having no expenditure are known to us as having a significant service.

Alternatively we wonder whether the costs are being passed to schools. If so a fuller analysis of the figures would be needed to determine whether this is a more efficient and effective way to deliver services.

- 3 g) Do you agree that the duties required for this service are fulfilled by local authorities, and therefore should be covered by the local authority retained duties funding (set out in Section 6)? If not, which aspects do academies hold responsibility for and should therefore be paid for by the standard ESG rate?

<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure
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Comments:

Central support services

- 4 a) Are there any reasons why local authority expenditure on central support services could not be significantly reduced, if not stopped altogether? Please give details below.

Comments:

Our figures are below the median

- 4 b) If you do not think this could be stopped altogether, how much of a saving could local authorities make to these services? If cost pressures on central support services have changed recently, please describe below.

Comments:

A significant element of our costs here is the free school meals eligibility service where the economic position, the growth in primary age population and the use of FSM eligibility for the two year old offer have all provided additional pressures on the system. With current requirements these could not be ceased at the present time.

If there was a data exchange with DWP for FSM eligibility for all pupils in the area then parents could simply be notified of eligibility without having to go through an application process. This would be similar to arrangements for the two year old child care offer where DWP provide the list of eligible parents for the LA to contact to secure access to the entitlement.

- 4 c) Is further clarification or guidance from the Department needed in order to have a clear set of expectations? If so, why?

Yes

No

Not Sure

Comments:

- 4 d) If your authority's expenditure is above the median (£6 per pupil) for this service, can you help us understand why this is?

Comments:

Our expenditure is at the median level and is expected to fall below it as staffing efficiencies through different It are pursued. 4b sets out the pressures on the service.

- 4 e) What would prevent your local authority from reducing costs to match the lowest spending 25% of local authorities (-£10 to £1)?

Comments:

Given the fact that the benchmarking data includes LAs that make a surplus from providing these services then the lower quartile would not appear to be a reliable or credible figure to use as a target for reduced expenditure. To arrive at this position it would be seen as acceptable to charge schools for parents securing FSM eligibility for their children.

Asset management

- 5 a) Which services are your local authority funding under the 'Asset Management' heading?

Comments:

This cover asset management planning, delivery of the school maintenance programme, checking of schools performance of statutory maintenance, asbestos management on school sites.

5 b) Could your local authority join up asset management relating to education with asset management across all local authority services, if this is not already happening?

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

There are links with the other Council asset management services and the cost reflects the appropriate level of the education element. Further integration of education and corporate assets support services is being developed.

5 c) Are there reasons why local authority expenditure on asset management, under the standard ESG rate, could not be significantly reduced if not stopped altogether? If cost pressures on asset management have changed recently, please describe below.

Comments:

The authority is responsible for the long term maintenance of its community

schools and needs to undertake asset management responsibilities to fulfil this. Including organising periodic building surveys as no suitable national alternative is yet available.
A similar role is expected to be performed in respect of VA schools through coordination of the LCVAP programme.

- 5 d) If you do not think this could be stopped altogether, how much could local authorities save by delivering this service in a different way?

Comments:

Some responsibilities could be transferred to schools in terms of annual survey data maintenance. However the incidence of long term maintenance is not one that schools could easily manage on their own. Similarly organising LCVAP programme across four organisations is not one that could be passed to schools individually.

- 5 e) Is further clarification or guidance from the Department needed in order to have a clear set of expectations? If so, why?

Yes

No

Not Sure

Comments:

Yes, clarity of the role of the Local Authority needed to be provided

- 5 f) If your authority's expenditure is above the median (£7 per pupil) for this service, can you help us understand why this is?

Comments:

Internal Note

Current average is £16 per pupil

The costs are above the national median as it incorporates an element for the cost of wages in London and the growth needed in primary places

- 5 g) What would prevent your local authority from reducing costs to match the lowest spending 25% of local authorities (-£1² to £3)?

Comments:

This would mean we would need to make a surplus of £30k or at a maximum cost £100k. Again we would question the credibility of the lower quartile figure as a target in this instance.

Premature retirement costs/ redundancy costs (new provisions)

² We do not know at this stage why this local authority has recorded a negative planned expenditure on this service and we will explore this during the consultation period.

6 a) Are there any reasons why schools could not take financial responsibility for redundancies? Please give details below.

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

6 b) If you are a local authority that is funding early retirement, why are you not requiring schools to do so?

Comments:

There is a small element, that in certain cases, we do not believe it is always appropriate to charge the school for redundancy costs resulting from the creation of federative arrangements or school intervention activity.

6 c) If your authority's expenditure is above the median (£0 per pupil) for this service, can you help us understand why you are spending that amount and what prevents you from reducing your expenditure to £0?

Comments:

Therapies and other health-related services

- 7 a) Given the high needs budget that local authorities have, and the improved joint working between health and education authorities which should result from the provisions within the Children and Families Bill, are there any reasons why funding for therapies and other health-related services should continue from ESG? If cost pressures on therapies and other health-related services have changed recently, please describe below.

Comments:

Therapies costs are not decreasing and if they were not able to be accounted for under this heading they would be a charge against the high needs block of the DSG i.e. the costs would be shunted from one part of the system to another. If it is felt they are more properly as DSG responsibility the funding should be moved to the DSG not deleted.

- 7 b) Is there a need for further clarification or guidance from the Department about what local authorities are expected to provide in terms of therapies and other health-related services. If so, why?

Yes

No

Not Sure

Comments:

This would be useful

- 7 c) If your authority's expenditure is above the median (£0 per pupil) for this service, can you help us understand why you are spending that amount and what prevents you from reducing your expenditure to £0?

Comments:

Monitoring National Curriculum assessment

8 a) What level of savings could local authorities make to this service?

Comments:

The cost is currently only £1 per pupil so is insignificant

8 b) If cost pressures on monitoring national curriculum have changed recently, please describe below.

Comments:

8 c) Is further clarification or guidance from the Department needed in order to have a clear set of expectations? If so, why?

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

8 d) Given that some local authorities are charging for this service and not incurring any net expenditure, is this something your local authority could do? If not, please help us understand why.

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

There needs to be further clarity on the expectations of whether LA's should undertake this duty

How the savings will affect academies

- 9 a) What level of saving could your academy make by adopting some of the strategies we have set out in Section 5 of the consultation document?

Comments:

n/a

- 9 b) Can you provide any additional examples of methods that academies can use to increase value for money from the ESG funding?

Comments:

n/a

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9 c) What would be the consequences of a less generous protection in 2015/16 for academies against losses in ESG than the protection offered in 2014/15?

Comments: n/a

9 d) What would be the consequences of reducing the academies rate of ESG to the local authority rate in 2015/16?

Comments: n/a

The local authority retained duties funding

10 a) What further savings could your local authority make from:

- i) education welfare services;
- ii) asset management; and
- iii) statutory and regulatory duties

As covered by the local authorities retained duties funding?

If cost pressures on the local authority retained duties have changed recently, please describe below.

Comments:

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10 b) Is further clarification or guidance about these duties from the Department needed in order to have a clear set of expectations? If so, why?

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

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.	<input type="checkbox"/>
E-mail address for acknowledgement:	

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

<input type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: aileen.shaw@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 19 June 2014

Send by post to: Emily Barbour, Funding Policy Unit, Sanctuary Buildings, Great Smith Street, London, SW1P 3BT

Send by e-mail to: esg.CONULTATION.education.gsi.gov.uk