



Department
for Education

Reforming how local authorities' school improvement functions are funded

Government consultation response

January 2022

Contents

Introduction	3
Who this was for	3
Consultation period	3
About the consultation	4
Context	4
Proposals	4
Summary	6
Question analysis and government response	7
Question 10	7
Government response	8
Question 11	9
Government response	10
Question 12	12
Government response	12
Question 13	13
Government response	14
Conclusion	15
Next steps	16
Annex A: List of organisations that responded to the consultation	17
Copy of all consultation questions	31

Introduction

In October 2021, we launched a consultation seeking views on our intention to remove the School Improvement Monitoring & Brokering grant ('the grant'), currently allocated to local authorities to support school improvement activities and make provisions within the School and Early Years Finance (England) Regulations for the financial year (FY) 2022-23 to allow local authorities to fund all of their school improvement activity via de-delegation from schools' budget shares.

The public consultation exercise sought views on making these changes and allowed respondents to express comments, views or concerns.

Who this was for

The following stakeholders were identified and consulted on the proposed changes:

- Local authorities (LAs)
- Schools and colleges
- Any other interested organisations and individuals

Consultation period

The consultation took place from 29 October 2021 to 26 November 2021. It was conducted online using the government's consultation software, or alternatively, respondents were able to email or send a response form.

About the consultation

Context

Since 2017, the Local Authority School Improvement Monitoring and Brokering grant ('the grant') has been allocated to local authorities (referred to here as 'councils') to support them in fulfilling their statutory school improvement functions under Part 4 of the [Education and Inspections Act 2006](#) and their additional school improvement expectations as set out in the [Schools Causing Concern \(SCC\) guidance](#) (collectively referred to as core school improvement activities). In summary, these activities require councils to monitor performance of maintained schools, broker school improvement provision, and intervene as appropriate. The grant is currently ringfenced and must be spent solely on the school improvement activities for which it is provided.

Since 2017 councils have also been permitted, with the agreement of their local schools forum, to de-delegate funding from their schools' budget shares, to fund the provision of additional school improvement services. These are activities that go above and beyond their core school improvement activities, and may include, for example, providing or funding access to school improvement support. Many councils will also provide additional school improvement and other services to schools on a traded basis, where school leaders choose to buy in services provided by the council.

The current funding arrangements presume that there is a clear distinction between core school improvement activities, for which the grant is provided, and additional activity, which councils fund through de-delegation or as a traded service. We believe this distinction no longer reflects the reality of how effective councils operate. Rather, we believe that, in practice, activity connected to their core school improvement activities forms part of a continuum of wider school improvement activity that councils may choose to undertake. In that context and taken together with the Secretary of State's responsibility to convert the poorest performing maintained schools (that Ofsted has judged 'Inadequate') into academies, it is unsurprising that whilst most councils continue to spend the full value of the grant, instances of councils exercising their intervention powers remain relatively low. This implies that the grant is predominantly used on early challenge and support in cases of potential underperformance, rather than use of formal intervention power.

Proposals

In view of this we proposed to (1) remove the grant over the course of FY 2022-23, and (2) include provision in the School and Early Years Finance (England) Regulations for FY 2022-23 which would allow councils to de-delegate for all school improvement expenditure, including all core school improvement activities, from maintained schools' budget shares.

Subject to the outcome of the consultation, we proposed that the grant would be ended with effect from the start of FY 2023-24, phased so that it would be reduced to 50% of the current amount on a per school basis in FY 2022-23 to give councils and maintained schools time to adjust to these new arrangements.

To ensure that councils remain adequately funded to exercise their statutory intervention powers we proposed to give councils the power in the School and Early Years Finance (England) Regulations to fund all school improvement activities, including core school improvement activities, via de-delegation of funds from maintained schools' budget shares, with the agreement of their local schools forum or the Secretary of State.

We asked respondents whether they agreed that in exercising their core school improvement functions that local authorities focused on early support and challenge; whether they agreed that our proposals would allow local authorities to ensure they remained adequately funded; whether we could usefully update any of our guidance to local authorities on their school improvement responsibilities; and whether they believed any of our proposals had the potential to have an impact on specific groups compared to others, in particular those who share protected characteristics.

Summary

In total there were 565 responses to the consultation. We have grouped the respondents by organisation type to support analysis of findings (see figure 1 below). We also discussed these proposals with several local authority and representative organisations during the consultation period.

Figure 1 – Breakdown of consultation respondents

Type of respondent	Total
Council	156
Local authority-maintained school	215
Academy or multi-academy trust	55
National organisation	16
Other	58
Not applicable or no response	65

A list of the organisations that responded can be found at Annex A, other than those who asked for their response to be kept confidential.

Overall, whilst many responses indicated that they understood the rationale for these proposals, we recognise the majority of respondents, in particular those from the maintained sector (councils and local authority-maintained schools), raised concerns. These centred on whether schools and councils would be able to absorb further funding pressures; what would happen if schools forums did not agree to de-delegation for core school improvement activity; and the desire for further clarity on what is considered core school improvement. Others noted the challenging implementation timescales.

We recognise the strength of feeling in the responses and have carefully considered the concerns outlined, and how they could be mitigated. Our detailed response with full analysis of the responses is set out below. Note, the total number of responses associated with each response type does not always equal 565 and the respective percentages do not always total 100, due to some respondents providing comments falling under more than one category, or not providing a response to that question.

Question analysis and government response

This section provides a breakdown of the responses received for each consultation question following a categorisation process and provides the government's response to the issues raised.

The consultation included 13 questions, the full list of which can be found at Annex A. The first nine questions gathered basic details about the respondent such as name, organisation and role. The remaining four questions are analysed below.

Question 10

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

Figure 2 – Breakdown of responses to Question 10

Response type	Number of responses	%
Agreed that this is the case	203	35.9
Disagreed that this is the case	175	30.9
<i>Of which:</i>		
- <i>Because they see no overlap in core and non-core functions</i>	22	3.9 (12.5)
- <i>Because the LA has used the grant for intervention and/or examples were provided of formal intervention</i>	36	6.3 (20.6)
- <i>Because LAs provide support before intervention becomes necessary and/or support before intervention is positive and/or the local authority has a school-led collaborative support system in place</i>	117	20.7 (66.9)
- <i>Other or no further reason given</i>	42	7.4 (24)
Not clear, or question not addressed / answered	187	33.1

* Numbers in brackets represent the percentages of those who disagreed. Note, the percentages do not always total 100, due to some respondents providing comments falling under more than one category, or not providing a response to that question.

Government response

Our Schools Causing Concern guidance sets out the core school improvement activities of councils, for which the local authority school improvement monitoring and brokering grant has been provided. This includes, but is not limited to, use of formal intervention powers.

The consultation set out our conclusions based on research and informal engagement with local authorities to date, which suggested that councils focus more on the non-intervention aspects of their core school improvement activities as they prefer to act before performance deteriorates to the point of requiring formal intervention, and that this overlaps with wider (non-core) school improvement provision. The largest proportion of respondents (35.9%) agreed this to be the case.

There were a substantial minority (30.9%) who disagreed. These responses have been analysed further, and it is clear only a very small minority have indicated they disagreed because they felt there was no overlap between core and non-core school improvement activity.

In contrast, the vast majority (66.9% of those who disagreed) indicated they disagreed because either their council provides early support and challenge before intervention becomes necessary; because their council has a school-led collaborative support system in place; and/or because they support councils providing support before intervention becomes necessary. While these respondents have indicated they disagreed with the question, we consider that their responses support the broader proposition that councils primarily exercise their core school improvement activities via early support and challenge rather than formal intervention.

In addition, there were a smaller number who indicated they disagreed because their council has formally intervened, in some cases providing examples of where they had done so, although not suggesting that is primarily how they have used the funding. As above, we are clear that councils' core school improvement activities are not limited to use of formal intervention powers, and we are not seeking to limit councils to only exercising their formal intervention powers.

We conclude therefore that consultation responses largely support our initial conclusions that with their considerable freedom to decide how to exercise their core school improvement activities, councils focus more on the non-intervention aspects of their core school improvement activities, and we agree that this is often the right approach to school improvement.

As the consultation noted, we are clear that councils are best placed to determine how to deliver the core school improvement responsibilities. However, the emphasis on early challenge and support also brings into focus that we do not provide a separate grant to Multi-Academy Trusts (MATs) to carry out the same sort of activity with their academies.

We instead expect MATs to fund this activity via deducting the cost of the activity from their academy budgets, and for this reason, we believe it is right to move towards removing this grant and putting school improvement funding on a more even footing

Question 11

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. 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.

Figure 3 – Breakdown of responses to Question 11

Response type	Number of responses	%	Council	Local authority-maintained school	Academy / Trust
Agrees	71	12.5	6	27	30
Disagrees	399	70.6	126	154	14
<i>Of which:</i>					
- <i>Because this will put pressure on school budgets, (in particular small, rural schools)</i>	272	48.1 (68.2)			
- <i>Because schools forums may not de-delegate sufficient funds and/or may lead to schools receiving inadequate support and/or LAs may not have sufficient funds to provide support</i>	227	40.2 (57)			
- <i>Because they want Government to continue providing funding to LAs for school improvement and/or because the system works well at present</i>	129	22.8 (32.3)			
- <i>Because there is insufficient time</i>	119	21.1 (29.8)			

Response type	Number of responses	%	Council	Local authority-maintained school	Academy / Trust
- <i>Because LAs provide local intelligence support to RSCs, particularly during the pandemic response</i>	106	18.8 (26.6)			
- <i>Because LAs have responsibilities for academies</i>	88	15.6 (22.1)			
- <i>Because they felt the proposals may incentivise academisation</i>	68	12 (17)			
- <i>Other or no further reason given</i>	180	31.9 (45.1)			
Not clear or question not addressed / answered	95	16.8	24	34	11

* Numbers in brackets represent the percentages of those who disagreed. Note, the percentages do not always total 100, due to some respondents providing comments falling under more than one category, or not providing a response to that question.

Government response

Most respondents (70.6%) disagreed that our proposals would enable councils to ensure they are sufficiently funded to exercise all their core school improvement activities. These responses have been analysed further to understand why respondents disagreed – with the vast majority indicating they disagreed because this would put a pressure on school budgets and/or that schools forums may not de-delegate sufficient funds to councils.

We recognise the concern that this change will put an additional pressure on school budgets. However, while we are not rolling the grant into dedicated schools grant (DSG) allocations, the recent Spending Review has announced an additional £1.6bn of core schools funding in 2022-23 compared to 2021-22, which is on top of the £2.4bn year-on-year increase already announced as part of Spending Review 2019. While we recognise schools' budgets face other pressures as well, the scale of this increase significantly offsets the pressure that may be felt through the loss of this grant, forecast to be worth c.£41m next financial year. And in line with other de-delegation decisions, the Secretary of State will retain the power to approve the de-delegation contrary to the decisions of the schools forum, if satisfied that the council had demonstrated such de-delegation was necessary to ensure the council is adequately funded to exercise core school improvement activities.

Having addressed these points, our view remains that councils will therefore be able to access sufficient funding to deliver their core school improvement activities, and that this change does not impose a significant new burden on them.

In addition, we recognise that many respondents would prefer Government continuing to pay this grant – however, as set out in the consultation, we believe this change will support our drive towards a school-led improvement system through putting more decisions about school improvement provision into the hands of school leaders; will bring funding arrangements for councils' school improvement activity closer into line with those in the academy sector; and will enable councils to better adjust over time to the Government's longer-term ambition for all schools to become academies within a strong trust. The responses to the previous question underline that we need to put school improvement funding on a more even footing.

We note too that a number of respondents felt there would not be sufficient time for local authorities and schools forums to agree de-delegation ahead of the next financial year, with a number highlighting it would be impossible to do so by the date of 21 January for making their Authority Proforma Tool (APT) submission to the Education & Skills Funding Agency (ESFA). We recognise these timescales will be more challenging than in other years but want to clarify that whilst councils need to submit their APT by 21 January, they only need to confirm schools' budget shares before de-delegation by 28 February, and confirm schools' budget shares after de-delegation by 31 March. ESFA are therefore happy to talk to councils on a case-by-case basis if, as a result of these changes, flexibility is required on timings for confirming de-delegation amounts and rates following the APT submission.

- NB. In APT submissions, councils will be able to deduct funding from maintained schools' budgets (with the consent of maintained school members of the schools forum) in much the same way as for existing de-delegated items in order to fund these services. The Education Functions worksheet should be used as it collects data on the services relating to maintained schools which local authorities can fund from the maintained school budget shares. This is a change from 2021 to 2022 arrangements where school improvement was included in general de-delegation not Education Functions.

We also note objections on the basis that through this core school improvement activity, councils are able to provide local intelligence to Regional Schools Commissioners, which in particular has supported responding to the pandemic. We recognise and value this close working, and by enabling de-delegation of budgets to cover school improvement activity, alongside continuing to pay the grant at 50% in 2022-23, we will ensure that this capacity can be protected.

We also received objections that councils have wider responsibilities, including towards academies. Whilst we recognise that councils will continue to have wider responsibilities, our guidance is clear that this grant has only ever been paid in relation to local

authorities' core school improvement activities relating to maintained schools, and further, the changes made to the conditions of grant in July 2021 formalised this position, such that this funding should not be used for wider purposes.

Finally, there was a not insignificant number who objected on the grounds that the proposals may incentivise further academisation. While we don't consider this a reason why councils would not be able to sufficiently fund themselves to exercise their core school improvement activities, we recognise there is a strength of feeling on this issue.

Question 12

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?

Figure 4 – Breakdown of responses to Question 12

Response type	Number of responses	%
Yes	197	34.9
<i>Of which:</i>		
- <i>Guidance needed on what is considered core school improvement activity that LAs can seek de-delegation for</i>	95	16.8 (48.2)
- <i>Guidance needed on what LAs are accountable for if they do not receive adequate funding to deliver core school improvement activity</i>	30	5.3 (15.2)
No further guidance required	84	14.9
Not clear or question not addressed / answered	284	50.3

* Numbers in brackets represent the percentages of those who provided suggestions.

Government response

Feedback showed that by far the most common theme arising in response to this question (48.2% of those who provided suggestions) was that respondents would welcome greater clarity on what is considered core school improvement activity that councils are expected to deliver. In light of this feedback, we will update the Schools Causing Concern guidance to make clear, as in the consultation, that as per page 36 of the guidance, core school improvement activity goes beyond exercising of formal intervention powers, and that councils should:

- Understand the performance of maintained schools in their area, using data as a starting point to identify any that are underperforming, while working with them to explore ways to support progress;
- Work closely with the relevant RSC, diocese and other local partners to ensure schools receive the support they need to improve;
- Where underperformance has been recognised in a maintained school, proactively work with the relevant RSC, combining local and regional expertise to ensure the right approach, including sending warning notices and using intervention powers where this will improve leadership and standards; and
- Encourage good and outstanding maintained schools to take responsibility for their own improvement, support other schools; and enable other schools to access the support they need to improve.

In updating the Schools Causing Concern guidance we will also make clear that these core activities only relate to maintained schools and not academies.

Beyond this, councils have considerable freedom to agree arrangements and associated funding with their schools forum, but to support such discussions, we will also clarify that the guidance does not require councils to provide or fund support themselves; and that we would normally expect the majority of activity to focus underperforming schools, rather than those rated good or outstanding.

The next most common theme was of respondents seeking guidance on what councils would be accountable for if they do not receive adequate funding to deliver core school improvement activity. As set out in the consultation, we intend to change the Schools and Early Years Finance regulations to enable local authorities to deduct funding from maintained school budgets to support this activity; and the Secretary of State would retain the power to approve the de-delegation contrary to the decisions of the schools forum, if satisfied that the local authority had demonstrated such de-delegation was necessary to ensure the local authority is adequately funded to exercise core school improvement activities.

Question 13

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.

Figure 5 – Breakdown of responses to Question 13

Response type	Number of responses	%
Would not expect a disproportionate impact on specific groups	50	8.8
The proposals will, or may potentially, have a disproportionate impact on specific groups	295	52.2
<i>Of which:</i>		
- <i>Because there would be reduced funding for LA support provision</i>	214	38.1 (72.5)
- <i>Because of the impact on school budgets</i>	105	18.6 (35.6)
Not clear or question not addressed / answered	220	33.6

* Numbers in brackets represent the percentages of those who believed the proposals will, or may potentially, have a disproportionate impact on specific groups.

Government response

Of those suggesting there will or may be potential negative impact the vast majority (72.5%) indicated this would be because of councils reducing the support they provide because of reduced funding going to councils. As set out above and in the consultation, we intend to change the Schools and Early Years Finance regulations to enable councils to deduct funding from maintained school budgets to support this activity; and the Secretary of State would retain the power to approve the de-delegation contrary to the decisions of the schools forum, if satisfied that the council had demonstrated such de-delegation was necessary to ensure they were adequately funded to exercise core school improvement activities. This means councils need not reduce the school improvement support they provide to maintained schools because of these proposals.

On which, there were also a significant minority who indicated there will or may be a potential impact on specific groups as a result of the impact of councils deducting funding from maintained school budgets. We have explored this further, comparing the potential impact in those councils where the impact on maintained school budgets may be comparatively higher than the national average, both in proportional and absolute terms.

Overall, this indicates that:

- Pupils attending religious schools make up a slightly higher proportion of maintained school pupils (35.3%) in those 15 councils in receipt of the largest

grant allocations (as a proportion of total maintained school budgets) than they do nationally (29.6%).

- Pupils from a minority ethnic background make up a lower proportion of maintained school pupils (23.0%) in those 15 councils in receipt of the largest grant allocations (in absolute terms) than they do nationally (36.2%).

While this analysis indicates a potential disproportionate impact on pupils attending religious schools, we note that in those 15 councils in receipt of the largest grant allocations as a proportion of total maintained school budgets, the current absolute level of the grant is on average low, with many councils receiving the minimum payment of £50,000, indicating any potential disproportionate impact on these pupils is likely to also be low.

Conclusion

We are grateful for the responses received, and for the ongoing role that councils continue to play in supporting schools and their pupils. We have carefully considered the key themes in the responses, which will shape how we implement these proposals. In particular:

- Councils and local authority-maintained schools value the early support and challenge which councils provide to maintained schools as part of their core school improvement activities and want this to continue. We will enable councils to deduct funding from maintained school budgets to ensure this can remain the case going forwards.
- There are concerns that these proposals will place a burden on maintained schools, and as a result schools forums may not de-delegate councils sufficient funds to deliver their core school improvement activities. We will reserve the right to permit de-delegation against the wishes of a schools forum in order to ensure councils are in sufficient funds to deliver their core school improvement activities, if satisfied that the local authority had demonstrated such de-delegation was necessary to ensure they were adequately funded to exercise their core school improvement activities as set out in the Schools Causing Concern guidance.
- There are concerns that there may be insufficient time for councils to arrange de-delegation in advance of financial year 2022-23. We have clarified that while councils need to submit their APT by 21 January, they only need to confirm schools' budget shares before de-delegation by 28 February and confirm budget shares after de-delegation by 31 March. ESFA are therefore happy to talk to councils on a case-by-case basis if flexibility is required on timings for confirming de-delegation amounts and rates following the APT submission.
- There were calls for greater clarity on what is considered core school improvement activity that councils are expected to deliver. We will update the Schools Causing

Concern guidance to make this clear, in particular that (i) core school improvement activity goes beyond solely exercising of formal intervention powers, and (ii) that the grant is provided to support core school improvement in maintained schools only; and does not require councils to provide or fund school improvement services themselves.

We recognise that there is significant concern, particularly from councils and the maintained sector about removing this additional source of funding. However, given one of the rationales of these proposals is to create greater parity between how school improvement is funded in the maintained and academies sector, which does not receive such additional school improvement funding, after careful consideration of the responses, the government intends to proceed with implementing the proposals.

As such, we will (1) reduce the grant by 50% for the FY 2022-23 and bring it to an end in FY 2023-24 and (2) include provision in Part 7 of Schedule 2 to the School and Early Years Finance (England) Regulations for FY 2022-23 which would allow councils to de-delegate for all improvement expenditure, including all core improvement activities. We will monitor the impact of the changes during the year.

Next steps

- **Mid-January 2022:** School and Early Years Finance Regulations 2022-23 (England) due to be laid in parliament
- **21 January 2022:** APT submission
- **28 February 2022:** Councils agree maintained school budget shares
- **By April 2022:** School and Early Years Finance Regulations 2022-23 (England) come into effect, permitting de-delegation of budgets
- **By end-April 2022:** Penultimate grant payment
- **By end-October 2022:** Final grant payment

Annex A: List of organisations that responded to the consultation

Achieving for Children

ADCS

ADCS - East Midlands Region

ADCS Yorkshire and the Humber

Air Balloon Hill Primary School

Albright Education Centre

All Saints'

All Saints C of E Primary School

All Saints' N20 Primary School

Area-Based Education Partnerships Association (AEPA)

Arnhem Wharf Primary School

Asby Endowed School

ASCL

Ashfield Junior School

Ashlands and Misterton Federation

Aston University Engineering Academy

Baginton Fields School

Barnet Education and Learning Service

Barnet Education and Learning Service Limited, responding on behalf of the London Borough of Barnet

Barnsley Council

Bartley Green School

Baysgarth School

BCP Council

Beacon Hill Community School

Beatrice Tate School

Beckington C of E VC First School
Bedford Borough Council
Bedgrove Infant School
Bellefield C of E Primary & Nursery School
Bellefield Primary and Nursery School
Bellevue Place Education Trust
Bildeston and Whatfield Federation
Birchfield Community Primary School
Birmingham City Council
Birmingham Education Partnership
Birmingham Safeguarding Children Partnership
Birmingham Schools Forum
Bishop's Hull Primary School
Blackburn with Darwen Borough Council
Black Combe Junior School
Blackpool Council
Bleakhouse Primary School
Blue Gate Fields Junior School
Bonner Primary School
Borrowdale CE Primary School
Bournemouth, Christchurch and Poole (BCP) SACRE
Bow School
Brandhall Primary School
Brent Council
Brent Strategic School Effectiveness Board
Brigg Primary School
Brighter Futures for Children (Reading)
Brighton and Hove Local Authority

Brighton and Hove Schools Forum
Bristol City Council
Broadleaf Partnership Trust
Brough Community Primary School
Brunswick School
Buckinghamshire Council
Bury CE Primary
Bury Council
Bushy Hill Junior School
Buxton Junior School
Calderdale MBC
Cambridgeshire County Council
Camden Council
Camden Learning
Castlebar School
Catholic Diocese of Northampton
Catholic Education Service
Central Bedfordshire Council
Central Foundation Girls' School
Cheshire East Council
Cheshire West & Chester LA
Cheshire West & Chester Schools Forum Finance Subgroup
Chilmark school
Chilthorne Domer Church School
Chilton Foliat CA VA Primary School
Christ Church CE Primary School
City of Westminster
City of Wolverhampton Council

City of York Council
Cockfield Primary
Colerne CE Primary School
Confederation of School Trusts (CST)
Congerstone Primary School
Coombe Bissett School
Cornwall Council
Corpus Christi Catholic Primary School
Coundon Court School
Coventry City Council
Coventry Extended Learning Centre
Coventry Schools Forum
Coventry Secondary Headteacher partnership
Coventry Secondary Headteachers' Partnership
Crosby Ravensworth C of E School
Crudwell CE Primary School
Cuddington and Dinton C of E School
Cumbria County Council
Delta Academies Trust
Denbury Primary School
Derbyshire County Council
Devon County Council
Diocesan Secondary School
Diocese of Bristol
Diocese of Ely multi academy trust
Diocese of Peterborough
Diocese of Worcester - Education Team
Discovery Schools Academy Trust

Dorset Council
Dover Grammar School for Girls
Dudley MBC
Dunraven Educational Trust
Durham Johnston Comprehensive School
Durrington CE VC Junior School
Ealing Local Authority
East Sussex County Council
Eastbury Community School
Eastern Green Junior School Coventry Local Authority
Edgewick Community Primary School
Education and Children's Services Group of Prospect
EKC Group and EKC Schools Trust
Ellingham Primary School
Elmfield School for Deaf Children
Enfield Council
Essex County Council
Essex Schools Forum
Evolution Academy Trust
F40 group
Fairlop Primary School
Farmor's School
Ferndown Upper School
Frederick Bird Primary
Frederick Gough School
Frogwell Primary School
Fynamore Primary School
Gateshead Council

GLA

Glade Primary School

Gloucestershire County Council

Grange Primary School

Grove Vale Primary

Guildford Diocesan Board of Education

Hallfield Primary School

Halton Borough Council

Hamilton School

Hammersmith and Fulham

Hampshire County Council

Hamstead Junior School

Hardenhuish School Governing Body

Haringey Education Partnership

Harnham Junior School

Harrow Council

Hawkesbury Primary School

Heddington Primary School

Herefordshire Council

Herringthorpe Infant School

HHJS

Hilmarton Primary School

Hitherfield Primary School

Holbrook Primary School

Ibstock Junior School

Imperial Avenue Infant School

Inspire Learning Partnership

Inspiring Primaries Academy Trust

Institute of School Business Leadership
Isle of Wight Council
Islington Council
Joint Coventry trade unions NEU, NASUWT and NAHT
Kent County Council
Killamarsh Infant and Nursery school
Kings Lodge Community School
King's Wood School and Nursery
Kirk Merrington Primary School
Kirkbampton CE Primary School
Kirklees Education and Learning Partnership
Kirklees Local Authority
Kiwi School
Knowsley Council
Kobi Nazrul Primary School
Lacock Primary School
Lancashire Schools Forum
Leeds Learning Alliance
Leicester City Council
Leicestershire County Council
LGA
Lincolnshire County Council
Lincolnshire Learning Partnership Board
Lincolnshire Local Authority
London Borough of Bexley
London Borough of Bromley
London Borough of Croydon
London Borough of Hackney

London Borough of Haringey
London Borough of Havering
London Borough of Hillingdon
London Borough of Lewisham
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Coordinators of Governor Services (LCOGS)
Lowther Primary School
Ludgershall Castle Primary School
Lumley Infant and Nursery School
Luton Borough Council
Lyneham Primary School
Lyng Primary School
Lytchett Minster School
Magdalen Gates Primary School
Magna Learning Partnership
Manchester City Council
Manor Fields Primary School
Marlbrook, Little Dewchurch and St Martin's Primary Collaboration
Marwood School
Mayflower School
Medway Council
Merton Council
Milborne Port Primary School
Milverton Community Primary and Pre-school
Moat Farm Junior School
Moat House Primary School

Monkton Park Primary School
Morland Area Primary School
Morpeth School
Much Wenlock Primary School
NASUWT
NASUWT - The Teachers' Union - Coventry Association
National Association of Head Teachers (NAHT)
National Education Union
National Governors Association
NEston Primary School
Neston Primary School, Wiltshire
Nether Stowey Primary School
Newcastle Board of Education
Newton Burgoland primary
Newton Hall Infants' School
Newton Tony Primary School
Nexus MAT
Norfolk County Council
North Somerset Council
North West Association of Directors of Children's Services
North Yorkshire County Council
Northumberland County Council
Nottingham City Council
Nottingham Schools Trust
Nottinghamshire County Council
Nova Primary School
Oakfield Academy
Old Oak Primary School

Old Park Primary School
Oldham Council
Oliver Tomkins Schools
Osmani Primary School
Otley and Winesham Partnership
Our Lady of the Assumption Catholic Primary School
Oxfordshire LA
Parkhill Junior School
Pennine Way Primary School
Phoenix school
Plymouth City Council
Polden Bower School
Primary School
Prince Regent Street Trust
public health Somerset County Council
RCBC
Rochdale Council
Rochdale Pioneers Trust
Rotherham Metropolitan Borough Council
Royal Borough of Kensington and Chelsea
Royal Latin School
Saint John Wall Catholic School
Salford City Council
Sandwell Borough Council
Sarum St Paul's Primary School
Schools Alliance for Excellence
Schools Forum
Sefton LA

SESLIP - the South-east Sector-led Improvement Partnership

Seven Sisters Primary School

Shaftesbury Junior School

SHARE Multi-Academy Trust

Sheldon School

Shirehampton Primary School

Silverwood School

Slough Borough Council

Society of County Treasurers'

Solihull MBC

Somerset County Council

South Gloucestershire Council

South Park Primary School

South West ADCS

Southampton City Council

South-east Sector-led Improvement Partnership (SESLIP)

Southwick CE Primary School

Special Educational Consortium

Sprowston Infant School

St Edward's School

St Helens Borough Council

St James cofE Primary

St John's and St Clement's Primary

St Johns Primary School

St Joseph's Catholic School

St Joseph's Catholic Primary School

St Mary's C of E Primary School

St Nicholas School

St Nicholas School Bromham
St Paul's C of E Combined School
St Thomas of Canterbury Catholic Primary school
St. Margaret's CE Primary
St. Paul's CE Junior School
Staffordshire County Council
Stanley Primary School
Stockport MBC
Stockton Local Authority: Education Improvement Service
Stone CE Combined School
Surrey County Council
Sutton Road Primary School
Sutton Veny CofE Primary School
Tameside Metropolitan Borough Council
Telford and Wrekin Council
Telford and Wrekin Local Authority
The Arun Villages Federation
The Church of England Education Office
The Claxton Trust
The Education People
The Grange School
The John of Gaunt School
The MFG Academies Trust
The Village Federation
The Weald and Downlands Schools Federation
Thomas Buxton Primary School
Thomas Hickman School
Thomas Hickman School, Aylesbury

Thornton-in-Craven CP School
Together For Children Sunderland Children's services
Tove Learning Trust
Tower Hamlets Council
Tower Hamlets Education Partnership
Tower Hamlets LA
Trafford Council
Tylers Green First School
Uckfield College
UNISON
Uplands Manor Primary School
Urchfont CE Primary School
Villa Real School
Villa Real Special School
Wakefield Council
Wandsworth Council
Warrington LA
Warwickshire County Council
WASSH
Water Mill Primary School
Wendover CE Junior School
West Berkshire Council
West Bromwich North Learning Community
West Coventry Academy
The Romero Catholic Academy
West Midlands Education and Skills
West Sussex County Council
White Woods Primary Academy Trust

Whitecrest Primary School

Wigan LA

William Davis school

William Murdoch Primary School

Wiltshire Council

Winterbourne Earls Primary School

Winterton Community Academy

West Midlands Local Authorities

Woodgate Primary School

Woodmancote School

Wootton Bassett Infants School

Worcestershire County Council

Yew Tree Primary School

Copy of all consultation questions

Preliminary questions

1. What is your name?
2. What is your email address?
3. Are you responding as an individual or as part of an organisation?
4. What is your organisation? (if applicable)
5. What type of organisation is it?
6. What is your role? (if applicable)
7. What local authority area are you based in?
8. Are you happy to be contacted directly about your response?
9. Would you like us to keep your responses confidential?

Consultation questions

10. 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
11. 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. 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
12. 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?
13. 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.



Department
for Education

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