

EIS Response to Scottish Government's Fair Funding Consultation

Introduction

As Scotland's largest Education union, representing over 55,000 members across all sectors and grades, the EIS (Educational Institute of Scotland) welcomes the opportunity to set out below our initial response to the consultation questions with a view to contributing to the debate about where change might advance and support effective teaching and learning and the well-being of students and staff, and where stability might achieve the same objective.

The EIS shares the Government's stated aims of raising attainment and seeking to address the poverty related attainment gap.

The EIS strongly believes that change needs to be evidence based, planned by educationalists with recent practical experience of schools, to have stakeholder support, and to be delivered within a realistic timeline with appropriate resources underpinned by local democratic accountability.

The Educational Rationale for Change

The EIS does not agree that the Government has provided a convincing rationale for change to the current funding structures, nor that it has provided any compelling evidence that its proposals will lead to improved outcomes for children. No clear educational rationale is presented as to how the funding changes will improve attainment or equity.

Furthermore, there is no clear rationale linking the proposed changes to governance structures, with the aim of empowering schools and headteachers, to other government programmes (such as GIRFEC or DYW) which set out to improve attainment and equity.

The EIS believes that the current system of funding is capable of delivering resources and accountability to the sector, and that the Government's aims of improving attainment and equity could be achieved by evolution of the current system as opposed to untested change underpinned by a new Education Act. If there is evidence that current capacity is not being used effectively that underlines the need for cultural change rather than structural.

The EIS believes that attainment and equity will be improved by investing in teachers, developing leadership skills, improving and making more consistent the level of Local Authority education support, and facilitating

greater collaborative working within and across Local Authorities and other stakeholders. In other words, some of the government's proposals, such as regional collaboratives, may be a good way of supporting improved attainment and equity if they are well developed and delivered. These potentially positive developments however, are not dependent on significant structural changes to the funding model of Scottish Education, although the level of resource, we believe, is critical.

Sequential or Concurrent Consultations?

The Government has consulted in "Education Governance: Next Steps" on its proposals on school governance and published an analysis of responses, and its list of actions. However, a number of these actions are vague and as a result there is no definitive new governance structure proposed for schools. Clearly, the Government is still considering how to proceed on these governance proposals, yet simultaneously it is consulting on how it funds schools in the Fair Funding Consultation. The EIS believes that this is less than ideal, especially as the PEF funding mechanism that is a key part of the Fair Funding Consultation has not completed a full financial cycle and has not been properly evaluated.

Foundations for Change?

A key document cited by the Government to support its proposals in the Fair Funding Consultation is the Accounts Commission School Education 2014 document, where it states: "*How councils allocate money and resources both centrally and at a school level is a decision for each council. Evidence from our literature review suggests that it is how councils decide to spend their education budget rather than the overall level of spend which has most impact on attainment levels.*"

The literature review cited in the report only cites one piece of literature; "Does money buy strong performance in PISA? Results in focus 2012; OECD, 2013; What makes a school successful?"¹ The full quote in the Executive Summary has a caveat that is not included in the Accounts Commission's report cited by the Government, and is below:

"PISA results show that beyond a certain level of expenditure per student, excellence in education requires more than money. Among countries and economies whose per capita GDP is more than USD 20 000, including most OECD countries, systems that pay teachers more (i.e. higher teachers'

¹ <https://www.oecd.org/pisa/keyfindings/pisa-2012-results-volume-IV.pdf>

salaries relative to national income per capita) tend to perform better in mathematics.”

The EIS believes it is important, therefore, to note that the OECD seems to believe there is a minimal core level of education funding required, and thereafter how additional funding is used is as important as to how much extra funding is provided. The EIS shares this view, and it could be argued that it reflects the current reality in Scotland – core education funding is given from the Government to Local Authorities, whilst additional funding to deliver equity is given directly by Government to schools with more controlled spending.

The same PISA report states in its Executive Summary that:

Schools with more autonomy tend to perform better than schools with less autonomy when they are part of school systems with more accountability arrangements and greater teacher-principal collaboration in school management.

This finding from the OECD Report does not support the notion of empowered headteachers – a key plank of the Government’s proposals. It proposes empowered schools with empowered teachers, working with headteachers – in other words the democratic schools model that the EIS has long championed.

The Fair Funding Consultation also refers to “Improving Schools In Scotland: An OECD Perspective²” (2015) which is also based on the 2012 PISA data and some more recent Scottish data. This was a substantial piece of work which gave a detailed picture of Scotland and its education system relative to Curriculum for Excellence in 2015. None of this report’s 12 recommendations, set out in the Executive Summary, refer to changing the school governance or funding structure.

In fact, the same OECD Report on Scottish education made it clear that Scotland’s education system needed cultural change rather than structural change.

Fair & Transparent Funding?

The Government, in the Fair Funding Consultation, appears to rule out a national funding formula for education (that would ring-fence education funding into schools) on the basis that it would introduce “*unacceptable instability and inflexibility*” - this is assertion rather than fact. No evidence is cited to support this claim.

² <http://www.oecd.org/education/school/Improving-Schools-in-Scotland-An-OECD-Perspective.pdf>

The Scottish Government also states in the Fair Funding Consultation that *"School funding is complex and lacks transparency."* The EIS disagrees with this statement; every Local Authority publishes how it allocates funding to schools and whilst a comprehensive picture is time-consuming to obtain it is easily available and thus transparent. It remains to be seen how simple and transparent it will be to follow the Government's PEF funding into each school.

The Government seems to be having it both ways – it will not use a national funding formula with ringfencing and yet it uses the variance in Local Authority education funding as a result of this to propose cutting Local Authorities out of much education funding. For the avoidance of doubt, the EIS has long supported ring-fenced education funding from the Government to Local Authorities. The EIS notes that the Government's PEF is ring-fenced and that delivery of Government assurances on the protection of teacher numbers required, ultimately, a very direct ring fencing of monies.

The Government and the EIS have previously done work on a national staffing formula – which is an approach the EIS still favours as a staffing floor. Whilst the Fair Funding Consultation paper highlights the different spending per pupil by different Local Authorities, it fails to put this into context. Furthermore, it fails to identify that if PEF funding is added to the pupil funding per head then the funding variance per head is likely to increase.

It should be noted, also, that the last few years have led to real terms cuts in public funding, including the funding to Local Authorities. The EIS believes that these cuts have had a negative effect on the education provision and that these effects should be disaggregated from looking at the efficacy of the current governance system.

The Fair Funding Consultation offers two funding models for consideration:

- giving funds directly to headteachers through the 'Headteachers' Charter'
- increased targeting of funds building on the Pupil Equity Fund (PEF) approach

The Headteachers' Charter is as yet undefined so it seems a little premature to be consulting on it as a basis for a funding model.

There may be a value to a 'Headteachers' Charter' but the EIS does not believe that it should be the underpinning for school funding, or that headteachers should have sole responsibility for allocated funding within their schools. This is not an approach to empower schools but to empower

headteachers. This approach is risky as it puts far reaching decisions in the hands of one person in each school, without a clear accountability.

The second option builds on the Pupil Equity Fund funding model currently in place in Scotland. This is a new funding model and its effectiveness is currently unknown. Anecdotal reports from EIS representatives create a concerning picture on the use of PEF funding – and wide divergence in its use. It is simply too early to say whether this is an effective model for the distribution for the Government’s education funding into schools.

Consultation on the two models is limited, of course, by a failure to define what level of funding is being discussed. Given that Local Authorities are to remain as the employer, is it reasonable to assume that this function will continue to be directed to Councils rather than schools? Are maintenance budgets to remain with Councils? Consultation without defining such key parameters runs the risk of being branded as superficial.

Other funding options are missing from the Fair Funding Consultation, but the EIS would suggest that there is still scope for the evolution of devolved general funding to schools from Local Authorities, as there is for further refinement of PEF funding.

Accountability

Whilst the EIS does believe that the schools can be responsible for greater (devolved) funding, the EIS believes that this should be through School Finance Committees, drawing membership from the entire school community and operating within a “democratic school” model.

According to the online Cambridge English dictionary, *“Someone who is accountable is completely responsible for what they do and must be able to give a satisfactory reason for it”*.³

The Fair Funding Consultation states that Local Authorities will be accountable for funding, and yet the proposals give headteachers decision making powers on funding. The EIS believes that for Local Authorities to be accountable then they must either make the funding decisions themselves or they must have oversight on headteachers’ decision making powers – including the right to over-rule headteachers’ funding decisions. Only those who exercise decision making powers can be accountable for those decisions.

³ <http://dictionary.cambridge.org/dictionary/english/accountable>

There is some anecdotal evidence that the PEF funding mechanism is paperwork heavy; the EIS is clear that administration and bureaucracy should not be conflated with accountability.

Local Authorities - Accountable for Devolved Schools?

The role of the Local Authority within the current education governance structure is clear and provides accountability for all decisions made within the Local Authority. Local Authorities' powers can enable educational consistency across a geographical area, provide sufficient resources to deliver on their statutory duties and are a safety net to schools and pupils. The EIS believes that the inconsistencies in the quality of education services delivered by Local Authorities is worthy of Government attention, but is not of itself an indicator of a flawed governance system.

The EIS supports the current Devolved Management System (DMS) within schools, which could support additional financial powers being transferred to schools where that is the wish of both schools and local authorities. The EIS is keen that funding decisions are transparent and accountable. Within a school context this cannot mean simply making the headteacher responsible for decisions. It requires a committee structure within schools which produces clear decisions with supportive, though minimal paperwork. The EIS believes that this democratic school model rather than one in which the headteacher makes such decisions alone would facilitate more consistent and sound decision making and would, through a collegiate process, relieve headteachers of the solitary burden of making unilateral decisions. This is consistent with much of the narrative on empowering teachers within both Government consultations on governance and fair funding, although not in any specific recommendation.

The costs associated with delivering the Government's funding proposals are not set out in the Fair Funding consultation document. The Deputy First Minister's introduction cites one source⁴ which implies that the targeted use of funding is more important than the overall level of funding.

The movement of powers from local authorities to schools was initiated for ideological reasons by successive Tory UK governments to reduce the power and influence of Local Authorities; "Devolved School Management" (DSM) in Scotland and Local Management of Schools (LMS) in England and Wales. Notwithstanding the revised DSM guidelines issued by the

⁴ Accounts Commission: School Education (2014)

Scottish Government in 2003, Scottish schools remain limited in this regard as Local Authorities retain most powers. For England and Wales, LMS led to all schools' governing bodies receiving the majority of Local Authorities' powers – leading to weaker Local Authorities with a limited educational role and a number of grant maintained schools.

In 1998, the UK Labour Government created "city academies" to address some "failing" inner-city schools. These were subsequently renamed as "academies" and the programme expanded massively by the 2010 Conservative UK Government for ideological reasons as academies sit outwith Local Authority funding and control, and have a governing body (or trust) that provides oversight to the headteacher.

A UK Government website⁵ states that academies are a means of *"Empowering the frontline and moving control away from managers and bureaucrats and directly to the frontline is an effective way of improving performance..."*

It could be argued that the Scottish Government's Fair Funding Consultation reflects similar aims. The EIS accepts that the Scottish Government has rejected the academies approach and it welcomes that decision. However, at one end of the spectrum of possibilities around the outcomes of the governance and funding reviews, the Scottish Government is in danger of creating schools with the same characteristics as "academies" in terms of reducing Local Authority power and increasing headteachers' powers, albeit "academies light" since the Government wish to nominally retain Local Authorities' accountability for schools.

How Local Authorities can retain accountability whilst headteachers have greater decision-making powers is difficult to envisage – and it is interesting that this consultation seems to be asking how it could be done. With the additional powers to headteachers and no governing body oversight, the Scottish Government's proposals for school governance go beyond the powers that headteachers have in academies in England.

It would be ironic if the outcome of the Governance Review was the anglicisation of Scottish education. The EIS does not believe that this is the intention of Scottish Government but the well-publicised tension between national and local government could lead to this outcome, if sensible compromise around roles and remits is neither sought nor found.

⁵ <https://www.gov.uk/government/news/10-facts-you-need-to-know-about-academies>

Empowering Schools or Headteachers?

The Government states that a variance in the quality of educational provision across and sometimes within Local Authorities is driving its governance proposals. It also highlights the variance in funding per pupil in the Fair Funding Consultation. Whilst the EIS is willing to support a regional improvement collaborative partnership model to improve attainment and equity by promoting good practice (i.e. provision), such a model cannot be allowed to become a further tier of governance; additionally, it will be essential for a pedagogical support model to be supported by additional funding or it simply becomes a structural exercise. It is difficult to see how devolving greater financial powers to headteachers will reduce funding variance per pupil.

The EIS supports empowered schools. The EIS believes that teachers, including headteachers, are the best placed people to make decisions in schools regarding teaching, pedagogy and priorities.

The 'democratic school' model has the empowered school at its heart, but an empowered school is about more than empowered headteachers – it is about empowering teachers. The OECD Report on Scotland (2015) stated:

"The power and leadership of school leaders, teachers and the profession does indeed need to be enhanced and consonant with the expectation that CfE will, in a real sense, be school- and teacher-led. But, we do not think that can be achieved just by augmenting school autonomy in the sense of giving greater freedom to individual school communities and head teachers untrammelled by engagement with others."

Empowered teachers are also a key feature of the Finnish education system, where decisions are often made by headteachers and teachers together. The OECD states about the Finnish education system:

"Finnish society and its education system place great importance on their schools and day-care facilities and trust the proficiency of their school leaders, teachers and educational staff, with no national standardised tests or high-stakes evaluations."⁶

It is worth noting that the OECD also states in its description of the Finland's educational context that:

"Governance of the education system is shared between central and local authorities. The Finnish Government defines and sets educational priorities, while municipalities (local authorities) maintain and support

⁶ <http://www.oecd.org/edu/highlightsFinland.htm>

schools and day-care centres and also have significant responsibility for organising education, funding and curriculum and for hiring personnel.”⁷

The EIS also believes that it is significant that the ‘Report of the Initial Findings of the International Council of Education Advisers⁸’ published in July 2017 made the following recommendation:

“The Council advised against becoming too focussed on changing the structure of the education system when, arguably, the more important aspects are the culture and capacity within the system.”

Headteachers have a key role to play in schools and the EIS supports giving headteachers some greater discretion within a context of empowered schools. The EIS believes that headteachers should be able to allocate resources that flow from decisions made at school level by teachers and headteachers – within the democratic school model.

There is currently a shortage of headteachers in Scotland. Adding to the list of headteachers’ duties and giving them significant statutory duties and increased financial stewardship may hinder future recruitment. The Fair Funding Consultation does not differentiate headteachers by size of school or by sector. There is anecdotal evidence that smaller schools, especially primary schools that have full LMS in Wales for example find the extra duties burdensome compared to the larger secondary schools.

The college sector in Scotland has been subjected to a number of governance breakdowns leading to a Ministerial Task Group to make recommendations on college governance in 2016. It is worth noting that all colleges have governing bodies, and yet these were unable to mitigate some of the bad governance examples created by a few principals. This scenario could be repeated in the school sector, if headteachers are not subjected to an appropriate level of accountability.

The EIS does not support the transfer of additional bureaucracy and administration to schools from Local Authorities⁹.

Conclusion

The EIS does not believe that either of the two funding mechanisms set out in the Fair Funding Consultation, in themselves, would drive an improvement in pupil attainment or equity. Furthermore, the EIS believes that proposals set out in the Consultation paper could possibly lead to a detriment in the current quality of provision as they could weaken local

⁷ <http://www.oecd.org/edu/highlightsFinland.htm>

⁸ <http://www.gov.scot/Resource/0052/00522962.pdf>

⁹ <http://www.oecd.org/education/school/Improving-Schools-in-Scotland-An-OECD-Perspective.pdf>

democratic accountability, reduce Local Authority ability to deliver planned educational services across an authority and overload headteachers with additional responsibilities without a transparent accountability structure.

The EIS shares the Consultation paper's aspiration of empowering schools. However, the reality is that the paper actually sets out ways to empower headteachers only and there is no specific action to empower ordinary teachers. One of the two funding mechanisms in the paper is to give headteachers additional responsibilities over financial and curriculum matters. The EIS believes that such powers could create an imbalance within schools and that weakened Local Authorities may not be able to provide the checks and balances for headteachers, leading to greater variance within the sector not greater collaboration.

The EIS believes the current arrangements around funding should evolve as collaboration develops between Local Authorities and between Local Authorities and Scottish Government – focussing on cultural rather than structural change.

The EIS shares the view of the International Council of Education Advisors, and believes that partnership working should be encouraged and further facilitated within the current governance and funding structures.

Question 1

(a) What are the advantages of the current system of funding schools?

The advantages of the current system are that national education policy is delivered by accountable and democratically elected local authorities, that are scrutinised by a number of bodies including Audit Scotland. The current governance system holds the decision makers accountable. Local Authorities' funding decisions are transparent, and a matter of public record published by each Local Authority.

The current system devolves some financial powers to schools, giving schools some local powers to vary staffing and curricula – although not all schools or Local Authorities use full devolved powers at school level.

The current system has been in place for almost forty years and as the Government's analysis of the governance consultation responses states:

"There was widespread support for the current governance system and an apprehension towards further change within the system – there is 'no need to fix something that is not broken.'"

It is clear that the current governance system allows most Local Authorities and schools to deliver high levels of attainment and equity, and therefore the system itself is no barrier to achieving the government's aims.

The current funding system allows resources to be handled and pooled at Local Authority level which allows the authority to fund duties for pupils across the authority – such as excluded pupils, ASN, early years etc. Furthermore, the current system allows for LAs to provide a safety net in funding for schools that vary in size and opportunity to pupils/staff to challenge decisions.

The current system allows headteachers to concentrate on providing leadership and educational support at the school. It maintains the educational focus of headteachers' role – preventing it from becoming a chief executive type role overly focussed on resources as opposed to pupils.

The current system also allows successful partnership working within (such as school clusters) and across Local Authorities (such as the Northern Alliance).

(b) What are the disadvantages of the current system of funding schools?

The disadvantage to the current system of funding is that Local Authorities provide varying amounts of funding per pupil, leading to a perception of a Local Authority lottery in education funding for pupils.

Furthermore, where there is no ringfenced Government funding for Education it is difficult for the Government to see how money for specific government programmes is channelled to schools, leading to a perception by Government that Local Authorities are not properly implementing Government policies.

With the Government's continued resistance to a national funding formula, and its proposed use of increased targeted funding for pupils, it is likely that the divergence in pupil funding per head is likely to increase.

The limited ability of Local Authorities to raise additional finance to support democratically agreed policies clearly acts as a limit on the ability of Councils to respond to local electorates.

Another clear disadvantage, in a time of austerity, is the competing demands of different service departments within Councils which may mean local decisions / priorities being out of kilter with national policy directives.

Question 2

(a) What are the benefits to headteachers of the current Devolved School Management schemes?

The EIS believes that current DSM schemes have the capability to deliver sufficient powers and proportions of resources to allow headteachers to lead successful schools, but clearly the critical element is the level of funding made available. There is solid evidence of successful schools in the high numbers of good, very good and excellent ratings awarded, as defined by HMIe inspection reports.

The EIS also believes that the oversight of headteachers by Local Authorities is important, as it believes that all decisions need to be accountable. Therefore, accountability and responsibility must lie in the same person or body.

(b) What are the barriers that headteachers currently face in exercising their responsibilities under Devolved School Management? How could these barriers be removed?

The EIS is not aware of any general feeling amongst headteachers that the DSM creates barriers for headteachers in exercising their responsibilities.

Question 3

How can funding for schools be best targeted to support excellence and equity for all?

The EIS believes in a ring-fenced national funding formula for Education services, and also a national minimum staffing formula for schools.

The EIS believes that general school funding that seeks to deliver excellence for all (i.e. increase attainment for all) should be delivered by Local Authorities, through enhanced devolved school management schemes.

Separate to general funding is additional funding that seeks to address the impact of poverty on educational attainment, a Scottish Government policy commitment. The EIS welcomes such additional monies but believes that such funding, as being ringfenced, should be transparent, accountable, effective (i.e. driven by evidence based policy) and funnelled through Local Authorities.

Question 4

(a) What elements of school spending should headteachers be responsible for managing and why?

The EIS believes that headteachers should be responsible for day-to-day management of schools and the spending associated with that (i.e. operational).

The EIS is not opposed to schools having more spending responsibilities or increased devolved powers – but is of the view that these should not simply sit in the hands of headteachers. The EIS supports a collegiate model of “democratic schools”.

(b) What elements of school spending should headteachers not be responsible for managing and why?

As Local Authorities are to remain as the employer and to have responsibility for the maintenance of the school estate, they clearly need to retain primary responsibility of budgets in these areas. Pulling Headteachers into this orbit risks distracting them from the leadership tasks associated with teaching and learning.

Council decisions need to be accountable, also, and indeed transparent. The EIS believes that all such decisions should be challengeable and ultimately reversible. Without these powers then the Local Authority is not properly responsible for decisions made within their schools – and thus cannot be properly accountable for them.

(c) What elements of school spending are not suitable for inclusion in a standardised, Scotland-wide approach and why?

If schools are to deliver the best possible service to all pupils then many will need to change their provision for less academic pupils and offer greater vocational training. The range of nature of vocational curricular options for pupils will vary according to local needs and partnership work with local colleges. This approach is consistent with the Developing the Young Workforce programme and is one which may lead to different schools having different curricular focus and staffing – none of which can be centrally planned.

Question 5

(a) What would be the advantages of an approach where the current system of funding schools is largely retained, but with a greater proportion of funding allocated directly to:

- 1. Schools;**
- 2. Clusters; or**
- 3. Regional Improvement Collaboratives?**

The EIS is not against a greater proportion of funding allocated directly to schools, but this is not the same as giving funding (and the responsibility for it) directly to headteachers alone. Increased funding to schools means decreased funding to Local Authority education support and programmes. These programmes, which are often aimed at ASN, vulnerable or disadvantaged pupils, may be lost or less effective if this funding is devolved to school level or if the Local Authority is unable to maintain staffing for such specialised programmes. In theory, highly devolved school funding could allow for the increased resources at school level to

be better applied for the benefit of individual school's pupils. The risk however is that many pupils supported directly by their Local Authority may lose out, or that devolved funding to schools may lead to the loss of efficiency gains generated by the use of central administrative functions at Local Authority level.

(b) What would be the disadvantages of an approach where the current system of funding schools is largely retained, but with a greater proportion of funding allocated directly to:

1. Schools;

2. Clusters; or

3. Regional Improvement Collaboratives?

There is currently no governance system in place or set out in the Fair Funding Consultation system that would allow for accountable direct public funding into school clusters or regional improvement collaboratives.

The disadvantage of giving additional funds to schools (or clusters or collaboratives) is that the Education support and programmes of the Local Authority are degraded and that on average the Local Authority's pupils do not benefit – or that current Local Authority targeted intervention programmes would be lost.

During the start-up period – some schools are likely to better use their additional resources than others leading to an inevitable dip in overall benefit.

Question 6

The Scottish Government's education governance reforms will empower headteachers to make more decisions about resources at their school.

What support will headteachers require to enable them to fulfil these responsibilities effectively?

The EIS notes view of the OECD 2015 Report¹⁰ on Scottish schools; *"The power and leadership of school leaders, teachers and the profession does indeed need to be enhanced and consonant with the expectation that CfE will, in a real sense, be school- and teacher-led. But, we do not think that can be achieved just by augmenting school autonomy in the sense of*

¹⁰ <http://www.oecd.org/education/school/Improving-Schools-in-Scotland-An-OECD-Perspective.pdf> p101

giving greater freedom to individual school communities and head teachers untrammelled by engagement with others.”

Headteachers will require more training in financial planning, and more support staff to carry out the additional associated bureaucracy and administration. It is doubtful that the current administration efficiency levels of Local Authorities will be maintained if all schools appoint additional administrative staff. Some headteachers may argue that with increased responsibilities come increased pay.

Placing all these additional and key responsibilities on one person, when they are currently resting with Local Authorities is a mistake in the view of the EIS. These responsibilities should be shared more widely rather than be attributed one individual, as the risk of individuals making poor decisions is greater than the risk of committees or democratic bodies making bad decisions.

The Government also proposes giving additional responsibilities in shaping the curricula to headteachers. The EIS would prefer for this responsibility to lie with the school – within a democratic school model – and for a linkage to be specified to the local regional (improvement) collaborative. If headteachers follow their own instincts on shaping the curriculum then the national improvements envisaged in the NIF and in Developing the Young Workforce programme may be lost.

Furthermore, the list of potential duties in the proposed headteachers’ charter seems to include some current duties held by the Local Authority. It is difficult to see how some of these can be realised by a headteacher without the resources of a Local Authority.

Question 7

What factors should be taken into account in devising accountability and reporting measures to support greater responsibility for funding decisions at school level?

The Government seems to have decided to move responsibilities from Local Authorities to schools without a clear mechanism of accountability.

The EIS strongly believes that decision makers need to be accountable; without that accountability, then poor governance is bound to follow. If decision makers are not accountable then they are likely to take more risks because they are protected against the risk and the other party will incur the cost (i.e. moral risk).

If Local Authorities are truly accountable for schools – as the Government sets out in its consultation paper – then they must have the power to

monitor all decisions in real time and to be able to challenge decisions. Ultimately that challenge must include the right to reverse a decision, for without power there is no accountability.

Question 8

Do you have any other comments about fair funding for schools?

The EIS supports the collaborative working proposals if they are delivered in a partnership model that is flexible enough for each region to develop according to their own needs and wishes.

The EIS supports empowering schools to make more decisions at school level, and shares the narrative for this with the Government's consultation documents. However, the EIS is concerned that in practice the Government seems to believe that empowering schools can only be done by empowering only headteachers – i.e. by giving them alone additional decision making powers and duties. The EIS does not support this approach and does not believe it will allow for an accountable system of school governance.

The EIS does not support either of the funding models put forward in the Fair Funding Consultation paper – using a headteachers' charter to give funding directly to headteachers or to use the current PEF model to deliver general funding directly to schools (thereby cutting out the Local Authority).

The EIS does support separate funding streams for school funding and those for specifically raising equity or other bespoke Government programmes. This means that Local Authorities should remain accountable and thus have a role to play in decision making over the use of school funds provided by the Government that seek to deliver improved attainment for all – which should be ringfenced. The EIS supports further evolution of the devolved management of schools if there is a demand for it – but seeks to ensure that decisions are made with a headteacher - teacher collaborative model as encouraged by the OECD as opposed to decision making by headteachers alone. The EIS recognises that funds from the Government to schools to deliver specific aims need also to be ring fenced and separate from the general Local Authority education budget – but that this funding should be no less accountable.