

Committee:	Schools' Forum
Meeting Date:	10 th July 2018
Title:	Suffolk's Future Policy for Funding High Needs Learners
Author:	Judith Mobbs and Jamie Mills
Decision making / consultative / information:	INFORMATION and COMMENT
Who can vote?	n/a

What is the Forum being asked to decide?

1. Schools' Forum are asked to note the outcomes of the recent consultation on high needs funding reform developed in partnership with the High Needs Working Group and the recommendations for implementation of the new policy proposed in response.
2. Suffolk County Council requests feedback from Schools' Forum on the proposed plans for new high needs funding policy.

Reason for recommendation

3. In 2014 the Education Funding Agency set out a series of funding reforms designed to improve the equity in funding of additional support for high needs learners in mainstream and specialist education provision. These reforms were based on moving to a model of needs driven funding rather than the provision based system that existed previously.
4. In Suffolk the current funding system for high needs has not been reformed since the introduction of these changes by the Education Funding Agency in 2014. There is widespread agreement across the system that the Suffolk high needs funding system should now be reformed and this is an action in the Suffolk SEND Strategy.
5. Following a period of development work with the Forum's High Needs Working Group, Suffolk County Council undertook a consultation throughout December and January on a series of proposals designed to fully embed the national funding reform of 2014 and to ensure that there is a more equitable, straightforward, and transparent funding system for all providers accessing the high needs funding across Suffolk. This paper sets out plans for implementation following the consultation and taking account of the responses from providers.

Alternative options

6. Remain with the existing disparate funding arrangements for Special Schools, Alternative Provision, mainstream and post-16 settings. These arrangements build inequity into the system and are the source of frustration and confusion to providers and families alike.

Who will be affected by this decision?

7. The proposed policy funding reforms for the high needs block set out in this paper will affect all providers who access funding through the DSG High Needs Block. This includes mainstream schools, special schools, PRUs, Alternative Provision Academies, FE Colleges and training providers.

Main body of the Report

CONTEXT

8. Over December and January Suffolk County Council consulted with stakeholders and residents on a series of reforms to the way in which high needs funding is allocated. This paper reports on that consultation and the proposed policy changes as a result. The reforms are a key element of Suffolk's response to its Area SEND inspection in December 2016 and are highlighted in the 2017-20 SEND Strategy. They are designed to establish a clearer and more equitable funding system which will better enable the council to deliver its statutory duty to provide mainstream education wherever preferred and practicable.
9. Currently over £10m of the £49m in the high needs block is spent on placements in the independent non-maintained sector. The consultation proposed an approach that would offer increased freedom to Suffolk's providers incentivising them to consider more bespoke learning packages. This should in turn reduce the need for reliance on the independent non-maintained sector with the aim of reinvesting more of the high needs block back in local provision and reducing overall funding pressures.
10. The proposals for policy change set out in this document have been developed in partnership with the Schools' Forum High Needs Group, Special Heads and PRU Heads.

CONSULTATION OVERVIEW

11. In order to ensure all education settings had the opportunity to contribute and provide their views regarding the proposed policy for funding High Needs Learners a consultation was held between December 13th 2017 and February 9th 2018. Educational Providers were given the opportunity to complete this survey either online or via a postal return. A total of 59 responses were received.

12. In addition, education providers were given the option to have a meeting with the County Councillor with responsibility for SEND and a senior officer from the Local Authority. These visits were well received by providers and created a further method of obtaining feedback. A total of 31 visits were undertaken to a variety of educational providers meeting a wide range of needs. Providers were extremely professional in ensuring they considered the general principles of the proposed changes, rather than looking at it solely from an individual educational settings perspective.
13. In addition to the consultation with providers, a parental consultation was also undertaken and this closed on May 16th. This was designed to give parents/carers an overview of the principles behind these changes. Parents/carers were invited to complete a survey and return either electronically or via post. In addition to this, three workshops were held in Lowestoft, Bury St Edmunds and Ipswich to give parents/carers the opportunity to ask questions and present views they may have with regards to the proposed changes. The feedback from the parental consultation has also been used to shape the final proposals set out here. It will also inform the way information about funding is provided to parents and published on the Local Offer website. A copy of the parental consultation is attached (Annex C)
14. There are two limitations to the consultation that need to be borne in mind when reading the results.
- The survey did not include a question to collect information about respondent's role in the current system and therefore we cannot analyse the responses by setting or stakeholder type. From the comments received we believe the majority of those who participated online were specialist settings. This would match the profile of visits we undertook – the large majority of which were to specialist settings. The survey was publicised through Suffolk Headlines and the Suffolk SENCO bulletin and both headteacher associations are part of the high needs working group, therefore it is disappointing that there has been very limited interest from mainstream schools.
 - If a respondent wished to answer "agree" or "disagree" they could not also leave a comment to expand their answer, so several people who would otherwise have selected "agree" or "disagree" chose to select "other" to enable them to leave a comment, therefore some of the "other" comments are also "agree" or "disagree" values.

KEY MESSAGES FROM THE CONSULTATION

15. A full copy of the provider consultation responses is contained within the report titled: Proposed changes to High Needs Funding: Online Survey and Visit Feedback attached at Annex B. Only headline points are summarised here.

Positives themes:

Overall respondents were positive about the changes proposed both in the survey and during the visits.

- **The Funding Principles:** A total of 77%, (37 of the 48 who answered the question) either strongly agreed or agreed with the proposed principles, as outlined in question 2 of the consultation, 2 of the 4 “other” responses also agreed. A significant number of responses also acknowledged a view that they did not feel the current targeted support formula was fair. This feeling was echoed during the visits undertaken by the vast majority of colleagues. In question 3 where people were asked for any further comments on the principles there were a number of comments about equality and equity, comments about ensuring funds were aligned to children’s needs and a request that the approach was coherent and a change for the long term. Parents were supportive of the principles proposed. **Response:** Adopt the principles as set out in the consultation and proceed with implementing a new high needs funding system based on the principles set out in the funding consultation.
- **Introducing a Universal high needs banding system** 75% of respondents either strongly agreed or agreed with the proposal to move to a universal high needs banding structure, question 4 of the consultation document. This equates to 37 respondents from the 49 who answered the question. Of the 7 “other” responses, 4 were in agreement with the principles, but had reservations, either about the differential application of the funding rate for FE or the band descriptors. Once again, the survey feedback was reiterated during the visits with a clear desire to have a transparent system that was understandable to all concerned, particularly parents/carers. Parents and carers want to be able to understand the new system so that they can have meaningful conversations with their child’s school about high needs funding. **Response:** proceed with a new universal banding system and ensure information produced is clear for all involved, including a parental guide.
- **Using same system for all children regardless of their setting:** There was a broadly positive response to the proposal of setting the same bandings across varying provision types. 58% of respondents either strongly agreed or agreed representing 29 responses from the 49 that answered the question. It was felt this would ensure there was a clear consistent process, understandable to all. Those who disagreed had concerns that further work was needed on the banding descriptors. This is addressed below. **Response:** proceed with a new universal banding system and ensure information produced is clear for all involved

Areas for development:

Although there were no responses which generated a particularly strong negative response, several respondents raised issues through the consultation

that identified concerns. These are set out below and have been considered in the proposals now being put forward for implementation.

- **Banding descriptors:** There was a widely held view that additional work was needed with regards to the proposed banding descriptors outlined within the original consultation document. Only 44% were supportive of the bands as currently expressed and a further 34% chose the “other category. Early feedback from parents and carers also indicates some concerns about the way language is used in the descriptors. A balance will need to be struck between ensuring that the banding descriptors can meet technical needs but also be acceptable to families. Some parent responses raised concerns about the language used being sensitive to their needs.
Response: A revised set of descriptors has been developed in collaboration with providers using a series of real child case studies to test and refine them. These now need to be tested in “live running”. These will best shared with parent reps and operate as a pilot set of descriptors during the 2018/2019 year with a review to undertake any further revisions needed in summer 2019.
- **Adjustments for small settings:** A few people fed back that the banding descriptors should acknowledge smaller provisions and additional cost potentially incurred against larger provisions. **Response:** no proposed changes as these banding descriptors are not meant to address the viability of individual providers – this would move them away from the principles of a universal system. If a child needs a very small group provision this will be reflected already in top up payments.
- **Allocation of bands and moderation:** Many respondents raised questions about the future process for decision making regarding allocation of bandings and review their subsequent review as individual needs change. Clarification as to how the proposed system will be monitored and the potential for abuse of the system, i.e. maintaining a band inappropriately to preserve funding levels. **Response:** Information about this process is currently being developed and will be shared with providers shortly.
- **Post 16 funding rates:** All Post-16 Providers raised concern regarding the proposal to fund post-16 placements at 75% of the band top up value. This is because the principle set out in the consultation document of post-16 placements only being 3 days per week does not hold true for many programmes, in some providers these are 4 or 5 days per week and providers wanted to continue this level of offer. A further point was made about the additional costs for some vocational programmes where these were less than five days e.g. a construction course vs an A Level in Business. Parents are very clear that they would not support any change that reduced provision from the current 4 or 5 days per week. **Response:** it is proposed to withdraw the 75% proposal for post-16 placements, particularly given that the FE sector is likely to experience a reduction in funding from the introduction of universal top-up bands.

- **Timescales:** A significant minority of respondents raised concern regarding the potential speed of implementation being too quick and the impact this may have upon educational providers, a few others were concerned it was too slow and those currently “under-funded” would have to wait too long, others were worried they needed more detail. **Response:** there is no plan to change the timescales. Transitional protection will mean that the changes could take 5 years or more to implement for some providers and the result is that the new system will not be fully operational until around 2024 with the current timescale. The LA suggests that it would be unreasonable to delay any further.
- **Viability of funding rates:** Concern from some providers that the banding model would not be financially viable from the indicative figures provided and from others that it would not be affordable. **Response:** the current indicative figures are a starting point for further work to be completed during this term on financial modelling at both a system and an institution level, this will determine the final banding rates and the indicative funds for each setting. It is not in the interests of the LA to destabilise providers and therefore we are keen to work with each provider to manage the change.
- **Timing for implementation in FE:** For FE we need to recognise that they have two types of provision – some students with high needs will be accessing mainstream provision and others are in specialist provision. **Response** It is therefore proposed that we should stage the changes in FE – introducing the new approach for mainstream students from 2018/2019 academic year and the new funding model for specialist courses from September 2019. This will align the implementation to that for the school system.
- **Variation of funding due to geographical range:** Request that consideration is given to the geographical range of some of the provisions and how this could potentially affect banding descriptors. **Response:** it is not intended to introduce a geographical factor into the banding system
- **Dual funded placements:** Concern from a few providers about the proposed changes to dual placement funding. LA officers are concerned that too few mainstream schools contributed to the consultation to ensure this was fully understood and commented on. **Response:** withdraw the current proposals and undertake further work in the autumn – with more involvement from mainstream providers – who were not well represented in the consultation responses

RECOMMENDATIONS FOR THE DEVELOPMENT OF A NEW HIGH NEEDS FUNDING POLICY

Considering the consultation feedback and responses proposed above the following recommendations are made in relation to the development of a new policy for funding high needs learners.

16. That the Local Authority will proceed with the implementation of a new high needs funding policy that will be sequentially implemented over the period September 2018 to September 2019, as set out in the timetable within the consultation document. The new policy will be developed based on the consultation proposals with the specific responses set out below.

Aspect	Consultation Proposal	Proposed Response
Principles	See principles as set out in consultation	The new policy will be based on the principles set out in the consultation document
Banding/Top Up Funding	Consultation proposal 4.6: <i>It is proposed to move to a single “universal” banding system for all children and young people in Suffolk 0-19 (25 with SEND). This will replace all the existing banding systems and better place parents and professionals to clearly see what level of need a child or young person has.</i>	<p>The Local Authority will adopt the proposal to move to a single “universal” banding system for all children and young people in Suffolk aged 0-19 years (25 with SEND).</p> <p>The Local Authority will set the band monetary rates at the same rate across all provider types and all age groups (not adopting the 75% rate for FE as previously suggested).</p> <p>Early years funding will remain the same as currently in approach. A piece of work to review this system will be commenced during 2019.</p>
Mainstream Inclusive Practice	Consultation proposal 6.9: <i>It is proposed that the maximum level of a schools notional SEN budget that is expected to be spent on pupils accessing element 3 funding is set at an initial rate 70%. (The funding for this will come from the current</i>	It is proposed to implement the proposal for a new formula for mainstream providers who have a high number of children with EHCPs. The final % will need to be confirmed after modelling to ensure affordability. This will be introduced from Sept. 2018.

	<i>funding level of SEN Targeted Support.)</i>	
Place Funding for Specialist providers	<p>Consultation proposal 7.4: <i>From 2018/2019 it is proposed to move to a place funding and commissioning system that is consistent across both special schools and AP providers including PRUs.</i></p> <p>Consultation proposal 7.5: <i>The commissioning requirements of the council will be determined by an understanding of historical requirements and the place planning set out in the SEND Sufficiency Plan. Place numbers by level of need will be agreed between providers and Suffolk County Council on an annual basis.</i></p> <p>Consultation proposal 7.6: <i>Funding will be based on a lagged system where the number of FTE places funded in year 2 will be based on the number of actual FTE places required in year 1. However, in line with guidance there will be an annual agreement between the commissioning authority and each provider to allow for exceptions to be made in cases where exceptional growth or shrinkage are expected.</i></p> <p>Consultation proposal 7.7: <i>Exceptional circumstances will be defined as plus or minus 5% of the provider's cohort or 5 FTE places whichever is the lower. For September 2019 the January 2019 census data would be used. The exceptions decisions for 2019/2020 academic year would be based on the Oct. 2019 census return.</i></p> <p>Consultation proposal 7:10: <i>The commissioning of places for PRUs/AP will consider the maximum level of need and the transitory nature of their intake. This is in recognition of the fact that they are required to provide for significantly different types of need at different times of the year and there is little consistency in their cohort needs.</i></p> <p>Consultation proposal 7.11: <i>It is not proposed as part of these reforms to suggest varying the value of each band for different key stages. Therefore, commissioning of places is</i></p>	<p>The proposals listed in the column to the left starting 7.4 are proposed for implementation from the consultation will be adopted in the new policy from September 2019.</p> <p>For Alternative Provision providers, in order to address the issue of stability in a system where the LA wants to encourage swift movement of children in and out of the provision, with a maximum of a two term stay for most, each provider will be allocated a number of banded places as a package to reflect the average make up of the cohort – rather than the band for each child being assessed on their specific needs on entry. Further modelling will be needed over the coming months to finalise this. It is also recognised that the current cohort of learners accessing alternative provision may not be the same profile as expected to be attending PRUs in the long term and may be awaiting specialist placement. This needs to be factored into short term planning arrangements. A key piece of work will be needed to determine the designation of pupils currently accessing the provision who require specialist placement and supporting them to an appropriate next placement promptly.</p>

	<i>not prescriptive across key stages giving providers and the commissioning authority maximum flexibility.</i>	
	Consultation proposal 7.8 will <u>not</u> be implemented: <i>Although the operational funding guidance allows for reductions in top up rates where the total number of commissioned places have not been required, it is not proposed to use such a system in Suffolk to maintain the principles of simplicity and transparency</i>	To make best use of the very limited amount of high needs funding available, the Local Authority continues to reserve the right to reduce top up rates where a provider has a significant excess of place funding (5% or more over) and there is no prospect of places being filled – i.e. the reverse situation of the exception clause where a provider over recruits.
	Consultation proposal 8.2: <i>It is proposed to move residential provision outside of the universal banding system so that the banding system remains a clear and concise codification of the child or young person's level of need.</i>	The LA will proceed with the disaggregation of the residential element from the banding system from September 2019. A piece of work has begun to determine a new policy approach for residential placements funded from the high needs block.
Dual Placements	Consultation proposal 9.2 <i>It is proposed that the funding for dual placements be reformed to mirror the principles of the universal banding system. From September 2019 it is proposed to use a pro rata of the top up funding to support any dual placements.</i>	In light of the feedback received during visits and upon further consideration the LA will not proceed with implementing the new proposals for dual placements in section 9 of the consultation. We recognise this need further work to create a system that incentivises all to be inclusive. We will work on new proposals for this and a further consultation with the High Needs Working Group to establish a more robust and viable system for dual placements.
Specialist Support Centres	Consultation proposal 10.3 <i>It is proposed to move the funding of pupils in SSCs commissioned by Suffolk CC to the same model of funding as other specialist provision, this would mean they receive 100% of the top-up banding rate in the future.</i>	The proposals set out relating to Specialist Support Centres will be implemented from September 2019. This means that from September 2019 SSCs will receive the full amount of top-up for each child. A stop gap arrangement has been put in place for 2018/19 year to ensure that no SSC provider is adversely financially affected by the introduction of the National Funding Formula.

17. Financial modelling and band rates. In the consultation document an indicative set of band rates was published. Financial modelling has been undertaken at a provision type level to indicate the potential financial impact of these proposals. This information is set out in the table below. Modelling has also been undertaken at a rate 10% below and above the indicative rate used in the consultation. It must be recognised that this modelling has used many assumptions and can only be taken as an indicative at this stage. It models the end position after any transition protection works through the funding system. It will take several years to reach this position. The short-term challenge is that there will be a need to potentially find additional funds in the short term to pay for additional funding into mainstream settings before funds can be recouped from the changes across the whole system. If the rates used in the consultation are adopted this would create a short-term cost pressure estimated to be between £250,000 and £300,000 for one whole academic year.

		2018/2019 Annual Top-Up Payments	2017-18 Modelled at Indicative Banding Rates		2017-18 at Proposed Bandings Plus 10%		2017-18 at Proposed Bandings Minus 10%	
PRUs (place funding)		£5,935,590	£4,226,100	-29%	£4,648,710	-22%	£3,803,490	-36%
Mainstream top-ups based on 2017/18		£4,725,750	£4,978,000	5%	£5,475,800	16%	£4,480,200	-5%
HIU/SLU units		£88,250	£125,200	42%	£137,720	56%	£112,680	28%
Spec. Support Units		£27,063	£608,500	2148%	£669,350	2373%	£547,650	1924%
Special Schools (Includes Suffolk One)		£8,596,110	£8,738,190	2%	£9,612,009	12%	£7,864,371	-9%
Further Education		£2,658,000	£2,433,100	-8%	£2,676,410	1%	£2,189,790	-18%
Mainstream SEN Targeted support		£774,000	£848,000	10%	£848,000	10%	£848,000	10%
Total		£22,030,763	£21,109,090		£23,219,999		£19,019,691	
Difference to current projected spend			£921,673		-£1,189,236		£3,011,072	
Budget Available 2018-19 & affordability	£20,791,129	-£1,285,510	-£317,961		-£2,455,160		£1,771,438	

18. Conclusions regarding financial modelling. In 2017/18 the top up budget was over-spent by £1.2m. This created the overall overspend of £1.2m within the High Needs Block of the DSG. If the new model is implemented using the indicative bandings that were published within the consultation this is modelled to cost £21.1m at 2017/18 demand levels. This option would there bring the overall spend back to a level that is nearer the available budget, with a projected overspend of £317k based on 17/18 demand. A lower rate per band would enable greater savings to be made, however this creates negative impacts on providers across the whole system and this was not the intention of this reform . It has always been the objective to rebalance the way the existing funds are spent – not to reduce the overall levels of spending within this part of the block. The higher rate per band is unaffordable as it would require a further £3m of high needs funding to be allocated from the Schools Block of DSG.

19. It should be noted that these indicative projections take no account of rising demand for high needs funding. During 2017 the number of applications for assessment for an education health and care plan more than doubled rising from 530 to 1113, a rise of 124% and the number of children and young people with an EHCP rose by 400 to 4036. This indicates the kind of pressure that the high needs block is under in terms of additional demand and this too will have a consequence on the overall cost of this model – however this same caveat applies to the current system.

20. It is therefore proposed that the banding rates set out in the indicative consultation are used for 2018/19 academic year for the allocations of top up funding to the mainstream schools and FE providers. However, Schools Forum should recognise that this adds a cost pressure of up to £300k within this period. Alongside this it is proposed that further work on affordability should be undertaken over the coming months and brought back to forum later in the year as part of consideration of implementation of transitional protection and the full funding model for 2019/2020 academic year.

Next Steps

The table below sets out a timeline for further work to take forward implementation of the new policy.

	High Needs funding for children attending Mainstream provision in schools and FE providers	High needs funding in specialist settings including special schools, specialist units and AP	LA Programme of work	Further consultation work
July 2018	Information shared with all mainstream providers regarding new system for HNF 2018/19	Publish indicative financial modelling information for each specialist setting	<p>Publish provisional banding descriptors for use in 2018/19</p> <p>Publish new funding policy</p> <p>Publish new templates for high needs funding applications</p> <p>Publish information about HN funding application and moderation process for 2018</p> <p>Confirm timescale and plan for residential implementation</p>	
August 2018				
September 2018	<p>New funding system goes live</p> <p>Rolling programme of application and interim moderation by year groups to allocate new bands to all learners by December</p>	Undertake further work with specialist providers to refine the planning assumptions regarding their banding profiles		Commence work to develop proposals for dual placements
October 2018			LA begins to allocate bands to children as part of EHC process	
November 2018		Confirm arrangements for transitional protection with modelling for each provider		Dual placement consultation commences
December 2018				
January 2019	Applications for additional cases for spring term considered			
February 2019		Confirm commissioned places for 19/20 based on Jan. 2019 census		

March 2019		Confirm place funding for 2019/20 including first year of transitional protection		Commence work to develop early years proposals
April 2019			New audit arrangements published to replace moderation from Sept 2019	
May 2019	Applications for additional cases for spring term considered			
June 2019				
July 2019				
August 2019				
September 2019	New audit arrangements begin and replace application and moderation process	New funding system goes live including residential		Implement new dual placement policy
October 2019		Exceptional cases for additional in year place funding considered following Oct census		

**CONSULTATION ON CHANGES
TO SUFFOLK HIGH NEEDS
FUNDING**

December 2017

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INTRODUCTION

The requirement to improve our high needs funding systems is an objective within the 2017-20 SEND Strategy for Suffolk which is a response to both the future strategic needs of the area and the outcome of the December 2016 SEND Area Inspection.

Over the last six months a review of high needs funding across Suffolk has been taking place. The factors that have caused this review are:

- the increasing pressure on high needs block funds
- the increasing number of children and young people (CYP) needing to leave Suffolk's local provision to be supported in the independent non-maintained sector
- a recognition that locally funding rates for individual CYP varied significantly depending on where they were educated
- a lack of clarity from providers and parents about how the high needs funding system works
- a perception of bias and lack of transparency and accountability.

This consultation aims to address these issues with a set of proposals to establish a simpler, clearer and more equitable funding system for children and young people with Special Educational Needs and/or Disabilities in Suffolk.

Suffolk is among the lowest funded areas for education in England. It is therefore essential that we use the funding we have as effectively as possible to benefit the greatest number of pupils.

As part of our commitment to co-production, the proposals contained in this consultation document have been developed in partnership with a range of provider representatives, primarily through the Suffolk Schools' Forum High Needs Working Group. However, we now need to broaden the conversation and we would very much welcome your views on these proposals.

Your contribution to this consultation and the development of a revised high needs funding policy is important to us and we will be seeking to speak with as many people as possible about these proposals, as well as asking for your views online and through other ways. Please take the time to respond with your ideas.

Cabinet Member for Children, Young People and Skills
Interim Director of Children's Services
Chair, Schools' Forum

Cllr Gordon Jones
Allan Cadzow
Alison Coleman

1. SCOPE

1.1 This consultation paper will be of particular interest to schools, colleges, academies and all other providers who receive high needs funding from Suffolk County Council. It will also be of interest to the pupils who access these providers, their families, and other stakeholders.

1.2 The proposed reforms set out in this consultation paper affect all education providers including

- nurseries and early years settings,
- mainstream maintained schools and academies,
- further education and sixth form colleges,
- special schools (including special academies and free schools funded in Suffolk)
- pupil referral units and alternative provision academies
- private training providers
- independent non-maintained schools and colleges

and all who are funded in whole or in part through the high needs block of the dedicated schools' grant (DSG). This includes special school and alternative provision provider funding allocations as well as high needs top up funding (element 3 funding) in mainstream and further education providers.

1.3 The scope of the consultation and proposed reform is significant. However, there are a number of policies currently operating in Suffolk which are not in the scope of the consultation. This includes the Specialist Support Centre (SSC) modifier currently in operation across Suffolk. SSCs currently receive 25% of the value of the mainstream banding. This is in recognition of the fact that they are paid £10,000 per place rather than having to find additional funding from their notional SEN budget. It is **not** proposed to consult on this policy as part of these reforms.

1.3 CONSULTATION QUESTIONS

QU 1.1 Do you agree with the scope proposed in section 1?

Yes/No

QU 1.2 If you answered no please provide further details below.

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.....

2. BACKGROUND: The Current Picture in Suffolk.

2.1 The high needs block of the dedicated schools' grant for Suffolk was £49m in 2017/18. Of this over £30 million is spent on either Element 3/top-up funding or placements in independent non-maintained schools. It is this £30m that forms the scope of these funding reform proposals.

2.2 Currently the money provides top up funding for approximately:

- 2000 pupils in mainstream schools (£3.87m)
- 430 pupils in alternative provision including pupil referral units (£6.35m)
- 1000 pupils in special schools, (£7.42m)
- 360 learners in the further education and post 16 sector (£2.79m)
- over 230 placements in independent non-maintained schools (£10.4m)

2.3 These numbers account for approximately 4% of the total school age cohort in Suffolk. The vast majority of these children and young people will have a statement of special educational need or an Education, Health and Care (EHC) plan, although it should be noted that top-up funding is currently available to children and young people without an EHC plan or statement where there is evidence of need. This will continue to be the case following the proposed reforms.

How the high needs funding system works

The high needs funding system has two main components: core funding and top-up funding.

Core funding

This is allocated to institutions in several ways, including:

- mainstream school and academy budgets, derived from the DSG schools' block and the pre-16 local funding formulae
- funding allocated to post-16 providers, including mainstream schools and academies, and FE institutions/ independent learning providers through the 16 to 19 national funding formula (sometimes called element 1) alongside place funding of £6,000 (sometimes called element 2 in post-16 settings)
- £10,000 per place, depending on the institution and place type (see the table at paragraph 54 below), which is drawn from the high needs block

The core funding is paid either by local authorities (for maintained schools and PRUs) or by the Education and Skills Funding Agency (ESFA).

Top-up funding

This is allocated by the Local Authority to institutions from the High Needs Block of DSG, and is sometimes known as element 3. Top-up funding is paid from the high needs budget of the local authority in which the pupil or student is resident or to which they "belong". If the cost of providing for a pupil with high needs is more than allocated through the core or place funding, the local authority will allocate the institution this additional top-up funding to enable a pupil or student with high needs to participate in education and learning.

Local authorities should work with providers in their area (particularly mainstream schools and academies, early years settings and further education institutions) to ensure there are clear processes for allocating top-up funding. Although many pupils and students receiving high needs funding will have EHC plans, local authorities have the flexibility to provide high needs funding outside the statutory assessment process for all children and young people with high needs up to the age of 19. The statutory assessment process is therefore not the sole means of securing additional support for children and young people with SEND. This doesn't replace the statutory right for institutions, parents or young people to request an EHC assessment, but

should provide local authorities with greater flexibility in meeting the costs of additional support for those with high needs incurred by institutions. Information about these processes should be published, for example in the local offer of SEND services and provision.

Core funding and top-up funding by institution

The following table sets out how high needs provision is funded in different types of provider for both pre and post-16 students for the 2018 to 2019 academic year.

	Pre-16	Pre-16	Post-16	Post-16
Type of provision	Core funding	Top up funding (real time)	Core funding	Top up funding (real time)
Mainstream schools, mainstream academies and mainstream free schools	Included within the per-pupil funding through the local schools funding formula. The first £6,000 of additional support costs is delegated within school budget and academy grant derived from local schools funding formula	Agreed per-pupil top up paid by commissioning local authority	Element 1 (based on 16 to 19 national funding formula) plus element 2 (£6,000) based on the number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority
SEN units and resourced provision in mainstream schools, academies and free schools	A combination of per-pupil funding through the local schools funding formula, plus £6,000 per place for those occupied by pupils on roll, and £10,000 per place for the remainder of places to be funded	Agreed per-pupil top-up paid by commissioning local authority	Element 1 (based on 16 to 19 national funding formula) plus element 2 (£6,000) based on number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority

	Pre-16	Pre-16	Post-16	Post-16
Maintained special schools, special academies, special free schools, and non-maintained special schools	£10,000 per place based on number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority	£10,000 per place based on number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority
Nursery schools	Per pupil funding through the early years funding formula. The place funding system doesn't operate in 0 to 5 year only settings	Agreed per pupil funding paid by commissioning local authority	N/A	N/A
Independent schools	Place funding system doesn't operate in independent schools	Agreed per-pupil funding paid by commissioning local authority	Place funding system doesn't operate in independent schools	Agreed per-pupil funding paid by commissioning local authority
Maintained pupil referral units, AP academies and AP free schools	£10,000 per place based on number of places to be funded	Agreed per-pupil top-up paid by commissioning school or local authority	Element 1 (based on 16 to 19 national funding formula) plus element 2 (£6,000) based on number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority
FE institutions, special post 16 institutions and ILPs	N/A	N/A	Element 1 (based on 16 to 19 national funding formula) plus element 2 (£6,000) based on number of places to be funded	Agreed per-pupil top-up paid by commissioning local authority

2.6 Additional detail and information on the national funding formula for high needs children and young people for all provider types can be found in the [“High Needs Funding: Operational Guide 2017 to 2018”](#) available of the Education Funding Agency website.

2.7 The current system for funding high needs provision in Suffolk is both complex and opaque. The table in figure 1. Shows the current equivalencies and funding rates for CYP accessing high needs (Element 3) funding.

Current Band					Current Top Up Funding Value			
Early Years	Mainstream	Alternative Provision	Further Education	Special Schools	Early Years	Mainstream (SSCs = 25%)	Further Education	Special School
Mainstream	Mainstream	Top up funding per place in AP providers uses the methodology	Mainstream	Place Plus Funding	£0	£0	£0	Place Plus funding
SEN Support	SEN Support	TB- PF/N (where TB= total budget; PF= place funding; and N= commissioned places) There are no bandings for additional need applied	Additional Support		£0	£0	£0	
Complex	1		1	5			£2,000	£1969-£7089
	2		2	4	£23.33ph	£750	£4,000	£2672-£8856
3	3		3	(£1049.85 max)	£2,000	£6,000	£3306-£10956	
Complex/ Severe	3		4	2	£36.67ph (£1650.15 max)	£4,000	£8,000	£3949-£13087
Severe	4		5	1	£50ph (£2250 max)	£6,000	£10,000	£4565-£15128
	OOO independent	OOO independent	OOO independent	6 OOO independent				£9888-£13275
								Individually commissioned in excess of £25,000 total

Figure 1: current high needs banding systems in Suffolk

2.8 It is clear from the table in figure 1 that there is little commonality in the current banding arrangements across provider types. In addition, there is little relationship between the levels of funding associated with a given level of need. This situation has led to confusion amongst parents, carers and professionals about what a fair level of funding for a child or young person is. Moreover the 2014 funding reforms were designed to move high needs funding and in particular special school funding to a more individual led rather than institution led system. The inconsistency of funding levels for similar types of needs across Suffolk goes against the principles for these reforms

- 2.9 The funding ceiling in all the current banding systems has been a disincentive to both special and mainstream schools from developing bespoke packages of support for those extremely vulnerable children and young people who currently and increasingly have to access provision out of county in the independent, non-maintained sector. This outcome is not always in the best interests of the child or young person nor in some cases does it support the council's duty set out in the code of practice to ensure value for money.

3. PRINCIPLES

- 3.1 The proposals set out in this consultation paper are designed to create a clearer, simpler high needs funding policy for Suffolk that is more easily understood by parents, carers and professionals across the system. They are designed to simplify the existing funding banding systems in operation in Suffolk into a single, universal banding system which is inclusive of all children and young people aged 0-25 so that a better understanding of that child or young person's needs can be gained.

- 3.2 The proposals put forward a set of reforms that will allow providers to better understand the thresholds between bands and offer some example strategies to support these. In addition, the process for accessing high needs funding will be made simpler for providers and easier to administer, freeing up capacity to be reinvested in front line delivery.

1. **Equality** - In line with the national funding principles these proposals are based on the principle that funding should be based on learner need. In short this means that a child in Ipswich and a child in Lowestoft, for example, should receive the same level of funding for the same level of need in the same type of provision. (It must be recognised however that different types of provider have differing needs and these should be taken into account as with other funding policies)
2. **Transparency** – high needs funding policy should be clear and easily understood.
3. **Value for Money** – The policy should support efficient use of public funds, making administration as streamlined as possible while ensuring that providers have access to funding in a timely manner
4. **Innovation** – High needs funding should support growth and innovation from Suffolk providers, allowing children and young people to be supported as close to home as possible and within a mainstream environment wherever this is practicable and desirable.
5. **Stability** – In a time of significant funding restraint and challenge any funding reform must be done in partnership with providers and ensure

that providers are supported through transition into the new funding arrangements. This should be seen in addition to the minimum funding guarantee which provides some budget protection for like for like places.

- 6. **Equality of opportunity** – In a time of funding constraint we must appreciate that high needs block funding spent on one child is not available for anyone else. Therefore, it is vital that all children and young people accessing high needs block funding have their needs met equally.
- 7. **Inclusion** – As a principle and in line with the statutory duty laid out in the Education Act 2005 Suffolk believes that although there will always be a very few children and young people whose special educational needs and/or disabilities require highly bespoke special provision, wherever practical and desirable children and young people should be supported to achieve within a mainstream environment. Where this is not possible, funding should support appropriate specialist provision as close as possible to their local community.

3.4 CONSULTATION QUESTIONS

QU 3.1 Do you agree with the principles above?

Yes / No

QU 3.2 Are there other principles that you think should be adopted? If so, what are they? Please use the space below to comment.

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4. A UNIVERSAL HIGH NEEDS BANDING SYSTEM FOR ALL CYP IN SUFFOLK

4.1 The cornerstone of the proposals to reform high needs funding policy in Suffolk is the move to a single universal banding system for all children and young people in Suffolk.

- 4.2 Currently the amount of high needs funding a child or young person receives is determined by their level of need depending on what type of provision they are attending. This system has developed over time and with little focus on ensuring consistency of funding or clarity of level of need across provider types.
- 4.3 As noted in section 2, the table in figure 1 shows the current equivalencies and funding rates for CYP accessing high needs (Element 3) funding.
- 4.4 It is clear from the table in figure one that there are significant disparities in the levels of funding both between and within providers types. In addition, the number of different bands and descriptors used to allocate an appropriate level of funding means that it is confusing for parent, carers and professionals to understand the needs of a particular child or young person.
- 4.5 Each type of provision currently uses bands based on descriptors around additional, complex and severe needs although there is little commonality between the understanding of these descriptors across the system.

Proposal

- 4.6 It is proposed to move to a single “universal” banding system for all children and young people in Suffolk 0-19 (25 with SEND). This will replace all the existing banding systems and better place parents and professionals to clearly see what level of need a child or young person has.
- 4.7 It is proposed to have nine bands running from A (for those requiring no additional support) to I (for very vulnerable CYP requiring highly significant specialist support and bespoke provision packages usually unavailable from within the local offer).
- 4.8 The work to develop the bands has been led by a working group of head teachers, SENCOs and SEND professionals and overseen by the high needs group of the Schools’ Forum. Figure 2 shows the high-level descriptors for the bands and how it is proposed that they relate to types of provision and the expectation of an EHC plan. It should be noted that the monetary values are for indicative purposes only.

Universal Band	Description of Need	Record Keeping	EHCP normally expected	High needs funding normally required	Band Value indicative figures provided for illustration only
Band A	<p>I can cope well with my progress and my achievement is in line with my peers. My needs can be met within mainstream differentiated learning.</p> <p>I learn in line with the expectations of other children my age. Although I may need some differentiation through quality first teaching I am able to meet or exceed progress and achievement in line with national norms</p>	Normal monitoring and record keeping by class teacher	NO	NO	£0
Band B	To keep up with children in my age group I need to take a bit longer to understand concepts and may need additional support to work effectively in groups. My needs can be met within mainstream differentiated learning	Monitoring by class teacher and SENCO. May require specialist advice or consultation.	NO	NO	£0
Band C	<p>I may not be working consistently at the level of my peers, but I am likely to achieve/exceed expected levels of progress with support. My engagement will be enhanced through curriculum differentiation, changes to schemes of work materials and recording.</p> <p>I may require personalised teaching throughout the curriculum with access to some small group and or individualised learning. Outreach services or adaptations to learning materials/differentiation of learning resources may be required to help me reach my potential.</p>	Regular detailed monitoring by SENCO. May require specialist advice or consultation. Records of additional costs should be kept.	NO	YES	(£1500)
Band D	<p>I may demonstrate substantial difficulties or a combination of significant difficulties in accessing learning in a mainstream environment. I potentially require intensive teaching and learning approaches to address specific needs.</p> <p>I may require modification of my attainment targets and access arrangements for assessment of progress. I may find it challenging to be able to achieve in line with their peers and my potential might be better realised in a specialist setting</p>	Costed provision map developed and regularly monitored, input from other agencies required. Annual review in place.	NO	YES	(£3300)
Band E	I have an assessed or diagnosed level of need as identified in the SEND code of practice 2014 and I will need additional specialist support. I am very likely to have an EHCP (or need to be referred for assessment).	Costed provision map in place. Regular (half termly) monitoring and review. Child centred annual review.	Likely	YES	(£5500)
Band	I have an assessed or diagnosed level of need as	Costed provision	YES	YES	(£8200)

F	identified in the SEND code of practice 2014. And the associated specialist support advice and guidance. I will require specialist support even within a specialist setting and I will have an EHCP which clearly identifies the specialist support needed.	map in place. Regular (half termly) monitoring and review. Child centred annual review.			
Band G	I have needs which are severe and significant but they are clearly definable and can be met within a specialised education setting. My needs have an impact on my functioning beyond my education setting and include my ability to engage in the community.	In addition to above: progress monitored at every stage. In addition, wellbeing will be consistently monitored.	YES	YES	(£10,500)
Band H	I have exceptional and profound difficulties which are likely to be permanent and currently have a significant impact on my ability to engage with my education setting and community. My needs are complex and require a highly personalised approach to teaching and learning through range of different specialist support.	In addition to above: regular multi-agency reviews required to monitor progress.	YES	YES	(£13,000)
Band I	I have severe and complex needs which require highly specialised settings, staffing and facilities, not found as part of the local offer. My needs are bespoke and have severe impact on functioning in any education setting and in the community.	As Band H	YES	YES	(<£16,000)

4.9 The detail of levels of need within each band are currently receiving further development. In order to demonstrate the proposed layout and type of detail being added, a complete set of detailed band descriptors are contained in Annex A. The detailed descriptors align the bands within the four SEND areas or need set out in the Code of Practice. These are cognition and learning; speech language and communication; social emotional and mental health; and sensory and physical needs.

4.10 While the overall descriptors are written as “I” statements the detail around strategies and levels of support and intervention required are based around practice models. This is designed to strike a balance between accessibility and a child centred approach with the specific needs of professionals who are required to put in place the necessary provision. As far as possible however, the proposed descriptors adhere to current good practice and do not specifically associate a level of need with TA or LSA hours.

4.11 The values shown against each band in figure 2 are based on initial modelling work undertaken to date. The methodology is contained in Annex 2. However, there is ongoing work throughout December – February to check the assumptions of the modelling and the appropriateness of the band values. This is being done through using the current mediation process for allocating bands as an opportunity to also notionally allocate one of the new proposed

universal bands. By mid-December therefore it will be possible to see whether the descriptors are written so as to support effective mediation and also the money attached to each band is appropriate to the level of need it describes.

4.12 The weighted pupil number in the table is designed to establish a ratio between each band. This is effect wold mean that it is agreed that a band H learner always attracts double the place funding of a band C learner. Any movement in the value of the bands, therefore, (for example as the reliance on independent provision reduces and more money is available for local schools) will always be equitably allocated.

4.11 CONSULTATION QUESTIONS

QU 4.1 Do you support the principle of the move to a universal high needs banding structure as the basis for high needs funding?

Yes/No

Please comment

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QU 4.3 Do you think that the number of bands proposed finds the right balance between simplicity and fairness?

Yes / No

QU 4.4 Please comment on how many bands you feel should be used and why?

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QU 4.5 Do you support raising the threshold for accessing high needs funding in order to effectively target funding at pupils with higher levels of need?

Yes/No

5. ALLOCATING FUNDING TO BANDS (including modifiers for different provider types)

- 5.1 The methodology for the value proposed for each band is set out in Annex B below.
- 5.2 It is proposed to set the band values fixed across all school types, mainstream, special, alternative provision, and across key stages 1-4 at a consistent level across all school types. This stays true to the principle of funding following the learner (section 3).
- 5.3 However, it is proposed to set out some exceptions for early years and further education providers in recognition of the significantly different funding mechanisms that support their provision.
- 5.4 Post 16 provision has a lower number of guided learning hours required to make up a “full time” curriculum. This often manifests itself in timetables being over three or four days per week rather than the five days found within schools. It is therefore proposed to fund FE bands at 75% of the top up band value. Although the majority of further education providers offer a three-day curriculum which suggests a 60% value, the 75% figure has been reached as an acknowledgement that further education providers do face some fixed establishment and staffing costs which could not be met at a 60% pro rata.
- 5.5 Early years settings have a fundamentally different system of allocating high needs funding based on an hourly rate. It is proposed to exempt settings funded through the early years system from these reforms until September 2020 in order to allow them to fully embed across compulsory education and post 16. However, it is proposed to move early years foundation stage into the universal banding system continuing to use an hourly rate equivalent for each band.

5.6 CONSULTATION QUESTIONS

QU 5.1 Do you agree with setting the same value per band across school types?

Yes/No

QU 5.2 Do you agree with maintaining the value of each band at the same level across key stages?

Yes/No

QU 5.3 Do you agree with the proposed 75% pro rata arrangement for post 16 and FE rates?

Yes/No

If no then what amount would?

QU 5.4 Please use the space provided below to add any further comments about the proposals set out in section 5

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6 SUPPORTING INCLUSIVE MAINSTREAM PROVIDERS (SEN targeted support)

6.1 Currently in Suffolk there is a formula designed to support mainstream schools who have a significant number of pupils accessing high needs (Element 3) funding. The current formula is based on a threshold of high need pupils in receipt of Local Authority top up funding, using the Autumn Term High Tariff Needs Funding Moderation return data and October school census number on roll data.

6.2 Suffolk has set the threshold of high needs pupils to pupils on roll at 5%. Where a school has more than 5% of its pupils accessing high needs (element 3) funding an additional payment is made to the school at the rate of £6000 for each pupil over the 5% threshold. See below for examples on how targeted funding would be applied.

6.3 Example 1:

- A primary school with 19 high needs pupils (in receipt of Top Up funding) and 170 pupils on roll at the October 2016 census would receive the following:
- 19 pupils as a percentage of 170 = 11.1% - Less 5% threshold = 6.1%
- October 2016 pupil count (170) x 6.1% = 10.37 pupils

- 10.37 pupils x £6,000 = £62,220 per year additional support (or £20,740 per term)

6.4 Example 2:

- A secondary school with 34 high needs pupils (in receipt of Top Up funding) and 576 pupils on roll at the October 2016 census would receive the following:

- 34 pupils as a percentage of 576 = 5.9% - Less 5% threshold = 0.9%

- October 2016 pupil count (576) x 0.9% = 5.18 pupils

- 5.18 pupils x £6,000 = £31,080 per year additional support (or £10,360 per term)

6.5 Current arrangements for targeted support are not clearly understood by schools and formula has the potential to penalise those schools who are inclusive and want to meet the needs of high needs pupils but their notional SEN budget is insufficient to meet the first £6000 of provision costs in all cases. Moreover, the current system in Suffolk means that it is possible that a provider is required to evidence spend in excess of their notional SEN budget on just those pupils who attract high needs funding.

6.6 For example, school D has a notional SEN budget of £56,000 and 203 pupils on roll and has 10 pupils who are in receipt of high needs funding. Expected school spend prior to high needs funding is £60,000 (10 x £6,000 element 2 funding). However, as the number of high needs pupils is less than 5% of the school roll they receive no targeted support.

Proposal

6.7 It is recognised that mainstream providers face challenges in meeting the needs of SEND pupils and that where a school has a high number of pupils who attract high needs funding but only receive a small notional SEN budget due to the characteristics of their intake. It is proposed implement a clearer simpler system for 2018/19.

6.8 The new system is based on the percentage of a schools notional SEN budget that is required to be used in support of those pupils in receipt of additional high needs funding.

6.9 It is proposed that the maximum level of a schools notional SEN budget that is expected to be spent on pupils accessing element 3 funding is set at an initial rate 70%. (The funding for this will come from the current funding level of SEN Targeted Support.)

6.10 Examples:

1. School A has a notional SEN budget of £130,000. It has 20 pupils in receipt of high needs funding. The total expected in the funding formula for that school to evidence in support of those pupils is £120,000 (20 x £6,000). $120,000/130,000 = 92\%$ School A would therefore **receive an additional £40,400** to give them a total notional SEN support budget of £170,400. ($120,000/170,400 = 70\%$)
2. School B has a notional SEN budget of £36,000. It has 3 pupils in receipt of high needs funding. The total expected in the funding formula for that school to evidence in support of those pupils is £18,000 (3 x £6,000). $18,000/36,000 = 50\%$. School B would therefore not receive any targeted SEN Support.

6.11 The benefit of the proposed system is that it allows schools in areas of low deprivation to still accommodate pupils with high needs without it impacting on their overall funding. This is intended to create an incentive to support Suffolk schools to be as inclusive as possible and allow smaller rural schools to cater for their local community without destabilising their funding.

6.12 CONSULTATION QUESTIONS

QU 6.1 Do you believe that the current targeted support formula is clear and fair to all Suffolk Schools?

Yes / No

QU 6.2 Do you agree with the proposed move to a formula based on a percentage of notional SEN budget?

Yes / No

Qu 6.3 Do you think that the proposed proportion of the notional SEN budget to support pupils who access element 3 funding (70%) is right?

Yes / No

7. FUNDING FOR SPECIAL SCHOOLS AND ALTERNATIVE PROVISION.

- 7.1 This section refers to proposals for place funding and commissioning arrangements within Suffolk's special schools and alternative provision settings. It applies only to those providers who are funded entirely from within the high needs block of the dedicated schools grant.
- 7.2 The basis for allocating funds to providers will be grounded in the practice and principles of the High Needs Operational Funding Guidance 2018/19.
- 7.3 The current arrangements for agreeing and commissioning specialist places in the further education sector will remain as they stand currently and are not affected by these proposed reforms.
- 7.4 From 2018/2019 it is proposed to move to a place funding and commissioning system that is consistent across both special schools and AP providers including PRUs.
- 7.5 The commissioning requirements of the council will be determined by an understanding of historical requirements and the place planning set out in the SEND Sufficiency Plan. Places numbers by level of need will be agreed between providers and Suffolk County Council on an annual basis.
- 7.6 Funding will be based on a lagged system where the number of FTE places funded in year 2 will be based on the number of actual FTE places required in year 1. However, In line with guidance there will be an annual agreement between the commissioning authority and each provider to allow for exceptions to be made in cases where exceptional growth or shrinkage are expected.
- 7.7 Exceptional circumstances are proposed to be defined as plus or minus 5% of the provider's cohort or 5 FTE places whichever is the lower.
- 7.8 Although the operational funding guidance allows for reductions in top up rates where the total number of commissioned places have not been required, it is not proposed to use such a system in Suffolk in order to maintain the principles of simplicity and transparency.
- 7.9 An example of how the commissioning process will look in practice is contained in the table below. In the example "A Suffolk School" is a special school that works with more complex needs pupils. The school therefore

does not have any pupils from bands C or D and the majority of its cohort are in the top two bands. The number of commissioned places agreed reflects as far as practicable multiples of the number of pupils expected to be in a class of that need level (12 per class at bands D and E, 8 per class for band F and 6 per class for bands G and H).

A Suffolk School				
Band	BAND VALUE	No of Commissioned places per Band	Place funding at £10,000 per place	Top up funding
BAND C	£1500	0	0	0
BAND D	£3300	0	0	0
BAND E	£5500	12	£120,000	£66,000
BAND F	£8200	32	£320,000	£262,400
BAND G	£10500	24	£240,000	£252,000
BAND H	£13000	48	£480,000	£624,000
TOTAL		116	£1,116,000	£1,204,400
			Total place funding	£2,320,400

- 7.8 Where providers have reached the total commissioned places for the year but are required to take pupils in excess of their place numbers (having been named in an EHCP as the most suitable provider) they will be paid the top up rate associated with the high need band identified in the EHCP or through the fair access process.
- 7.9 Where providers intake is within the total commissioned place numbers, but the numbers of pupils across the bands is not in line with the places agreed funding will be realigned in the following year. Thus, the basis for agreeing place funding for year 2 is the actuals a provider had in year 1.
- 7.10 The commissioning of places for PRUs/AP will take into account the maximum level of need and the transitory nature of their intake. This is in recognition of the fact that they are required to provide for significantly different types of need at different times of the year and there is little consistency in their cohort needs.

7.11 As has been stated in section 4 above, it is not proposed as part of these reforms to suggest varying the value of each band for different key stages. Therefore, commissioning of places is not proscriptive across key stages giving providers and the commissioning authority maximum flexibility.

7.12 CONSULTATION QUESTIONS

QU 7.1 Do you support the principle of a single place planning and funding system for both Special Schools and AP providers (including PRUs)?

Yes/No

QU 7.2 Does the commissioning system set out in section 7 provide an effective and equitable way of allocating high needs funds to providers

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QU 7.3 Do you agree that there should be no reduction in band value for top ups where providers have not met their commissioned FTE places?

Yes / No

8. FUNDING FOR RESIDENTIAL SPECIAL PROVISION

8.1 There is a small amount of residential provision funded within Suffolk’s Special Schools and AP providers. Current funding arrangements for CYP accessing special school residential provision are that they are funded at a specific residential banding irrespective of their needs. (This is band 6 shown in fig 1 above.)

8.2 It is proposed to move residential provision outside of the universal banding system so that the banding system remains a clear and concise codification of the child or young person’s level of need.

8.3 Work is currently underway to establish the best way to take forward the work of reforming the funding of residential provision within Suffolk.

8.4 CONSULTATION QUESTIONS

QU 8.1 Do you agree that funding for residential provision should be removed from the high needs band structure?

Yes/No

QU 8.2 In your opinion should residential funding be based on the principles set out in section 2?

Yes/No

QU 8.3 Please use the space below to provide additional comments

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9. DUAL PLACEMENT FUNDING

9.1 Dual placements arise where a pupil is on roll in two separate schools. This is usually a special school and a mainstream school. Dual placements arise to allow pupils who have a specific set of needs to access both more intensive pastoral, specialist support and broader more demanding curriculum. They are often used in support of transition arrangements.

9.2 Funding for dual placements in Suffolk is paid by the special school the child is enrolled at a flat rate of £1000 per term for each day of the week the pupil spends their mainstream school.

9.3 This arrangement leads to situations where the special school can be paying out significant amounts to support placements (up to £12,000 per year). The current formula does not take into account either the needs of the mainstream school or the funding given to the special school.

9.4 It is proposed that the funding for dual placements be reformed to mirror the principles of the universal banding system. From September 2019 it is proposed to use a pro rata of the top up funding to support any dual placements.

9.5 These changes do not affect the current arrangements in place to support children who attend PRUs/AP academies but remain on the roll of another provider.

9.6 Example 1:

A child at band 4 who has moderate learning disabilities and is dual placed between a special school and a mainstream school for 2 days and 3 days respectively.

Currently Special School A will receive £10,000 place funding plus a top up rate of £2672 for a band 4 pupil. This gives a total of £12,672 place funding. The special school then pays the mainstream school £1000 per day per term = £9,000 (3 days per week x 3 terms).

In the proposed model Special School A would potentially receive £15,500 for the pupil but will be required to pay the mainstream school 3/5 of the top up band value (one fifth per day of the week) or £3300

9.7 Example 2:

A child in band 2 with significant physical and personal needs and learning difficulties who is dual placed between Special School B and a mainstream school for 4 and 1 days respectively.

Currently Special School B receive £10,000 place funding plus a top up rate of £15,128 for a pupil in band 1. This give a total place funding of £25,128. The Bridge will then pay the mainstream £3000 (1 day per week X 3 terms).

In the proposed new model Special School B will potentially receive £10,500 for the pupil but will be required to pay the mainstream school 1/5th of the top up value or £2100

9.8 CONSULTATION QUESTIONS

QU 9.1 Do you agree with the proposed changes to dual placement funding
Yes/No

QU 9.2 If no, how do you think the current dual funding arrangements could be improved?

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10. POLICY IMPLEMENTATION SCHEDULE

10.1 The scope and level of the proposed high needs funding reforms has the potential to destabilise existing provision and support for vulnerable CYP in the county. It is important therefore that the implementation of the proposed reforms (following appropriate consultation) be clear, planned and well understood.

10.2 The timetable below sets out the proposed dates for implementation of the proposed reforms

FUNDING REFORM DEVELOPMENT AND IMPLEMENTATION TIMELINE	
DATE	ACTION
June to October 2017	Joint development of High needs Band descriptors.
September 2017	1st draft funding reform consultation document to High Needs Group
October 2017	2nd draft funding reform consultation document to High Needs Group
November 2017	<ul style="list-style-type: none"> • Pre-consultation with PRU and Special Heads • Joint moderation and band testing
November 2017	Final Draft Consultation to Schools' Forum
December 2017 – January 2018	Broad Consultation: <ul style="list-style-type: none"> • Survey Monkey/online • Individual meetings • Group work
December 2017 – January 2018	Refinement of detailed band descriptors
January 2018	Consultation to SEND Programme Board
February 2018- March 2018	Provider meetings
February 2018- March 2018	Response to consultation, high needs band testing and policy development
April 2018	Policy proposals to Schools Forum High Needs Group
April 2018	Policy proposals to Schools' Forum
ACTIONS BELOW ARE SUBJECT TO FORUM APPROVAL OF REFORMS	
April 2018	Indicative Allocations against new high needs bandings issued to Providers
September 2018	Universal Banding System comes into force for mainstream schools and further education
September 2019	Funding allocations based on new policy for Special Schools and AP/PRU Transitional Protection arrangements begin
September 2019	Universal banding system comes into force for early years settings
August 2024	Transitional protection period finishes

10.3 CONSULTATION QUESTIONS

QU 10.1 Do you find the implementation timescale realistic
Yes/No

QU 10.2 Do you agree with delaying the application of the new bands to Early Years until 2019?
Yes/No

QU 4 Please use the space below to provide further comment on the implementation timescale.

.....
.....
.....
.....
.....

11. TRANSITIONAL SUPPORT ARRANGEMENTS

11.1 The high needs block of the dedicated schools grant continues to be under considerable pressure and modelling work undertaken to date suggests that this pressure will not be fully addressed by the new national funding formula coming in for 2018/19. Therefore, the proposed funding reform in Suffolk must live within the current funding available. Suggesting a more transparent and equitable funding system will not increase the overall place funding available, rather it will distribute it in accordance with learner need rather than provision.

11.2 Because of this it is important to note that the higher the level of transitional protection offered to schools who may lose out, the longer it will take for the full benefits to be realised for those providers who gain,

- 11.3 The move to a funding system for high needs based on funding following the learner through a single banding system for all Suffolk CYP will inevitably have an impact on the funding that each provider receives. However, in order to cushion the rate of change that some providers may face a suite of transitional protections are being proposed. These are designed to build upon the funding protection set out nationally.
- 11.4 National funding guidance puts in place a protection for providers called the minimum funding guarantee (MFG). The MFG for 2018/19 states that like for like place funding in any school cannot be less than -1/5% of the previous year's funding rate per place. Further information about the MFG including example of how it operates in practice can be found in the 2017/18 High Needs Funding Operational Guidance.
- 11.5 In order to allow sufficient time for Suffolk schools and providers to adjust to the new high needs funding policy it is proposed to stick to the national MFG and not apply to the ESFA for a derogation. In addition, it is proposed to guarantee to hold to the current MFG rate even in the event that nationally MFG is adjusted or removed altogether.
- 11.6 Practically that means that it will take between five and seven years before all transitional arrangements are completed and the new funding system is fully implemented.

11.7 CONSULTATION QUESTIONS

QU 11.1 Do the proposed transitional support arrangements provide enough security for providers

Yes/No

QU 11.2 What additional transitional protections would you like to see

.....

QU 11.3 Do you agree with timescale proposed for aligning all providers to the new funding arrangements?

Yes / No

QU 11.4 If answer is no to QU 2 how you do you think the timescale should be?

.....

12. EVIDENCE REQUIREMENTS

- 12.1 In order to determine the appropriate level of support required by each child or young person Suffolk Council officers currently request and gather a range of evidence from providers, parents, and assessments from SEND professionals.
- 12.2 It is proposed to have a single suite of evidence requirements for applications for both an EHCP and applications to access High Needs funding. The evidence requirements for both an application for an EHCP and application for high needs funding have the same basis although a higher evidential threshold is required for an ECHP to be issued.
- 12.3 The evidence set for accessing high needs will comprise of
- High Needs Funding Application Form
 - Individual learning Plan
 - A costed provision map demonstrating targeted support over the previous four terms
 - A succinct pen picture of the child/young person, detailing their needs, targets/outcomes to meet the needs, and a rationale for funding.
 - A copy of the EHC Plan (if the child or young person has one) and the last Annual Review/Annual Person Centred Review
 - It is likely that a pupil with this level of need will also have a school based support plan and this should also be included with evidence of review.
- 12.4 Early years providers, Schools and FE colleges are able to apply for Element 3 funding (“Top Up”), even if the child does not have a Statement or an EHC Plan. **However**, only Element 3 funding granted by the LA for a child/young person with an EHC Plan can be classed as a personal budget. If the child/young person does not have a EHC Plan the Element 3 funding granted is a support cost and not eligible as a personal budget.

ANNEX A

DETAIL OF HIGH NEEDS DESCRIPTORS

Universal Band	Description of Need	Record Keeping	EHCP normally expected	High needs funding normally required	Band Value
Band A	<p>I can cope well with my progress and my achievement is in line with my peers. My needs can be met within mainstream differentiated learning.</p> <p>I learn in line with the expectations of other children my age. Although I may need some differentiation through quality first teaching I am able to meet or exceed progress and achievement in line with national norms</p>	Normal monitoring and record keeping by class teacher	NO	NO	WPN= 0 £0
Band B	To keep up with children in my age group I need to take a bit longer to understand concepts and may need additional support to work effectively in groups. My needs can be met within mainstream differentiated learning	Monitoring by class teacher and SENCO. May require specialist advice or consultation.	NO	NO	WPN = 0 £0
Band C	<p>I may not be working consistently at the level of my peers, but I am likely to achieve/exceed expected levels of progress with support. My engagement will be enhanced through curriculum differentiation, changes to schemes of work materials and recording.</p> <p>I may require personalised teaching throughout the curriculum with access to some small group and or individualised learning. Outreach services or adaptations to learning materials/differentiation of learning resources may be required to help me reach my potential.</p>	Regular detailed monitoring by SENCO. May require specialist advice or consultation. Records of additional costs should be kept.	NO	YES	WPN = 1 (£1500)
Band D	<p>I may demonstrate substantial difficulties or a combination of significant difficulties in accessing learning in a mainstream environment. I potentially require intensive teaching and learning approaches to address specific needs.</p> <p>I may require modification of my attainment targets and access arrangements for assessment of progress. I may find it challenging to be able to achieve in line with their peers and my potential might be better realised in a specialist setting</p>	Costed provision map developed and regularly monitored, input from other agencies required. Annual review in place.	NO	YES	WPN =1.16 (£3300)
Band	I have an assessed or diagnosed level of need as	Costed provision	YES	YES	WPN=1.35

E	identified in the SEND code of practice 2014 and I will need additional specialist support. I am very likely to have an EHCP (or need to be referred for assessment).	map in place. Regular (half termly) monitoring and review. Child centred annual review.			(£5500)
Band F	I have an assessed or diagnosed level of need as identified in the SEND code of practice 2014. And the associated specialist support advice and guidance. I will require specialist support even within a specialist setting and I will have an EHCP which clearly identifies the specialist support needed.	Costed provision map in place. Regular (half termly) monitoring and review. Child centred annual review.	YES	YES	WPN = 1.58 (£8200)
Band G	I have needs which are severe and significant but they are clearly definable and can be met within a specialised education setting. My needs have an impact on my functioning beyond my education setting and include my ability to engage in the community.	In addition to above: progress monitored at every stage. In addition, wellbeing will be consistently monitored.	YES	YES	WPN = 1.78 (£10,500)
Band H	I have exceptional and profound difficulties which are likely to be permanent and currently have a significant impact on my ability to engage with my education setting and community. My needs are complex and require a highly personalised approach to teaching and learning through range of different specialist support.	In addition to above: regular multi-agency reviews required to monitor progress.	YES	YES	WPN = 2 (£13,000)
Band I	I have severe and complex needs which require highly specialised settings, staffing and facilities, not found as part of the local offer. My needs are bespoke and have severe impact on functioning in any education setting and in the community.	As Band H	YES	YES	WPN =2.25+ (<£16,000)

This section contained the first draft of detailed banding descriptors – not included here to reduce the length of the paper

ANNEX B

subject:	Proposed changes to High Needs Funding: Summary of Consultation Feedback from Providers
author:	Jamie Mills
date:	<u>6 March 2018</u>
Purpose <ul style="list-style-type: none">• This paper will provide an update regarding the feedback provided from the online survey and visits undertaken over the proposed changes to the High Needs Funding arrangements, subsequent actions and potential further work required.	

1. Overview

As part of the consultation process regarding the proposed changes to Suffolk's High Needs Funding arrangements, stakeholders were given the opportunity to complete an online survey providing their views on the proposed questions set out within the consultation document. In addition to this, they were also offered the opportunity to have face to face meetings with a senior Local Authority Officer and the Cabinet Member with responsibility for SEND to discuss the proposed changes and any thoughts they had regarding the general principles of the consultation document.

It is acknowledged the proposed changes are significant, not only in terms of financial commitments, but also with regards to changing a long-standing process embedded within both schools and the Local Authority. Therefore, providing educational settings the opportunity to respond through a convenient means at a time suited to them, was vital in order to gain a wide range of views. This approach also ensured the views captured were from a wide range of settings, rather than a specific cohort, allowing for a more balanced feedback return.

A total of 59 responses were received to the online survey. As these were anonymous, it is not possible to establish a particular theme in terms of a specific profile of learner catered for, or pockets of concern within certain geographical areas of the county. However, when considering the total number of educational establishments within Suffolk, the number of responses is pleasing.

In addition to this survey a total 31 visits were carried out during the consultation. These included a number of MLD, SLD, FE providers, APs and mainstream schools. Each visit was designed to allow sufficient time to discuss any points of clarification, whilst ensuring ample opportunity for any general concerns or suggestions to be made. Whilst it was acknowledged that individual providers

would inevitably wish to raise concerns regarding their own establishment, the emphasis was placed upon feeding back on the proposals as a whole in order to ensure a well-rounded response. It is pleasing to report educational settings were excellent at providing this balanced overview of the proposals without dwelling upon individual circumstances.

2. Key Themes

A summary of the survey feedback is contained within appendices; however, it is clear there are some key themes identified for further consideration and development.

Positives themes:

There was a clear response of positivity regarding the proposed changes.

- A total of 77% of responses either strongly agreed or agreed with the proposed principles, as outlined in question 2 of the consultation. A significant number of responses also acknowledged a view that they did not feel the current targeted support formula was fair. This feeling was echoed during the visits undertaken by the vast majority of colleagues.
- 75% of respondents either strongly agreed or agreed with the proposal to move to a universal high needs banding structure, question 3 of the consultation document. Once again, the survey feedback was reiterated during the visits with a clear desire to have a transparent system that was understandable to all concerned, particularly parents/carers.
- There was a generally positive response to the proposal of setting the same bandings across varying provision types. It was felt this would ensure there was a clear consistent process, understandable to all.
- There was a small percentage (4.4%) who either disagreed or strongly disagreed with the proposal changes to dual placement funding. Unfortunately, the reasons behind this disagreement were not outlined via either the survey responses or during the visits undertaken.

Areas of development:

Although there were no responses which generated a particularly strong feeling of concern, there were areas it would be prudent to explore in greater detail.

- It was quickly identified via the meetings, and subsequently from the survey results, that some additional work would be required with regards to the proposed banding descriptors outlined within the original consultation document. As a result, a more detailed set of descriptors is being drawn up. Work is being undertaken with a number of stakeholders to ensure they are fit for purpose, and acknowledge the suggestions made throughout the

consultation process. These are in the process of being trialled and will be circulated in due course.

- Reference was made to the banding descriptors acknowledging smaller provisions and additional cost potentially incurred against larger provisions.
- One area consistently raised during the visits was the identification and further clarification over how the decision making, allocation of funding, and review of individual bandings, will be developed within the proposed new model.
- Providers raised the point that different post 16 courses require different input, even if the pupil has identical needs, i.e. Construction BTEC vs English A level. This means that funding may need to be considered against the course requirements and the young person's needs.
- A number of FE providers outlined some concern regarding the proposal to fund at 75% of the band top up value. This was highlighted in particular where the young person is receiving a 5 day a week offer, something a number of FE providers were keen to continue offering.
- Although there was a not a consistent response via the survey, there was some concern reported regarding the potential timescales for implementation and the impact this may have upon educational providers.
- Concern from providers that the banding model would not be financially viable from the indicative figures provided. Whilst it was emphasised the figures provided were not finalised, a number of educational establishments had used these to calculate the potential financial impact of the proposed model.
- Clarification as to how the proposed system will be monitored and the potential for abuse of the system, i.e. maintaining a band inappropriately to preserve funding levels. Whilst it was acknowledged the banding model was a fairer way of allocating funding, there was a concern over how any potential abuse of the system would be managed.
- Clarification as to whether there will be an acknowledgement that some provisions are purpose built, which could provide a greater freedom to support children and young people.
- Request that consideration is given to the geographical range of some of the provisions and how this could potentially affect banding descriptors.

3. Overview of the feedback from survey and visits

By far the most significant outcome from both the survey and visits was the positive feeling from a majority of educational providers over proposed changes

to the High Needs Funding model and the wish to have a universal bandings system.

It was recognised this would lead to a more equitable and consistent funding system, that would be understandable to both parents and carers. A significant number of educational establishments acknowledged that the current system was confusing and inconsistent.

During the consultation process, and in light of the level of feedback received, the need to evaluate the banding descriptors was recognised as a priority. This was highlighted within both the survey and visits to educational settings.

4. Conclusions

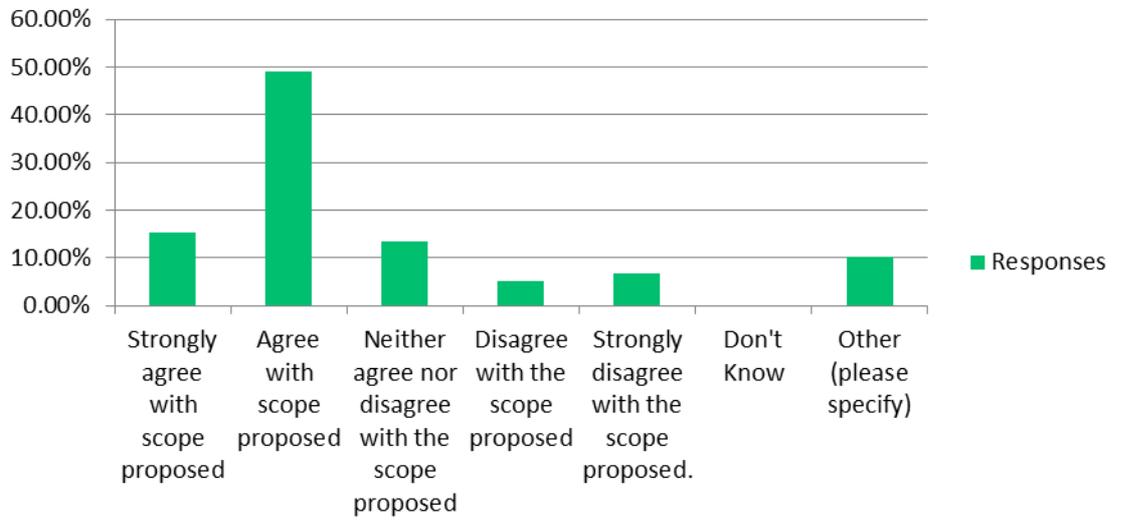
The opportunity to undertake visits, and a survey to gather thoughts and input from colleagues directly affected by the proposed changes, has proved invaluable. A clear and consistent message of positivity has been received with regards to the general principles outlined within the consultation, both from the visits and the survey feedback. The consistency and transparency of the process is something that has been welcomed.

The feedback received has also proved to be invaluable in shaping potential areas for consideration. Educational establishments were open and honest, considering the principles of the process rather than focussing upon their own setting. This has provided a number of useful priorities to focus upon as next steps.

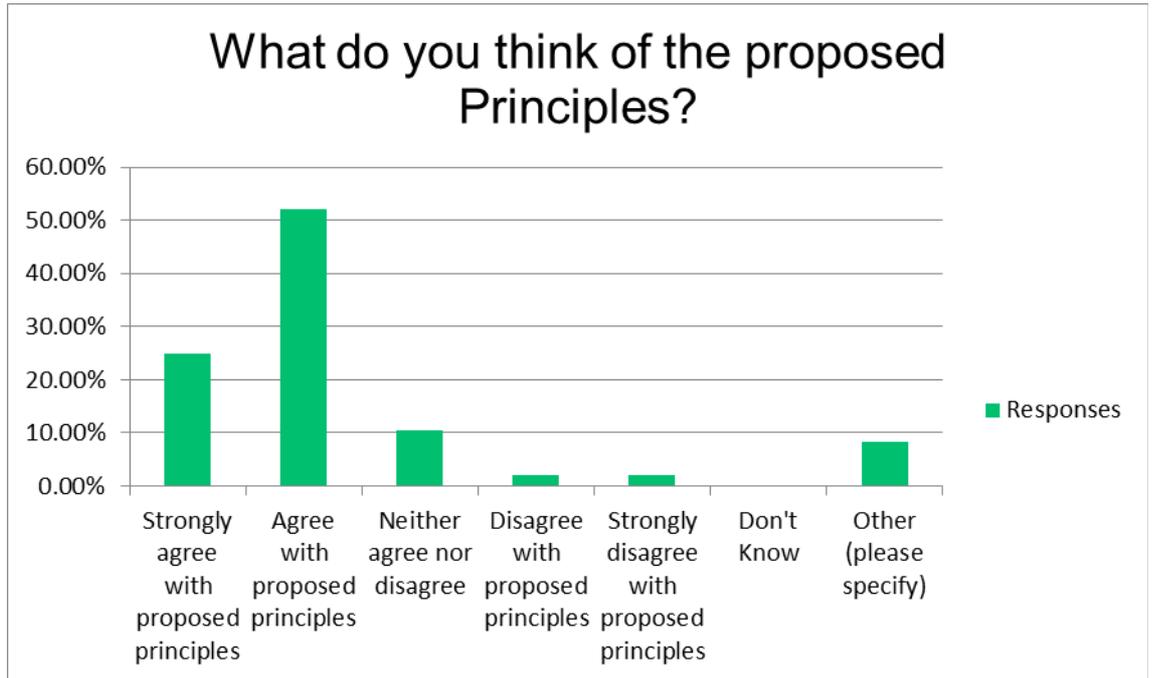
5. Appendices

Question 1

What do you think of the scope proposed in section 1?

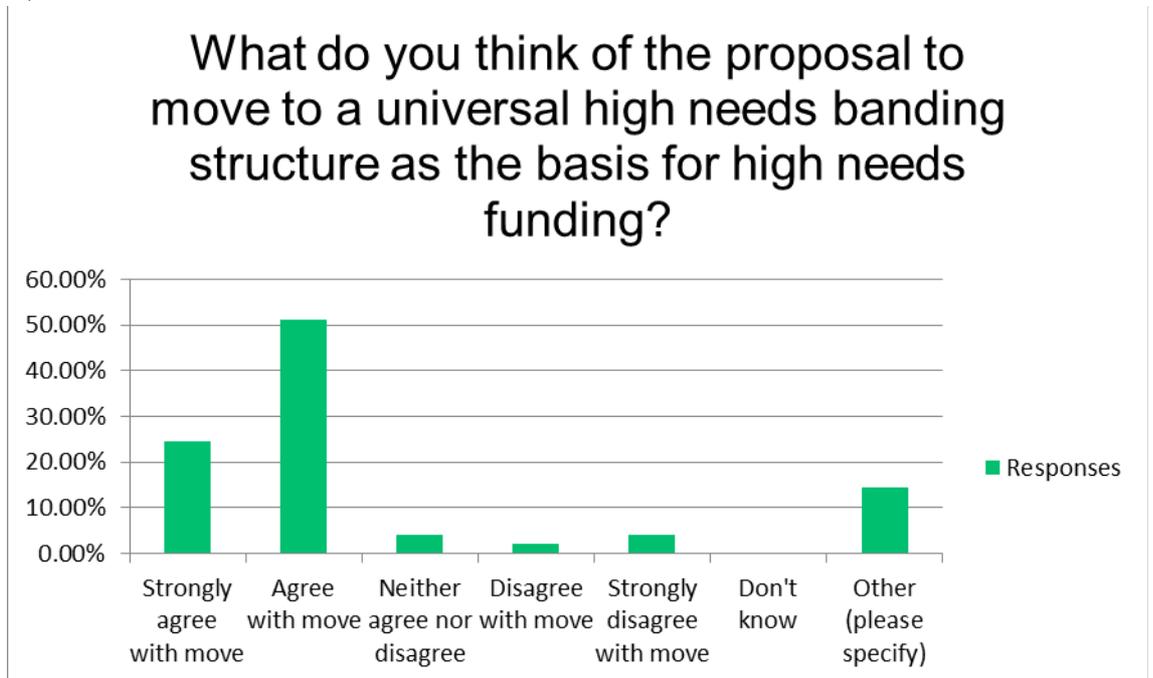


Question 2

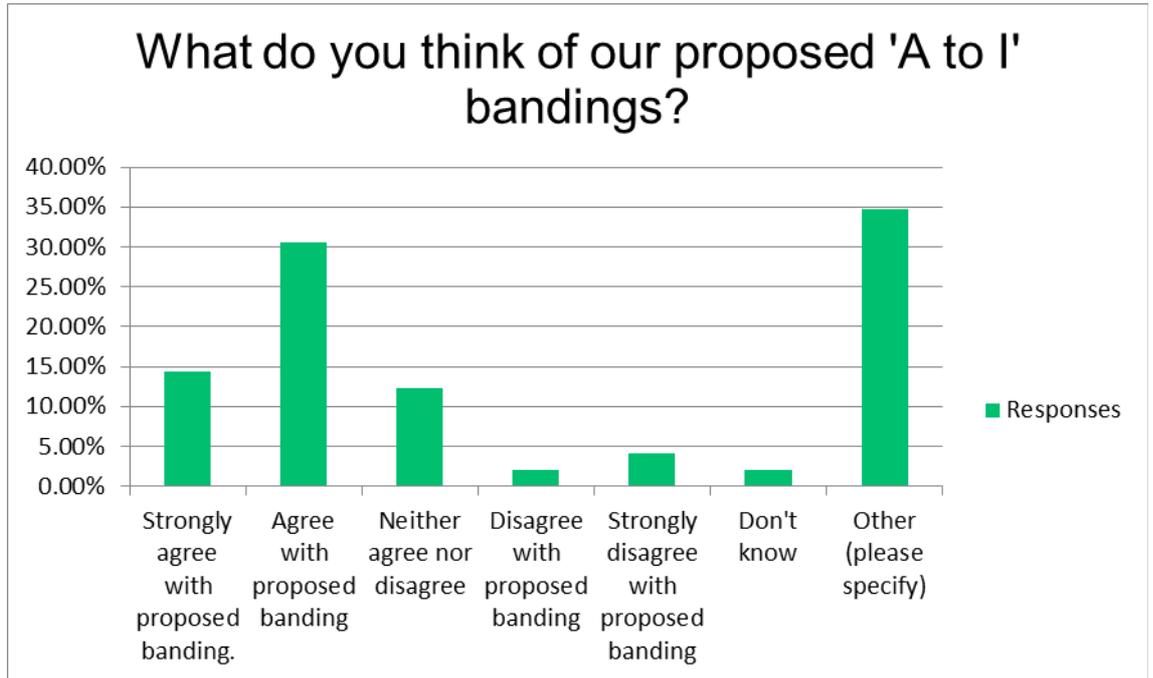


Question 3 was narrative therefore no graph available to summarise answers

Question 4

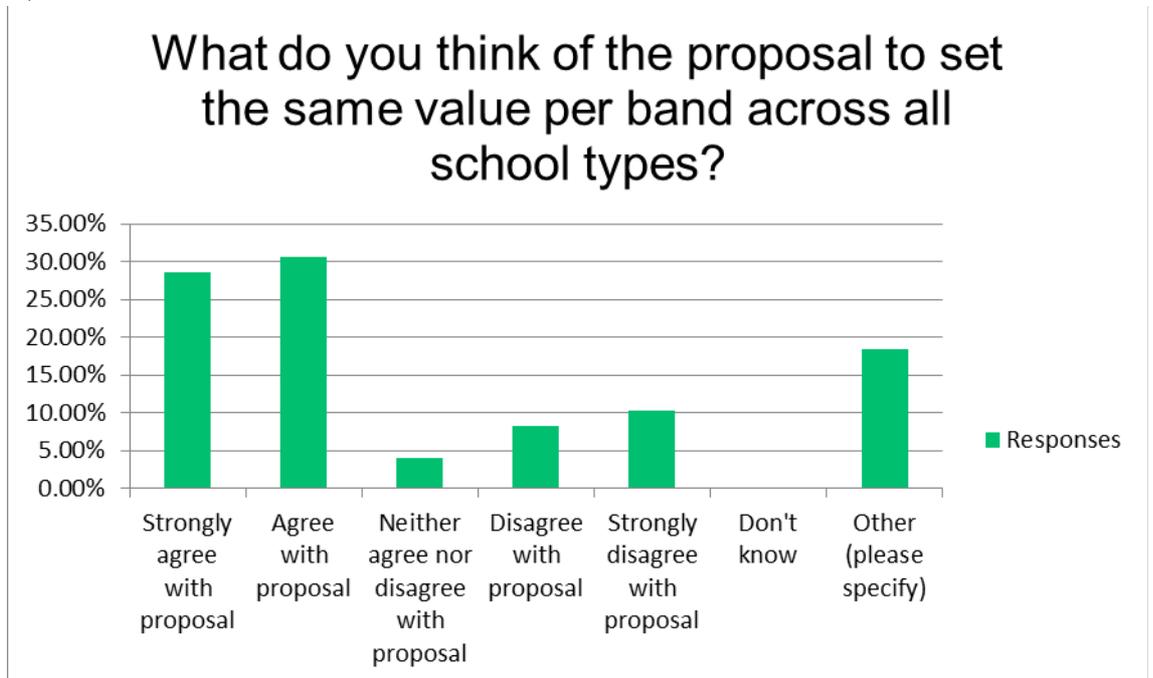


Question 5

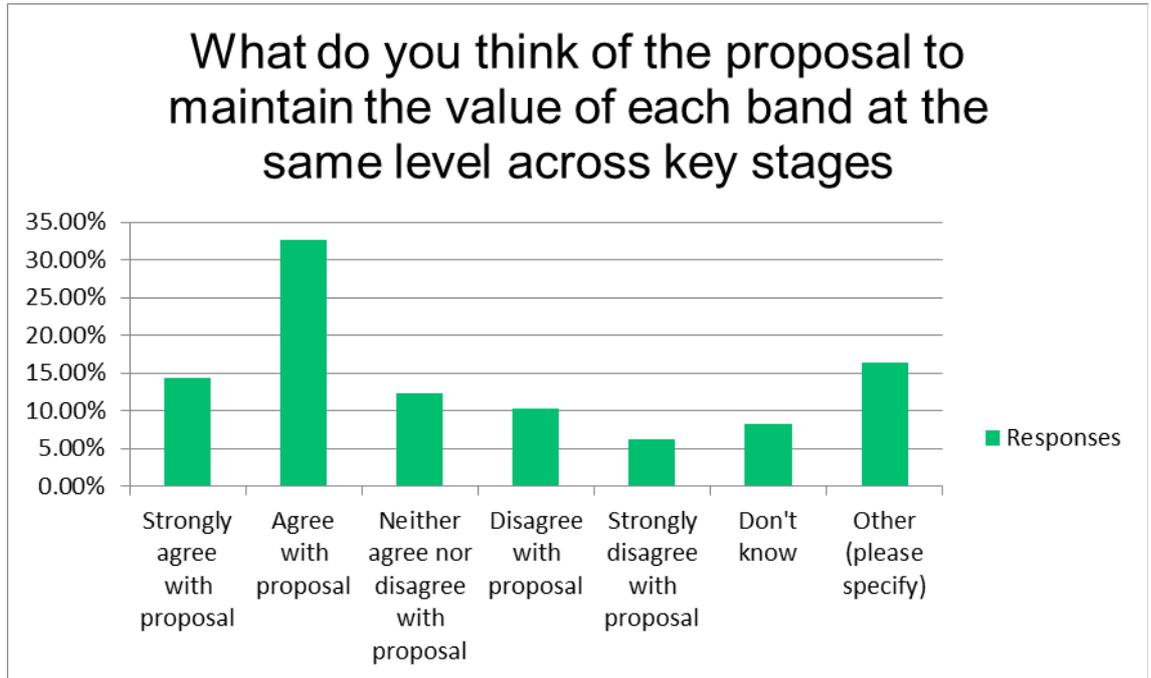


Question 6 was narrative therefore no graph available to summarise answers

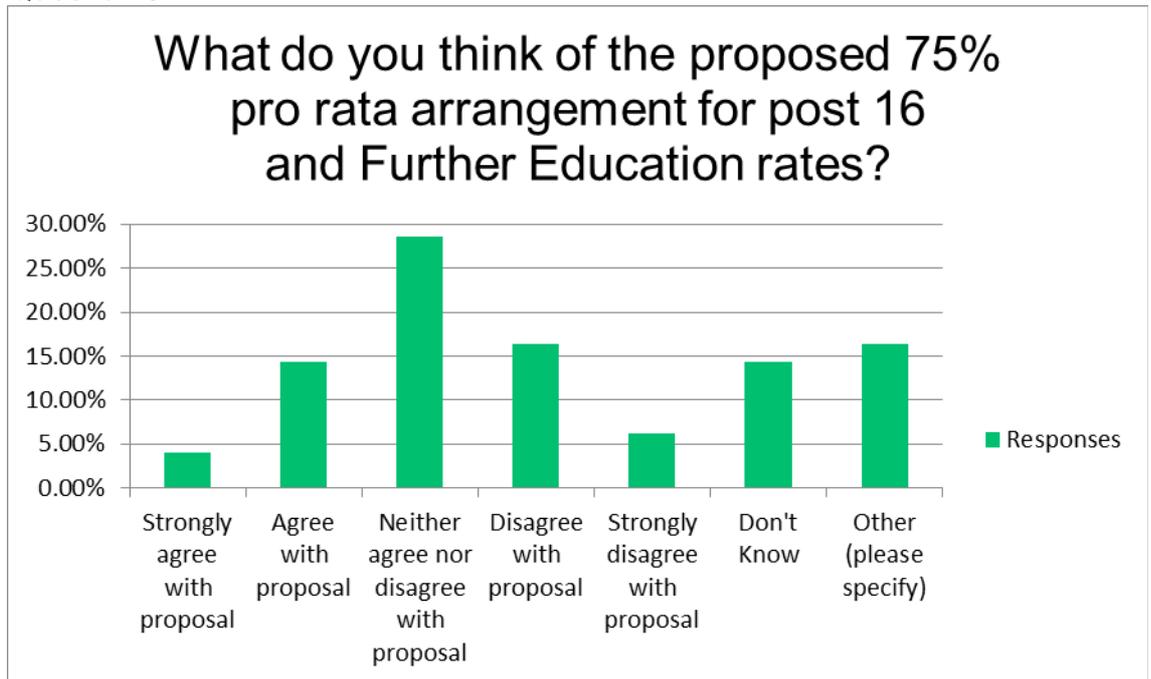
Question 7



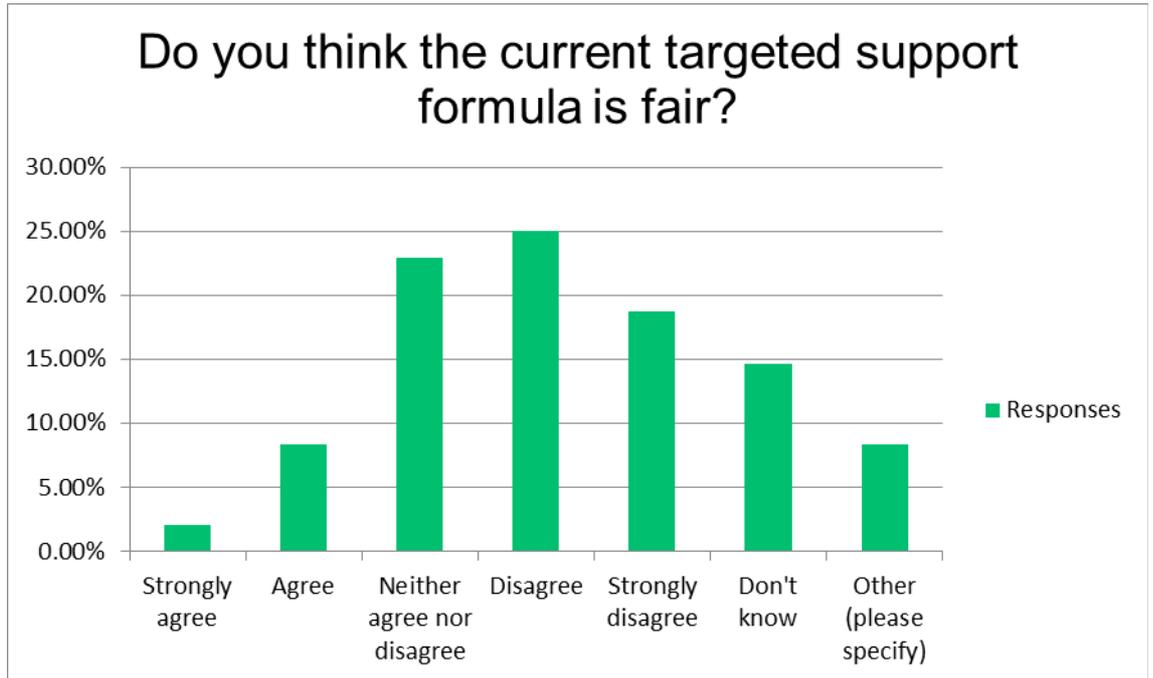
Question 8



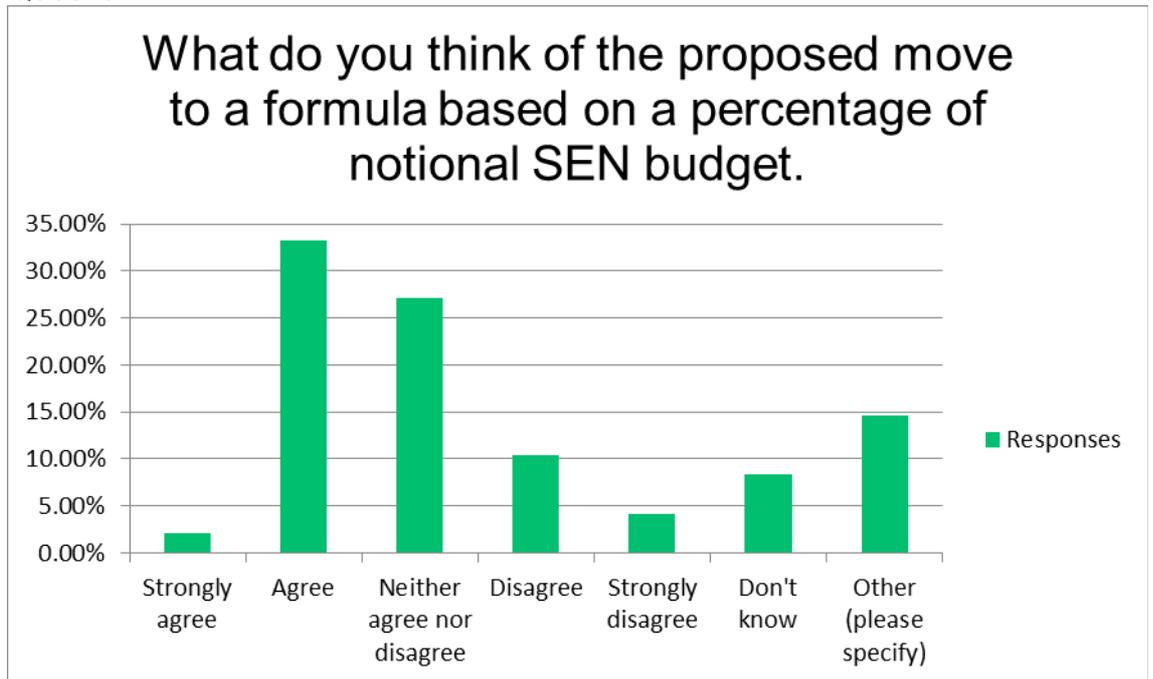
Question 9



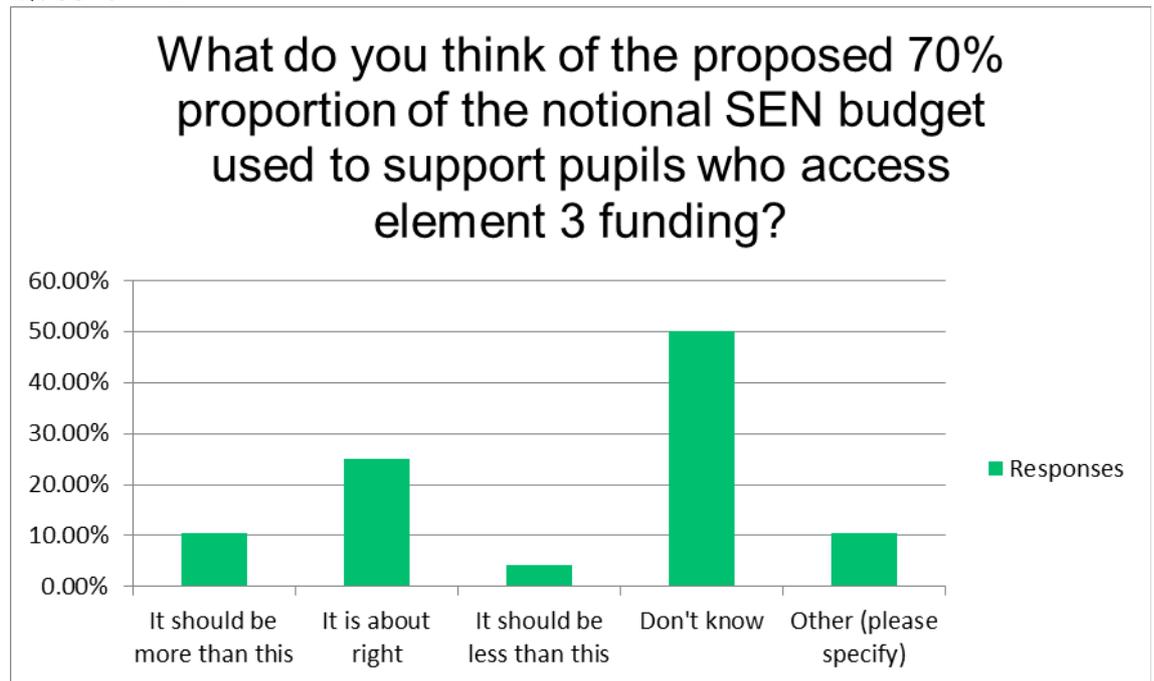
Question 10



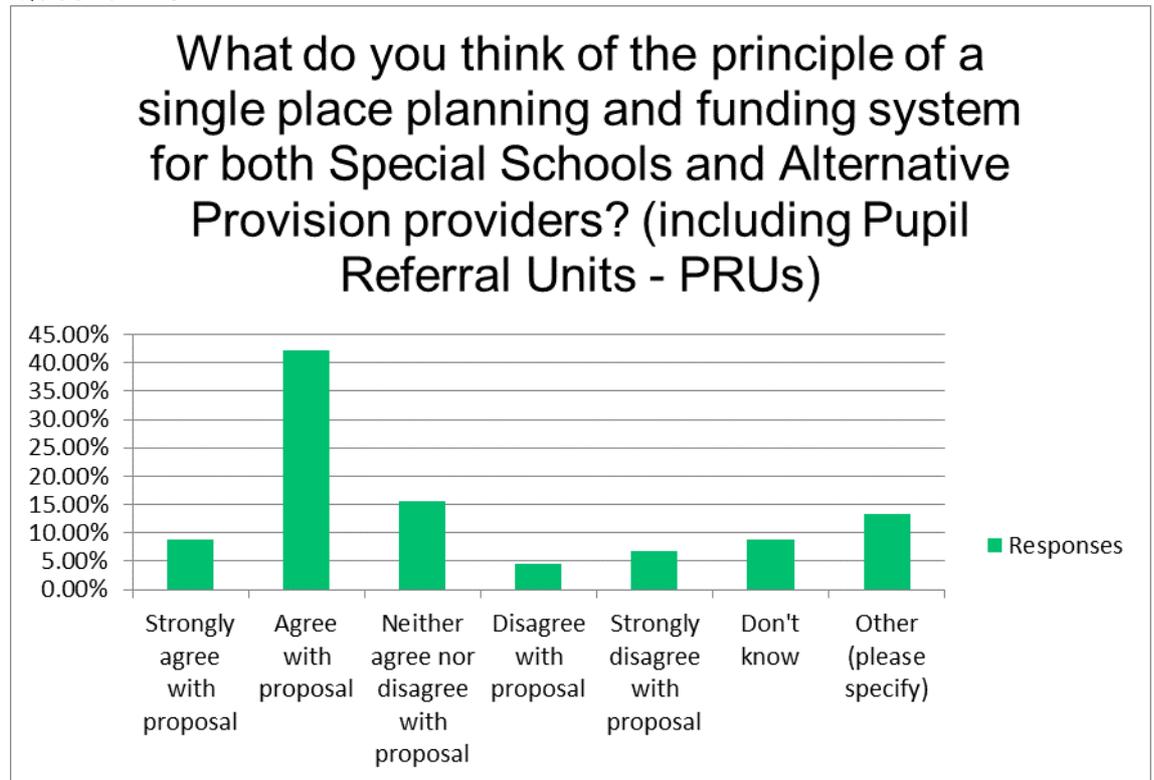
Question 11



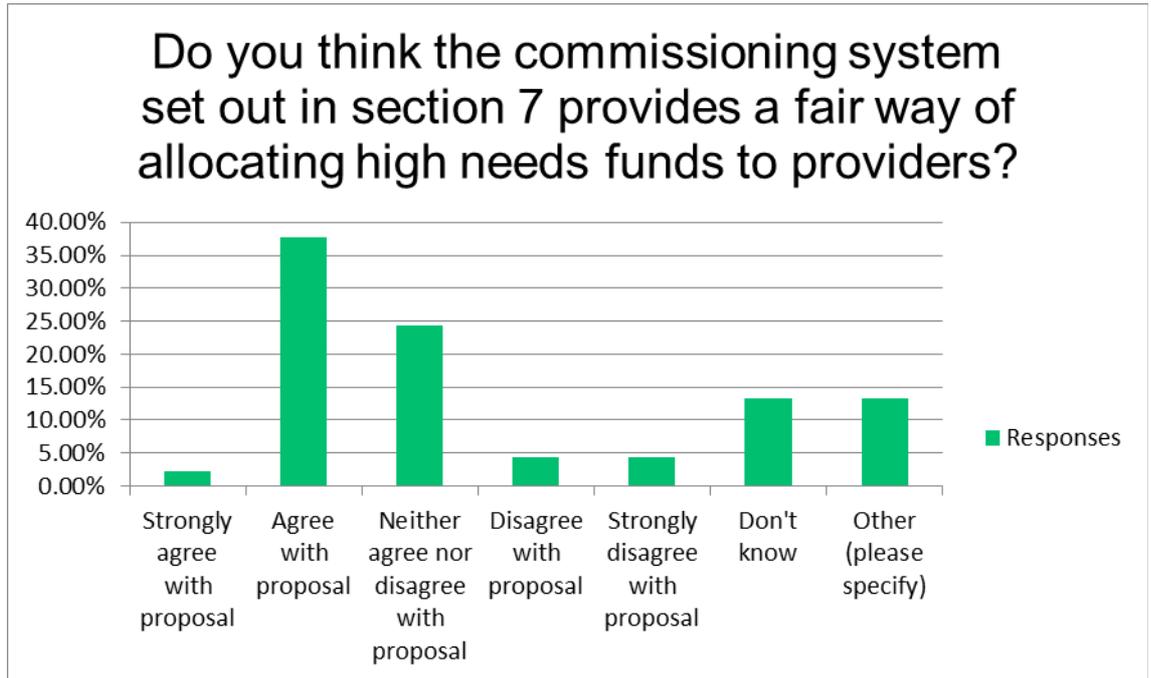
Question 12



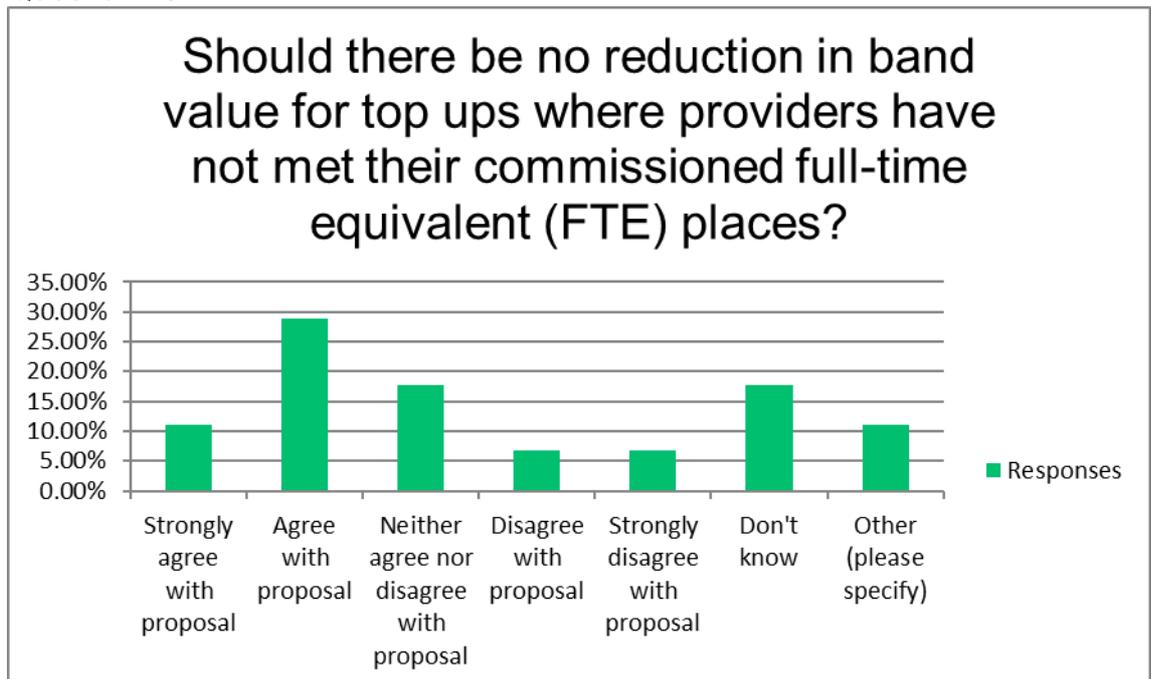
Question 13



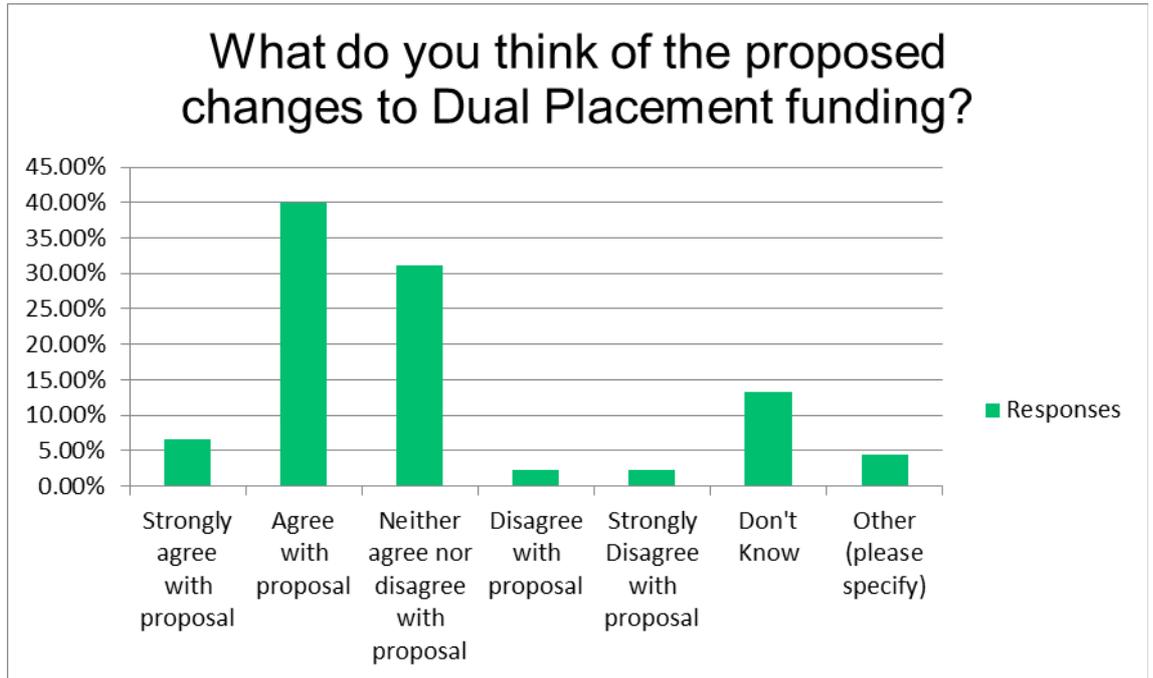
Question 14



Question 15

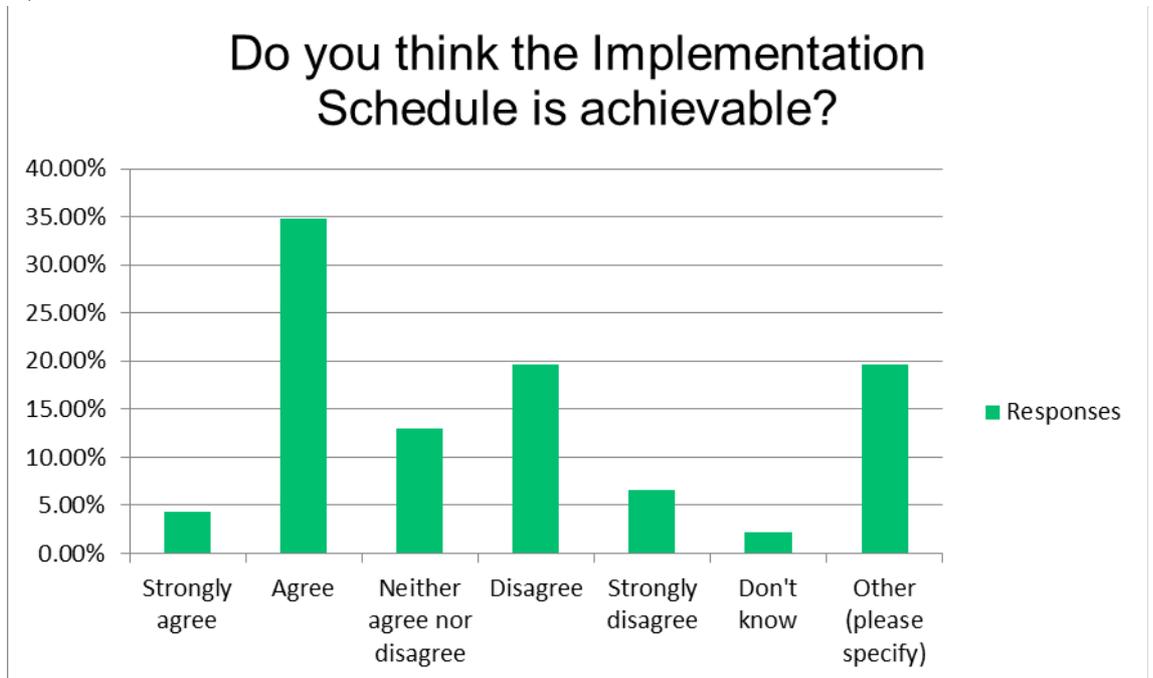


Question 16

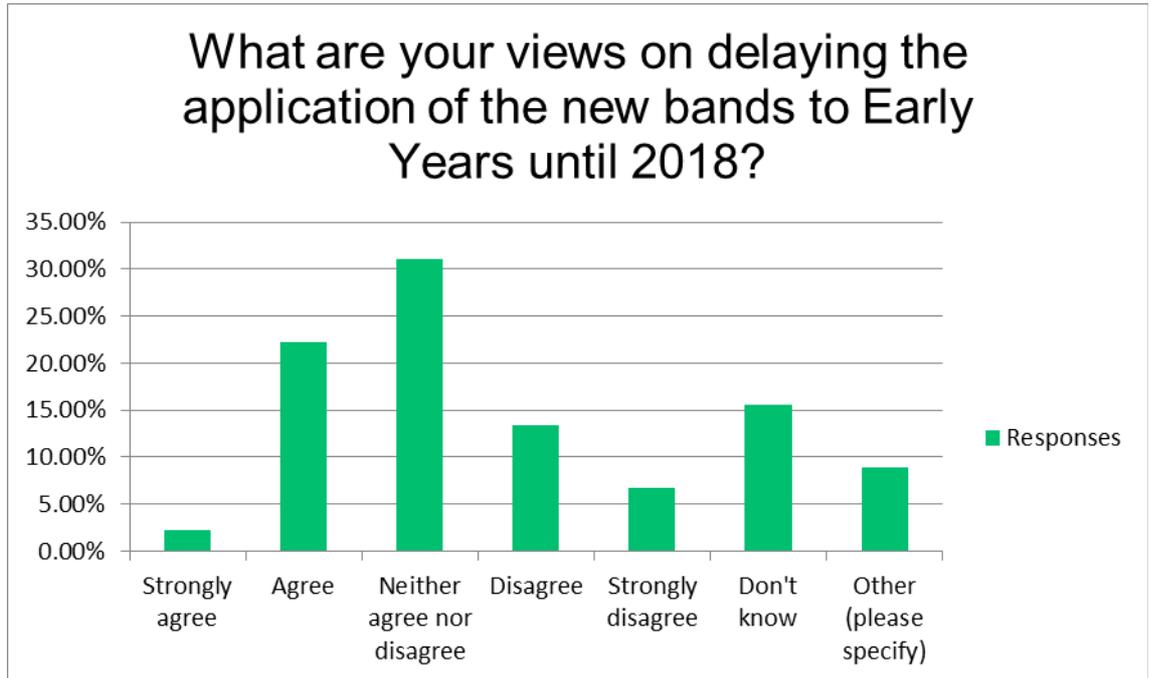


Question 17 was narrative therefore no graph available to summarise answers

Question 18

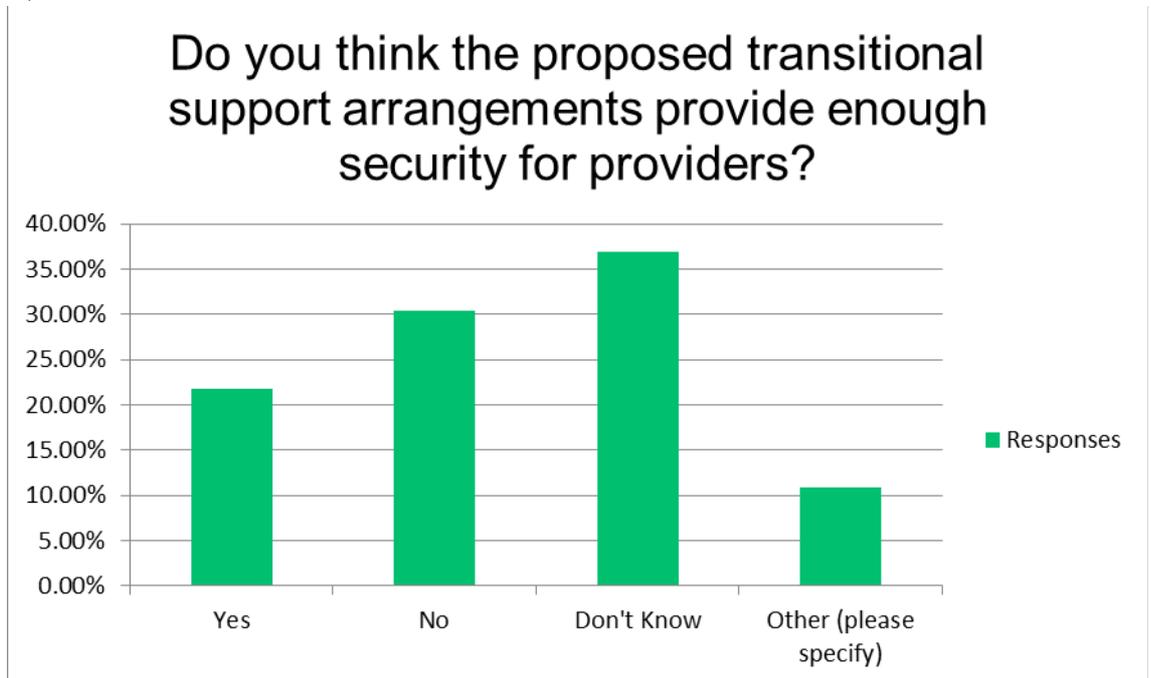


Question 19



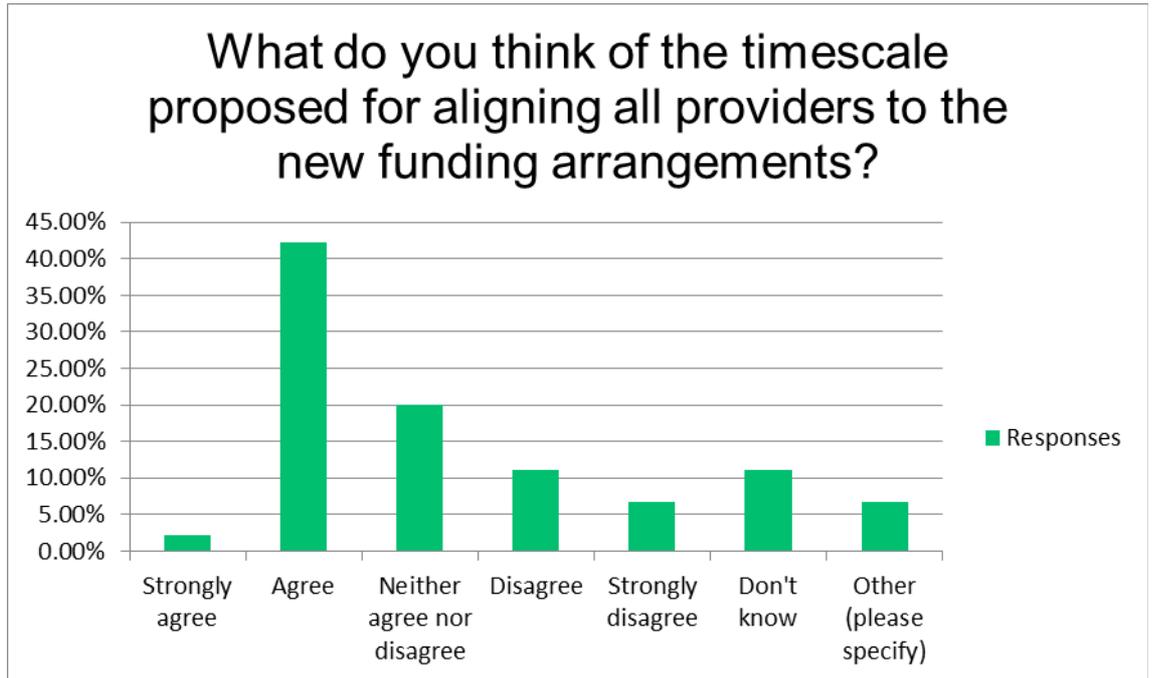
Question 20 was narrative therefore no graph available to summarise answers

Question 21



Question 22 was narrative therefore no graph available to summarise answers

Question 23



Question 24 was narrative therefore no graph available to summarise answers

Please see embedded report below for full answers from above questions.



High Needs
Funding Consultati

ANNEX C

Proposals to change the way schools are funded for children with special education needs and disabilities (SEND) and other additional needs

Consultation with Parents / Carers

We want to ensure that every child and young person receives the best possible support to meet their additional needs within the funds that we have available. Currently the way that our funding system works for those children and young people with high needs is not fair or transparent, and we want to change this. We are proposing a new way of sharing out the funds available to schools, colleges and other education providers that means all providers will receive the same amount of money for a child with a particular level of need regardless of where they are in Suffolk. This consultation provides parents and carers with a chance to have their say about these proposed changes.

How to Have Your Say

There are three ways that you can contribute:

Complete the online survey at [xxxx](#)

Contact us to ask for a paper copy of the survey to complete. The address to contact us is: Barbara Barraclough, Endeavour House, Russell Road, Ipswich, Suffolk, IP1 2BX or via email Barbara.barraclough@suffolk.gov.uk

Attend a consultation workshop. There will be three workshops, which we will run in partnership with the Suffolk Parent Carer Network (SPCN), on the following dates:

7pm – 8.30pm – Tuesday 17 April in Lowestoft

10am – 12noon – Thursday 19 April in Ipswich

7pm – 8.30pm – Thursday 19 April in Bury St Edmunds

At the workshops you will be able to hear more about the changes, ask questions and share your views. Register to attend a workshop by sending an email to Barbara.barraclough@suffolk.gov.uk or write to Barbara at the above address. We will confirm your place and provide you with final details of the venue.

How the funding system works now

What is High Needs Funding?

High needs funding is the money provided to schools to enable them to meet the SEND or additional needs of individual pupils, over and above what schools are expected to provide.

The money is given to a range of settings including schools, specialist support classes, nurseries, colleges, pupil referral units and special schools. The funding is sorted by bands depending on the amount of support required and the school / setting the child or young person attends. Nurseries, maintained (Local Authority) schools and academies, special schools and post 16 provisions (colleges, etc) all have different banding systems.

Where does High Needs Funding come from?

This funding is given to the Local Authority from Central Government as part of the Dedicated Schools' Grant and is called the High Needs Block. It is used to meet the additional needs of all children who need extra support, whatever the reasons, this includes funding some specialist school places.

As there is a limited amount of money available it is vital it is used fairly and provides the best support possible for all our children and young people.

Who decides where this money is spent?

Suffolk County Council makes decisions about how the high needs funding is spent according to the guidelines within the funding system. The Council works closely with the Schools Forum, a group of headteachers and governors from various schools and colleges, to make these decisions.

What currently happens?

If a child or young person has additional needs, a school or college can request additional funding to provide support for a child or young person once they have used the funding which they have been given in their budget. In Suffolk we use a process called moderation to consider the request for additional funding. We request a pack of evidence for each pupil which shows the needs and provision in place to meet those needs. This is checked by representatives from schools and colleges, alongside officers from Suffolk County Council, before payment is made. If it is decided that the school / setting needs more money to meet the needs of a child or young person, then they would receive high needs funding.

What sort of things is High Needs Funding used for?

It can be used for specialist classroom resources, staff training, for example learning British Sign Language, or training staff to undertake specific work to support pupils with social, emotional and mental health barriers.

When schools provide evidence packs to the Local Authority, they are expected to “paint a picture” of the child or young person. They need to highlight what difficulties the young person has in accessing education and what additional support or interventions they need. How have they used the funding previously, and what difference this has made to the outcomes for the pupil?

The aim for all pupils is to support them to make good progress and develop their independence and the Local Authority would look at ways the school has helped a young person to achieve this, including how they communicate and express their needs, feelings and wishes.

Does my child need to have an Education and Health Care Plan to access High Needs Funding?

No, not necessarily we provide high needs funding to schools for some children without an education, health and care plan if there is an evidenced need.

What we are proposing to change

A single funding system that would apply to all schools and other education providers: We are proposing to introduce a single funding system for all children and young people in Suffolk, aged 0-19 (or up to 25 with special educational needs). This would be easier for everyone to understand and would be fairer as it would mean the funding provided to support a child or young person would be based on their level of need, not the type of school they attend or the location of the school.

The same amount of additional funding for a child regardless of where they learn: We are proposing a single set of funding bands from A-I are used across all educational settings. This would end the situation where the same child can attract different amounts of funding depending on which school they attend. As the amount of money we have in total will be the same, this will mean that for some schools the amount of money they get per pupil will go down, but for others it will go up – it will be the same amount for everyone.

The proposed bandings: Below is a copy of the initial banding descriptors circulated to all educational providers. Following feedback from providers, further

work is currently being undertaken to ensure they appropriately describe the needs of children and young people and the support they may require. The views of parents / carers would be welcomed to ensure a thorough understanding of young people's needs is captured.

Universal Band	Description of Need	Record Keeping	High needs funding normally required
Band A	<p>I can cope well with my progress and my achievement is in line with my peers. My needs can be met within mainstream differentiated learning.</p> <p>I learn in line with the expectations of other children my age. Although I may need some differentiation through quality first teaching, I am able to meet or exceed progress and achievement in line with national norms.</p>	Normal monitoring and record keeping by class teacher	NO
Band B	To keep up with children in my age group, I need to take a bit longer to understand concepts and may need additional support to work effectively in groups. My needs can be met within mainstream differentiated learning.	Monitoring by class teacher and SENCo. May require specialist advice or consultation	NO
Band C	<p>I may not be working consistently at the level of my peers, but I am likely to achieve / exceed expected levels of progress with support. My engagement will be enhanced through curriculum differentiation, changes to schemes of work materials and recording.</p> <p>I may require personalised teaching throughout the curriculum with access to some small group and or individualised learning. Outreach services or adaptations to learning materials / differentiation of learning resources may be required to help me reach my potential.</p>	Regular detailed monitoring by SENCo. May require specialist advice or consultation Records of additional costs should be kept.	YES

Universal Band	Description of Need	Record Keeping	High needs funding normally required
Band D	<p>I may demonstrate substantial difficulties or a combination of significant difficulties in accessing learning in a mainstream environment. I potentially require intensive teaching and learning approaches to address specific needs.</p> <p>I may require modification of my attainment targets and access arrangements for assessment of progress. I may find it challenging to be able to achieve in line with my peers and my potential might be better realised in a specialist setting.</p>	Costed provision map developed and regularly monitored, input from other agencies required.	YES
Band E	I have an assessed or definable level of need as identified in the SEND Code of Practice 2014 and I will need additional specialist support. I am very likely to have an EHCP (or need to be referred for assessment).	Costed provision map in place. Regular (half termly) monitoring and review. Child centred annual review.	YES
Band F	<p>I have an assessed or diagnosed level of need as identified in the SEND Code of Practice 2014. And the associated specialist support advice and guidance.</p> <p>I will require specialist support even within a specialist setting and I will have an EHCP which clearly identifies the specialist support needed.</p>	Costed provision map in place. Regular (half termly) monitoring and review. Child centred annual review.	YES

Universal Band	Description of Need	Record Keeping	High needs funding normally required
Band G	<p>I have needs which are severe and significant, but they are clearly defined and can be met within a specialised education setting.</p> <p>My needs have an impact on my functioning beyond my education setting and include my ability to engage in the community.</p>	<p>In addition to above: progress monitored at every stage. In addition, wellbeing will be consistently monitored.</p>	YES
Band H	<p>I have exceptional difficulties which may be permanent, and currently have a significant impact on my ability to engage with my education setting and community. My needs require a highly personalised approach to teaching and learning through a range of bespoke specialist support.</p>	<p>In addition to above: regular multi-agency reviews required to monitor progress.</p>	YES
Band I	<p>I have severe and complex needs which require highly specialised settings, staffing and facilities, not usually found as part of the local offer. My needs are bespoke and have a severe impact on functioning in any education setting and in the community.</p>	As Band H	YES

A phased approach to the changes: we propose to make these changes over a five-year period starting in September 2018. This will mean that there will be no large changes to any school's funding that could destabilise them, but it will slow down the speed at which the less well funded schools get more funding. This will allow those educational settings affected to make the necessary adjustments.

Better information for parents and carers about how the funding system works: Parents and carers have told us they would like to understand more about how school funding works so that they can have informed discussions with their child's education provider. If we have one system that works across all education settings it will mean we can provide this information.

The Survey

Thank you for taking the time to read this guide. We hope you will now complete the survey to tell us what you think. Your views are important to us.

Our Questions to You:

1. What do you think about the plan to move to a single funding system for children with high needs?

Agree / Disagree / Not Sure (plus box for any additional comments)

2. What do you think about the proposal to move to a single banding system across Suffolk so that the level of funding is the same for an individual child regardless of where a child lives or goes to school?

Agree / Disagree / Not Sure (plus box for any additional comments)

3. As some schools will gain funds and some schools will have less funds, what are your views on how long we should phase the changes over?

4 years or less / 5 years (as proposed currently) / 6 years or more

4. We want to provide you as parents and carers with better information about school funding. What information would you find useful?

Free text box

5. Do you feel of the initial banding descriptors capture the needs of our children and young people?

Agree/Disagree

What information, if any, do you think could be included in the banding descriptors?