

## Response ID ANON-G377-XXWP-Y

Submitted to **Funding for SEND and those who need AP: Call for evidence**  
Submitted on 2019-07-31 18:19:24

### Introduction

#### A Name

**First name:**

Carol

**Last name:**

Kelsey

#### B What is your email address?

**Email:**

coordinator@hertsparentcarers.org.uk

#### C Response type

**Are you responding as an individual or as part of an organisation?:**

Part of an organisation

**What is your role?:**

Other

**What is the name of your organisation?:**

HPCI - Herts Parent Carer Involvement

**What type of organisation is this?:**

Other

#### D Which local authority are you responding from?

**Local Authority:**

Hertfordshire

#### E Are you happy to be contacted directly about your response?

Yes

### Confidentiality

#### F Do you wish for your response to remain confidential?

No

If you wish for your response to remain confidential, please tell us why.:

### Funding for pupils with SEN in mainstream schools

**1 What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important.**

**What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Age-weighted pupil unit of funding:**

1

**What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Low prior attainment†:**

3

**What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - IDACI†† – a measure of area deprivation:**

5

**What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Eligibility for free school meals – a measure of deprivation relating to**

individual children:

4

What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Mobility – additional funding for schools that have a high proportion of pupils who start at a school mid-year:

6

What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Standard lump sum – intended to reflect fixed costs of a school, however many pupils and teachers are required:

2

What formula factors are most important in providing schools with enough money to ensure they meet the needs of their pupils with SEN? Please rank the following factors in order of importance with 1 as the most important. - Other (please add below any other factors you think are important for ensuring that schools get an annual budget that enables them to provide appropriate SEN support):

7

**Further comments:**

Complex needs are not so closely linked to social deprivation/free school meals measures and there needs to be a factor that allows for SEN/Disability actual incidence. So schools in more affluent areas can have a number of children with complex needs that are not deprivation related and haven't to meet higher needs on less funding.

### **Funding for SEN through the schools funding formula**

**2 Would allocating more funding towards lower attainers within the low prior attainment factor help to better target funding towards the schools that have to make more SEN provision for their pupils?**

Yes

**3 What positive distributional impact would this change in approach (e.g. creating tiers of low prior attainment) create for mainstream primary and secondary schools?**

**Comments:**

Improving the match up between the actual SEN population in an individual setting than just using an average formula.

**4 Would such a change in approach introduce any negative impact for mainstream primary and secondary schools?**

**Comments:**

It could for individual schools if it led to a cut in overall SEN funding

### **Targeted funding and support for SEN provision in schools**

**5 Please indicate whether you agree or disagree with the statements below, and in the comments box give the advantages and disadvantages of your preferred approach.**

**Please indicate whether you agree or disagree with the statements below, and in the comments box give the advantages and disadvantages of your preferred approach. - Local authorities should retain the flexibility to develop, in consultation with their schools, their own method of targeting extra SEN funding to schools that need it.:**

Disagree

**Please indicate whether you agree or disagree with the statements below, and in the comments box give the advantages and disadvantages of your preferred approach. - Central government should provide more guidance for local authorities on how they should target extra SEN funding to schools, but local authorities should remain responsible for determining the amounts in consultation with their schools.:**

Agree

**Please indicate whether you agree or disagree with the statements below, and in the comments box give the advantages and disadvantages of your preferred approach. - Central government should prescribe a consistent national approach to the targeting of additional funding to schools that have a higher proportion of pupils with SEN and/or those with more complex needs.:**

Agree

**Comments:**

There is such huge variance nationally in how each local authority does this and how complex, process driven and opaque they make their system that there needs to be much more consistency in approach and recognition of different costs (particularly staffing costs) in different parts of the country. This could, if done well, make the system much more efficient, transparent and equitable for children in different areas and reduce some of the acrimony and challenge in the system. The arrangements that we have nationally and in most local areas have not been updated to take into account the impact and intended effects of the Children and Families Act 2014.

### **Notional SEN Budget**

**6 Is it helpful for local authorities to continue to calculate a notional SEN budget for each school, and for this information to be published, as now?**

Somewhat helpful

**7 For those responding from a school, who in your school(s) is involved in decisions about spending from the school's notional SEN budget?**

**Other (please comment):**

**8 Should the national funding formula for schools include a notional SEN budget, or a way of calculating how much of each school's funding is intended to meet the costs of special provision for pupils with SEN?**

Yes

**Do you have any further comments on the notional SEN budget?:**

All school budget information should be made easily available for all to see, including parents. The huge spreadsheet published by the DfE is NOT easy to access, well presented or easy to understand by members of the public such as parents. As a parent carer forum we have numbers of parents reporting to us regularly that their school has told them that the SEN money goes into the general pot, they don't have a budget for SEN, it is all spent and various other 'there is no money' comments.

In our recent funding survey, responded to by 197 parents, 68% said they did not or only partly understood how SEND funding worked in their child's setting. 76% said they would like to understand how SEND funding works and 30% reported that the setting involved them in discussions about how funding is used to support their child.

### **The £6,000 threshold**

**9 Please indicate whether or not you agree with the following statements.**

**Please indicate whether or not you agree with the following statements. - The level of the threshold makes little or no difference to the system for making special provision: it is the level of funding available to schools and local authorities that is crucial.:**

Agree

**Please indicate whether or not you agree with the following statements. - The £6,000 threshold should be lower, so that schools do not have to make as much provision for pupils with SEN from their annual budgets, before they access top-up funding from the local authority.†:**

Not Sure

**Please indicate whether or not you agree with the following statements. - The £6,000 threshold should be higher, so that schools have to make more provision for pupils with SEN from their annual budgets, before they access top-up funding from the local authority.††:**

Disagree

**Please indicate whether or not you agree with the following statements. - The operation of the £6,000 threshold should take account of particular circumstances.:**

Agree

**10 If you have agreed with the final statement in question 9, please indicate below which circumstances you think would be relevant for a modified threshold or different funding arrangement.**

**If you have agreed that the £6,000 threshold should be modified so that particular circumstances are taken into account., please indicate below which circumstances you think would be relevant for a modified threshold or different funding arrangement. - Schools that are relatively small.:**

Yes

**If you have agreed that the £6,000 threshold should be modified so that particular circumstances are taken into account., please indicate below which circumstances you think would be relevant for a modified threshold or different funding arrangement. - Schools that have a disproportionate number of pupils with high needs† or EHC plans.:**

Yes

**If you have agreed that the £6,000 threshold should be modified so that particular circumstances are taken into account., please indicate below which circumstances you think would be relevant for a modified threshold or different funding arrangement. - When pupils with EHC plans are admitted to a school during the year, which may create unintended consequences.††:**

No

**If you have agreed that the £6,000 threshold should be modified so that particular circumstances are taken into account., please indicate below which circumstances you think would be relevant for a modified threshold or different funding arrangement. - Other (please specify below):**

Yes

**Comments:**

Where children arrive in a school at the beginning of a school year without needs being known or adequately understood there should be some flexibility in the system to provide some short term funding QUICKLY so that the situation/needs can be clarified. This is particularly key in areas of the country where the population is more transient.

Clarity about what costs the £6000 is there to cover should be much clearer as there is confusion now at setting, local authority and family level.

## Provision for pupils with SEN in mainstream schools

**11 If you are responding on behalf of a school, do you have a clear understanding about what provision is “ordinarily available” to meet pupils’ special educational needs in your school?**

Not Answered

**Comments:**

**12 How is this determined?**

Part of a whole-local authority approach

**13 How is this offer communicated to parents?**

If the offer is publicly available, please provide a web link.:

**14 Does your local authority make it clear when a child or young person requires an education, health and care (EHC) plan?**

No

**15 How is this articulated?**

Unpublished local authority policy

If this is publicly available, please provide a web link.:

## Funding for pupils who need alternative provision (AP) or are at risk of exclusion from school

**16 Please indicate your agreement or disagreement with the following statements.**

**Please indicate your agreement or disagreement with the following statements. - The current funding arrangements help schools, local authorities and AP to work together and to intervene early where such action may avoid the need for permanent exclusion later:**

Strongly disagree

**Please indicate your agreement or disagreement with the following statements. - The current AP funding arrangements help schools and AP to reintegrate children from AP back into mainstream schooling where this is appropriate:**

Strongly disagree

**17 How could we encourage more collaboration between local authorities, schools and providers to plan and fund local AP and early intervention support?**

**Comments:**

Better joint accountability for the child and the outcomes. Improved data and case analysis to provide appropriately for need. Schools are often commissioning AP provision directly but we have concerns that their understanding of how to commission effectively is in most cases very limited. There should be robust guidance, commissioning arrangements and monitoring in place based on the outcomes sought for the child rather than the best outcome for the LA, school or provider.

**18 What changes could be made to improve the way that the AP budget is spent, to better enable local authorities, schools and providers to use the local AP budget to provide high quality AP, intervene early to support children at risk of exclusion from school, or reintegrate pupils in AP back into mainstream where appropriate?**

**Comments:**

Improve commissioning of AP provision and the measurement of effectiveness.

Quicker response to families and settings when they are reporting problems - other services such as CAMHS etc are not able to respond effectively they are still crisis led.

**19 Please use the box below to share any examples of existing good practice where local authorities, schools and AP settings have worked together effectively to use the AP budget to provide high quality AP, intervene early to support children at risk of exclusion from school, or reintegrate pupils in AP back into mainstream where appropriate.**

**Comments:**

## Funding for students with SEN in further education

**20 Are there aspects of the operation of the funding system that prevent young people from accessing the support they need to prepare them for adult life?**

Not sure

**Comments:**

**21 Notwithstanding your views about the sufficiency of funding, please describe any other aspects of the financial and funding arrangements that you think could be amended to improve the delivery of provision for young people with SEN.**

**Comments:**

There is a lack of flexibility around post 16 education in that many specialist provisions stop at 16 and college is the only option. The cost of expanding the age range at some of these specialist provisions should be looked at carefully to see if this would actually be cheaper than FE college provisions and would also provide these young people with a real choice which they don't have ie to stay at school or go to college as their non SEND peers do.

**22 If you are able to provide any examples where local authorities and colleges have worked together effectively to plan provision to meet the needs for SEN support and high needs, please describe these below.**

**Comments:**

**Improving early intervention at each age and stage to prepare young people for adulthood sooner**

**23 Are the current funding or financial arrangements making early intervention and prevention more difficult to deliver, causing costs to escalate?**

Yes

**Comments:**

The Early Years SEND funding is bitty coming from different pots which is confusing for all. Many providers in Early Years are businesses which need to make a profit to stay open and currently they are not receiving enough funding to make it viable for many of them to provide well for individual children from a well trained staff.

**24 If you can you provide examples of invest-to-save approaches with evidence that they can provide value for money by reducing the costs of SEN support, SEN provision or other support costs (e.g. health or social care) later, please describe these below.**

**Comments:**

Many children with SEND struggle to engage appropriately in health settings for routine things such as injections, minor procedures, dental health etc One family, where their young child was increasingly resistant and aggressive about any health appointments, employed (at their own cost) their own learning disability nurse to work with the child and them over a period of time developing techniques and resources for the family to use and liaising directly with the health services to improve their understanding and way of dealing with the child. The child now accesses all health appointments well. Had this not happened then the family felt that as the child grew then sedation would have been needed for most simple procedures and that as an adult they would have become either untreatable or required 2 or 3 carers for each health appointment. This has undoubtedly saved health significant sums for a child with life long health issues. Learning disability nurses are available in our area to do this work with adults but this is too late with behaviours being deeply entrenched by then and taking longer to remedy.

**25 If you think there are particular transition points at which it would be more effective to access resources, please indicate below those you believe would be most effective to focus on.**

The transition from early years provision to reception class in primary school, The transition from Year 6 in primary school to Year 7 in secondary school, The transition from secondary school to further or other tertiary education

**Please indicate below any other transition points that you think we should look at.:**

The onset of puberty in secondary school also brings problems with transition and more attention needs to be paid to this. It surely contributes to the issues we see with exclusion - formal and informal - in years 9/10/11

**Effective partnership working to support children and young people with complex needs**

**26 Please describe as briefly as possible below changes that you think could be made to the funding system nationally and/or locally that would foster more effective collaborative approaches and partnership arrangements.**

**Comments:**

There is a lack of understanding between services and leaders about what they each do which needs addressing. Leaders in children's services do not always have enough understanding of SEND in general which adds to the silo working issues. Transparency over decision making is also key. Lack of focus/provision in health on children generally needs to be addressed before you can get effective joint working.

**Other aspects of the funding and financial arrangements**

**27 Are there any aspects of the funding and financial arrangements, not covered in your previous responses, that are creating perverse incentives?**

**Comments:**

The lack of transparency and accountability of what is spent where and on what at all levels in the system means that there is a lack incentive to improve. There is no linkage of spend to outcomes for CYP so a mainstream setting can fail to provide with no consequences.

**28 What aspects of the funding and financial arrangements are helping the right decisions to be made, both in securing good provision for children and young people with additional needs, and in providing good value for money?**

**Comments:**