

MEETING OF THE SCHOOLS FORUM

**Tuesday 16th October 2018, 1pm to 3pm
at Whitmore High School**

AGENDA

Item	Title	Attachments
1	Apologies & Order of Agenda	
2	Minutes of the Last Meeting – 11 September 2018	Attached
3	Matters Arising	
4	2018-19 DSG Budget Monitoring Q2	Report by Jo Frost attached
5	Review of EHCP funding in mainstream schools and academies	Report by Jo Frost attached
6	AOB	

Date of Next Meeting: 20th November 2018

Voting Members Circulation:

Mike Baumring (Headteacher-Kenmore Park Junior School)	Patrick O'Dwyer (Special Needs Service)
Jo Daswani (Headteacher-Whitchurch Primary School)	Anna Smakowska (Headteacher-Woodlands School)
David O'Farrell (Headteacher-St Bernadette's Primary School)	Anne Monahan (Headteacher-St Anselm's Primary School)
Sue Hammond (Chair) (Headteacher-Whitmore High School)	Edwin Solomon (Governor-Hatch End High School)
Nigel Hewett (AHGB Representative)	Jonathan Watson (Associate Headteacher – Whitefriars)
Rebecca Hastings (Headteacher-Cedars Manor School)	Pam Virdee (Headteacher-Longfield Primary School)
Sue Maguire (Headteacher-Hatch End High School)	16-19 Representative (Principals Harrow/Stanmore/St Dominic's)
Rutinder Mahil-Pooni (Headteacher-Kenmore Park Inf Sch)	Claudia Calogero (Governor-Hillview Nursery School)
Paa-King Maselino (Headteacher-The Helix Education Centre)	Keven Bartle (Headteacher– Canons High School)
Paul Gamble (Headteacher-Harrow High School)	Louise Browning (Headteacher – Norbury School)
Vacant (PVI representative)	Geraldine Higgins (Headteacher-Sacred Heart Lang College)
Ian Nutch (Academy High School Finance Manager)	Vacant (Governor)

Non-Voting Members Circulation:

Cllr Christine Robson (Portfolio Holder)	Paul Hewitt (Director of Children's Services)
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Copies to:

Johanna Morgan (Divisional Director, People Services)	Atifa Sayani (Harrow School Improvement Partnership)
Barbara Worrall (Schools Finance Manager)	Jo Frost (Finance Business Partner)

SCHOOLS FORUM

Minutes of the Meeting held on Tuesday 11 September 2018 **at 1.00 pm at Whitmore High School**

Members Present: Sue Hammond – Headteacher, Whitmore High School (CHAIR)
Anna Smakowska – Headteacher, Woodlands School
Pam Virdee – Headteacher, Longfield School (VICE CHAIR)
Geraldine Higgins – Headteacher, Sacred Heart Language College
Patrick O'Dwyer – Div. Director Education Services (Special Needs Services)
Rebecca Hastings – Headteacher, Cedars Manor School
Louise Browning – Headteacher, Norbury Primary School
Paul Gamble – Headteacher, Harrow High School
Christine Robson – Portfolio Holder, Young People & Schools
Mike Baumring - Headteacher, Kenmore Park Junior School
Rutinder Mahil-Pooni – Headteacher, Kenmore Park Infant School
Sue Maguire – Headteacher, Hatch End High School
Claudia Calogero – Governor, Hillview Nursery School
Keven Bartle – Headteacher, Canons High School
David O'Farrell – Headteacher, St Bernadette's Primary School
Anne Monahan – Headteacher, St Anselm's Primary School
PK Maselino – Headteacher, The Helix

Officers in Attendance: Jo Frost - Finance Business Partner

SH opened the meeting.

1. Apologies and Order of the Agenda

Apologies were received and accepted from:

Sarbdip Noonan – Principal, Stanmore College
Paul Hewitt – Interim Corporate Director People Services
Nigel Hewett - AHGB Representative
Ian Noutch – Academy High School Finance Manager
Jo Daswani – Headteacher, Whitchurch Primary School

The order of the agenda was agreed.

2. Minutes of the Last Meeting held on 3 July 2018

The minutes of the meeting held on 3 July 2018 were agreed as an accurate record

3. Matters Arising

a. Election of Chair and Vice Chair

Sue Hammond was nominated and elected as Chair for the next academic year.
Pam Virdee was nominated and elected as Vice Chair for the next academic year.

- b. POD provided an update on the banding matrix and explained that the LA plans to consult in Autumn and make a decision in Spring and is seeking clarification from the ESFA in relation to timescales for implementation.
- c. In relation to a previous action about the Pupil Premium Grant for Looked After Children, POD advised that he has written to both primary and secondary execs and had responses from both phases
- d. The action in relation to a report on PAN and primary numbers is on today's agenda
- e. SM enquired as to whether there had been any further announcements about the teachers' pay grant. There was a consensus that there had not been any further announcements.

4. 2019-20 Budget Setting and Funding Formula Review

JF introduced the report which set out the changes to the funding arrangements for 2018-19 and a proposed consultation document.

JF gave an overview of the current position for 2018-19 and explained there would be minimal changes to the funding formula in 2019-20.

JF explained that the LA would be consulting on a request to transfer from the Schools Block to the High Needs Block.

SH advised that Schools Forum had been clear this would be agreed for one year only to allow the LA to progress the strategy.

JF explained that as this is an option for the LA to help to manage the pressure. The LA has to do its due diligence and request this transfer as part of the consultation as this is a mechanism afforded to the LA as part of the funding regulations.

POD explained that there has been progress on the banding matrix and there is currently an external review of services and demand underway. The LA continues to work with the West London Alliance and the SEND strategy is progressing.

AS queried what it would mean for high needs children if this wasn't agreed

PG queried what the LA would do if Schools Forum did not agree to the transfer. JF explained that the LA may have to report a deficit as other LAs have done.

JF explained that any decision to cut or change service provision would be subject to consultation.

Schools Forum reviewed the proposed consultation document and broke into small groups to discuss.

Q1 in relation to MFG – Schools Forum requested that three options be given -1.5% 0% and +0.5% and that indicative budgets based on these three scenarios be calculated. A health warning should also be given with the indicative budgets so that schools do not plan for future years on these numbers and that the final MFG will be subject to affordability.

Q2 in relation to the growth fund – Schools Forum committed to maintaining the current per class growth fund allocation so that schools that had already agreed to expand did not have their funding changed. If the growth fund allocation through the new funding formula does not provide the same

level of funding then this would be found within the remainder of the Schools Block. It was, therefore, agreed that there was no need to consult on this question and it should be removed.

Q3 in relation to the High Needs Block Transfer – Schools Forum requested that more narrative be provided in the consultation document about the services and provision funded by the High Needs Block. There were some changes to the wording which will be reflected in the final consultation document.

Q4 in relation to the place funding for EHCPs – there were some changes to the wording which will be reflected in the final consultation document.

It was agreed that JF would update the consultation document and this would be reviewed by SH before clearing. The aim is to start the consultation on Friday 21st September and for it to run for four weeks to Friday 19th October.

ACTION JF/SH

Schools Forum thanked JF for the report.

5. School Place Planning and Admissions

POD introduced the report which set out the position for reception place planning as of September 2018.

POD explained that the LA is working with a number of schools to informally reduce the plans where they are under numbers. There will be a consultation for formally reducing PANs from 2020.

SH reminded Schools Forum that it is important leading up to the census date in October that schools admit any pupils they are offered in order that maximum funding is generated for the borough. POD also stated that during the final two weeks the Admissions Service will be prioritizing finding places in borough for pupils without a school or currently placed out of borough, who wish to move in, rather than moving pupils around within Harrow schools.

Any Other Business

None

Next Meeting and Agenda Items

The next meeting will take place on 16 October 2018 at 1pm at Whitmore High School.

The meeting closed at 2.45pm

Meeting:	Schools Forum
Date:	16 October 2018
Subject:	Item 4: 2018-19 DSG Budget Monitoring Quarter 2
Responsible Officer:	Jo Frost, Finance Business Partner – Children’s Services

Section 1 – summary

1. This report is the 2018-19 quarter 2 budget monitoring report for the Dedicated Schools Grant (DSG)
 - Schools Block
 - Early Years Block
 - High Needs Block
 - Centrally retained and de-delegated budgets

Section 2 – report

2. The total notified DSG budget as quarter 2 is £141.613m. A summary of funding blocks and forecast expenditure is shown at Table 1.
3. This is an increase in notified DSG this financial year of £317k due to adjustments for Early Years pupil numbers from the January 2018 Early Years Census. This is covered later under the Early Years Block section.
4. There is a net projected overspend of £1.754m which is made up of an overspend on the High Needs Block of £2.129m partially offset by an underspend in the growth fund of £375k.

Table 1 – DSG budget and forecast 2018-19

Block	2018-19 Budget £'000	2018-19 Forecast £'000	Variance £'000
Central	£1,196	£1,196	£0
Early Years	£17,498	£17,498	£0
High Needs	£29,980	£32,109	£2,129
Schools - Delegated	£38	£38	£0
Schools - Growth Fund	£2,467	£2,092	-£375
Schools - ISB	£90,435	£90,435	£0
Grand Total	£141,613	£143,367	£1,754

Early Years Block

5. In 2018-19 the current Early Years Block is £17.498m. This includes an in-year adjustment in relation pupil numbers from the January 2018 census.

3&4 year old provision

6. A new local funding formula was introduced in 2017-18. At quarter 2 the projection indicates that there could be an underspend on this budget however it is included in the forecast as a balanced budget.
7. In relation to the 15 hour entitlement there has been an in-year reduction in this budget because the budget was set based on 4118.33 children as recorded on the January 2017 census. This has now been updated for the January 2018 census which recorded 4015.5 children. This has led to a reduction in budget of £327k.
8. However in relation to the additional 15 hour entitlement there has been an in-year increase in this budget because the budget was set based on 684.80 children which was the DfE's estimate. This has now been updated for the January 2018 census which recorded 863.69 children. This has led to an increase in budget of £569k.

2 year old provision

9. In 2018-19 the hourly rate paid to providers remains at £5.92. At quarter 2 the projection indicates that there could be an overspend on this budget however it is included in the forecast as a balanced budget. There has been an in-year increase in this budget because the budget was set based on 526.13 children as recorded on the January 2017 census. This has now been updated for the

January 2018 census which recorded 551.86 children. This has led to an increase in budget of £86.8k.

High Needs Block

10. The High Needs Block budget is £29.980m after recoupment of place funding for academies/free schools and post 16 institutions and including the 0.5% transfer from the Schools Block agreed for 2018-19. It is currently forecasting to overspend by £2.129m.
11. In 2018-19 the High Needs Block budget has been calculated using the new High Needs National Funding Formula which came into effect from April 2018. This shown in Table 2 below.

Table 2 – High Needs Block Allocation 2018-19

Description	Pupil Numbers	Per Pupil £	£'000
HN NFF baseline block			£30,034
No. pupils in special schools/academies	533	£4,446.45	£2,370
Import/export adjustments	247	£6,000.00	-£1,479
Total 2018-19 HN Block Total			£30,925
Recoupment academy & post 16 place funding			-£1,755
Total High Needs Block 2018-19			£29,170
0.5% transfer from Schools Block			£810
HNB Budget 2018-19			£29,980

12. The High Needs Block National Funding Formula in 2018-19 has generated funding which is £2.9m lower than the actual budget allocated to High Needs in 2017-18. This is partially due to the fact that the 50% of the overall allocation is based on previous years' HNB allocations, rather than the actual spending on HNB.
13. The detailed budgets are shown at Appendix A. The 2018-19 High Needs Block is set out at Table 3 below.

Table 3 – High Needs Block 2018-19 Quarter 2

Area	201819 Budget	Q2 Forecast	Q2 Variance	Q1 Forecast	201718 Variance
	£'000	£'000	£'000	£'000	£'000
Independent & NMSS Day & Residential Provision	£4,942	£5,868	£926	£5,353	£411
Independent Specialist Provision	£852	£1,357	£504	£1,539	£687
Out of Borough EHCPs	£598	£554	-£44	£562	-£36
FE Colleges	£1,185	£1,760	£574	£1,374	£188
Other LA Special Schools	£1,973	£2,166	£192	£2,118	£145
Early Years SEN Provision	£338	£355	£17	£334	-£4
EOTAS & Alternative Provision	£284	£239	-£44	£157	-£126
Harrow Maintained Special Schools	£8,210	£8,211	£1	£8,210	£0
Pupil Referral Unit	£1,437	£1,437	£0	£1,437	£0
PFI Special Schools	£449	£449	£0	£449	£0
Sensory Teams	£1,151	£1,151	£0	£1,151	£0
SEN Transport	£187	£187	£0	£187	£0
Therapy	£773	£761	-£12	£773	£0
Harrow Academies Statements	£2,100	£2,100	£0	£2,100	£0
Harrow Academies ARMs	£512	£527	£15	£527	£15
Harrow Academies Special Schools	£1,003	£1,003	£0	£1,003	£0
Harrow Schools Statements	£2,924	£2,924	-£0	£2,924	£0
Harrow Schools ARMs Units	£1,060	£1,060	£0	£1,060	£0
Total	£29,980	£32,109	£2,129	£31,260	£1,280

14. The forecast as at quarter 2 is a predicted overspend of £2.129m. The individual line item budgets have been realigned to more accurately reflect the projected activity data within the budget available but there has been an overall reduction in budget. The net forecast has increased by £849k from the forecast reported in Month 2.

Independent & Non Maintained Special Schools (INMSS)

Day Provision

15. The forecast as at quarter 2 is an overspend of £456k. This is an increase of £291k from the forecast reported in month 2. There have been 15 additional children requiring provision and a reduction of 7 children who moved to other provision and one mover out. The majority of new placements are as a result

of tribunal decisions or children who have moved from mainstream school and ARMs provision. This is a net increase of 7 children funded from this budget. The average cost of a place in 2017-18 was £33.9k and this has increased to £37.7k in 2018-19. The forecast includes 3 further possible placements this academic year totalling £105k.

Residential Provision

16. The forecast as at quarter 2 is an overspend of £470k. This is an increase of £225k from the forecast reported in month 2. There have been 3 additional children requiring provision of which 2 have moved from day provision and 1 is a new placement. The forecast includes 5 further possible placements this academic year totalling £210k.

Independent Specialist Provision

17. The forecast as at quarter 2 is an overspend of £504k. This is a reduction of £183k from the forecast reported in month 2. There has been 2 additional young people requiring provision as a result of tribunal decisions and a reduction of 5 young people previously forecast here but who have subsequently been placed in other provision. The forecast includes 4 further possible placements this academic year totalling £252k.

Out of Borough Education Health Care Plans

18. This budget funds top up funding for statements/EHCPs for Harrow pupils in other local authority mainstream schools and academies. The forecast as quarter 2 is an underspend of £44k which is a small improvement from the forecast reported at month 2.

Further Education Colleges

19. The forecast as at quarter 2 is an overspend of £574k. This is an increase of £386k from the forecast reported in month 2. Part of this increase is the opposite impact of gross reductions of young people in INMSS day and residential provision and ISPs but there is an increase in the number of young people overall requiring provision. There have been a number of learners who have returned to education having previously left at 19 as well as young people staying on longer as a result of the SEND Reforms extending the age range to 25 years old. The forecast includes 4 further possible placements this academic year totalling £80k for young people currently in INMSS day provision. The new college placements and contracts are still being finalised and therefore there is potential that this forecast can change.

Other local authority special schools

20. This budget funds top up funding for Harrow pupils in other local authority special schools. The forecast as at quarter 2 is an overspend of £192k. This is an increase of £48k from the forecast reported in month 2. The number of young people has remained broadly the same. However there has been an increase in forecast due to request for additional place funding for 9 places from an out of borough academy trust which is creating additional places over and above which it has received funding for. In 2018-19 there are 114 places anticipated to be funded from this budget. The average cost per place has increased from £16k in 2017-18 to £19.7k in 2018-19. The forecast includes 3 further possible placements this academic year totalling £48k.
21. In previous years the LA has benefited by placing pupils in other LA special schools since the place funding (£10k) has to be paid by the host LA and only the top up is paid by the child's resident LA. However, in 2017-18 the ESFA has begun to calculate import/export adjustments on an annual basis. Therefore place funding for any Harrow pupils placed in other LA special schools will be recouped and paid to the host LA.

Early Years SEN Provision

22. The forecast at quarter 2 is an overspend of £17k. This budget commissions places at Haggston and Herga nursery schools and provides an ARMs type unit at Hillview nursery school. In addition this budget provides funding for EHCPs for approx. 42 nursery age children accessing PVI provision.

Education Other Than At School (EOTAS) & Alternative Provision

23. The forecast at quarter 2 is an underspend of £44k. The budget funds young people with high needs who are educated outside of a school setting including young people who are receiving medical treatment in a medical facility for example for mental health issues and accessing education at the provision. The responsibility for the education funding lies with the local authority through the high needs block regardless of whether the young person has a statement or EHCP. There has been an increase of 2 young people requiring provision both of whom have moved from other types of provision above.

Summary of movement between Quarter 2 and Month 2

24. The above paragraphs show the financial movement in the different types of provision between reporting periods. A number of young people have moved between different types of provision than previously projected and so to look at each of the above provision types in isolation can be misleading. The following table seeks to provide a combined summary of all of the movements

above so that the net number of new and ceased placements is more visible. It also gives Schools Forum a clearer view on the reason for new provision and in particular why a number of the changes were not and could not have been predicted earlier in the year.

Table 4 – Summary of HNB changes this financial year

Description	Amount	No. YP
HNB Forecast Month 2	£31,987,182	
Price Changes	-£24,142	various
New placement - mover in to the borough	£38,521	2
New placement - judicial review/tribunal	£314,463	7
New placement - social care requirement (education element only)	£77,677	2
New placement - moved from mainstream	£294,718	13
New placement - moved from special school	£88,000	2
New placement - from mental health provision	£18,000	1
New placement - returned to education	£39,112	1
Other FE (net of starters & leavers)	£60,285	various
Additional Place Funding OOB special schools	£52,500	9
EHCP ceased/moved out of borough	-£103,462	-7
Moved to alternative provision	-£43,555	-1
Credit Note from prior year	-£27,375	
Early Years	£21,028	
Alternative Provision	£82,044	
Other	-£38,955	
HNB Forecast Period 6	£32,836,041	
Movement	£848,859	

Harrow Maintained Special School Budgets & The Helix

25. The forecast as at quarter 2 is within budget. This budget funds the place funding and element 3 top up funding for the three maintained special schools and The Helix. The budget has increased between years due to an additional 14 places commissioned at Woodlands to meet the growth in demand for reception children. No adjustment has been made for claw back of top up funding for vacant places or for other LA pupils.

PFI Schools

26. PFI affordability gap funding for the three maintained PFI schools

Sensory Teams

27. The forecast as at quarter 2 is that the service will spend within budget.

SEN Transport

28. This is an agreed and fixed amount of funding from the DSG to contribute to SEN home to school transport.

Therapy

29. The forecast as at quarter 2 is that the service will spend within budget. The budget funds the Speech and Language Therapy contract with London North West Healthcare NHS Trust. In addition there is funding for adhoc therapy packages to individual children. The forecast is based on the agreed contractual values as well as an allowance for adhoc therapy packages.

Harrow Academies Costed Statements/EHCPs

30. The forecast as at quarter 2 is within budget. The forecast is based on the actual number of plans and top up funding is adjusted throughout the year. An allowance of £31k has been included to take account of the net anticipated cost of starters and leavers for the remainder of the academic year as top up funding is adjusted monthly.

Harrow Academies ARMs Units

31. The forecast as at quarter 2 is within budget. This budget funds top up funding for places in specialist units in Harrow academy primary and secondary schools. No adjustment has been made for claw back of top up funding for vacant places or for other LA pupils.

Harrow Academies Special Schools

32. The forecast as at quarter 2 is within budget. This budget funds top up funding for places in Harrow special academies. Place funding has been recouped by the ESFA from the Council and is paid to the academy directly. No adjustment has been made for claw back of top up funding for vacant places or for other LA pupils.

Harrow Schools Costed Statements/EHCPs

33. The forecast as at quarter 2 is within budget. The forecast is based on the actual number of plans on the October Census. An allowance of £127k has been included to take account of the net anticipated cost of starters and leavers for the remainder of the academic year as top up funding is adjusted monthly.

Harrow Schools ARMs Units

34. The forecast as at quarter 2 is within budget. This budget funds top up funding for places in specialist units in Harrow academy primary and secondary schools. No adjustment has been made for claw back of top up funding for vacant places or for other LA pupils.

SEND Strategy & High Needs Block

35. A report was brought to Schools Forum in May 2018 outlining the work being undertaken to review the High Needs Block and implement the SEND Strategy. In addition to this the LA is continue to:
- Maintain the integrity of thresholds for EHCPs
 - Monitor and review levels of support
 - Chair multi agency panels to ensure where out of borough and residential provision is required, best value is achieved, and pupils are placed as close to home as possible. This includes ensuring equity of funding between partners where appropriate
 - Review most efficient way of meeting needs when children are transferring from primary into secondary and from secondary into college settings
 - Work across the West London Alliance to resist inflationary pressures in the cost of day and residential placements
 - Defend decisions at Tribunals
 - Utilise Care Place Dynamic Purchasing System to provide a more transparent market place between providers that sign up to it so that all LAs will be aware of offers.
 - Seek to provide additional local capacity through both the free school programme to provide an additional free school and ARMs provision.
 - Continue to develop a five day offer for post 16 and post 19 pupils. Initially this will focus on the pathway for severe and complex needs post 18 in partnership with an FE provider, adult social care and the voluntary sector
 - Increasing opportunities for entry to employment

Growth Fund

36. The growth fund has been primarily established for Additional Class Funding for planned increases in PAN for the Primary Expansion Programme. Schools taking a bulge class or expanding permanently will receive £63k per class to cover the period September to March until the additional pupils are funded in the following year's budget through the census. In addition, funds have been added for expansion funding for schools extending the age range, in year bulge classes in the second year and funding for schools with varying rolls.

Table 5 – Growth Fund

Category	Budget	Forecast	Variance
Primary Expansion Funding	£1,565	£1,186	-£379
Post opening grants	£116	£116	£0
Bulge classes in year 2	£70	£0	-£70
Varying rolls funding	£73	£73	£0
Licences	£141	£141	£0
The Helix additional place funding	£125	£199	£74
Business Rates adjustments	£378	£378	£0
Total	£2,467	£2,092	-£375

Primary School Expansion Funding

37. £1.565m was earmarked for schools taking expansion classes from September 2018. Included in this budget was also a contingency for additional bulge classes in other year groups. The underspend relates to clawback of bulge class funding where the bulge has moved out the top of the school and the assumption that the additional in year bulge classes will not be required this financial year.

Bulge classes in year 2

38. £70k was earmarked for schools which took a bulge class in AY 2017-18 after the October census where the pupil numbers would not be included in the 2018-19 budget. As there were no bulge classes in 2017-18 this funding is not required.

Contingency

39. The anticipated impact on the contingency in 2018-19 is shown as follows:

Description	Schools £'000	Early Years £'000	Total £'000
Balance 1st April 2018	-£2,349	-£620	-£2,969
Anticipated clawback Early Years			£0
Proposed Earmark for SEN Inclusion	£306	-£306	£0
Anticipated spend for SEN Inclusion		£306	£306
2018-19 net overspend	£1,734		£1,734
Projected balance 31st March 2019	-£309	-£620	-£929

Section 3 – contact details

Contact:

Jo Frost
Finance Business Partner – Children's Services
020 8424 1978
Jo.Frost@harrow.gov.uk

Service Area	2018-19 Budget	2018-19 Forecast	Variance
	DSG	Q2	
Independent & NMSS Day Schools Independent NMSS Total	£4,336,016 £4,336,016	£3,908,751 £883,756 £4,792,508	 £456,492
Independent & NMSS Residential Schools Independent NMSS Total	£605,588 £605,588	£598,434 £476,972 £1,075,406	 £469,818
Independent Specialist Provision Total	£852,428 £852,428	£1,356,805 £1,356,805	 £504,377
DSG Out Borough Placement Fees OOB SEN Statements ABA Programme Tribunal Agency Schools Specialist Equipment Total	£597,887 £597,887	£537,929 £12,239 £3,355 £553,522	 -£44,365
FE Colleges Total	£1,185,432 £1,185,432	£1,759,779 £1,759,779	 £574,347
Other LA Special Schools RNOH Harrow claw back OOB special OOB Special Schools Total	£1,881,255 £92,000 £1,973,255	£92,000 £0 £2,073,754 £2,165,754	 £192,499
Early Years SEN Provision Hillview Nursery SEN Assessment Other EY Provision Total	£106,032 £232,452 £338,484	£106,032 £249,408 £355,440	 £16,956
EOTAS & Alternative Provision LAC CAMHS Tier 4 Education Costs Total	£283,818 £283,818	£143,978 £95,465 £239,443	 -£44,375
DSG Special School budgets Maintained special schools Less EFA Funding Total	£8,740,087 -£530,000 £8,210,087	£8,740,789 -£530,000 £8,210,789	 £702
DSG ISB Pupil Referral Unit Total	£1,436,564 £1,436,564	£1,436,564 £1,436,564	 £0

2018-19 Budget	2018-19 Forecast	Variance
DSG	Q1	
£4,336,016 £4,336,016	£3,615,311 £886,910 £4,502,221	 £166,205
£605,588 £605,588	£507,992 £342,835 £850,827	 £245,239
£852,428 £852,428	£1,539,346 £1,539,346	 £686,918
£597,887 £597,887	£559,512 £0 £2,682 £562,193	 -£35,694
£1,185,432 £1,185,432	£1,373,706 £1,373,706	 £188,274
£1,881,255 £92,000 £1,973,255	£92,000 £0 £2,026,154 £2,118,154	 £144,899
£106,032 £232,452 £338,484	£106,032 £228,380 £334,412	 -£4,072
£283,818 £283,818	£61,934 £95,465 £157,399	 -£126,419
£8,740,087 -£530,000 £8,210,087	£8,740,087 -£530,000 £8,210,087	 £0
£1,436,564 £1,436,564	£1,436,564 £1,436,564	 £0

2017-18 Budget	2017-18 Outturn	Variance
DSG		
£3,774,656 £3,774,656	£4,190,483 £4,190,483	 £415,827
£2,772,287 £2,772,287	£1,655,285 £1,655,285	 -£1,117,002
£798,265 £798,265	£837,214 £837,214	 £38,949
£498,507 £498,507	£596,762 £596,762	 £98,255
£1,631,623 £1,631,623	£1,263,374 £1,263,374	 -£368,249
£1,473,226 £92,000 £1,565,226	£92,000 -£229,672 £1,821,572 £1,683,900	 £118,674
£106,032 £220,000 £326,032	£106,032 £147,140 £253,172	 -£72,860
£186,779 £186,779	£273,815 £273,815	 £87,036
£8,501,308 -£530,000 £7,971,308	£8,558,590 -£530,000 £8,028,590	 £57,282
£1,436,550 £1,436,550	£1,436,550 £1,436,550	 £0

2016-17 Budget	2016-17 Outturn	Variance
DSG		
£3,717,963 £3,717,963	£3,827,942 £3,827,942	 £109,979
£2,812,321 £2,812,321	£2,829,529 £2,829,529	 £17,208
£638,267 £638,267	£610,101 £610,101	 -£28,166
£940,570 £940,570	£580,722 £37,410 £618,132	 -£322,438
£1,598,283 £1,598,283	£1,269,269 £1,269,269	 -£329,014
£1,526,706 £92,000 £1,526,706	£92,000 -£113,566 £1,598,408 £1,576,842	 £50,136
£38,520 £252,570 £38,520	£81,782 £252,570 £334,352	 £295,832
 £0	£69,714 £106,150 £175,864	 £175,864
£7,625,616 £7,625,616	£8,155,616 -£530,000 £7,625,616	 £0
£1,436,550 £1,436,550	£1,436,550 £1,436,550	 £0

Service Area	2018-19 Budget	2018-19 Forecast	Variance
	DSG	Q2	
PFI Special Schools Less PFI credits/income Total	£449,231 £449,231	£2,505,283 -£2,056,052 £449,231	 £0
Sensory Team - Visual Total	£1,017,400 £1,017,400	£1,017,400 £1,017,400	 £0
Sensory Team - ASD Total	£133,520 £133,520	£133,520 £133,520	£0 £0
SEN Transport Total	£187,330 £187,330	£187,330 £187,330	 £0
Therapy Total	£773,498 £773,498	£761,259 £761,259	 -£12,239
Harrow Academies Costed Statements Primary - allocation All through - allocation Secondary - allocation In year adjustments Total	£354,650 £130,497 £1,564,386 £50,000 £2,099,533	£354,650 £130,497 £1,564,386 £50,000 £2,099,533	 £0
Harrow Academies ARMs units Primary - allocation Secondary - allocation In year adjustments Total	£254,376 £282,950 -£25,083 £512,243	£254,718 £272,187 £0 £526,905	 £14,662
Harrow Academies Special Schools Top up allocation In year adjustments Total	£1,003,480 £1,003,480	£1,003,480 £0 £1,003,480	 £0
Harrow Schools Costed Statements Primary - allocation Secondary - allocation Special Schools - allocation Nursery Schools - allocation In year adjustments Total	£1,996,336 £398,627 £226,177 £2,401 £300,000 £2,923,541	£1,996,336 £398,627 £226,177 £2,401 £300,000 £2,923,541	 -£0
Harrow Schools ARMs Units Primary - allocation Secondary - allocation In year adjustments Total	£777,648 £282,670 £1,060,318	£777,648 £282,670 £1,060,318	 £0
TOTALS	£29,979,653	£32,108,525	£2,128,872

2018-19 Budget	2018-19 Forecast	Variance
DSG	Q1	
£449,231 £449,231	£2,505,283 -£2,056,052 £449,231	 £0
£1,017,400 £1,017,400	£1,017,400 £1,017,400	 £0
£133,520 £133,520	£133,520 £133,520	£0 £0
£187,330 £187,330	£187,330 £187,330	 £0
£773,498 £773,498	£773,498 £773,498	 £0
£354,650 £130,497 £1,564,386 £50,000 £2,099,533	£354,650 £130,497 £1,564,386 £50,000 £2,099,533	 -£0
£254,376 £282,950 -£25,083 £512,243	£254,718 £272,187 £0 £526,905	 £14,662
£1,003,480 £1,003,480	£1,003,480 £0 £1,003,480	 £0
£1,996,336 £398,627 £226,177 £2,401 £300,000 £2,923,541	£1,996,336 £398,627 £226,177 £2,401 £300,000 £2,923,541	 -£0
£777,648 £282,670 £1,060,318	£777,648 £282,670 £1,060,318	 £0
£29,979,653	£31,259,666	£1,280,013

2017-18 Budget	2017-18 Outturn	Variance
DSG		
£449,231 £449,231	£2,505,283 -£2,056,052 £449,231	 £0
£1,017,400 £1,017,400	£997,700 £997,700	 -£19,700
£133,520 £133,520	£109,879 £109,879	£0 -£23,641
£187,330 £187,330	£187,330 £187,330	 £0
£703,795 £703,795	£767,066 £767,066	 £63,271
£1,966,094 £1,966,094	£278,385 £124,055 £1,547,654 £9,296 £1,959,390	 -£6,704
£127,188 £268,738 £128,000 £523,926	£127,188 £262,905 £115,630 £505,723	 -£18,203
£1,003,480 £1,003,480	£1,003,480 -£92,191 £911,289	 -£92,191
£2,549,666 £2,549,666	£1,796,906 £426,340 £326,420 £278,695 £2,828,361	 £278,695
£1,238,276 £372,576 -£128,000 £1,482,852	£1,238,345 £372,576 -£157,858 £1,453,063	 -£29,789
£30,978,527	£30,388,178	-£590,349

2016-17 Budget	2016-17 Outturn	Variance
DSG		
£449,231 £449,231	£2,505,283 -£2,056,052 £449,231	 £0
£868,400 £868,400	£893,468 £893,468	 £25,068
£133,520 £133,520	£124,874 £124,874	£0 -£8,646
£187,330 £187,330	£187,330 £187,330	 £0
£678,042 £678,042	£744,180 £744,180	 £66,138
£1,722,127 £1,722,127	£200,057 £40,534 £1,081,430 £498,344 £1,820,365	 £98,238
£127,188 £256,645 -£41,037 £383,833	£127,188 £256,645 -£41,037 £342,796	 -£41,037
£996,250 £996,250	£996,250 -£69,592 £926,658	 -£69,592
£2,396,502 £2,396,502	£1,408,685 £342,786 £198,528 £938,111 £2,888,110	 £491,608
£1,001,277 £372,576 £1,373,853	£1,001,277 £372,576 £52,656 £1,426,509	 £52,656
£29,523,884	£30,107,718	£583,834

Meeting:	Schools Forum
Date:	16 October 2018
Subject:	Item 5: Review of funding for EHCPs in mainstream schools and academies
Responsible Officer:	Jo Frost, Finance Business Partner – Children’s Services

Section 1 – summary

1. This report sets out the proposals for changes to funding for pupils with Education Health & Care Plans (EHCPs) and statements in mainstream schools and academies, including free schools. These proposals do not apply to special school funding, pupils in special resource provision in mainstream schools or early years pupils with EHCPs.
2. The LA intends to consult on these proposals in the Autumn Term 2018 with a proposed implementation date of 1st April 2019.
3. Schools Forum is asked to consider the proposals in this report which is intended to form a consultation document.

Section 2 – report

Background

4. Funding for pupils with Special Educational Needs and Disabilities (SEND) comes from the High Needs Block (HNB) of the Dedicated Schools Grant (DSG).
5. Local authorities should use the HNB to provide the most appropriate support package and setting for an individual with SEND, taking account of parental and student choice. The Children and Families Act 2014 extended local authorities’ statutory duties relating to SEND across the 0 to 25 age range.
6. Where individual pupils require additional support that costs more than £6,000, the excess should be met by top-up funding associated with the

individual pupil. Top-up funding rates are for local authorities to agree with schools and academies. They should reflect the needs of the individual, and the cost of meeting those needs.

7. Local authorities should provide additional funding outside the main funding formula for mainstream schools and academies on a consistent and fair basis where the number of their high needs pupils cannot be reflected adequately in formula funding. They should define the circumstances in which additional funding will be provided from their high needs budget.
8. Local authorities should have a formula or other method, based on their experience of distributing additional funding to their schools and academies. This should be agreed with schools. In all cases the distribution methodology should be simple and transparent, and devised so that additional funds are targeted only to a minority of schools which have particular difficulties because of their disproportionate number of high needs or SEND pupils or their characteristics

Harrow Context

9. In 2013-14 the School Funding Reforms introduced the place-plus approach to SEND funding. In the school funding formula it was proposed that schools receive a notional SEN budget. From this they would provide a standard offer of teaching and learning for all pupils including those with high needs.
10. On this basis schools would contribute the first £6,000 of the additional support costs of high needs pupils. Additional support is defined as the additional requirements that a pupil needs in order to access the school's offer of teaching and learning. Funding above this level should be agreed with the commissioning local authority and paid in the form of a top up from its High Needs Block (HNB).
11. In 2013 detailed analysis was undertaken to establish which of the allowable factors could be used to initiate the additional delegation into the schools funding formula that this new methodology would require in order to determine a notional SEN budget. The conclusion reached was that none of the factors would target funding to schools in accordance with where children's needs are met.
12. Therefore the following was agreed with Schools Forum:
 - Part 1 All schools through the schools block receive £6,000 to support the equivalent of two high cost SEND pupils, i.e. £12,000. It should be noted that

two placements was seen as the most efficient level of delegation as virtually all schools have two placements.

- **Part 2** All schools with in excess of two high cost statements/EHCPs exceed receive an allocation of an additional £6,000 per pupil from the centrally managed High Needs Block based on the previous year's October census. The notion of using October as a count date is in line with the basis of all other factor data, including pupil numbers.

13. The top up funding is currently paid out on an hourly rate of £10.77 (over 52 weeks) for the number of hours (or equivalent) agreed in an EHCP.

Element 2 Place Funding (£6,000)

14. The current Harrow Schools Funding Formula uses the lump sum value in the National Funding Formula but in addition Element 2 place funding of £12,000 for the first two costed statements/EHCPs in each mainstream school and academy. Each additional statement on the October census is then funded through the High Needs Block.
15. The addition of the £12,000 in the schools funding formula is a locally made decision and adjustment. Under the hard national funding formula to be implemented in April 2020 the local authority will not have any involvement in determining budgets to schools and this funding will not be in the school funding formula.
16. The LA is currently consulting with all schools to seek views on whether this funding should be moved back into the High Needs Block.
17. The remaining Element 2 place funding is currently distributed based on the previous October census. Going forward the LA is proposing to change this mechanism to instead fund Element 2 £6,000 in real time so that each month it will be included in the adjustment for starters and leavers. This would be consistent with the mechanism for funding the top-ups.
18. The impact across all schools would not be significant. However, the impact at school level may vary. Historically if a school had a pupil with an EHCP recorded on the October census it would receive £6,000 the following year regardless of whether the pupil subsequently left or not.
19. However if a school admitted a pupil after the census date it could take up to 18 months before the £6,000 is reflected in the school's budget. The LA believes that the proposed method is fairer to schools admitting pupils with EHCPs because the

funding will be received in real time and it will be consistent with the methodology for providing top-up funding.

20. Funding adjustments would be calculated over 52 weeks and adjusted monthly so that starters and leavers in year would only be funded for the number of weeks they are in the school.

Top-up funding

21. Top-up funding is currently paid out at an hourly rate of £10.77 (over 52 weeks) for the number of hours (or equivalent) agreed in an EHCP. A number of schools, through Schools Forum, have expressed the view that funding allocated on the basis of teaching hours does not reflect the complexities or the flexibility of how provision is managed in schools. In order to address this, the LA has explored an alternative model of funding, in particular, a banding system to support the decision making process.
22. The LA has developed a High Needs Matrix to support decision making relating to additional funding (i.e. Element 3). The High Needs Matrix is based on the 4 broad areas of difficulty described in the 2014 SEND Code of Practice. The aim of the banding matrix is that funding is provided at a consistent and transparent level across all mainstream educational settings. The move away from an allocation of funding based on 1-1 teaching assistant hours provides the school with a level of flexibility in how funding is used in the school to meet the provision as specified in a pupil's EHCP.

How does the High Needs Matrix work?

23. The High Needs Matrix will be used to support the decision making for all allocations of additional education funding for special educational needs in all mainstream schools, academies and free schools in Harrow.
24. The 2014 SEND Code of Practice describes four broad categories of SEN
- Sensory and/or Physical
 - Communication and Interaction
 - Emotional, Social and Mental Health
 - Cognition and Learning
25. In the High Needs Matrix these are further subdivided to give 10 columns describing need with 5 rows relating to the severity of the need. Each row is assigned points ranging from 0 – 4 with 0 being no significant need and 4 being the highest level of need.
26. The four main categories are weighted as follows:
- Sensory and/or Physical x 4

- Communication and Interaction x 2
- Emotional, Social and Mental Health x 4
- Cognition and Learning x4

Allocating funding to a new EHCP

27. When an EHCP reaches draft stage the LA must decide on the level of provision required to meet a pupil's needs. The following steps will be taken:

- The decision exercise will be part of the weekly SENARS panel.
- Based on the information gathered as part of the statutory assessment, the needs in each column are considered and a decision reached on which description best describes the pupil.
- Descriptors in more than one row can apply so best judgement should be used to decide which one is the best fit alongside the information gathered.
- On a copy of the Matrix, the columns and rows are marked to record the panel decision.
- The Matrix assigns points ranging from 0 – 4 depending upon which row the pupil's needs are plotted against
- The point level is worked out by adding up the scores in the columns which will be set out in a table such as Table 1 below.

Table 1 – Matrix scoring template

Column Heading	Score	Weighting	Points
Physical disability and/or medical conditions	0	x4	0
Hearing	0	x4	0
Vision	0	x4	0
Speech and Language	0	x2	0
Communication and Interaction	0	x2	0
Emotional Wellbeing	0	x4	0
Social behaviour	0	x4	0
Learning behaviour	0	x4	0
Cognitive ability	0	x4	0
Specific learning difficulty	0	x4	0
Total points	xxx		xxx

- The columns are weighted.
- Under the Cognition and Learning category, the final two columns: Cognitive Ability and Specific Learning Difficulty are capped at a maximum of 16 points.
- The points total converts to a point band in the funding table and establish the top-up funding amount.

Table 2 – Matrix Banding and Funding

Band	Points Band	Place & Top-up	Place funding	Top-up
A	0-15 points	School budget	School budget	School budget
B	16-26 points	£9,523.76	£6,000.00	£3,523.76
C	27-42 points	£11,200.80	£6,000.00	£5,200.80
D	43-53 points	£13,900.76	£6,000.00	£7,900.76
E	Over 54 points	£16,531.99	£6,000.00	£10,531.99

When is Element 3 funding allocated or amended?

28. The LA allocates Element 3 funding using the High Needs Matrix:

- In issuing a final EHCP following a Statutory Needs Assessment based on the information provided
- The Annual Review process – the school should ensure that the recommendation for an amendment to funding is evidence based

How else may the High Needs Matrix be used?

29. The High Needs Matrix may be used to when considering when thinking about making a request for Statutory Needs Assessment.

Exceptions to the Matrix

30. The High Needs Matrix is used to support decision making. It is not intended to be definitive although the sampling carried out during the development of the Matrix indicated that it was accurate in determining an appropriate level of additional funding in the majority of sampled cases. SENARS intend to continue to sample cases to have in place more detailed sampling to support and inform a consultation.

31. There are exceptions where the Matrix does not reflect the level of need for a pupil who has a significant sensory impairment /VI or HI or pupils who have significant physical need but no SEN learning need. In such cases a more detailed discussion will be held before determining the allocation of additional funding.

Further work

32. It is important that there is clarity on the language used in the Matrix descriptors and a common understanding of what is meant by terminology. For this reason the LA will be developing an Appendix to the Matrix to clarify the language in the descriptors so there is clarity on what is meant by:

- Sometimes
 - Often
 - Frequently
 - Regularly
-
- Exceptionally Low Range
 - Significantly Low Range
 - Below Average Range
 - Average Range
 - Above Average Range
 - Significantly High Range
 - Exceptionally High Range

33. In addition to this the LA is working with Legal Services to ensure that the matrix is robust and will not open up the LA to challenge

Next Steps

34. Subject to legal assurances and further sampling the LA is proposing to consult with all schools and academies in the Autumn Term. The proposed implementation date is 1st April 2019.

Consultation

35. The Schools Forum (England) Regulations 2012 state:

Consultation on financial issues

- **10.—(1)** The authority must consult the schools forum annually in respect of the authority's functions relating to the schools budget, in connection with the following—
- (a) arrangements for the education of pupils with special educational needs and in particular—
- (i) the places to be commissioned by the local authority in different schools and other institutions, and
- (ii) the arrangements for paying top-up funding to schools and other institutions

Section 3 – contact details

Contact:

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POINTS	Sensory and Physical			Communication and Interaction		Social emotional and mental health		Cognition and learning		
	Physical Disability and /or Medical	Hearing	Vision	Speech and Language	Social communication and Interaction	Emotional and mental well being	Social behaviour	Learning behaviour	Cognitive ability	SPLD
0	No needs in this area, physical development and general health within normal levels	Does not meet the minimum unaided threshold for classification of hearing loss.	Does not meet the minimum unaided threshold for classification of vision loss. Included when corrected by glasses 6/6-6/12	Language and communication skills within normal levels	No significant needs in this area.	No significant needs in this area.	No significant needs in this area.	No significant needs in this area.	No significant needs in this area	No significant difficulties with literacy and numeracy given the CYP's history of schooling
1	Mild physical disability e.g. absent digits, low muscle tone. CYP is independently mobile without the use of aids etc. but requires assistance for some school routines and self-help skills. CYP may needs support with management of medical condition administration of regular medication in school	Mild - unaided threshold 20-40dBHL Unilateral/Fluctuating conductive HI - Good hearing in better ear. Mild HI/CI functioning as mild HI Mild HI with conductive overlay/Unilateral HI with conductive overlay Mild APD/ANSD	Distance Vision Mild vision loss - Within the range 6/12 - 6/18 Snellen/Kay (LogMAR 0.3 – 0.48) Near vision mild vision loss - N14-18 Monocular/mild/fluctuating VI (with reasonable vision for a considerable amount of time) Functional mild loss due to CVI or other visual factors such as visual field loss or nystagmus	CYP has mild difficulties In expressive and/or receptive language and/ or CYP has a mild speech sound disorder	CYP has difficulties with aspects of social interaction but has academic and behavioural competencies that support their ability to cope with the expectations of school life with some non-specialised adaptations	Some inappropriate emotions and responses Somewhat lacks empathy with others Sometimes appears upset or low Some occasional mood swings Sometimes unsettled by change	Sometimes has poor interactions with other CYP Sometimes is disrespectful to staff or property Sometimes seeks attention inappropriately or unable to wait for rewards	Regularly impolite/uncooperative Is very difficult to direct. Regularly resorts to physical/verbal aggression	CYP presents with some learning delay, shows some difficulties with conceptual understanding, in one or more areas of the core curriculum and attainments are below expected levels	Some difficulty with acquiring literacy skills. Literacy skills over 2 years behind chronological age in spite of extensive attempts to remediate difficulties
2	Moderate disability CYP is mobile with the use of walking aids May require level access and/or supervision or assistance on stairs or other reasonable adjustments CYP needs daily specialist programme for co-ordination skills CYP needs daily adult support with health care regimes	Moderate - unaided threshold 41-70 dBHL Moderate longstanding conductive HI/Moderate HI/CI functioning as moderate HI Moderate APD/ANSD	Distance Vision Moderate vision loss - Less than 6/19 - 6/36 Snellen/Kay (LogMAR 0.5 – 0.78) Near vision moderate vision loss Near vision Moderate vision loss - N18-24 Moderate/Fluctuating VI/Functional moderate loss due to CVI or other visual factors such as visual field loss or nystagmus	Moderate language difficulties that create obstacles to communication or learning in everyday life. CYP has a moderate speech sound disorder.	CYP has difficulties with aspects of social interaction and has some other significant areas of need (learning, attention, behaviour) and requires additional support and/ or specialised interventions in school. Is able to independently develop with targeted support	Often shows inappropriate emotions and responses. Often shows little empathy with others Often unhappy, withdrawn, disengaged, shows mood swings Often upset by change	Often has poor interaction with other CYP Often is impolite/uncooperative to staff or disrespectful to property Often seeks attention inappropriately or unable to wait	Often gets distracted from tasks. Often inattentive to staff Often disorganised and lacking equipment Often finds group learning difficult	Mild learning difficulties. Needs differentiated work and support with conceptual understanding, and reasoning across the core curriculum. In the low range on standardised assessments of cognitive ability, or CYP presents with a very uneven profile of cognitive abilities that requires a balance of small groups and additional adult support	Uneven profile of skills in core areas. Some difficulties with spelling and reading high frequency words. Unrecognisable spelling of phonic alternatives. Reading 3-4 years behind chronological age in spite of specialised advice to support and remediate difficulties over a period of more than two years.
3	Severe disability CYP needs access to wheelchair for movement either independently with chair or adult support CYP requires specialist seating and possible other specialist equipment Dependent on assistive technology and/or support for most curriculum access e.g. alternative to handwriting	Severe - unaided threshold 71-95 dBHL Severe HI (including significant high frequency)/CI function as severe HI Moderate HI with conductive overlay/Functional severe loss due to auditory neuropathy period from presumed onset: 6mths-2yrs Continuing assessment of HI required e.g. fluctuating condition, deteriorating/degenerative/progressive loss Recently acquired permanent HI (within the last 6 months) Bilateral hearing loss Severe APD/ANSD	Distance Vision Severe vision loss - Less than 6/36 - 6/120 Snellen/Kay (LogMAR 0.8 – 1.3) Near vision Severe vision loss - N24-36 Severe/Fluctuating VI/Functional severe loss due to CVI or other visual factors such as visual field loss or nystagmus Continuing assessment of VI required e.g. fluctuating condition, deteriorating/degenerative/ progressive loss	Severe language and /or speech sound disorder/ limited language. Uses mix of speech and augmented communication systems	As above but social communication difficulties impact across all areas of development. CYP needs a regulated setting with staff experienced in using approaches suited to CYP with autism	Frequently show inappropriate emotional responses. Frequently distressed by change/transition Frequently displays bizarre, obsessive or repetitive behaviours	Frequently have poor interactions with CYP. Frequently is impolite/uncooperative to staff or disrespectful to property Frequently seeks attention inappropriately	Frequently gets distracted from tasks Frequently inattentive to staff Frequently disorganised and lacking equipment Frequently finds group learning difficult	Moderate learning difficulties, showing significant delay in reasoning skills and experiencing learning difficulties across all areas of the curriculum. Extremely low range on standardised assessments of cognitive ability and requires an individualised curriculum and substantial individual adult support	Very uneven profile of skills. Difficulty in all literacy based subjects. Severe difficulties with HF words. Reading 5 or more years behind chronological age.
4	Profound or Progressive condition Powered wheelchair dependent on assistance for mobility Non-weight bearing - requires use of hoisting Staff require regular moving and handling training Dependent on assistance for most personal care needs, e.g. toilet, dressing, eating and drinking Specialist health care support required e.g. tracheostomy, gastronomy, pressure care, multi-agency joint working required	Profound - unaided in excess of 95 dBHL Profound HI/Profound functional loss due to auditory neuropathy/CI functioning as profound HI Regular support required to support assistive listening technology/specialist equipment required Bilateral hearing loss Profound APD/ANSD	Distance Vision profound vision loss - Less than 6/120 Snellen/Kay (LogMAR 1.32+) Near vision Profound vision loss - Educationally blind/Braille user/can access small quantities of print larger than N36 Profound VI/Functional profound loss due to CVI or other visual factors such as visual field loss or nystagmus	Severely limited language skills, uses alternative communication systems to make needs/choices known	As above but CYP difficulties have a profound impact on their ability to function and multiple difficulties attaining developmental expectations across all curriculum areas	Regularly shows inappropriate emotional responses including self-harming. Regularly behaviour is severely withdrawn, bizarre or obsessional	Regularly impolite/uncooperative Is very difficult to direct. Regularly resorts to physical/verbal aggression	Regularly finds it very difficult to cope with most learning situations as an individual or as part of a group. Regularly shows very little interest in school work at all	Severe learning difficulties and global developmental delay, affecting self-help and independence skills throughout school. Functions at a level that requires specialised interventions and adaptations to the curriculum	Severe difficulties in accessing any written material and often