

Item 5 – Appendix A – Mainstream EHCP Funding Consultation Responses

Question 1

This response was submitted by 16 schools

However we do not agree with the percentage suggested

- Whilst any additional funding is welcomed, there are issues with the methodology
- The assumptions made with regard to other LAs spending appear low
- This represents a below inflation rise (whilst costs are rising at a much higher rate)
- The ambition appears to be to bring Harrow up to 'average' and there should be a higher aspiration
- If we fall lower than the anticipated average in this consultation or stay as average, an adjustment to be made to put us at the LA's ambitious above average expectation should be consulted on
- Would like clarity on what this will look like for schools based on Oct 23 Census numbers
- Would like it formally written that EHCP funding to be reviewed by the council annually to align with teacher and support staff pay increases and rates of inflation – funding must match

We appreciate further funding as current funding does not allow us to adequately provide for the support needed so this increase would be welcomed

- ☐ Agree, in principle, with increased level of funding for mainstream EHCPs
- ☐ Would tick 'YES' if this were a minimum proposal (at least this % figure)
- ☐ Pleased that Harrow Council has recognised the challenge and are taking action
- ☐ Concerned that the anticipated rise in level of funding by other LAs for 2024-25 may be cautious – would want to be assured that there is a plan in place to adjust that accordingly if those rises are in excess of estimates
- ☐ Although it is recognised that, if the assumptions are accurate, this would bring Harrow to an average level, it would be good to show more ambition
- ☐ In order to support such a proposal, it would be preferred to see the longer term plan

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- The assumptions made with regard to other LAs spending appear low.
- The ambition appears to be to bring Harrow up to 'average' and there should be a higher aspiration.

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- The assumptions made with regard to other LAs spending appear low
- This represents a below inflation rise (whilst costs are rising at a much higher rate)
- The ambition appears to be to bring Harrow up to 'average' and there should be a higher aspiration.
- Not a long term plan, for budgeting, we suggest we need an annual link (e.g. for 3 years) to increases for other schools staff pay or to inflation year on year

However the LA needs to be mindful and ensure that increases are in line with other LAs who currently offer a higher rate than Harrow for EHCPs in mainstream school. It is essential to ensure that increases are in line and Harrow schools do not continue to be disadvantaged compared to neighbouring authorities

The current funding is not sufficient in the majority of cases to support the high needs of pupils in a mainstream setting and more funding for the bandings would be very useful. The percentage is disagreed with as it is below inflation. No long term plan has been shown

This response was submitted by 6 schools

While any increase to the EHCP banding/hourly rates is obviously welcome, we have some concerns about the proposed level of increase and the methodology used to support this.

- 1) The figures used to calculate EHCP funding in other boroughs for 2022-23 and 2023-24 rely on an assumption of increased funding of 3.4% and 3% respectively. This figure is well below inflation, significantly below the recent pay awards and ignores the possibility of higher increase in those boroughs
- 2) If we accept the assumptions above, we are concerned that the 7% increase brings us to a position of average level of funding across local boroughs. Schools in Harrow aspire to be providing services for EHCP students that are well above average and the funding should reflect this. We all strive hard to achieve above average outcomes for our students and therefore believe that funding should match this.

<p>3) We are very concerned that this does not mean additional funding in the system, but will instead come from reducing the SEND support fund. Schools with an above average number of EHCPs rely on both the EHCP top up funding and the SEND support fund to provide the support our students need. This is already extremely difficult, top up funding at current levels is insufficient and the increasing level of SEND need we are seeing continues to intensify.</p> <p>4) No provision is made in this proposal for a long term solution to ensure we are not in this position again.</p>
<p>I would support this proposal if we can again review comparisons between boroughs in April 2024 to check that we are aligned with average EHCP funding.</p>
<p>We support the need to increase the hourly rates but we would suggest that 7% is not enough given the inflationary pressures that we have faced with all of the services attached to the children affected by this. 10% would be more like it.</p>
<p>However we do not agree with the percentage suggested</p> <ul style="list-style-type: none"> • Whilst any additional funding is welcomed, there are issues with the methodology • The assumptions made with regard to other LAs spending appear low • This represents a below inflation rise (whilst costs are rising at a much higher rate) • The ambition appears to be to bring Harrow up to 'average' and there should be a higher aspiration • there is no long term plan • (Redacted) is a faith school hence pupils from different boroughs with EHCPs study here - if the threshold is proposed at 3% then our school will always be lower as the threshold will be calculated across different boroughs - how will this be inclusive for (Redacted) Primary school
<p>(Redacted) School does support this proposal, though is concerned without any 'new' money coming into the borough to fund this, that other services will be depleted. Our other concern is that the increase is welcomed, yet does not cover some of the specialist provision required for EHCP's. The majority of EHCP's we have are not supported by OT despite having it in their Plan due to a shortage and other pastoral services are not consistent across Harrow – which means even with the money – it may not be enough to buy in the specialism we need.</p> <p>In addition - I don't know if this is viable but I would like to see the money front loaded, so that the school that does the work to get the EHCP is rewarded for the effort and any clawback if the child leaves in year is not proportionate to the number of weeks the child has been at the school. This would acknowledge the time and effort that goes into producing the EHCP. This isn't asking for more money it is just recognising the effort if a child leaves before the end of the year.</p>
<p>The percentage increase is too small cost of staffing has risen more than 7% schools are coping with increased demands with SEND and yet budgets are being reduced considerably</p>

Question 2

<p>This response was submitted by 16 schools</p> <p>Unable to support any proposal which reduces SEND funding</p> <ul style="list-style-type: none"> • Schools rely on this funding. Interventions, work with outside agencies, TA support etc is dependent on this • The reduction in this additional support will offset any gains from proposals 1 or 3, leaving schools in a difficult position • Would like to see how schools affected by falling rolls and not meeting the 3% mark will be affected in particular and clarify if there is support for them
<p>We would not support a model where schools would lose funding</p> <p>All children with EHCP should receive funding regardless of how many in the schools</p> <p>We should not be setting schools up in competition against each other</p> <p>*Another factor is that for schools with ARMs it might mean that the main body of the school have less EHCPs but overall the school staffing body is one and the needs will be as great across the school (especially as the ARMs model aims to integrate children as much as possible) even though proportionately within the main school there are less EHCPs so this model will penalise a school with an ARMS</p>
<ul style="list-style-type: none"> • It is difficult to support any proposal which will result in a reduction in funding • Whilst it is recognised that the overall spending reduction will fund the increase in mainstream

EHCP finding, and Band F, this means that some schools may not receive sufficient additional funding to manage the level of need in their schools · Even a small drop in funding, of £12,000 or £18,000, may result in the loss of additional support staff – which we cannot support
<ul style="list-style-type: none"> • Unable to support any proposal which reduces SEND funding • Schools rely on this funding as interventions, work with outside agencies, TA support etc is dependent on this. • The reduction in this additional support will offset any gains from proposals 1 or 3, leaving schools in a difficult position.
We do not support this as this funding is vital and is relied upon. Without this funding we would be unable to provide additional support, work with outside agencies and provide much needed interventions. There would also be no gains for schools that receive the additional funding as it would be offset by this reduction.
<ul style="list-style-type: none"> • We are unsure why we (redacted) are not listed as a school who should receive the SEND Support Funding in 2023-24 as our EHCP percentage is currently 3% (13 EHCs out of 420 children) and will be at least 3.8% when EHCs approved by panel go through. We also have 3 further children whose EHC applications we are working on. • We are unwilling to support a proposal which reduces SEND funding • The reduction in this additional support will offset any gains from proposals 1 or 2, leaving schools in a difficult position
I do feel that the response to this question is not straightforward as indicated in the consultation paper- the funding is where the number of SEND pupils are over 3% of the school population based on Oct 2022. This is fine for all through primary schools however, for an infant school where needs of new early years starters are in the early stages of identification but they still have to be resourced with potential EHCPs in the pipeline which the school works hard to acquire they then move on into the Junior school, (the school thus received limited funding and it is never comparable with what has been financially committed for those learners during their time in the infant school). The junior school then continue to benefit from the funding and the infants are further disadvantaged. There continues to be a huge issue of pre- school settings not submitting paperwork and being supported to acquire EHCP for children with high needs prior to admissions into early years settings into schools which places huge pressures on SENCO's and school staff to resources and support these learners to get EHCP which can take up to a year or longer in some cases where referrals and assessments from other professionals are pending and holding up the process!
<p>This response was submitted by 6 schools</p> <p>We do not support any proposal that reduces funding available to support students with an EHCP. In the vast majority of affected schools the reduction in funding substantially offsets any benefit gained from the 7% increase in Question 1 rendering this meaningless for those schools In this situation affected schools would be forced to review their staffing levels and also the third party intervention support that we currently offer to our SEND students. To support the high number of students with EHCPs we need to see a meaningful increase to our SEND funding not tinkering at the edges by moving funding around. It should also be noted that dependent on the demographics of catchment areas, the level of need displayed by children with EHCPs can vary greatly, so for example some school's with more affluent and articulate parents will have a high number of EHCPs than schools who draw from a less affluent background. We have been in the situation a number of times where schools with ARMS units have refused a student whom we have then been forced to take, in spite of not having the same level of resource.</p>
Receiving an EHCP for a pupil is currently very challenging, if the threshold were to be raised then there is the potential that pupils who require EHCP's would not receive the support they require. As a school which is on the boarder of three different boroughs, SEN support from trained professionals is a serious concern for us and our pupils. This makes it more challenging as Brent and Ealing will not send in specialists, such as Speech and Language or Occupational Therapy, without an EHCP.
We have children with very complex needs but according to the new threshold we as a school would lose out - we might not qualify fo the 3% but it is not the quantity of children but the complex and individual needs that is the critical issue. Children with high needs should be supported in any school they are in - it should not be according to numbers of children, but individual needs

<p>The only reason for this threshold raise is to gain the increased funds for a Band F approach. So although this does not affect (redacted) it will have a detrimental effect on many other schools so the threshold should remain as it is. This problem would be greatly eased if funding for Primary schools was at least on a par with secondary schools to start with and this needs to be taken seriously by Harrow and the Government.</p>
<p>How can leaders support any proposal which reduced SEND funding Schools rely on this funding. Interventions, work with outside agencies, TA support etc is dependent on this the reduction in this additional support will offset any gains from proposals 1 or 2, leaving schools in a challenging position</p>
<p>We are not fully clear on what this question means and how it will be calculated. 1. How and when are you calculating the 'disproportionate numbers of SEND?' Often these numbers build across a year, so we may not have all EHCP's completed and ready for the Census collections – which means we will be underfunded until the next census. 2. How can the numbers be calculated when many Central Schools e.g. Grange and Norbury, have disproportionate high levels of mobility and need, that may not show-up on Census? 3. I am confused on how you can share this funding equally amongst all the children – I think it will result in an unfair system. 4. There should be a robust system at Admissions to ascertain needs and where these children have been (not just the school name) so that schools can know in advance for</p>
<p>The threshold either needs to stay the same or be lowered. If it increases to 3% of roll a lot of schools will lose financially and therefore won't be able to support their EHCP pupils. As a result of this other children will lose out as funds are diverted from their resources to fund EHCPs. Schools that have a larger percentage of EHCPs will lose out and these tend to be the schools in the more deprived communities who are already financially stretched.</p>

Question 3

<p>This response was submitted by 16 schools NO - we do not agree to the amount, or it happening by taking away from SEND support funding and no long-term presentation of how special school places will be increased • Any additional funding is welcomed, and understand the LA's recognition of this significant issue for schools • This is not additional funding; it is re-allocated funding from proposal 2 • Children in this category need specialist provision. Additional funding in mainstream is not the answer for these children for whom mainstream provision is not suitable (also impact on all other students) • Not a long-term solution is needed • Clarity and confidence is needed in the definition of Section F including if parents do not want a special school but any professional indicating a special school place would be best to meet the child's needs • Clarity on Band F must be a short term 1-year max solution before a special school setting is found • Accountability issues with the Band F e.g., a parent may say you have band F funding therefore you should be providing everything for my child • Clarity this will NOT delay processing applications for a special school • Clarity on what a good Band F provision should have (what is the criteria?) • Concerned about unrealistic expectations set on schools from Harrow and parents (especially if the school does not have the correct environment for the child) • Costings in place for the LA to provide additional OT, SALT etc resources and professionals • What about the children who join EYFS with no EHCP but have severe needs and they also need a special school place urgently?</p>
<p>Whilst it is understandable and it does happen that mainstream schools have children waiting for special school places (last year we had to wait 10 months for a special school place which was promised for the next September in November the previous year) and it requires a high and expensive model of staffing, our concern is that if Band 'F' funding is given that schools will be expected to wait for longer for the special school place which is detrimental for the child and the other children from whom resources are being pulled. We would prefer that the special school place is recognised as a need with urgency and effort and energy put into securing that place. We would welcome emergency time-specific and limited funding to help while we are in the waiting period eg for 2:1 staffing ratio but would not support the band F model as the danger is that it numbs the urgency needed for the child to get the special school place</p>
<p>• We feel unable to respond to this questions with a simple 'yes' or 'no' • We are pleased that Harrow Council has recognised the significant challenge faced by mainstream schools managing children with the most complex needs and wholeheartedly</p>

<p>support any additional, short-term funding to alleviate the issue</p> <ul style="list-style-type: none"> · However, we disagree with the premise of the context to the question which indicates that children may receive a high-quality education in mainstream with this additional funding – this is not true because the children need small-group specialist provision within a special school setting and their needs cannot be met similarly within mainstream, even with additional funding · The impact of having children with highly complex needs is not simply on those children – it is detrimental to the efficient education, health and safety, and progress of all other students · We welcome the additional funding, of course, but we recognise (as does Harrow Council, of course) that this is not a long term solution · It is difficult to agree to the proposal in its current format given that the Devil may be in the detail – too many questions: <ul style="list-style-type: none"> o What is the criteria for inclusion in Band F? o Will this be immediate, or will it need an annual review? o What if panel and all professionals agree that specialist provision is needed but parents disagree? · We would be happy to be involved in a small working group
<ul style="list-style-type: none"> • Any additional funding is welcomed and we appreciate the LA's recognition of this significant issue for schools. • This is not additional funding, it is re-allocated funding from proposal 2. • Children in this category need specialist provision, which includes the specialist environment. Additional funding in mainstream is not the answer for these children for whom mainstream provision is not suitable (also impact on all other students).
<p>We do not support this as this funding is vital and is relied upon. Without this funding we would be unable to provide additional support, work with outside agencies and provide much needed interventions. There would also be no gains for schools that receive the additional funding as it would be offset by this reduction. We do not support this as this funding is vital and is relied upon. Without this funding we would be unable to provide additional support, work with outside agencies and provide much needed interventions. There would also be no gains for schools that receive the additional funding as it would be offset by this reduction.</p>
<p>No amount of increased funding will allow us to meet the needs of the SLD children who are in our school. All schools have an increasing number of children who are non-verbal with conditions such as severe autism and who cannot be efficiently educated alongside other children but who are being left in schools indefinitely. I therefore disagree with the proposal for the following reasons: • Children with highly complex needs need a completely different curriculum, expertise, resources and room space which primary schools cannot provide. Small schools cannot suddenly find space for separate education of children who need this highly specialist provision (Currently in St Anselm's - 4 children in need of SLD special schools) • There is a lack of availability of, and training mechanisms for appropriate staff. There are insufficient Harrow professionals or private specialist support available e.g. OT and SALT, ASD specialist time. • This relatively small increase in funding will lead to even higher expectations and pressure from parents which we will not be able to meet. • All school are struggling with staff retention and staff stress difficulties as school staff are unable to cope with the pressure of the multi-tasking and the skills breadth needed – staff working with SLD high needs pupils and also trying to ensure needs of other SEN pupils are met. The few SLD pupils who present serious safe-guarding issues are diverting needed resources away from a large number of children with SEN on K. • Special Schools are “full” but there is no concept that mainstream school is “full” or has reached its SEN capacity and there appears to be a continually increasing SEN population. • We continue to have children with increasingly complex SLD children placed without consultation or funding as they have not fully gone through the EHCP 20 week process e.g. reception children, newcomers from abroad and fair access. • We are concerned that despite vague assurance to the contrary that band F will close down or at least delay the possible route to a special school (possibly in another borough) for them. • Continuing pressure (and permission) to build more in-borough special schools is needed. This would make the biggest difference to ensure equitable funding is spent on appropriate resources based on SEN need. This is an attempt to avoid or mask the issue that the lack of special school places is creating a crisis in Harrow for all the children in schools. All children's education is sub-optimal due to schools trying to deliver all things to all children without the needed resources.</p>
<p>Although I support the proposal in principle – I think it is also important to ensure that this is a short term provision and that simply because additional funding has been devolved that there is not a perception that schools can continue to manage and then plans to support transition to special schools get forgotten. I think there needs to be termly or half termly review to ensure that progress</p>

and updates on identifying suitable provision are provided to settings. It is important to ensure that schools don't become victims of their own attempts to be inclusive!

Parents of learners with HN should not be led to believe that the extra funding and higher band means that schools can manage the needs of the pupils with complex needs in mainstream.

Especially as the school do not have the expertise or provision often to meet the needs fully and it in the long term it is the child who is disadvantaged.

Furthermore, professional support and expertise for school staff working with HN learners is essential and should be guaranteed from the onset. However, the situation is that for these groups of learners it is often the SENCO's who already have ever increasing high workloads and challenges have to make the time to chase expert professional engagement that is often part of the EHCP plan.

This response was submitted by 6 schools

As noted above we have concerns that this isn't additional funding, it is just repurposing of the SEND fund. Creating a Band F is not just a question of funding. Students who require specialist SLD provision cannot be integrated into a mainstream school simply by providing additional funding. Whilst we understand the need to find a solution for students who need an SLD place, we have very significant concerns that the needs of these students cannot be met by placing them in a mainstream school.

In addition, please note that the cost of a full time (term time only) TA is in the region of £30k once on-costs are included and this will increase again in Apr-24.

As a school this would not be in our interests, as we would lose out financially when we have children with significant needs. This would not appear to resolve the issue of under-funding but rather be a re-allocation of funding

The definition/criteria of the Band F funding is vital in order to ensure that this is a temporary measure and not a long-term alternative to children accessing the types of schools that they need.

We really need this funding to support the increase of children at this level within our mainstream schools but it is not the long term answer. If this funding is applied then we would worry that we will be left to fend for ourselves without the correct support services to educate the children in this band. It might well bring us up to funding levels for Special schools but it is still very different inside our schools because we operate classes of 30 which are much larger and much more stressful for children with special needs without the specialist staff to support.

The solution has to be more places in Special schools and this must remain our main priority.

Additional funding is welcomed, and appreciate the LA's recognition of this significant issue for schools. This is not additional funding, it is re-allocated funding from proposal 2

Children in this category need specialist provision. Additional funding in mainstream is not the answer for these children for whom mainstream provision is not suitable, furthermore this will impact other pupils. This is not a long term solution

The Band F is something that we would like to consider and we appreciate the move towards funding special school pupils in a mainstream school at a special school rate, however, there would need to be a clear and robust criteria in order for the following concerns to be met:

- Do EHCP's state the provision or do they name schools – the wording in the Plan would have to be changed so that it is clear that this is a Band F pupil, who is being supported in a mainstream school, that is not fully meeting need.

- Norbury is worried that Band F could become a way of pupils getting lost in the system if there is not a robust method of reviews and evaluations. These need to be in place so that they never fall-off lists for special school provision and also do not appear to be 'sorted' when actually this is not the case.

- Band F can only be a short-term solution because these pupils are not flourishing in mainstream due to their differing needs and therefore need specialist support and teaching that cannot be bought by giving Band F. Band F should mean a trigger for: other support services swooping in to help the school, lead-teachers engaging within a certain time-scale, termly reviews so that the need to move into another school is never lost.

- How are Band F's calculated for those pupils already at your school? What is the criteria for a Band F? Do those who are already in school not qualify?

- Band F can only work if it is part of a bigger process – it is a stepping stone rather than a 'dead-end'. Therefore, without more Special Schools (both Woodlands & Alexandra have stated they are happy to expand – where is this in the plan?), further capital investment I do not see how the Band F will do anything other than allow the Council to feel that they have placated schools.

- I am concerned that without new money, new schools and a robust understanding of how

admissions can be a greater part of this process we are going to see more staff leaving our schools due to the increased pressure they are under with accommodating pupils who are placed in a setting that is not able to meet need.

YES - We agree with a band F funding

No - We do not agree to the amount and the prospect of this extra funding being taken away from other bands.

We desperately need further SEND schools within the borough. Many schools are trying to educate pupils with very high needs who should be placed in special schools. Mainstream schools do not have the resources and/or expertise to cope with these pupils. This can lead to a reduction of staff time with all other pupils within the school