

Meeting:	Schools Forum
Date:	16 January 2024
Subject:	Item 5: SEND Funding Proposals 2024-25 – Response to Consultations
Responsible Officer:	Jo Frost, Finance Business Partner – Children’s Services

Summary

1. In the Autumn Term 2024 the LA consulted with maintained schools, academies, and free schools in Harrow in respect of:
 - Funding for EHCPs in Mainstream Schools, Academies and Free Schools
 - Funding for Additional Resources Mainstream Units (ARMs) in schools and academies
2. Schools Forum is required to:
 - Note the outcome of the consultations in the report and attached in full at Appendix A and Appendix B
 - Note the LA's responses to the consultations
3. The reasons for the funding proposals for 2024-25 were set out in the original consultation documents which were based on evidence provided from the independent review of SEND funding in Harrow. Therefore, this paper does not repeat the rationale for the proposals in the responses to the consultations.

Funding for EHCPs in Mainstream Schools, Academies and Free Schools 2024-25

4. There were 37/54 (69%) mainstream schools which responded as show in Table 1.
5. All responses to the consultation have been included at Appendix A but redacted where any comments would identify an individual school.

Table 1 – summary of consultation responses

Phase	Number of Schools	Responses Received	%
All Through	1	1	100%
Primary/Nursery	41	29	71%
Secondary	12	7	58%
Total	54	37	69%

Consultation Question 1

6. Question 1 asked: *Do you support the proposal to increase the band/hourly rates for EHCPs in mainstream schools by 7% in 2024-25, in line with statistical neighbour averages?*
7. Table 2 shows a summary of responses

Table 2 – consultation question 1 summary of responses

Phase	Number of Responses	Yes	No	Blank	Yes & No*
All Through	1				1
Primary	29	8	4	1	16
Secondary	7		7		
Total	37	8	11	1	17

*please note 'Yes & No' was not an option in the consultation document

8. The majority of schools (25/37) supported and increase responding 'yes' to a proposed increase in funding. However, of those responding 'yes' 17 caveated by this by expressing concern that a 7% increase was too low with the general theme being:
 - This represents a below inflation rise
 - There should be a higher aspiration than the ambition of bringing Harrow up to the average
 - The assumptions about other LA funding appear low
 - There is no long-term plan
9. Whilst it is acknowledged that the majority of schools want to see an increase above 7% the LA intends to proceed as proposed in the consultation.

- It is not the responsibility of the High Needs Block to meet the cost of inflation. The growth in the HNB for 2024-25 is below 3% and this not only needs to support inflationary pressures but also growth in demand/complexity of need.
- High Needs funding is part of a larger system of funding in schools
- The 7% rise (which effectively equates to 10%-13% top up increase) is in addition to a 10% rise in the previous financial year
- The intention of the two years' of % rises was to bring Harrow in line with other boroughs
- Having had conversations with other boroughs since our consultation, our assumptions about what additional average funding they may have provided in 2024-25 were generous. Some boroughs are providing no increases, some have realigned bandings through a review process which has changed funding linked to need and not to inflation. No boroughs have reported inflationary increases. This means that Harrow is now likely to be above the average.
- We propose to next review EHCP funding in line with the budget setting process for 2026-27. We cannot commit to annual funding reviews or inflationary increases.

Consultation Question 2

10. Consultation Question 2 asked: *Do you support the proposal to increase the threshold of the SEND Support Fund so that only a minority of schools which have particular challenges because of their disproportionate number of pupils with SEND or high needs will receive this support?*

11. Table 3 shows a summary of responses

Table 3 – consultation question 2 summary of responses

Phase	Number of Responses	Yes	No	Blank
All Through	1		1	
Primary	29	2	26	1
Secondary	7		7	
Total	37	2	34	1

12. The majority of schools (34/37) do not support the change of threshold for eligibility for the SEND Support Fund. The general theme of the comments is:
- Would not support a model where schools would lose funding
 - The reduction in this additional support will offset any gains from other proposals
 - Schools rely on this funding

13. Whilst we acknowledge that this will reduce funding to some schools it is our intention to proceed as proposed in the consultation, which as stated in the consultation document, adheres to the DfE guidance '*so that additional funds are targeted only to a minority of schools which have particular challenges*'. Harrow had operated outside this guidance and provided higher funding to schools through this method. We now are aligning with the guidance whilst providing more funding through the standard models.
14. It should be noted that the consultation document used the October 2022 schools census data as the 2023 data was not available at the time
15. This indicated that there would be 9/54 schools eligible for funding above the 3% threshold. However, this has since been updated for the October 2023 schools census data which indicates that there will be 16/54 schools eligible for this funding in 2024-25.

Consultation Question 3

16. Consultation question 3 asked: *Do you support the proposal to introduce Band F on the mainstream EHCP banding matrix to provide mainstream schools with additional funding to support pupils requiring specialist SLD provision?*
17. Table 4 shows a summary of responses

Table 4 – consultation question 3 responses

Phase	Number of Responses	Yes	No	Blank	Yes & No*
All Through	1				1
Primary	29	4	6	1	18
Secondary	7		7		
Total	37	4	13	1	19

*please note 'Yes & No' was not an option in the consultation document

18. The majority of schools (23/37) supported this proposal responding 'yes', however, of those responding 'yes' 19 caveated by with 'no' by expressing the following concerns
- Any additional funding is welcomed. This is not additional funding it is reallocated from proposal 2
 - Children in this category need specialist provision. Additional funding in mainstream is not the answer for these children for whom mainstream is not suitable
 - Clarity on Band F must be short term 1-year max solution and must not delay processing applications for a special school
 - Clarity on good Band F provision
 - Costings in place for the LA to provide additional OT, SALT etc

19. We are aware that in the consultation document we did not provide any details which would clarify the questions/concerns raised in the consultation responses as we want to form a small working group to discuss and find solutions, which would lead to the introduction of Band F on the EHCP mainstream matrix, that would provide enhanced funding to schools which are supporting these pupils
20. Some clarity that we can now provide is that a Band F solution will only be a short-term solution and will not delay a special school place being identified. Band F will not be a way of placing a pupil identified as needing specialist SLD provision in a mainstream school but will support schools where a pupil's needs are subsequently identified after the pupil has joined the school.

Funding for Additionally Resourced Mainstream (ARMs) Units in Schools and Academies

21. There were 10/14 (71%) responses from mainstream schools with ARMs units.
22. All responses to the consultation have been included at Appendix B but redacted where any comments would identify an individual school.
23. The consultation question asked: *Do you support the proposal to increase place/top up funding in all ARMs unit in 2024-25 by 3.4%.*
24. Table 5 shows the summary of responses

Table 5 – response to consultation question

Phase	Yes	No	Yes & No*
Primary	3	2	2
Secondary		3	
Total	3	5	2

*please note 'Yes & No' was not an option in the consultation document

25. All of the 'yes' and 'yes & no' responses support an increase to funding as do all of the 'no' responses, but the latter two categories think the increase in funding is too low. The main theme of the responses being:
- Funding has remained without increase from 2016 to 2023 when the 10% increase was applied
 - Funding should have risen with inflation which would equate to a 31% increase since 2016
26. There were also school specific responses which will be addressed with individual schools.

27. Whilst it is acknowledged that schools want to see an increase above 3.4% the LA intends to proceed as proposed in the consultation. The rationale is as follows

- The intention of the two years' of % rises was to bring Harrow in line with other boroughs which the benchmarking data suggests will now be the case
- It is not the responsibility of the High Needs Block to meet the cost of inflation. The growth in the HNB for 2024-25 is below 3% and this not only needs to support inflationary pressures but also growth in demand/complexity of need.
- High Needs funding is part of a larger system of funding in schools
- The 3.4% rise is in addition to a 10% rise in the previous financial year
- The 3.4% rise is aligned with the DfE mandated increases for special schools and PRUs, for consistency.

28. As stated in the consultation document, we will also carry out the recommendations of the funding review which proposed a wider review of ARMs provision as to its place in the wider landscape of provision for SEND.

Section 3 – contact details

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