

SCHOOLS FORUM**20th January 2020****Report of the Executive Director for Children's Services****Support for mainstream schools with significant numbers of children with additional educational needs (AEN).****1. Purpose of the Report**

To ask the Schools Forum to consider once more the financial arrangements for supporting mainstream schools with significant numbers of children with additional educational needs and to make recommendations to Council.

2. Information and Analysis

As the arrangements in this paper apply equally to mainstream schools and academies, references to schools should be taken to include academies as well unless otherwise stated.

At the July 2019 meeting of the Council an amended Motion was unanimously agreed which sought to ensure that every Derbyshire SEND (Special Educational Needs & Disability) pupil gets the education they are entitled to by:

- i. Continuing to pressure the government for more funding to be invested in education, especially SEND; and
- ii. Urgently reviewing the discretionary contingency fund, in consultation with the Schools Forum, so that those schools which feel penalised because they have more SEND Children can be given more financial support; and
- iii. To bring a report outlining progress on reviewing the discretionary contingency fund and with the government to a future Full Council meeting within the next six months.

The 2020-21 settlement provided an additional £9.8m (14%) increase in funding for Derbyshire, thus meeting objective (i) of the Motion above. The remainder of this report focusses on item (ii), the discretionary contingency fund arrangements.

2.1 Background to the Motion

Under the national funding framework mainstream primary and secondary schools are expected to fund the first £6,000 of additional costs for any child with additional educational needs. Costs in excess of the £6,000 threshold are funded from the High Needs Block rather than schools' delegated budgets, subject to the approval of a GRIP (Graduated Response for an Individual Pupil) or an EHCP (Education Health and Care Plan).

The issue behind the Motion is the pressure on some schools' budgets in meeting multiple £6k contributions, in particular those schools with a significant proportion of children with an approved GRIP/EHCP. These pressures can be compounded in schools which have developed a good reputation for supporting children with special needs. Schools with this reputation argue that they incur significant costs for the many children on roll whose needs, whilst not at the GRIP/EHCP level, nevertheless require additional resources which creates further pressure on the school's delegated budget.

2.2 Schools' Notional SEN budgets

Local authorities are required to identify how much of each school's budget is notionally available to help meet the costs of children's additional educational needs, including SEN. Despite the advent of a mainstream National Funding Formula (NFF), the calculation of "notional SEN budgets" remains a matter for each local authority to determine. The DfE are currently considering whether or not to adopt a national calculation of notional SEN budgets within the NFF. In the interim, proposals to update Derbyshire's historic calculation were considered by the Schools Forum in June 2019 and the following percentages agreed:

Table 1 – Derbyshire revised notional SEN percentages 2019-20

Indicator	Primary %	Primary £m	Secondary %	Secondary £m
AWPU	3.25%	5.32	3.21%	4.98
Deprivation – Ever 6/IDACI	50.00%	7.04	50.00%	6.67
Low Prior Attainment (LPA)	100.00%	15.22	100.00%	12.06
Lump sum	2.24%	0.87	1.96%	0.10
Total (£m)		28.45		23.81

The Council Motion requires a re-consideration of:

- i. how to link schools' costs of meeting children's additional educational needs with their notional SEN budgets; and, by extension,
- ii. on what basis would additional support from central budgets be appropriate?

2.3 Derbyshire's and other LAs' approaches

As reported to the June 2019 Forum meeting, the Authority holds a contingency of £0.350m within the High Needs Block to help those schools having difficulty in meeting the requirement to fund the costs of additional needs. Prior to 2018-19 requests for support were assessed subjectively on a case by case basis. That process became increasingly time-consuming and resulted in long delays before final decisions were made. In order to ensure that schools were able to plan more effectively, and thus receive any funding due earlier in the year, for 2018-19 and 2019-20 an objective formulaic approach was adopted to allocate most of this total, with a small amount (£0.050m) held back to fund any exceptional cases for support.

The current calculation looks at the number of children with an EHCP/GRIP allocation and expresses the count as a percentage of the number on roll. Schools with more than 3% of such children qualify for support. Actual support is net of an assumed contribution from the school (equivalent to 1% of their annual budget) with the resultant allocations scaled back to keep within the resources available.

The Authority has undertaken an internet search of other LAs' arrangements and also asked other East Midlands LAs to set out their approaches. The results of this research are set out in Appendix 2. In general the models compare the costs of provision with the available funding, in some cases supplemented by an option for schools to bid for additional support. The approaches are not dissimilar to those currently operating in Derbyshire.

2.4 Impact of the mainstream National Funding Formula (NFF) changes

The government's December 2016 consultation on the National Funding Formula (NFF) included the following text¹

With regard to basic per-pupil funding, to:

- *reflect that the majority of funding is used to provide a basic amount for every pupil, but that some of this funding is at present specifically supporting pupils from disadvantaged backgrounds. To do this, we propose increasing the total spend on the additional needs factors in the national funding formula.*
- *increase substantially the weighting of the low prior attainment factor, because we know that attainment data is one of the strongest indicators of how children are likely to do later, and we want to target funding to schools to help all pupils catch up.*

¹Source: https://consult.education.gov.uk/funding-policy-unit/schools-national-funding-formula2/supporting_documents/NFF_Stage2_schools_consultationdoc.pdf

As a result of the NFF changes, the proportion of funding allocated as low prior attainment nationally rose from £1,367m (4.3%) in 2016-17 in LAs' formulae to £2,394m (7.5%) in the NFF. There was also an increase in the proportion of funding allocated as deprivation with the total increasing from £2,424m (7.6%) in LAs' formula to £2,985m (9.3%) in the NFF.

In light of the above, it is reasonable to infer that:

- i. the basic pupil funding (AWPU) in the NFF includes a much reduced allocation for AEN; and
- ii. the indicators for LPA, deprivation, English as an additional language and mobility are the key indicators that resource schools to meet the cost of their children's additional educational needs.

The national changes have also impacted on the distribution of funding in Derbyshire with the combined amount allocated as low prior attainment funding and deprivation increasing as follows:

Table 3 – Change in LPA & Deprivation Funding in Derbyshire

	Primary	Primary	Primary		Secondary	Secondary	Secondary
	Depriv'n*	LPA	Total		Depriv'n*	LPA	Total
	£m	£m	£m		£m	£m	£m
2017-18	20.030	1.053	21.083		17.575	8.184	25.759
2019-20**	18.110	15.223	33.333		15.704	12.061	27.765
Change	-1.920	+14.170	+12.250		-1.871	+3.877	+2.006
2020-21***	19.991	19.327	39.318		17.300	13.486	30.786

* All deprivation i.e. current and Ever 6 free school meals and IDACI

** 2019-20 totals pre capping & primary LPA multiplier of £750 (NFF = £1,022).

*** Indicative figure, 2020-21 budgets still to be finalised

Revised proposals to support children in Derbyshire and which take into account the impact of these national changes are set out in section 2.5 below.

2.5 Alternative model to support Derbyshire schools and academies

Whilst Derbyshire's current arrangements focus contingency support on those schools with the highest proportion of pupils with an EHCP/GRIP – schools with more than 3% of pupils with EHCP/GRIP initially qualify - the model does not take into account the resources available to schools to meet their financial responsibilities i.e. the notional SEN budget. Thus schools with fewer EHCP/GRIPs but with much lower notional SEN budgets are potentially at a disadvantage.

An alternative arrangement would be simply to compare the cost of the multiple £6,000 EHCP/GRIPs with a proportion of the notional SEN budget. Schools for which the cost of the contributions exceeded the notional budget would be eligible for support.

In comparing budgets with costs it would be unreasonable to use all of the notional SEN budget as some of this resource is needed to meet the costs of supporting children with lower levels of need. The number of such children outweigh the EHCP/GRIP population by a ratio of more than 6:1.

In making the comparison it is proposed that Derbyshire's notional SEN budget would in future be calculated as follows:

Table 4 – Revised notional SEN percentages & allocations 2020-21

Indicator	Primary	Primary	Secondary	Secondary
	%	£m	%	£m
AWPU	0.00%	0.000	0.00%	0.000
Deprivation – Ever 6/IDACI	100.00%	14.882	100.00%	14.466
Low Prior Attainment (LPA)	100.00%	19.327	100.00%	13.486
Lump sum	0.00%	0.000	0.00%	0.000
Total	-	34.209	-	27.952

AWPU - the removal of this element recognises the impact of the NFF as discussed in section 2.4 i.e. the NFF AWPU only funds the basic needs of all children.

Deprivation – a key driver of the variance in funding between individual schools which recognises the reduced financial resources of some families and the impact this can have on their children's educational needs. Deprivation funding linked to current entitlement to a free school meal will be excluded as this resource is specifically allocated to meet the cost of a free meal.

LPA – a key driver of the variance in funding between individual schools which recognises at least some of the additional educational needs facing individual children and the impact this has on costs.

Lump sum – the removal of this element reflects the pressure smaller schools face in meeting AEN costs.

The next step is to decide what percentage of schools' notional SEN budget should be considered as being available to meet the cost of the EHCP/GRIP contributions. The higher the percentage the more resources would be available and the lower the formulaic call on contingency funds. Table 5 below shows the impact of a range of percentages on this calculation.

Table 5 – Impact of different notional SEN percentages

% of notional SEN budgets applied	Primary Excess Cost	Primary . eligible schools	Secondary Excess Cost	Secondary eligible schools
	£m	No.	£m	No.
20%	1.873	165	0.486	14
30%	0.852	100	0.100	6
40%	0.408	54	0.033	1
50%	0.224	35	0.009	1
60%	0.113	26	0.000	0

Based on 2020-21 budget data and autumn 2018 SEN data, if 40% of notional SEN budgets were assumed to be available for EHCP/GRIPs this would indicate that support of around £0.441m would be payable, £0.141m more than the £0.300m budget currently allocated via formula. A schedule of the allocations and a comparison with the allocations under the current model paid in 2019-20 is provided in the schedule at the end of this report. N.B. Actual support for 2020-21 would be based on autumn 2019 SEN data and the final cost may therefore vary.

The extra cost would have to be met from the increase in the 2020-21 HNB. If the threshold were reduced to below 40% this would increase further the cost to the high needs block and would require savings to be made in other budgets to resource it.

On balance the Authority considers that the alternative model is preferable as it looks at both the costs of the contributions and the resources available to the school. If this model were to be adopted the Authority considers that using 40%

strikes a reasonable balance between the need to support schools and the additional cost to the high needs block.

2.6 The choice facing the Schools Forum and Council

The options available going forward are as follows:

- (a) Maintain the current arrangements but vary some of the detail e.g. the 3% threshold and/or not scaling claims and/or not expecting schools to contribute 1% from their own resources;
- (b) Revert to a process whereby all allocations are on the basis of bids submitted by schools;
- (c) The alternative model set out in section 2.5 of this paper, amended as necessary;
- (d) Another model, as yet to be established.

The Authority's preferred approach remains one based on a formula with a safety net to ensure exceptional cases can be supported. This has the advantage of ensuring that most of the support would be calculated and known by schools at the start of the year.

By contrast, a process entirely reliant on bids - option (b) above - would be subjective and time-consuming both for the school and the LA. Based on previous experience of this approach in Derbyshire it would be likely to result in support for schools being paid later in the financial year, creating funding uncertainty and weakening financial planning.

Whichever model is ultimately agreed for 2020-21 will have its imperfections. For example, whilst the alternative Derbyshire model set out in this report makes a relatively modest assumption about the proportion of the notional SEN budgets available to meet EHCP/GRIP contributions, the model would not consider whether or not the remaining notional SEN budget is sufficient for that institution to provide the necessary support for children with lower levels of need.

Also, as the schedule shows some schools would attract less funding under the new model.

Given these imperfections it would be unwise to rely entirely on either of the formulaic approaches - options (a) or (c) – and it is therefore proposed that the element of contingency funding set aside to meet exceptional cases be increased by £0.050m to £0.100m. Any school seeking additional support would, however, be expected to explain why their residual notional SEN budget is insufficient to meet pupils' needs.

The overall increase in the contingency budget as a result of the revised arrangements would be £0.192m which would be met from the £9.8m increase in the 2020-21 high needs block budget.

2.7 Closing remarks

Final decisions on the High Needs Block budgets for 2020-21, including the support for schools with significant number of high needs pupils, will be determined by Cabinet in March 2020.

The Council would welcome the views of the Schools Forum on the arrangements that should apply from 2020-21.

3. Other Considerations In preparing this report the relevance of the following factors has been considered: prevention of crime & disorder, equality of opportunity, HR, legal & human rights, environmental, health, property and transport considerations.

4. Background Papers Held within Finance.

5. Executive Director's Recommendation

- (i) The views of the Schools Forum on the contingency arrangements for 2020-21 are welcomed.
- (ii) If there is not general support for the alternative model in section 2.5, the Schools Forum is asked to advise the Council on the arrangements that should apply instead for 2020-21.

Jane Parfremment
Executive Director for Children's Service

Derbyshire County Council recognises that schools are facing significant financial challenges as a result of rising cost pressures and funding which, although increasing in recent years, has not adequately kept pace in real terms. A variety of factors can have a significant effect on a school's financial situation, including the age and condition of its buildings, staffing levels and the complexity of the needs of its pupil population.

Council is also aware that some inclusive schools, who have developed a good reputation for supporting disadvantaged students and those with special educational needs and disabilities, feel that they have become a victim of their own success, in that their demands are increasing but the funding has not adequately reflected this.

Council recognises the National Funding Formula as a positive step forward but believes that Government must go further in making it fairer and more transparent, by removing the historic inequalities in the system and increasing the basic entitlement for schools to ensure the core running costs are met. Council also believes that significant additional investment in both the schools block and high needs block is required urgently by the Government.

In addition, Derbyshire County Council resolves to ensure every Derbyshire SEND pupil gets the education they are entitled to get by:

- Urgently reviewing the discretionary contingency fund, in consultation with the Schools Forum, so that those schools which feel penalised because they have more SEND Children can be given more financial support; and
- To continue to pressure the government for more funding to be invested in education, especially SEND; and
- To bring a report outlining progress on reviewing the discretionary contingency fund and with the government to a future Full Council meeting within the next six months.

Leicestershire: Twice yearly comparison of the number of element 2s that schools are needing to fund versus the notional SEN budget. The difference is funded but rarely is there an allocation (in 2018-19 £6k was funded). LA are looking to move away from an EHC only approach and to target need earlier. No specific contingency fund.

Northamptonshire: Schools approach on an ad hoc basis when they perceive there isn't enough notional SEN. They have to cost a provision map to justify their claim. LA assesses current notional SEN, existing funding and the local offer. Decision then taken on support. If successful funding is allocated monthly. There is no specific contingency fund. On average 5 claims per year are supported.

Nottingham City: Fund called Additional Inclusion Allocation (AIA). Calculated as £4,017 per pupil (pro rata) for the school where named top up funding was received in the previous year. Funded £1.854m in 18-19 & £2.143m in 19-20 - there's clearly a significant budget for this and it's not really a contingency for disproportionate numbers of pupils.

Oldham (may be out of date): Schools with more than the sector average number of statements and less than 3% CF from previous year may qualify. Business case has to be submitted and the costs are compared with notional SEN and any MFG received.

Shropshire: Support is provided when notional SEN funding is deemed insufficient to meet the first £6,000 of each high needs pupil and still leave 20% remaining for pupils deemed not to be high needs but require additional support.

Cambridgeshire: The number of pupils in receipt of top up multiplied by (AWPU + £6,000) is compared to Notional SEN. Comparison is done twice per year (5/12, 7/12). Any allocations are subject to a contribution of 0.5% of school's budget share. Schools with excessive balances (16% or £80k primary, 10% secondary) do not qualify.

Nottinghamshire: Additional funding where there is a shortfall between the calculated notional SEN and the number of identified pupils for whom high needs funding was allocated during the previous financial year multiplied by £6,000.

Coventry: Split into two elements. First compares number of element 3 top ups x £6,000 and notional SEN. Funding provided if E3 higher than notional. 13/84 primary and 0/21 secondary supported in 19-20. Secondly if number of element 3 pupils is greater than 2% of population then an additional £6,000 provided per pupil (even if notional is sufficient). 1/84 primary and 2/21 secondary in 19-20

Lincolnshire: Adopt a targeted policy whereby if a school has a higher than expected number of children with EHCPs then they receive £6k funding if above the qualifying threshold minus 5% of the AWPU for the sector

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