

INFORMATION AND CONSULTATION ON FUNDING HIGH NEEDS PROVISION **2019/20 FINANCIAL YEAR**

Document JM Appendix 1

1. Introduction

1.1 The purpose of this information and consultation document is to set out, and collect views on, the formula approach that Bradford Council proposes to use to delegate High Needs Block funding to providers in the 2019/20 financial year. This is known and referred to as our 'Place-Plus' system and has two parts: a) core (or place) funding and b) top-up (or plus) funding. This document provides a summary of high needs funding, what it pays for, and an explanation of the main ways this is allocated.

1.2 Bradford Council proposes for 2019/20 to continue the system that is currently in place, with the exception of possible amendment to the approach to the funding of special schools and special academies, which is currently in review and under discussion with the Schools Forum.

1.3 We would like to highlight that the Council has identified the benefit that holistic review of our top-up funding arrangements may have, in particular in insuring that our top-up funding continues to be based on clear descriptors of need, continues to follow our continuum of provision as this develops, and is allocated on accurate moderation of pupil-need. The Council expects to continue to develop and amend our Place-Plus system incrementally over time.

1.4 The deadline for responses to this consultation is Friday 30 November 2018. Please address all questions and responses to Andrew Redding 01274 432678 andrew.redding@bradford.gov.uk. A response form is included at Appendix 5.

2. Background

2.1 All local authorities are following a direction of travel set by the Department for Education (DfE) towards National Funding Formula. Significant changes to the way high needs provision is funded were required to be implemented by the DfE for the 2013/14 financial year. These changes, now well established, affected activities funded by the High Needs Block (HNB), which is a specific block of money within the Dedicated Schools Grant (the DSG) that amounts to about 12% of the overall DSG resources available to Bradford Council.

2.2 The high needs funding system supports provision for children and young people with special educational needs and disabilities (SEND) in line with the Children and Families Act 2014. High Needs Block DSG funding is also allocated to support good quality Alternative Provision for pre-16 pupils who cannot receive education in schools. The Children and Families Act 2014 extended the statutory duties local authorities hold relating to SEND across the 0 to 25 age range. Therefore, Bradford Council has a key role in determining the funding that is given to schools and other providers to meet the needs of children and young people with SEND.

2.3 Schools and other providers also have duties under the Act, in particular a duty to co-operate with their local authorities on arrangements for children and young people with SEND.

2.4 In 2018/19 Bradford Council received £65.88m High Needs Block funding within our DSG allocation. This figure incorporates the transfer of £5.7m that was made from the Schools Block to the High Needs Block in 2017/18. 90% of the £65.88m funding is delegated or devolved to support the following:

- Children and young people with Education Health and Care Plans (EHCPs) educated in mainstream schools, academies and free schools.

- Special schools and Special academies.
- Resourced units attached to maintained nursery schools.
- Resourced units attached to mainstream primary and secondary schools, academies and free schools.
- Pupil Referral Units (PRUs).
- Primary Behaviour Centres attached to mainstream primary schools and academies.
- Young people placed in independent alternative provision.
- Young people aged 16 to 25 in Further Education Colleges, 6th Form Colleges and with independent or specialist learning providers.
- Children and young people placed in independent and non-maintained special schools.
- Children and young people in hospital education.

2.5 High Needs Block funding in Bradford also supports central services relating to SEND and Alternative Provision, as permitted by the Finance Regulations, which includes SEND teaching support services that are accessed by schools and other providers and tuition for children and young people that are unable to attend school for medical reasons. Local authorities are permitted to continue to separately fund additional outreach and support services that may be managed centrally or may be devolved to providers under service level agreements.

2.6 The DfE's National Funding Formula however, does not introduce a provider-level national formula for High Needs Block funded providers. Local authorities continue to have responsibility for the management / formula funding of High Needs Block (HNB) provisions. The DfE sees the importance of local authorities (and high needs providers) finding significant efficiencies in their provisions, including collaborative arrangements.

3. DfE-Led Changes in the National High Needs Funding System 2019/20

3.1 The 2019/20 national Place-Plus system is basically the same as operated in 2018/19. The DfE has confirmed within its guidance only limited optional changes to the operation of the national Place-Plus system for post 16 provisions in 2019/20. These are related to how local authorities can agree with post 16 providers how element 2 (£6,000) funding is allocated. At this stage, our response to these optional changes is to further explore them, with a view to developing more flexible agreements, if this will add value to our funding system, for implementation in 2020/21. We are not be in a position to satisfactorily conclude review and reach agreement prior to the deadline of 16 November 2018 to inform the ESFA of alternative arrangements for the funding of academies and further education settings. We are also concerned to ensure that our review properly takes account of demographic changes forecasted in future years as well as the development of the post 16 curriculum, including supported internships. In this context, we must also bring in a review of element 3 (top up funding).

3.2 The DfE has indicated that it will publish in October a consultation on the funding of hospital provision. At the time of writing this document, this consultation has not begun. The DfE has not confirmed whether or not planned changes would be implemented for 2019/20. So there uncertainty in this area at this time. We believe that the primary purpose the DfE's consultation is to discuss how provision for children not able to attend school on medical grounds is funded at DSG level. However, this is likely to have knock-on implications for the funding of education in hospital provisions. We will respond as quickly as possible to the DfE's consultation and will talk further with the Schools Forum and affected provisions.

3.3 There are some other potential developments going forward in the national high feeds funding system, which it is important not to lose sight of:

- The DfE is considering options for the review of alternative provision and is expected will publish plans on this. This may affect how the different kinds of AP provider are funded.
- The DfE is working to better 'describe' SEND needs, responsibilities and costs, replacing the concept of a 'notional SEND budget', which will influence future policy on high needs funding. There is no timescale currently for the release of further information about policy development in this area. There is no response to this work within the 2019/20 arrangements.

4. Bradford's 2019/20 Proposed Arrangements: High Level Summary

4.1 As stated in paragraph 1.2, Bradford Council proposes for 2019/20 to continue the system that is currently in place, with the exception of possible amendment to the approach to the funding of special schools and special academies.

4.2 The Council continues to hold the view that, given the extent of discussion that is taking place about the District's SEND model, and the changes that have already taken place and may come from these discussions, continuity generally in funding in 2019/20 will be welcomed, especially in mainstream settings. Any further change in the funding model should be managed incrementally following holistic re-assessment.

4.3 The Council expects in 2019/20 to consolidate the changes that were made in 2018/19 in the funding of alternative provision, namely, the cessation of the funding from the High Needs Block of the top-up element for non-EHCP placements. The Council will continue to work with schools, in particular the primary phase, to develop local agreements.

4.4 The Council anticipates that the values of funding allocated in 2019/20 by our Pupil-Led Need top-up Ranges Model (see Appendix 4) will be the same as allocated in 2018/19 i.e. will be cash flat, noting that the review of special school funding (see 4.7 below) may alter the ranges model used for special schools in 2019/20.

4.5 Following further analysis and benchmarking work, the Council proposes to continue to use our existing methodology for the definition of notional SEND budgets for mainstream primary and secondary schools and academies within the Schools Block funding formulae. Please see Appendix 3.

4.6 Also following further analysis, the Council proposes to continue to protect SEND Floor allocations for primary and secondary schools and academies at 2017/18 levels, subject to the conclusion of the discussions that are to take place with the Schools Forum on the transfer of Schools Block monies to the High Needs Block in 2019/20. Please see Appendix 3. The Council has identified that we need to find a better way of calculating additional mainstream SEND funding support now that we have moved to National Funding Formula. So review is planned by April 2020 and this will be discussed with the Schools Forum. This review most likely may not result in a change in the total value of support overall that will continue to be funded, but may result in this support being more concentrated. However, we wish to ensure continuity in 2019/20.

4.7 The Council is currently working with the District Achievement Partnership (DAP) on a review of the funding of special schools and special academies, which incorporates a review of our Top-Up Ranges Model, and which is anticipated will be introduced in pilot for 2019/20. This work is still at the review stage and is under discussion with the Schools Forum. One of the key aims of the review is to better align the EHCP 'funding result' to the needs of the pupil. This review may mean that we take a different approach to the funding of special schools and special academies in 2019/20, which may include applying an adjusted Top-Up Ranges Model (a model that has more steps and different funding values). If a new model is agreed with the Schools Forum, and is successful in its pilot period, the Authority would naturally look to implement the revised approach incrementally from April 2020 across all mainstream and specialist settings, including Further Education Colleges, in order to maintain the continuum of funding. This may mean, for example, that there are a greater number of funding steps, at different values, for mainstream pupils assessed at Range 4. The Council will also bring in a review of the new additional flexibility provided for the funding of element 2 at post 16. However, we do not propose to change the funding model, except for special schools, in 2019/20.

5. Place (or Core) Funding

5.1 The national high needs funding approach is based on the financial definition of a 'High Needs' child or young person being one whose education, incorporating all additional support, costs more than £10,000 per annum. This threshold lays the foundation of the national 'Place Plus' framework and the basis of the definition of the financial responsibility that maintained schools, academies and other providers have for meeting the needs of children and young people from their delegated budgets.

5.2 High needs funding has two parts a) core (or place) funding and b) top-up (or plus) funding. The grid at Appendix 1 sets out in summary how this system operates, and how these two parts work together, for each main type of school or provider.

5.3 Core (or place) funding for Bradford's stand alone maintained special schools and special academies, and for PRUs including Tracks, and the primary behaviour centres, is set at the national annual value of £10,000 for pre-16 aged placements. The value for post 16 placements in special schools and academies is slightly enhanced by the higher value of element 1 funding in the post 16 national funding formula. Place funding is allocated on the agreed number of places commissioned both by Bradford Council and by other local authorities. A Bradford-located institution is allocated place funding by Bradford Council for its total number of high needs places irrespective of where the pupil resides. This place funding is allocated to support the institution's core costs (element 1) and also to contribute to the additional costs associated with meeting the additional needs of the child or young person (element 2). However, it is not 'pupil specific'. Place funding is set before the start of the financial year and isn't withdrawn if an individual place is not occupied. It is up to the institution to decide how best to apportion their total allocated place funding across the actual number of places commissioned by local authorities. Additional place funding, where an institution's number on roll exceeds the number of places during the year, is allocated by Bradford Council. An end of year reconciliation is actioned however, which means that an institution's place funding will be reduced if the institution has been allocated too much additional place funding when its actual annual composite occupancy is calculated.

5.4 Place funding for Bradford's resourced units (DSPs, ARCs and Early Years DSPs), and for post 16 placements in Further Education Colleges, operates on the basis set out in paragraph 5.3 but is set at the national annual value of £6,000. The value is not £10,000 because these institutions already receive formula funding, which allocates the first element of place funding (known as element 1). To explain then, how place funding is split into 2 parts in the national system:

- Element 1: a basic £4,000 for children and young people aged pre-16, which is the defined value of funding that all pupils attract and which has already been allocated within the pre-16 funding formula, or Early Years Single Funding Formula (EYSFF), for an institution's core costs. This formula allocation is derived from the annual October Census (pre-16 formula) and from the 3 termly censuses (EYSFF). For post 16 students, this element 1 is derived from the national post 16 funding formula and typically is greater than £4,000 (notionally defined at £5,000). Element 1 across the post 16 sector is funded with a year's lag in pupil numbers. For example, the total allocation of element 1 for the 2019/20 academic year will be based on the number of students recruited in 2018/19.
- Element 2: a further £6,000 for additional needs, which is not already allocated:
 1. within the formula funding received by Bradford's mainstream schools and academies that have resourced units (DSPs and ARCs) where local authorities commission high needs places.
 2. within the formula funding received by Bradford's maintained nursery schools that have resourced units where local authorities commission high needs places. £6,000 is the value for 1 FTE place. Therefore, a 15 hour place = 0.6 FTE (£3,600) and a 30 hour place = 1.2 FTE (£7,200).
 3. within the formula funding received by Bradford's Further Education Colleges where local authorities commission high needs places post 16.

5.5 The national funding system includes an additional complexity in the calculation of place funding for resourced units in mainstream primary and secondary schools and academies. The value of a place is set at £6,000 where the place is occupied at the time the October Census is taken. Where a place is not occupied at this Census, local authorities are required to fund this place at £10,000. This is because the school or academy will not receive element 1 funding for this place in the following financial year in its formula funding. For maintained nursery schools, an adjustment is made to the termly funding allocated via the EYSFF to add element 1 funding for resourced unit places that are not occupied where these are being held open by the school.

5.6 The physical payment of place funding by Bradford Council takes place on a monthly basis and is combined with the monthly payment of top-up funding, which is described in paragraph 7. Bradford Council published monthly funding statements for providers to access. For some institutions, such as academies and Further Education Colleges, place funding is not directly allocated by Bradford Council. Instead, the Education Skills and Funding Agency (ESFA) deducts the place funding from the Council's DSG to pay this directly.

5.7 Mainstream primary and secondary schools and academies do not receive additional place funding for children and young people that have EHCPs. The high need funding system works on the basis that schools and academies have sufficient funding already within their delegated formula funding allocations to enable them to meet the additional costs of the SEND needs of their pupils up to the threshold of £6,000 per pupil, using their funding calculated on measures of additional need such as Free School Meals, IDACI and prior low attainment. Local authorities are currently required to define for each primary and secondary school the value of their formula funding that is 'notionally' allocated for SEND to be used in meeting the first £6,000 of needs for pupils with EHCPs, as well as the needs of pupils without EHCPs. The value of each school's notional SEND budget is clearly set out in the annual S251 statements Bradford Council publishes. Please see Appendix 3. A separate 'SEND Floor' mechanism in our approach currently ensures that all mainstream primary and secondary schools and academies receive a minimum amount of SEND formula funding, compared against the value of EHCPs of children at a school or academy. In effect, the SEND Floor provides a top up for schools and academies with higher numbers of individual EHCPs at a value greater than £6,000 that have generally lower levels of FSM and IDACI and higher levels of attainment. The values of SEND Floor allocations, and the basis of the calculation, are clearly set out for each school in the monthly high needs funding statements the Council publishes. Please see Appendix 3.

5.8 For providers delivering the entitlements to early education to 2, 3 and 4 year olds (maintained nursery schools, nursery classes in primary schools and academies and Private, Voluntary and Independent providers), Bradford Council allocates element 1 funding using our Early Years Single Funding Formula (EYSFF), which is funded by our Early Years Block within the DSG. The Council has put in place an Early Years SEND Inclusion Fund, also funded from the Early Years Block, which enables additional funding to be allocated to support children with low level emerging SEND. This basis of this fund is to replicate the £6,000 element 2 place funding for eligible early years children that is not already funded within the EYSFF. Further details on the Early Years SEND Inclusion Fund can be found on Bradford Schools Online. In addition, early years providers of the 3 and 4 year old entitlement are entitled to receive a one off payment of £615 per year for children eligible for the Disability Access Fund (DAF). Further details on DAF can be found in our Early Years Technical Statement [here](#).

5.9 Place funding for education in hospital provision, nationally, has still to be brought into the Place-Plus methodology. Currently, local authorities are required to maintain prior-year place funding values. The rate of funding per place Bradford Council has set in 2018/19 is £18,465. The DfE consultation on the approach to the funding of hospital provision going forward is still to be published and review.

5.10 The funding of independent schools has also not yet been brought into the national Place-Plus funding system. The basis of funding of placements in these settings is open to market forces and will reflect a number of factors, including the needs of the child, place availability and negotiation.

6. Number of Commissioned Places 2019/20

6.1 Bradford Council's DSG High Needs Block planned budget currently assumes that the places that are set out in Appendix 2 will be commissioned in 2019/20.

6.2 These numbers include:

- For individual SEND settings, the greater of either actual occupancy at October 2018 or the 2018/19 planned places total, with some adjustments to individual settings for known specific changes and planned increases and reductions.
- The continuation and full year impact of the additional places that have been created between April 2018 and April 2019, which are now allocated to individual settings.

- 79 additional SEND places to be created from April 2019 in Special schools and DSPs, including the establishment of 4 new DSP provisions.
- An estimate of the number post 16 places in Further Education Colleges for the 2019/20 academic year, based on current occupancy information and incorporating the establishment of 2 new post 16 providers at September 2019.
- The number of subsidised alternative provision places taken from the agreements that were reached in 2018/19. Bradford Council has agreed to fund in 2018/19:
 - 50 lots of place funding at Bradford Central PRU, of which 10 places are assigned for support for pupils permanently excluded (where the Council will also pay the Pupil-Led Need top-up).
 - 160 lots of place funding in total across Bradford District PRU and independent alternative providers. There are some transitional arrangements in place with regard to the funding of Pupil-Led Need top up at Bradford District PRU. From 1 September 2019, all top-up will be funded by the commissioning schools (or BACs) not by the High Needs Block.
 - 50 lots of place funding across the Primary Behaviour Centres, of which 8 places are assigned for support for pupils permanently excluded and 5 for pupils with SEND EHCPs (where the Council will also pay the Pupil-Led Need top-up).

6.3 The Council will continue to firm up the forecast of places over the autumn term and will talk to providers, prior to agreeing the DSG's provision with the Schools Forum for 2019/20 on 9 January 2019. A revised planned places list will be presented to the Schools Forum in December 2018.

6.4 Within the 2019/20 planned budget estimates, the Council also forecasts a growth in High Needs Block spending from a continuing increase in the number of pupils with EHCPs in mainstream primary and secondary schools and academies and from a continuing increase in the number of children and young people placed in independent and non-maintained special schools.

7. Top-Up Funding: Pupil-Led Need

7.1 Top-up funding (also known as Element 3) is the funding required by an institution, over and above place funding, to enable a child or young person with high needs to participate in education and learning. Top-up funding should reflect the cost of additional support an institution incurs related to the individual needs of the child or young person. In this document this is called 'Pupil-Led Need'. Top-up funding can also reflect costs (and differences in costs) related to the setting that the child or young person is placed at and can also take account of the real time occupancy of places at a setting. In this document this is called 'Setting-Led Need' and this is discussed further in paragraph 8.

7.2 Although most children and young people receiving high needs funding will have an EHCP, local authorities have the flexibility to provide high needs funding outside the statutory assessment process for all children and young people up to the age of 19. The statutory assessment process is, therefore, not the sole means of securing additional support for children and young people with SEND. Bradford Council allocates an element of High Needs Block funding to support schools in managing the needs of children and young people that do not have EHCPs, in particular in funding the place element for alternative provision in the PRUs. Inclusion funding is also allocated from the Early Years Block to support early years-aged children with lower level emerging SEND. However, due to increasing budget pressure, the Council, with the Schools Forum, has agreed for the High Needs Block to step back from meeting the cost of top-up funding for children and young people that are placed in alternative provisions that do not have an EHCP and / or remain on the role of the school or academy. Placing schools (through the BACs in the secondary sector) are required to meet the top-up cost using their element 2 funding within their formula funding allocations. This change, which began at 1 September 2018, has simply removed the 'double funding' of these placements in both the Schools Block and the High Needs Block that was previously present.

7.3 Top-up funding for children and young people with EHCPs is paid by the placing local authority. Bradford Council is responsible for funding the top-up for children and young people with EHCPs that are resident in Bradford and that we place either in Bradford-located settings or elsewhere. Institutions in Bradford are

required by the national system to recover for themselves the top-up funding relating to children and young people placed with them by other local authorities.

7.4 Bradford Council allocates Pupil-Led Need top-up for children and young people with EHCPs following an agreed Ranges Funding Model. This model is attached at Appendix 4. This model is used to assign pupils into categories of need for funding purposes. Each range has an applicable level of funding, and every pupil assigned to a range is allocated the set value of funding. The Council's intention has been to establish a single uniform framework for calculating top-up funding. The Council's expectation is that this framework will categorise the vast majority of pupils and will thus ensure consistency in the approach to the funding of high needs in mainstream and specialist settings both pre and post 16. It is accepted that there will be a small number of children or young people that will sit outside this Ranges framework; most of whom will be placed in specialist independent provisions.

7.5 For the Pupil-Led Need top-up funding of post 16 high needs students with EHCPs in the Further Education sector, it has been agreed with the relevant providers that, as, on average, colleges deliver around 60% of the hours delivered by schools, colleges are funded for the vast majority of students at 60% of the Ranges Model value for the primary need of the student. The exceptions are students with the primary need of sensory impairment (Hearing / Visual), where funding continues to be allocated on an actual cost basis. Due to the specific support needs of these students in Further Education, and the diverse nature of their curriculum choices, it is not possible to formularise this funding element.

7.6 Because the funding of hospital education currently has not been brought within the national Place Plus system, and places are funded at higher set value of £18,465, additional top-up funding is not allocated to education in hospital provision.

7.7 A total value of top-up funding owed to an institution by Bradford Council, calculated using the Ranges Model, for all EHCP placements, is calculated and paid on a monthly basis. The calculation is based on the institution's occupancy recorded on the 10th day of each month. Where a child or young person is admitted after the 10th, top-up funding begins from the next month.

- For any errors in the data for a single month, or where the position has been estimated due to the most up to date data not being available (at September, picking up all changes for the new academic year), retrospective adjustments are made in the subsequent month's calculation.
- Funding for August repeats the position recorded for July, except for Further Education placements, where August's funding is based on the new academic year's position.
- A ready reckoner is available, which helps institutions predict the impact on top-up funding of movements in pupil numbers / ranges on a monthly basis.
- Bradford Council also published monthly funding statements for providers to access.

7.8 The process for placing children and young people with EHCPs into the Ranges Model is led by the Council, via its established Panels, using the primary need data that is held and the descriptors of need that have been agreed by school and provider colleagues and that have been applied for funding purposes for a number of years.

- The Council reviews existing EHCPs pupil populations and discusses the outcomes of this with each setting.
- Children and young people that have been placed whilst EHCP assessment is taking place are funded initially at Range 4D.
- All placements in the resourced units attached to maintained nursery schools are funded at Range 4D.
- The Council tracks the movement of children between settings and re-calculates funding on a monthly basis. SEND Services provides to each setting a list of pupils on roll and their funding range by the 5th day of each month. Any discrepancies in that month's data are resolved at this point, before the 10th of

the month deadline. New EHCP children are placed into one of the 7 Ranges by the Authority using primary need data. Children initially placed at Range 4D are re-categorised following assessment and settings are notified of this. Settings are also notified of the proposed funding range of a child at the point of consultation on placement. Schools are able to refer to the monthly funding statements to check changes and the funding position of newly admitted pupils.

- Adjustments to reflect changes in the needs of individual children, where an issue has been raised by a setting, are referred to the SEND Strategic Manager / Assessment Manager. If agreement is not reached, the SEND Panel is asked to make a final decision. Where changes are agreed, funding is updated from the next applicable month.
- The Council is increasingly rolling out the [‘My Support Plan’](#) initiative, which enables early access to additional funds for children with SEND.
- The DfE, in its current operational guidance, states its expectation that the top-up for non-EHCP placements in alternative provisions are managed on a formulaic basis, rather than with reference to the individually identified need of pupils. Currently, there is agreement in place that top-up for these placements is calculated at 50% Range 4D and 50% Range 5. This is the rate of funding that will be used by the Council in funding top-up relating to the placement in the PRUs and the Primary Behaviour Centres of children and young people permanently excluded.

7.9 The DSG Finance Regulations provide for a Minimum Funding Guarantee (MFG) for special schools and academies, which is invoked when an authority substantially amends its approach to top-up funding to the extent that this would reduce the budget of a special school or academy by more than a set threshold. As Bradford Council has not recently altered its Ranges Model, this MFG has not been required. However, it may come into play where the special school funding formula is amended in 2019/20 following the current review. The Council will consider this more closely but will always comply with the requirements of the MFG or will seek exemption from the ESFA where it is agreed that this will help deliver a better transition.

8. Top-Up Funding: Setting-Led Need in Specialist Settings

8.1 Top-up funding can reflect costs (and differences in costs) related to the setting that the child or young person is placed at. In this document this is called ‘Setting-Led Need’.

8.2 Place-funding is expected to meet a school’s basic core costs. However, our current funding model recognises that there are certain differences in a school’s cost base that are influenced by the features of the setting. Two simple examples are that the setting is small and requires additional funding to meet basic core costs of a fixed nature and the setting operates across a split-site and therefore, has certain duplicated costs.

8.3 Appendix 3 sets out in more technical detail these factors within Bradford Council’s current funding approach and how and where they are applied.

8.4 These factors are in summary, for:

- Special schools and special academies: split sites; post 16 element 1 enhancement; new services delegation; small setting protection; 3% cash budget protection.
- Resourced Units (DSPs and ARCs) attached to mainstream primary and secondary schools and academies: small setting protection; new services delegation (ARCs only, not the DSPs); 3% cash budget protection.
- PRUs: Business Rates; new services delegation (Ellar Carr and Primary PRU only); small setting protection (Ellar Carr and Primary PRU only).
- Mainstream primary and secondary schools and academies: SEND Funding Floor.

8.5 Setting-Led Need top-up is calculated alongside Pupil-Led Need top-up on a monthly basis following the same timetable set out in paragraph 7.7.

8.6 No Setting-Led Need top-up is allocated to: early years resourced provision in maintained nursery schools; Further Education Colleges; hospital education; independent alternative providers; the primary behaviour centres.

9. Consultation Responses

9.1 This is relatively simple consultation. Providers are simply asked whether they agree to the continuation of our current funding system on that basis summarised in section 4 of this document.

9.2 Please use the responses form at Appendix 5 to submit your views. There is space in this form for you to comment on any aspect of the proposals. If you wish to discuss these proposals in more detail, or have any specific questions, please contact Andrew Redding using the contact details shown in paragraph 1. Please ensure that your response is submitted by the deadline of **Friday 30 November 2018**.

10. Next Steps

10.1 The Schools Forum will make final recommendations on the approach to the funding of high needs provision for the 2019/20 financial year on 9 January 2019. These recommendations will be made following consideration of the responses receive to this consultation and once the value of DSG funding allocated to the Authority for 2019/20 has been confirmed.

10.2 Subject to the agreement of Council, the recommended approach will be used to allocate DSG funding from 1 April 2019.

11. Appendices

Appendix 1	Summary of the Place-Plus system and how this works for different providers
Appendix 2	2019/20 Planned Funded Places (Bradford-located settings)
Appendix 3	Technical Annex
Appendix 4	Bradford's Pupil-Led Need Top Up Funding Ranges Model 2018/19
Appendix 5	Consultation Responses Form

Appendix 1 – Summary of Place-Plus and how this works for different providers in Bradford

	Pre-16	Pre-16	Post-16	Post-16		
Type of Provision	Place (Core) Funding	Top-Up Funding (Pupil-Led Need)	Place Funding	Top-Up Funding (Pupil-Led Need)	Setting-Led Need Factors	Additional Support Measures
Mainstream primary & secondary (schools, academies and free school)	<p>Element 1 is included within the per-pupil funding allocated through the local school funding formula (NFF).</p> <p>Element 2 - the first £6,000 of additional support cost – is also already delegated with the school's formula funding allocation.</p> <p>Notional SEND defines the value of funding already allocated (see appendix 3).</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4).</p>	<p>Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be funded.</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4).</p>	None.	<p>SEND Funding Floor (see appendix 3).</p> <p>My Support Plan</p>
Mainstream early years (schools, classes and PVI)	<p>Element 1 included within the per-pupil funding allocated through the local EYSFF.</p> <p>Early Years SEND Inclusion Fund allocates Element 2 (£6,000) for eligible low level emerging</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a</p>	n/a	n/a	None.	<p>Early Years SEND Inclusion.</p> <p>DAF Grant.</p>

	SEND.	Ranges Model (see appendix 4).				
DSP Units (mainstream primary & secondary)	Element 1 & 2 is allocated through a combination of per-pupil funding allocated through the local schools funding formula plus £6,000 per place for those occupied by pupils on roll in October and £10,000 per place for the remainder of places to be funded.	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4).	Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be funded.	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4).	Small Setting Protection. 3% Cash Budget Protection.	None.
ARC Units (mainstream primary & secondary) Note provision is centrally managed by Bradford Council and element 2 and top-up funding is retained.	Element 1 & 2 is allocated through a combination of per-pupil funding allocated through the local schools funding formula plus £6,000 per place for those occupied by pupils on roll in October and £10,000 per place for the remainder of places to be funded.	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4).	Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be funded.	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4).	New Services Delegation. Small Setting Protection. 3% Cash Budget Protection.	None.
DSP Units (maintained nursery schools)	Element 1 & 2 is allocated through a combination of per-pupil funding allocated through the local EYSFF funding formula plus	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year.	n/a	n/a	None.	None.

	<p>£6,000 per place.</p> <p>Element 1 funding is paid via EYSFF for places held open.</p>	<p>Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4). All EY DSP places are funded at Range 4D.</p>				
Special Schools & Special Academies	<p>£10,000 per place based on an agreed number of places.</p> <p>Additional place-funding is allocated where occupancy exceeds with an end of year reconciliation.</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4).</p>	<p>£10,000 per place based on an agreed number of places.</p> <p>Additional place-funding is allocated where occupancy exceeds with an end of year reconciliation.</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4).</p>	<p>Split Sites</p> <p>Post 16 element 1 enhancement.</p> <p>New Services Delegation.</p> <p>Small Setting Protection.</p> <p>3% Cash Budget Protection.</p>	None.
Primary Behaviour Centres	<p>£10,000 per place based on an agreed number of places.</p>	<p>Agreed per-pupil top up paid by the commissioning local authority or school.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4 – formulaic approach).</p>	n/a	n/a	None.	None.
PRUs – non-EHCP	£10,000 per place	Agreed per-pupil top	n/a	n/a	Business Rates.	None.

provision (Bradford District PRU & Bradford Central PRU)	based on an agreed number of places.	up paid by the commissioning local authority or school (BACs). Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4 – formulaic approach).				
PRUs – EHCP provision (Ellar Carr and Primary PRU)	£10,000 per place based on an agreed number of places. Additional place-funding is allocated where occupancy exceeds with an end of year reconciliation.	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers. Bradford uses a Ranges Model (see appendix 4).	n/a	n/a	Business Rates. New Services Delegation. Small Setting Protection.	None.
Hospital Education	£18,465 per place based on an agreed number of places.	No additional top-up is allocated.	n/a	n/a	None.	None.
Tracks	£10,000 per place based on an agreed number of places.	A fixed amount of top-up is allocated to ensure a fixed budget allocation. This is not adjusted during the year (for actual	n/a	n/a	None.	None.

		occupancy).				
Further Education Institutions, special institutions and ILPs (post 16)	n/a	n/a	<p>Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be funded.</p> <p>Additional place-funding (element 2 only) can be allocated where occupancy exceeds with an end of year reconciliation.</p>	<p>Agreed per-pupil top up paid by the commissioning local authority.</p> <p>Allocated in 'real time' during the year. Changes for starters and leavers.</p> <p>Bradford uses a Ranges Model (see appendix 4). Typically values are funded at 60% for most placements.</p>	None.	None.
Independent Schools	The place funding system doesn't operate in independent schools.	Agreed per-pupil top up paid by the commissioning local authority.	The place funding system doesn't operate in independent schools.	Agreed per-pupil top up paid by the commissioning local authority.	None.	None.

DSG 2019/20 - High Needs Block Local Authority Funded Planned Places (Bradford-located Settings)

Appendix 2

Setting	Type (AP or SEND)	Oct 18 Authority Funded Places Occupancy (FTE)	18/19 Initial Planned Budget AY LA Funded Places (FTE)	19/20 FY Apr-Aug Updated LA Funded Planned Places (FTE)	19/20 AY Initial LA Funded Planned Places (FTE)	Diff 19/20 AY vs. 18/19 AY
Bradford Central PRU	AP	10.0	50.0	50.0	50.0	0.0
Bradford District PRU	AP	80.0	160.0	80.0	80.0	-80.0
Ellar Carr	SEND	70.0	90.0	72.0	72.0	-18.0
Primary PRU	SEND	51.0	56.0	56.0	56.0	0.0
Other Alternative Providers (balance of ex District PRU Places)	AP	36.0		80.0	80.0	80.0
Willow Centre	AP	2.0	10.0	10.0	10.0	0.0
Horizons Centre	AP	2.0	10.0	10.0	10.0	0.0
Silver Birch Centre	AP	2.0	10.0	10.0	10.0	0.0
Phoenix Centre	AP / SEND	2.0	20.0	20.0	20.0	0.0
Early Years DSP - Abbey Green Nursery School	SEND	10.0	12.0	12.0	12.0	0.0
Early Years DSP - Canterbury Nursery School and Children's Centre	SEND	21.6	16.8	16.8	16.8	0.0
Early Years DSP - St Edmund's Nursery School and Children's Centre	SEND	10.2	19.8	19.8	19.8	0.0
Early Years DSP - Strong Close Nursery School	SEND	10.2	18.0	18.0	18.0	0.0
Early Years DSP - Balance of places still to determine	SEND		11.4	11.4	11.4	0.0
ARC - Girlington Primary School	SEND	15.0	20.0	20.0	20.0	0.0
ARC - Swain House Primary School	SEND	18.0	20.0	20.0	20.0	0.0
ARC - Grove House Primary School	SEND	11.0	12.0	12.0	12.0	0.0
ARC - Hanson School	SEND	42.0	48.0	48.0	48.0	0.0
Special - Beechcliffe School	SEND	121.0	144.0	144.0	144.0	0.0
Special - Chellow Heights School	SEND	243.0	243.2	243.2	243.2	0.0
Special - Delius School	SEND	134.0	131.2	134.0	134.0	2.8
Special - Beckfoot Hazelbeck Academy	SEND	144.0	140.0	144.0	144.0	4.0
Special - High Park School	SEND	127.6	130.0	130.0	130.0	0.0
Special - Beckfoot Phoenix Primary Special School	SEND	96.4	97.0	97.0	97.0	0.0
Special - Southfield Academy	SEND	273.0	287.0	287.0	287.0	0.0
Special - Oastler School	SEND	89.0	94.0	94.0	94.0	0.0
Education in Hospital - Airedale	AP		7.0	7.0	7.0	0.0
Education in Hospital - BRI	AP		16.0	16.0	16.0	0.0
Education in Hospital - Tracks	AP		26.0	26.0	26.0	0.0
DSP - Carrwood Primary School	SEND	5.0	4.0	12.0	12.0	8.0
DSP - Denholme Primary School	SEND	8.0	8.0	8.0	8.0	0.0
DSP - Green Lane Primary School	SEND	16.0	24.0	24.0	24.0	0.0
DSP - High Craggs Primary Academy	SEND	5.0	6.0	6.0	6.0	0.0
DSP - Crossflatts Primary School	SEND	13.0	16.0	16.0	16.0	0.0
DSP - Beckfoot Academy	SEND	4.0	10.0	10.0	10.0	0.0
DSP - Oasis Academy (Lister Park)	SEND	7.0	4.0	4.0	4.0	0.0
DSP - Grange Campus	SEND	11.0	12.0	12.0	12.0	0.0
DSP - Parkside School	SEND	12.0	12.0	12.0	12.0	0.0
DSP - The Holy Family Catholic School	SEND	14.0	16.0	16.0	16.0	0.0
DSP - Beckfoot Thornton Academy	SEND	12.0	14.0	14.0	14.0	0.0
DSP - Titus Salt School	SEND	25.0	30.0	30.0	30.0	0.0
DSP - Bradford Academy	SEND	19.0	27.0	27.0	27.0	0.0
DSP - Bradford Forster Academy	SEND	10.0	6.0	10.0	10.0	4.0
DSP - Haworth Primary Academy	SEND	10.0	10.0	10.0	10.0	0.0
DSP - Crossley Hall Primary School	SEND	4.0	12.0	12.0	12.0	0.0
DSP - Long Lee Primary School	SEND	6.5	6.0	6.0	6.0	0.0
DSP - New Primary Provision (location identified)	SEND		8.0	8.0	8.0	0.0
DSP - New Primary Provision (location identified)	SEND		8.0	12.0	12.0	4.0
DSP - Cottingley Village Primary School	SEND	7.0	10.0	10.0	10.0	0.0
DSP - New Secondary Provision (location identified)	SEND		20.0	15.0	15.0	-5.0
DSP - New Secondary Provision (location identified)	SEND			12.0	12.0	12.0
Further Education - Bradford College	SEND	173.0	173.0	173.0	175.0	2.0
Further Education - Shipley College	SEND	105.0	102.0	102.0	110.0	8.0
Further Education - Aspire I	SEND	85.0	85.0	85.0	85.0	0.0
Further Education - Places for new provisions Sept 19 (estimate)	SEND				60.0	60.0
Additional SEND Places in development	SEND			32.0	32.0	32.0
Totals		2,172.5	2,522.4	2,566.2	2,636.2	113.8
<i>Totals SEND (including Ellar Carr and Park Primary PRU)</i>		<i>2,038.5</i>	<i>2,213.4</i>	<i>2,257.2</i>	<i>2,327.2</i>	<i>113.8</i>
<i>Totals AP (not including Ellar Carr or Park Primary PRU)</i>		<i>134.0</i>	<i>309.0</i>	<i>309.0</i>	<i>309.0</i>	<i>0.0</i>

Appendix 3 – Technical Annex

This appendix contains more technical detail on the definitions and calculations of factors that are contained within Bradford Council's high needs funding model. The Funding Ranges Model for Pupil-Led Need is shown separately in Appendix 4.

Notional SEND (Mainstream Schools Block Primary & Secondary)

Local authorities are required to define for each primary and secondary school the value of formula funding that is 'notionally' allocated for SEND (for meeting the first £6,000 of needs for pupils with EHCPs and the needs of pupils without EHCPs). Our calculation has built up over time. How Bradford currently defines notional SEND (the %s of funding in each factor that make up this budget) is shown in the table below.

Formula Factor	% Primary	% Secondary
Prior Low Attainment	100%	100%
Free School Meals Factor	23.1%	10.2%
IDACI Factor	22.4%	19.2%
Base £APP	7.5%	6.3%

In addition, 6% of a school's allocation under the Early Years Single Funding Formula, for schools and academies that have nursery provision, is also defined to be available for supporting SEND in early years.

SEND Funding Floor (Mainstream Primary & Secondary)

The SEND Floor provides a 'top up' where the SEND formula does not allocate a minimum level of funding, after the cost of EHCPs has been removed. This is re-calculated on a monthly basis for changes in EHCP positions. SEND formula funding is defined as the notional SEND in the table above but does not include the 5.5% (primary) / 4.5% (secondary) of the Base £APP element. The floor tops up funding to these minimums:

- For Primary schools and academies: £19,931 or £69.10 per pupil (whichever is greater).
- For Secondary schools and academies £75,337 or £69.10 per pupil (whichever is greater).

The values of SEND Floor allocations for individual primary and secondary schools and academies are currently protected at 2017/18 cash levels i.e. schools and academies in 2018/19 received at least the value of allocation they have received in 2017/18.

Setting-Led Needs Factors – Special Schools & Special Academies

- New Services Delegation – an additional amount per pupil to reflect that stand alone special schools cannot access de-delegated and centrally managed services without charge - set at a flat £364 per pupil. So a setting with 100 pupils receives $100 \times £364 = £36,400$ funding.
- Small Setting Protection – an additional sum, for stand-alone settings with fewer than 75 places, to ensure a minimum level of funding for fixed costs. The formula in 2018/19 is:
A $(75 \times £10,000 \times 20\%)$
B $(\text{setting's place funding} \times 20\%)$
= top up to the value of A where B is less than A
- Split Sites – an additional agreed sum to replicate existing cash values for schools that continue to operate across split sites (£162,850 full year allocation).
- Post 16 Places – an additional sum per Post 16 place, to continue the additional £1,100 per Post 16 place following the directed reduction from £11,100 to £10,000 place value within the national funding model. This ensures that special schools with post 16 places do not lose out from the technical simplification and retain a higher level of element 1 funding.

- 3% Cash Budget Protection – an additional total cash budget protection, which ensures that at no point during 2018/19 will the total 'Place Plus' calculated budget for an individual special school be more than 3% lower than the 2017/18 total level of funding (taking account of the top-up income received for placements by other local authorities).

Setting-Led Needs Factors – Resourced Units Attached to Mainstream Primary & Secondary Schools and Academies

- New Services Delegation – as special schools above for ARCs only (not applicable for DSPs).
- Small Setting Protection – an additional sum, for DSPs / ARCs with fewer than 24 places, to ensure a minimum level of funding for fixed costs. The formula in 2018/19 is:

A (24 x £10,000 x 20%)

B (setting's place funding (where each place is worth £10,000) x 20%)

= top up to the value of A where B is less than A

- 3% Cash Budget Protection – as special schools above.

Setting-Led Needs Factors – Pupil Referral Units

- Business Rates – applicable for all PRUs – additional funding for business rates at actual cost.
- New Services Delegation – as special schools above for Ellar Carr and Primary PRU only.
- Small Setting Protection – as special schools above for Ellar Carr and Primary PRU only.

HIGH NEEDS PROVISION: FUNDING CATEGORIES, BANDS & AMOUNTS PUPIL-LED NEED 2018/19

	Range 1	Range 2	Range 3	Range 4				Range 5	Range 6	Range 7
				Band A (16.5-21.5 hours)	Band B (22-27 hours)	Band C (27.5-34.5 hours)	Band D (35+ hours)			
PRIMARY NEED Additional "Plus" Funding			£0	£952	£3,000	£4,597	£7,161	£10,440	£13,910	£22,857
Mainstream Autism & SLCN						SLCN	ASD		ASD+	ASD++
Mainstream MLD/SLD/PMLD			MLD		MLD+	SLD	PMLD	SLD+	PMLD+	PMLD++
Mainstream PD							PD		PD+	PD++
Mainstream HI/VI						HI/VI		HI+/VI+		
Mainstream BESD							BESD		BESD+	BESD++

**Mainstream funding is within colour coded Bands (mainly range 4)
Funding is determined by actual Primary Need and is shown as text**

The DfE, in its current operational guidance, states its expectation that the top-up for non-EHCP placements in alternative provisions are managed on a formulaic basis, rather than with reference to the individually identified need of pupils. Currently, there is agreement in place in Bradford that top-up for these placements is calculated at 50% Range 4D and 50% Range 5. This is the rate of funding that is used by the Council in funding top-up relating to the placement in the PRUs and the Primary Behaviour Centres of children and young people permanently excluded.

RESPONSES FORM

Consultation on Funding High Needs Provision 2019/20

Name _____ Setting Name _____

THE DEADLINE FOR RESPONSES TO THIS CONSULTATION IS FRIDAY 30 NOVEMBER 2018

Please send completed questionnaire responses to:

School Funding Team
City of Bradford Metropolitan District Council
1st Floor, Britannia House,
Hall Ings
Bradford
BD1 1HX

Tel: 01274 432678

Fax: 01274 435054

Email: andrew.redding@bradford.gov.uk

Please complete the questionnaire by marking the appropriate boxes. There is a space below each question for you to record comments.

Question 1: Do you agree with the Council's proposal to continue the existing system for the calculation of high needs funding allocations in 2019/20 on the basis set out in section 4?

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 2: Do you have any comments on the places (or the distribution of places) that are planned to be funded from the High Needs Block in 2019/20 (listed in Appendix 2)?

Question 3: Do you agree with the proposal to continue to use the existing Ranges Model framework (as shown in Appendix 4) as the basis for the calculation of the Pupil-Led Need top-up funding element for the 2019/20 financial year? If not, please explain why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 4: Do you agree with the proposal to continue to use the existing Setting-Led Need factors as shown in Appendix 3? If not, please explain why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 5: Do you agree with the proposal to continue to use our existing definition of 'notional SEND' funding identified for individual primary and secondary schools and academies? If not, please explain why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 6: Do you agree with the proposal to continue to protect in 2019/20 the values of SEN Floor allocations for primary and secondary schools and academies currently in receipt of this funding at their 2017/18 levels? If not, please explain why not.

Strongly Agree **On Balance Agree (some reservations)** **Strongly Disagree**

If not, please provide further explanation here:

Question 7: Are there any changes that you would wish to see made to the funding model in 2019/20? Please give details.

Question 8 – Do you have any other comments on the funding model or the proposals that you have not recorded elsewhere?