

INFORMATION & CONSULTATION ON FUNDING HIGH NEEDS PROVISIONS FOR THE 2021/22 FINANCIAL YEAR

1. Introduction & Summary

1.1 This consultation document is written to set out, and to collect views on, the formula approach that Bradford Council proposes to use to delegate Dedicated Schools Grant High Needs Block funding to high needs providers, mainstream schools and academies and other settings in the 2021/22 financial year April 2021 to March 2022. 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.

1.2 The DfE announced in September 2019 a full national review of the SEND / EHCP / AP system. The DfE also conducted in summer 2019 a 'Call for Evidence' on the financial arrangements for SEND and AP. These together are very likely to result in changes to the national high needs funding system in the future. However, at the time of writing this document, the outcomes of these reviews are to be published. Through its operational guidance for local authorities, the DfE has confirmed that the national EHCP and AP funding systems, as are currently established, continue to be in place for the 2021/22 financial year.

1.3 We would like to remind providers that, for the current 2020/21 year, we introduced a new Banded Model for the allocation of 'top up' funding for EHCPs. This model replaces our previous 'Ranges Model' and quite significantly uplifts the funding of EHCPs in all settings, both mainstream and specialist. This new model includes protections, which have ensured that no EHCP in place on 1 April 2020 has reduced in value as a result of model change. In 2020/21, we have also introduced a new Day Rate Model for the funding of alternative provision for pupils permanently excluded.

1.4 It continues to be our intention in 2021/22 to use the Banded Model, and the Day Rate Model, to release to schools, academies and high needs providers included within the Place-Plus system a significant proportion of the additional High Needs Block funding that will be allocated to Bradford. We received an uplift of £11.50m (17% per pupil) in High Needs Block funding in 2020/21. We are set to receive an uplift of £10.65m (12% per pupil) in 2021/22.

1.5 We propose the following changes in our funding models in 2021/22. These are explained in more detail in this document.

- To uplift the rates of funding allocated via the Banded Model and via the Day Rate Model. Please see sections 6 and 8.
- To revise our SEND Funding Floor mechanism, in trial for a year, in support the funding of EHCPs in mainstream primary and secondary settings. Please see section 10.
- To add into our arrangements the allocation of the Teacher Pay Grant and the Teacher Pension Grant. This change is required in response to these grants being transferred into the DSG at April 2021. Please see section 9.

1.6 In certain places, and especially in setting out uplifts proposed to funding rates, we must add the caveat that the sizes of these uplifts are subject to final affordability checks, which will take place following the closure of this consultation and prior to asking the Schools Forum to give its final view to the Authority in January 2021. As such, although we set out here the rates of funding we anticipate will be used in 2021/22, subject to the responses to this consultation, providers should still view these rates at this time as indicative and subject to change.

1.7 We do not propose to make further major technical changes.

- As we have just introduced a new Banded Model for the funding of top up for EHCPs for schools, academies and other providers, and a new Day Rate Model for PRUs and AP academies, our focus is to ensure that these new models are fully embedded. We also aim to consolidate the other changes we implemented in 2020/21, including support funding for specialist equipment. As a reminder, we amended and clarified how the cost of specialist equipment is shared between schools / providers and the Local Authority, meaning especially that a) special schools are able to access support for the cost of equipment, and b) schools / providers are required to meet the first £1,000 of the cost of all equipment, subject to a 'reasonableness cost assessment' made by the SEND Panel.
- We propose to continue the setting needs-led factors within our specialist setting models e.g. small setting protection, split sites, with the values of these uplifted where appropriate. Please see section 7.
- We do not propose to amend our definition of notional SEND for mainstream primary and secondary schools and academies in 2021/22. We do expect that the DfE will provide further guidance and possible prescription for this definition at a point in the future. Our benchmarking of data taken from 2020/21 local authority returns continues to evidence how disparate definitions of notional SEND currently are. We do not see merit in adjusting our definition now when, amongst other things, it is highly likely that the DfE may soon prescribe one.

1.8 We would like to remind providers that our high needs funding arrangements continue to operate in the context of the following wider changes:

- The continued creation of additional specialist places in Bradford. A list of places that are planned to be commissioned is provided at Appendix 4.
- The development and expansion of new Local Authority-led resourced provisions in mainstream primary and secondary schools and academies.
- The continued growth in the numbers of pupils with EHCPs in mainstream settings.
- The completion of the 'restructuring' of our PRU and AP academy provision, where our PRUs and AP academies going forward deliver provision for pupils permanent excluded.
- The completion of the re-alignment of responsibility between the High Needs Block and mainstream schools and academies for the funding of alternative provision that is commissioned by mainstream schools and academies.
- The amalgamation of Bradford's hospital education, Tracks and medical home tuition provision into a single Local Authority managed service.

1.9 The deadline for responses to this consultation is Tuesday 1 December 2020. Please address all questions and responses to Andrew Redding 01274 432678 andrew.redding@bradford.gov.uk. A response form is included at Appendix 6.

2. Background – High Needs Block

2.1 All local authorities are following a direction of travel set by the Department for Education (DfE) towards National Funding Formula (NFF). Significant changes to the way high needs provision is funded were implemented by the DfE in 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 14% 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 We estimate that we will receive £91.92m High Needs Block funding within our DSG allocation in 2021/22. Around 93% of this £91.92m is expected to be 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.
- Maintained Special schools and Special School Academies.
- Enhanced Specialist Provisions (resourced provisions) attached to maintained nursery schools.
- School-led resourced provisions within mainstream primary and secondary schools, academies and free schools (formerly known as DSPs).
- Local Authority-led resourced provisions within mainstream primary and secondary schools, academies and free schools (formerly known as ARCs).
- Young people aged 16 to 25 in Further Education Colleges, 6th Form Colleges and with independent or specialist learning providers.
- Pupil Referral Units (PRUs) and Alternative Provision Academies.
- Children and young people placed in independent provisions and non-maintained special schools.

2.5 High Needs Block funding in Bradford also supports centrally managed services relating to SEND and Alternative Provision, as permitted by the Finance Regulations, which includes SEND teaching support services that are accessed by schools, academies and other providers and tuition for children and young people that are unable to attend school for medical reasons. Local authorities are permitted 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 Unlike for primary and secondary schools and academies within the Schools Block, the DfE's National Funding Formula does not introduce a provider-level national formula for High Needs Block funded providers. Local authorities continue to have full responsibility for the management of formula funding relating to High Needs Block (HNB) provisions.

3. DfE-Led National High Needs Funding System 2021/22

3.1 The basic construct of the national high needs funding system in 2021/22 remains in place and unchanged from the arrangements and thresholds that operated in 2020/21. The most obvious elements are place funding for specialist provisions, set at £10,000, and Element 2 funding (and place funding for resourced provisions), set at £6,000. These are unchanged.

3.2 As has occurred in the other DSG Blocks, the previously separately allocated Teacher Pay Grant and the Teacher Pension Grant have now been transferred into the High Needs Block. This means that our arrangements from April 2021 need to continue the allocation of these monies to specialist settings. This is discussed further in section 9.

4. Place (or Core) Funding

4.1 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 current 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 already delegated budgets.

4.2 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 and provider.

4.3 Core (or place) funding for Bradford's stand alone maintained special schools and special school academies, and for PRUs and AP academies, 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 special school 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 the Local Authority. 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 any additional place funding allocated to an institution will be reduced / removed if the institution has been allocated too much additional place funding when its actual annual composite occupancy is calculated.

4.4 Place funding for Bradford's School-led resourced provisions (formerly known as DSPs), Early Years Enhanced Provisions (EYESPs), and for post 16 placements in Further Education Colleges, operates on the basis set out in paragraph 4.3 but is set at the national annual value of £6,000. The value is not £10,000 because these institutions, unlike special schools, 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 (notionaly defined at £5,200). 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 2021/22 academic year will be based on the number of students recruited in 2020/21.
- 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 School-led resourced provisions where the Local Authority commissions high needs places.
 2. within the formula funding received by Bradford's maintained nursery schools that have resourced provisions where the Local authority commissions 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 the Local Authority commissions high needs places post 16.

4.5 The national funding system includes an additional complexity in the calculation of place funding for School-led resourced provisions in mainstream primary and secondary schools and academies. The value of a place is set at £6,000 where that place was occupied at the time the October Census in the previous year was taken. Where a place is not occupied at this census, local authorities are required to fund this place at £10,000 i.e. an additional £4,000 in the following year. This is because the school or academy will not receive Element 1 funding for this place in the following financial year in its main formula funding. For maintained nursery schools, an adjustment is made to the termly funding allocated via the EYSFF to add Element 1 funding for the resourced places that are not occupied where these are being held open by the school.

4.6 Place funding for Bradford's Local Authority-led resourced provisions (existing provisions were formerly known as ARCs), operates on the same basic principles as for School-led provisions, but with a couple of technical differences relating to the fact that the Local Authority retains Element 2 funding, whereas for School-led provisions this delegated to and retained by the school. These technical differences are highlighted in Appendix 1.

4.7 The physical payment of place funding by Bradford Council, where this is delegated and is the Council's responsibility to pay, takes place on a monthly basis and is combined with the monthly payment of top-up funding, which is described further in sections 6 and 7. Bradford Council publishes monthly funding statements for providers to access on [Bradford Schools Online](#). 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 across to these providers directly.

4.8 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 for more technical information.

4.9 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 total value of EHCPs at a school or academy. In effect, the current SEND Floor provides a top up for mainstream 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, so receive lower levels of AEN funding within their core school formula allocation. However, we propose to amend the calculation of our SEND Funding Floor for 2021/22, on a one year trial basis, and this is discussed further in section 10.

4.10 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. However, Element 2 is not allocated within the EYSFF. In response, all early years children that have EHCPs and that are not placed in the EYESPs at maintained nursery schools are allocated Element 2 funding in addition to the top up funding allocated via the Banded Model. The Council has also put in place an Early Years SEND Inclusion Fund, funded from the Early Years Block, which enables Element 2 funding to be allocated to support children in early years settings that do not (yet) have EHCPs but have low level emerging SEND. In addition, early years providers of the 3 and 4 year old entitlement are entitled to receive a one off payment for children eligible for the Disability Access Fund (DAF). Further details on the SEND Inclusion Fund and DAF can be found in our Early Years Technical Statement [here](#).

4.11 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 set in 2020/21 was £18,465. Please note that Bradford's hospital provisions closed as separate PRUs on 31 August 2019 and Tracks closed as a separate entity on 31 August 2020. Provision is continuing as a single Local-Authority service. Funding of this centrally managed service now operates outside the Place-Plus mechanism, working within the discrete allocation provided within our High Needs Block. This approach is subject to annual review to respond to any changes in the DfE's funding methodology and / or other funding requirements.

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

5. Commissioned Places 2021/22

5.1 Bradford Council's DSG High Needs Block planned budget currently assumes that the places that are set out in Appendix 4 will be commissioned in 2021/22.

5.2 These draft numbers will include / take account of:

- For individual SEND settings, the greater of either actual occupancy at October 2020 or the 2020/21 planned places total, with some adjustments to individual settings for planned increases and reductions. Some of these adjustments are still to be confirmed.
- The number post 16 places in Further Education Colleges for the 2021/22 academic year, based on predicted occupancy information. Please note that these numbers are still being reviewed.
- The continuation and full year impact of additional places that have been recently created, which are now allocated to individual settings.
- Budget provision to enable up to 80 more SEND places to be created during 2021.
- The planned cessation (at 1 September 2020) of the High Needs Block's funding of school-commissioned alternative provision places at the Primary Behaviour Centres and at District PRU.
- The consolidation and expansion of provision for pupils permanently excluded within the PRUs.
- The amalgamation of hospital education and Tracks places within a single Local-Authority managed service.

5.3 Within the 2021/22 planned budget estimates, the Council also forecasts a continuing increase in the number of pupils with EHCPs in mainstream primary and secondary schools and academies and a continuing increase in the number of children and young people placed in independent and non-maintained special schools.

6. Top-Up Funding for EHCPs: Pupil-Led Need

6.1 Top-up funding (also known as Element 3 or 'Plus' funding) 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 is expected to 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 section 7. How top up funding is allocated to PRUs and AP academies for provision for pupils permanently excluded is specifically discussed in section 8.

6.2 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 Council, with the Schools Forum, has agreed for the High Needs Block to step back from meeting the cost of funding for children and young people that are placed by schools in alternative provisions. The schools commissioning the places (including through the BACs in the secondary phase) are required to meet the cost using their Element 2 funding within their formula funding allocations.

6.3 Top-up funding for children and young people with EHCPs is paid by the placing local authority. Bradford Council therefore, 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 should recover for themselves the top-up for pupils placed with them by other local authorities.

6.4 For the current 2020/21 financial year, we introduced a new Banded Model for the allocation of top up funding for EHCPs. This model replaces our previous 'Ranges Model' and quite significantly uplifts the funding of EHCPs in all settings, both mainstream and specialist. The model includes protections, which have

ensured (and which will continue to ensure) that no EHCP in place on 1 April 2020 reduces in value as a result of funding model change.

6.5 We do not propose to make major technical changes to our Banded Model for 2021/22. As we have just introduced this, the focus of our work is to ensure that this new model is fully embedded. How the Banded Model works and is applied currently (and how it is proposed to work in 2021/22) is set out in more detailed in Appendix 2.

6.6 The total value of top-up funding owed to an institution by Bradford Council, calculated using the Banded Model, will continue in 2021/22 to be calculated and paid as now on a monthly basis. The calculation will be 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.

- Retrospective adjustments are made in the subsequent month's calculations 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 (for example, at September, picking up all changes for the new academic year).
- 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 / bands on a monthly basis.
- Bradford Council also published monthly funding / payment statements for providers to access.

6.7 The process for placing children and young people with EHCPs into the Banded Model will continue to be led by the Council via the established SEND Panel and the application and assessment processes this Panel manages. Any appeals (or disputes) will be managed by the Panel through its resolution procedure. The Council is currently working on improved guidance for the Panel process, including guidance for schools on what information is needed in support of an EHCP assessment request in line with the Banded Model.

6.8 It continues to be our intention in 2021/22 to use the Banded Model to release to schools, academies and high needs providers, included within the Place-Plus system, a significant proportion of the additional High Needs Block funding that will be allocated to Bradford.

6.9 The table below shows the actual top up rates that were funded in 2019/20 (under our previous Ranges Model), in 2020/21 (in the first year of our new Banded Model) and the rates that are now indicatively proposed for 2021/22, subject to warning that is given in paragraph 1.6.

	£ Top Up Value 2019/20	£ Top Up Value 2020/21	£ Top Up Value 2021/22
Band 3L	£952	£1,670	£1,900
Band 3M	£3,000	£3,347	£3,626
Band 3H	£4,597	£4,974	£5,302
Band 4L	£7,160	£7,747	£8,435
Band 4M	£10,440	£11,296	£12,235
Band 4H	£13,910	£15,051	£16,148
Protected 7	£22,857	£24,732	£26,534

6.10 The table below shows the % and cash uplifts in values.

	% Increase Top Up 2020/21 vs. 2019/20	% Increase Top Up 2021/22 vs. 2020/21	£ Increase Top Up 2021/22 vs. 2020/21
Band 3L	+ 75.4%	+ 13.8%	+ £230
Band 3M	+ 11.6%	+ 8.4%	+ £279
Band 3H	+ 8.2%	+ 6.6%	+ £328
Band 4L	+ 8.2%	+ 8.9%	+ £688
Band 4M	+ 8.2%	+ 8.3%	+ £939
Band 4H	+ 8.2%	+ 7.3%	+ £1,097
Protected 7	+ 8.2%	+ 7.3%	+ £1,802

6.11 The table below shows the % uplifts in 2021/22 values vs. 2020/21 when Element 2 (£6,000) and Element 3 (£10,000) are included.

	(1) % Increase Top Up Only	(2) % Increase Top Up plus £6,000	(3) % Increase Top Up plus £10,000
Band 3L	+ 13.8%	+ 3.0%	+ 2.0%
Band 3M	+ 8.4%	+ 3.0%	+ 2.1%
Band 3H	+ 6.6%	+ 3.0%	+ 2.2%
Band 4L	+ 8.9%	+ 5.0%	+ 4.0%
Band 4M	+ 8.3%	+ 5.4%	+ 4.4%
Band 4H	+ 7.3%	+ 5.2%	+ 4.4%
Protected 7	+ 7.3%	+ 5.9%	+ 5.2%

6.12 To explain what these tables illustrate:

- The total value that is allocated to support an individual EHCP is derived by adding Element 2 (a fixed £6,000 per 1 FTE pupil) to the value of the top up allocated through the Banded Model.
- The total value of support for the three steps in Band 3 is proposed to be uplifted for 2021/22 by 3.0%. The total value of support for the three steps in Band 4 is proposed to be uplifted by a basic 5.0%. These uplifts are shown in the table above in paragraph 6.11 column (2). These uplifts are calculated on our estimate of the impact of pay award and inflation on the cost of provision. For Band 3, the 3.0% relates to inflation and the pay award for support staff as well as an allowance for incremental pay scale progression. For Band 4, the 5.0% relates to inflation, the pay award, and incremental pay scale progression for both support staff and for teachers. Recognising that it is the DfE's intention to increase the salaries of teachers early in their careers, as part of a national pay settlement that is expected to significantly exceed inflation over the next couple of years, the base uplift for Band 4 is proposed to be set at 2.0% higher than for Band 3. As explained in Appendix 2, the provision mapping approach to the calculation of the bands is based purely on support staff time in Band 3 but a mixture of support staff and teacher time in Band 4. Although a base 5.0% has been used for Band 4 (this can be seen in step 4L), the % increases for steps 4M and 4H exceed 5.0% due to the greater proportion of teacher time on which these two steps are calculated.
- Because the value of Element 2 has not changed between 2020/21 and 2021/22 – it is still £6,000 – the value of the top up allocated through the Banded Model must increase by a greater percentage in order to achieve these base 3.0% and 5.0% total uplifts. This is the reason why the % increases in top up – as shown in the table in paragraph 6.11 column (1) - are significantly higher. This is also the reason why the % increases in top up in the steps in the model are not the same; the Element 2 value of £6,000 as a proportion of the total cost of provision decreases as the steps get higher. Therefore, the extent to which the top up has to compensate for Element 2 not increasing in value also decreases as the steps get higher. Recognising this, it would not follow our new model approach to simply provide a blanket % increase in top up funding across all steps. Column (2) in the table in paragraph 6.11 gives the true real position of the increase in total funding available at each step – Element 2 plus top up - to support the cost of EHCP provision.
- For special schools and special school academies, and for resourced provisions where appropriate, it is also important that we incorporate within our uplift of top up recognition that these schools receive a fixed £10,000 per place (which includes the £6,000 Element 2) and that this £10,000 is not changing in value between 2020/21 and 2021/22. Column (3) in the table in paragraph 6.11 shows the total overall increase in funding per occupied place special schools are indicatively proposed to receive in 2021/22. Please note that the vast majority of special school placements are expected to be funded in Band 4 and the top up rates are calculated as such. The increases in the steps in Band 4, when the fixed £10,000 is added, range between 4.0% and 5.2%. In comparison, the overall National Funding Formula settlement for mainstream primary and secondary schools and academies in 2021/22 is 3.0%. We are seeking to continue to recognise the growth in costs in special schools and in resourced provisions.
- The Banded Model retains a transitional 'Protected 7' step, which will continue to fund EHCPs that were graded at Range 7 under the old model in place on 1 April 2020. We have guaranteed that the value of

Protected 7 will be uplifted each year by the same % that is applied to Band 4H. The tables above evidence this.

6.13 Please note that the Finance Regulations provide for a Minimum Funding Guarantee (MFG) for special schools, which is invoked when an authority substantially amends its approach to top-up funding to the extent that this would reduce the budget of (or reduce any increase that would have otherwise been allocated to) a special school. The 2021/22 Regulations require an MFG of 0%. As we propose to increase the values of all EHCPs, without amending how our Banded Model works, we are compliant with the requirements of the MFG without needing to adjust our model to provide for minimum values.

6.14 We have explained how we propose to approach the uplifting of the Banded Model in 2021/22. This approach is centred on increasing the salary cost assumptions used within the model rather than adjusting (increasing) the quantity of support that can be funded by each step. We have not adjusted this as we wish the new model to embed and as we are also continuing to write guidance for schools on the application of the model and of the SEND Panel's criteria. However, where we continue to substantially uplift the model in future years, and where this uplift may be at a value greater than staffing pay awards, we may look to adjust the provision mapping assumptions on which the Banded Model is based.

Question 1 – Do you agree with the approach that is proposed for uplifting the values of the Banded Model in 2021/22? If not, please can you explain why not.

Question 2 – Do you have any comments (including technical comments) on the Banded Model you would like the Authority to consider for 2021/22?

7. Top-Up Funding for EHCPs: Setting-Led Need in Specialist Settings

7.1 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'.

7.2 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 core costs of a fixed nature and that the setting operates across a split-site and therefore, has certain duplicated and additional costs.

7.3 Appendix 3 sets out in more technical detail these factors within Bradford Council's proposed funding approach for 2021/22 and how and where they are applied.

7.4 These factors are in summary, for:

- Maintained Special schools and Special school academies: split sites; post 16 Element 1 enhancement; new services delegation; small setting protection; 3% cash budget protection.
- School-Led Resourced Provisions attached to mainstream primary and secondary schools and academies: small setting protection; 3% cash budget protection.
- Early Years Enhanced Specialist Provisions attached to maintained nursery schools: small setting protection.

7.5 For 2021/22 we propose the following changes, to:

- Uplift the value of split site funding for special schools and special academies by the mean average increase for Band 4 in the Banded Model. The full year value of the lump sum is proposed indicatively to be uplifted to £214,265 from the 2020/21 value of £198,500.
- Uplift the value of the New Services Delegation factor for special schools by the mean average increase for Band 4 in the Banded Model; from £393.85 to £425.13 per pupil.

7.6 The value of the Post 16 Element 1 Enhancement factor for special schools is retained unchanged at £1,200 to keep in line with the national Element 1 figure for post 16 provision (which is also retained at £5,200 in 2021/22).

7.7 As explained in paragraph 1.6, please note that the values proposed for 2021/22 are indicative and may be adjusted, subject to the responses received to this consultation and final affordability checks.

7.8 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 6.6.

Question 3 – Do you agree with the amendments to the setting-led need factors that are proposed in paragraph 7.5? If not, please can you explain why not.

Question 4 – Do you have any comments (including technical comments) on the setting-led need factors you would like the Authority to consider for 2021/22?

8. PRUs and AP Academies – Day Rate Top Up Funding Model

8.1 This section sets out the basis proposed for the continuation of the Authority's calculation of top up funding to support the cost of provision for pupils permanently excluded in Park PRU and Bradford Alternative Provision Academy Central (BAPAC). The methodology and principles set out here also extend to the Authority's funding of top up for pupils permanently excluded that may be placed in other provisions.

8.2 Park PRU and BAPAC both receive place funding from the High Needs Block, at £10,000 a place, as explained in section 4. They then also receive top up funding from the Authority for places occupied following the placement of pupils permanently excluded. We introduced in 2020/21 a Day Rate Model for the calculation of this top up. A formulaic basis such as this follows the DfE's expectation that, as top up funding for AP institutions is not usually related to an assessment of SEND, a standard predictable top up rate can be set, which reflects the overall budget needed by the institution. This budget should be built up with the understanding that a level of capacity is needed to be retained during the year, recognising that numbers on roll in PRUs and AP academies can fluctuate.

8.3 Using the Day Rate Model, top up funding is allocated on an agreed £value per day, multiplied by the number of days of provision expected to be delivered weekly / monthly / termly / annually. The total number of annual days is 195. The value of the day rate can adjust according to the PRU's / AP academy's overall occupancy to ensure that a minimum level of funding is allocated to enable the PRU / AP academy to meet fixed costs (largely related to the setting) and to retain sufficient capacity (staffing capacity) for the Authority to use. The model is informed via annual review, which includes checking actual against expected occupancy. In situations where there are significant differences in occupancy, which are more permanent, the number of places to be commissioned by the Authority will be reviewed for the following year.

8.4 As set out in section 4, the Authority plans to commission an increased number of places at both Park PRU and BAPAC in 2021/22. Both are now planned to deliver more than 50 places.

8.5 We propose to uplift the value of the Day Rate in 2021/22. The day rate in 2020/21 was £67.38. We propose to uplift this, indicatively and subject to the warnings given in paragraph 1.6, to £72.29. This is the 2020/21 rate plus 7.29%, which uses the mean average Band 4 increase proposed for the EHCP Banded Model of 7.94% but reduced to recognise that the small setting protection factor in the calculation is not uplifted. This is set out further in the table below. Together with the fixed £10,000 per place, a 7.29% increase in the day rate results in an overall 4.14% increase in funding per pupil for each occupied place (the total annual per pupil funding in 2021/22 will be £10,000 + (195 days x £72.29) = £24,096 compared with £10,000 + (195 days x £67.38) = £23,139 in 2020/21).

8.6 The £72.29 is made up of the following factors and amounts. These factors are the same as used in 2020/21. All factors but the small setting protection have been uplifted by 7.94%. The small setting protection factor is retained at the 2020/21 value, as is the case for all other parts of high needs formula funding that include a small setting protection factor, because this factor protects place funding and place funding is not uplifted in value in 2021/22.

Factor	£Day Rate Value
Main pupil-need led provision *	£59.89
Small Setting Protection	£5.55
Business Rates	£1.80
New Services Delegation	£2.18
Pupil Mobility	£2.86
Total	£72.29

8.7 The equivalent annual per pupil value, based on 195 days, is as follows:

Factor	£Day Rate Value
Main pupil-need led provision *	£11,679
Small Setting Protection	£1,082
Business Rates	£351
New Services Delegation	£426
Pupil Mobility	£558
Total	£14,096

* this element is the equivalent of the top up funding allocated to EHCPs through the Banded Model. This value sits between bands 4L and 4M.

8.8 We propose to continue to apply the Day Rate Model as we applied it in 2020/21 but with one technical modification, which is to adjust the calculation of minimum top up funding so that this calculation is based on each setting's agreed commissioned places number (currently 90 for Park PRU and 65 for BACAP) rather than based on a fixed 50 places. In this way, the funding model supports the PRU / AP academy to retain their unique capacity to deliver the increased number of places the Authority wishes to commission.

- Where the PRU / AP academy is close to full occupancy throughout the year, they will be funded at £72.29 per day. The basic day rate value of £72.29 will be adjusted however, where necessary should occupancy fluctuate, to ensure a minimum level of funding to enable capacity retention, meaning that the PRU will not receive less than:
 - (£1,082 + £351 + £426 + £558) x no. of places (for setting-based costs), plus
 - 88% of £11,679 x no. of places (for main pupil-led need provision)

8.9 We will continue in 2021/22 the following two technical features relating to the in year application of the Day Rate Model:

- Although there is the option to move to a more sensitive approach to the counting of actual occupancy, we do not yet for 2021/22 propose to move away from the 10th of the month census, which is the process followed for the re-calculation of Banded Model funding for EHCPs. We will continue to re-calculate the funding of the PRU / AP academy on a monthly basis as now, taking the 10th of the month census as the actual occupancy for that month. But we will keep this under review for future years.
- We will continue in 2021/22 to calculate and profile top up funding across 12 months. Going forward, we could be more specific about the number of days delivered and funded each month, taking account of the profile of holidays. This would mean that, unlike now, for example, top up funding would not be calculated and allocated in August. We would like to do some more work to look at the extent to which the current flattened 12 month profile arrangement balances providing a secure funding base for the PRU / AP academy with ensuring that the funding model most accurately responds to true occupancy as this changes during the year. This will be a more significant matter to consider if the numbers on roll in the PRU / AP academy are significantly different at different times of the year. We will keep this under review.

Question 5 – Do you agree with the amended Day Rate mechanism that the Authority proposes to use to fund the PRU / AP academy in 2021/22? If not, please can you explain why not.

Question 6 – Do you have any comments (including technical comments) on the proposed Day-Rate mechanism you would like the Authority to consider for 2021/22?

9. Transfer of Teacher Pay Grant and Teacher Pensions Grant

9.1 We are required to add into our formula funding arrangements for specialist settings in 2021/22 the allocation of the Teacher Pay Grant (TPG) and the Teacher Pension Grant (TPECG). This change is required in response to these grants being transferred into the High Needs Block. These grants have previously been allocated separately and in addition to place-plus funding.

9.2 The DfE's High Needs Block operational guidance outlines how local authorities, on a general basis, are expected to manage this transfer. This guidance also sets some restrictions, including that:

- Local authorities are required to pass on to special schools, special academies, pupil referral units, AP academies and hospital schools amounts of funding per place no less than the amounts of TPG, TPECG and supplementary fund paid in 2020 to 2021.
- This additional high needs funding must not result in a reduction in the number of places for which £10,000 per place is allocated to a school or to the top-up funding in respect of individual pupils.

9.3 These monies are described by the DfE as "additional place funding" and we propose to allocate them in 2021/22 on a place-led basis as follows. Please note that separate arrangements will be used for the allocation of TPECG monies to independent providers in respect of EHCP placements.

- These monies will continue to be calculated and allocated separately from main place-plus funding and will be separately identifiable. This feels to be important, certainly in the first year of transfer, so that settings have confidence that these monies have continued to be allocated.
- Unlike main place-element funding, the Authority will allocate these monies to academies as well as to maintained schools and PRUs.
- The basic rate of funding per place for 2021/22 is proposed at £693. This is the value of £660 used by the DfE in the transfer of these monies into the High Needs Block plus 5% in line with the increase in the Band 4 top up model and in the PRU / AP academy day rate model. The use of a single per place value for all settings is in line with the way that these grants have been transferred into the Schools Block and how they will now be allocated to primary and secondary mainstream schools.
- Special schools, special academies, PRUs and AP academies, and our centrally managed Education in Hospital provisions, will be allocated £693 x the number of places agreed to be commissioned for the next financial year. This would be calculated at the start of the year (April 2021) and would not subsequently change during the year. The allocation would be paid in two instalments in April (for 5/12ths to August) and in September (for 7/12ths to March). This will closely replicate the way that the grants are currently paid.
- Where the value per place actually received by a setting in 2020/21 is higher than £693, we will calculate funding using this higher value, which we will also increase by 5% for 2021/22. Indicatively (as 2020/21 full year allocations, including supplementary grant allocations, are still to be confirmed), of eleven specialist settings, £693 represents a higher per place value for seven settings. Four settings are currently funded at a value per place higher than £693 and would receive a protected value.

The values per place in four settings are higher because our current methodology uses adjusted workforce census information (the number of teachers a setting employs) rather than a fixed single value per place. It is a specific DfE requirement to protect current place-led values for individual settings in 2021/22. Although it also potentially feels beneficial to continue to recognise where specialist settings may employ more teaching staff, because of the nature of their provisions or levels of need of their pupils, it also feels reasonable to now seek to move to a fixed per-place methodology, which ensures there is a clear, predictable and objective methodology for allocating this funding going forward. We do wish however, to look more closely at how we could possibly embed this funding into our top-up arrangements in the future (as our Banded Model uses provision mapping assumptions about workforce numbers). However, there would be difficulties with this. The requirements set by the DfE in 2021/22 also lend themselves towards needing to continue a separate methodology. Using a place-led basis also clearly

ensures that this funding is secure and predictable and does not fluctuate with changing monthly occupancy. We anticipate that this certainty will be welcomed by the specialist settings.

9.4 Resourced provisions (EYESPs, resourced provisions school-led and resourced provisions local authority-led) currently do not access these separate grants either at the higher specialist setting rate or for places that are un-occupied in the October census. It does not feel correct however, to continue this exclusion within our own high needs funding arrangements from April 2021, recognising that resourced provisions have additional costs related to lower pupil to teacher ratios and that the proportion of salaries that is covered by these grants is not reimbursed by the top up calculated by our Banded Model. We therefore, propose to allocate the £693 per place also in respect of places commissioned at resourced provisions using the same methodology and timetable as set out for specialist settings in 9.3 above. As these settings do not currently receive these grants however, no protection arrangements are necessary. The Authority will allocate these monies to both maintained schools and to academies. Monies in respect of local authority-led resourced provision will be retained by the Authority rather than be delegated to the host school or academy (as the Authority has responsibility for staffing costs).

Question 7 – Do you agree with the methodology that the Authority proposes to use to allocate the Teacher Pay Grant and Teacher Pensions Grant in 2021/22? If not, please can you explain why not.

10. SEND Funding Floor for EHCPs in Mainstream Primary & Secondary

10.1 The Banded Model works on the basis that mainstream schools and academies are required to contribute £6,000 (Element 2) to the cost of support for pupils with EHCPs on their rolls from their already delegated formula funding derived budgets.

10.2 We have highlighted in consultation documents in recent years the significance going forward of approaches that ensure the correct minimum level of SEND / AEN (additional educational needs) driven formula funding in schools in relation to their numbers of children with EHCPs i.e. that mainstream primary and secondary schools and academies with higher proportions of pupils with EHCPs have sufficient resources to cover their commitments to meet the cost of Element 2 without this detracting, in a way that is disproportionate from the position found in other mainstream schools, from the amount of formula funding available to them to use in support of their wider SEND, AEN and AP activities.

10.3 We have an SEND Funding Floor in place currently, which:

- Provides a ‘top up’ where the NFF based SEND / AEN funding formula does not allocate a minimum level of funding to a school or academy, after the full cost of EHCPs has been removed. For Primary schools and academies this minimum is currently £19,931 or £69.10 per pupil (whichever is greater). For Secondary schools and academies the minimum is £75,337 or £69.10 per pupil (whichever is greater).
- Is re-calculated on a monthly basis for changes in EHCP positions.

10.4 Our current SEND Funding Floor however, was substantially affected by our movement at April 2018 to the National Funding Formula for mainstream primary and secondary funding. Since then, the values of SEND Floor allocations received by individual primary and secondary schools and academies have been protected at 2017/18 cash levels. We have not progressed a review locally because we have anticipated that the DfE’s national SEND and EHCP reviews will very likely result in a more prescriptive approach. We have not previously seen merit in adjusting our system for this to be immediately changed by a new national policy.

10.5 However, we are starting to see a greater number of issues being raised by schools and academies in respect of the sufficiency of their Element 2 funding in relation to their numbers of EHCPs. These issues are expanding as the numbers of pupils with EHCPs that are educated in mainstream settings continue to grow.

10.6 We also identify that, due to the DfE’s ‘levelling up’ of mainstream formula funding, in particular where all mainstream primary schools and academies will receive a minimum of £4,180 in per pupil funding in 2021/22, many schools and academies that used to receive SEND Floor funding, and continue to have their previous allocations protected, are now allocated significantly higher levels of relevant formula funding. It does not feel to be correct to continue to protect previous allocations where it is clear a school’s circumstances have significantly improved.

10.7 The status of the DfE's national review is not confirmed. However, we feel it is appropriate now to more seriously consider a local review of our SEND Funding Floor, to ensure that it is fit for purpose.

10.8 We propose to amend our SEND Funding Floor for the 2021/22 financial year. This proposal is put forward **as a trial, for one year only, and being subject to further review including in the light of the outcomes of the DfE's national reviews**. In particular, if our local approach continues, we may wish to be more targeted in how SEND Funding Floor support is allocated.

10.9 We would like to emphasise that the SEND Funding Floor does not apply to early years providers because Element 2 funding is allocated in addition to top up funding for children with EHCPs in early years settings. There is therefore, no additional pressure placed on early years providers in respect specifically of having to fund £6,000 to contribute to the cost of an EHCP. The Floor also does not apply to post 16 EHCPs (and FE provision) as Element 2 funding is allocated on an agreed lagged basis.

10.10 In 2021/22, we propose to trial the following SEND Funding Floor formula. As now, this would be recalculated on a monthly basis for changes in EHCPs.

A = FTE number of EHCPs in a school / academy (excluding early years and post 16) x £6,000
(Element 2)

B = The set % of a school's AEN NFF based formula funding that is required to be put to Element 2 costs, where

- The set % is the median average of the primary and secondary phase AEN NFF based formula funding contribution to Element 2 cost, rounded plus 1%. These averages are currently 11.20% for the primary phase and 9.50% for the secondary phase. Please note that these %s are to be confirmed for 2021/22 using final NFF data.
- AEN NFF based formula funding is: 100% of the English as an Additional Language factor, Free School Meals factor, Prior Attainment factor, Minimum Funding Level factor and IDACI factor, plus 80% of Minimum Funding Guarantee factor.
- Both these parameters for 2021/22 will be fixed in February 2021 at the point the S251 Budgets are published for maintained schools.

Where A is greater than B a school / academy receives a top up for the difference.

10.11 This formula is aimed at ensuring that no mainstream primary or secondary school or academy will have to manage from their own formula funding an above phase-average cost pressure in respect of their commitment to fund Element 2 for their EHCPs. As well as supporting provision for pupils with EHCPs, this approach will help to protect the funding used by schools and academies to support their wider AEN, SEND and AP activities. It will directly financially support schools and academies that have higher proportions of pupils with EHCPs, in support of inclusion, combining also to support schools and academies that may have lower levels of AEN formula funding and that may be smaller in size. It will also support schools and academies that may have some turbulence in formula funding as a result of in year pupil numbers changes.

10.12 Indicative modelling of this new formula is provided in Appendix 5. This modelling uses the EHCP information taken from the September 2020 high needs funding allocations and the AEN NFF formula funding estimates for 2021/22 that are used in the separate Schools Block consultation. This modelling does not show final allocations for 2021/22. Both the EHCP data and the NFF formula funding values will be adjusted prior to April 2021. The EHCP data will then be adjusted monthly according to a school's EHCP population.

10.13 There would be a change in distribution and there are winners and losers.

- Overall, the proposed new SEND Floor, based on current modelling data, allocates £0.83m more financial support than the floor in place currently. This is reflection in particular of the growth in the numbers of EHCPs in mainstream schools. It is also a reflection of the specific link that now is made between the value of the Floor's allocation and the value of Element 2 commitments. This is especially the case for the secondary phase.

- A significant number of the schools and academies that see a reduction or a removal of SEND Floor funding are at the same time in 2021/22 seeing a significant increase in their delegated formula funding following the DfE's 'levelling up'. These are the schools where it is felt not to be correct to continue to protect previous allocations as their relevant circumstances have significantly improved. Their gain from the levelling up of formula funding at least matches the value of SEND Floor Funding that is lost. These schools can be identified as having significant Minimum Funding Levels (MFL) funding in the Appendix 5 modelling.
- However, a small number of smaller sized primary schools and academies see a substantial reduction in their SEND Funding Floor allocations without seeing an at least equivalent gain in delegated formula funding through the MFL (£4,180) levelling up changes. For these identified and named small primary schools and academies, subject to the outcomes of this consultation, we propose to continue to protect their current allocations during the trial in 2021/22 and pending further review.

Question 8 – Do you agree with proposal to adopt a new SEND Funding Floor approach for 2021/22, in trial for one year, as set out in section 10? If not, please can you explain why not.

Question 9 – Do you have any comments (including technical comments) on the proposed new SEND Funding Floor mechanism you would like the Authority to consider?

Question 10: Are there any changes that you would wish to see made to the funding models in 2021/22? Please give details.

Question 11 – Do you have any other comments on the funding model or the proposals that you have not recorded elsewhere?

11. Consultation Responses

11.1 Please use the responses form at Appendix 6 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 section 1. Please ensure that your response is submitted by the deadline of **Tuesday 1 December 2020**.

12. Next Steps

12.1 Following consideration of the responses to this consultation, and of the final view of the Schools Forum, our high needs funding approach will be agreed by the Council's Executive in February 2021.

12.2 It is anticipated that the Schools Forum will give the Authority its final view on 2021/22 arrangements on Wednesday 13 January 2021.

12.3 Discussions on the DSG funding position and high needs funding matters for 2021/22 will continue with the Schools Forum between now and January 2021. You are recommended to keep in touch with these discussions by visiting the Schools Forum webpage on the Council's Minutes site [here](#).

13. Appendices

- Appendix 1 Summary of the Place-Plus system and how this works for different providers
- Appendix 2 Banded Model for Pupil-Led Need Top Up Funding
- Appendix 3 Technical Annex (including Setting-Led Need factors)
- Appendix 4 Planned Commissioned Places 2021/22 (Bradford-located settings)
- Appendix 5 Proposed SEND Funding Floor Modelling
- Appendix 6 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 (maintained schools, academies and free schools)	<p>Element 1 is included within the per-pupil funding allocated through the local school funding formula (NFF-based).</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school.</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 commissioned.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school.</p>	None.	SEND Funding Floor support Element 2 cost in pre-16 provisions (see section 10).
Mainstream early years (nursery schools, classes and PVI providers)	<p>Element 1 is included within the per-pupil funding allocated through the local EYSFF.</p> <p>Early Years SEND Inclusion Grant 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>	n/a	n/a	None.	Early Years SEND Inclusion Grant. DAF Grant.

	<p>SEND (non-EHCP) as agreed by Panel.</p> <p>Element 2 is allocated to early years EHCPs in addition to top up.</p>	<p>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school or provider.</p>				
<p>School-led Resourced Provisions (mainstream primary & secondary)</p> <p><i>(formerly known as DSPs).</i></p>	<p>Elements 1 & 2 are allocated through a combination of per-pupil funding allocated through the local school's funding formula plus £6,000 per place for places occupied by pupils on roll in October in the previous year and £10,000 per place for the remainder of places agreed to be commissioned.</p> <p>Additional place-funding is allocated in real time where occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school.</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 commissioned.</p> <p>Both Elements 1 and 2 are retained by the school.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school.</p>	<p>Small Setting Protection.</p> <p>3% Cash Budget Protection.</p>	<p>Teacher Pay and Teacher Pensions Grants</p>

	<p>the year.</p> <p>Both Elements 1 and 2 are retained by the school.</p> <p>Element 1 is set at a minimum of £4,000 per agreed place.</p>					
Local Authority-led Sensory Need Resourced Provisions (mainstream primary & secondary). <i>(formerly known as ARCs).</i>	<p>Elements 1 & 2 are allocated through a combination of per-pupil funding allocated through the local school's funding formula plus £6,000 per place for those occupied by pupils on roll in October in the previous year and £10,000 per place for the remainder of places agreed to be commissioned.</p> <p>The host school retains Element 1, set at a minimum of £4,000 per agreed place.</p> <p>Element 2 funding is retained by Bradford Council. This currently requires host schools to repay Element 2 back to the Council.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is retained by Bradford Council.</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 commissioned.</p> <p>The host school retains Element 1.</p> <p>Element 2 funding is retained by Bradford Council. This currently requires host schools to repay Element 2 back to the Council.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is retained by Bradford Council.</p>	None.	Teacher Pay and Teacher Pensions Grants

	<p>Additional place-funding is allocated in real time where occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across the year.</p>					
<p>Local Authority-led Resourced Provisions (mainstream primary & secondary).</p> <p><i>(established from 2019).</i></p>	<p>Element 1 is allocated through a combination of per-pupil funding allocated through the local school's funding formula plus £4,000 for places to agree to be commissioned but not occupied by pupils on roll in October in the previous year.</p> <p>The host school retains Element 1, set at a minimum of £4,000 per agreed place.</p> <p>Element 2 funding is calculated at £6,000 per commissioned</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is retained by Bradford Council.</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 commissioned.</p> <p>The host school retains Element 1.</p> <p>Element 2 funding is retained by Bradford Council.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is retained by Bradford Council.</p>	<p>None.</p>	<p>Teacher Pay and Teacher Pensions Grants</p>

	place and is retained by Bradford Council.					
Early Years Enhanced Specialist Provisions (maintained nursery schools)	<p>Elements 1 & 2 are allocated through a combination of per-pupil funding allocated through the local EY-SFF plus £6,000 per FTE commissioned place.</p> <p>Both Elements 1 and 2 are retained by the school.</p> <p>Additional Element 1 funding is paid using EY-SFF rates for any FTE places not occupied in the EY-SFF termly censuses.</p> <p>Additional place-funding is allocated in real time where occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across the year.</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>Uses the Banded Model (see appendix 2). All EYESP places funded at Band 4L.</p> <p>The top up funding is allocated to and retained by the school.</p>	n/a	n/a	<p>Small Setting Protection. Please see appendix 3.</p>	Teacher Pay and Teacher Pensions Grants

Maintained Special Schools & Special School Academies	<p>Elements 1 and 2 are combined in a fixed £10,000 per place, based on an agreed number of places to be commissioned. Additional place-funding is allocated in real time where occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across the year.</p> <p>Retained by the school.</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>Uses the Banded Model (see appendix 2).</p> <p>The top up funding is allocated to and retained by the school.</p>	<p>£10,000 per place based on an agreed number of places.</p> <p>Additional place-funding is allocated in real time where occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across the year.</p> <p>Retained by the school.</p>	<p>Uses the Banded Model (see appendix 2).</p>	<p>Split Sites.</p> <p>Post 16 Element 1 enhancement.</p> <p>New Services Delegation.</p> <p>Small Setting Protection (<i>Not currently needed</i>).</p> <p>3% Cash Budget Protection.</p> <p>Please see appendix 3.</p>	<p>Teacher Pay and Teacher Pensions Grants</p>
PRUs & AP Academies (funding provision for pupils permanently excluded).	<p>Elements 1 and 2 are combined in a fixed £10,000 per place, based on an agreed number of places to be commissioned.</p> <p>Retained by the PRU.</p> <p>Additional place-funding is allocated in real time where</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>Uses the Day Rate Model (see section 8)</p> <p>The top up funding is</p>	n/a	n/a	<p>No specific additional factors – setting-led need costs are to be covered within the calculation of the Day Rate.</p>	<p>Teacher Pay and Teacher Pensions Grants</p>

	occupancy is exceeded, with an end of year reconciliation to ensure no overall overpayment of additional place-led funding for the actual total composite occupancy across the year.	allocated to and retained by the PRU.				
Hospital Education, Tracks and Medical Home Tuition.	The funding of the centrally managed services operates outside the Place-Plus mechanism, working within the discrete allocation provided for this service within our HNB. This will be subject to annual review to incorporate any changes in the DfE's funding methodology and requirements.	n/a	n/a	n/a	None.	Teacher Pay and Teacher Pensions Grants
Further Education Institutions, special institutions and ILPs (post 16)	n/a	n/a	Element 1 (based on the 16-19 national funding formula) plus Element 2 (£6,000) based on the number of places to be funded. Additional place-funding (element 2	Agreed per-pupil top up paid by the commissioning local authority. Allocated in 'real time' during the year. Changes for starters and leavers.	None.	None.

			<p>only) can be allocated in year where occupancy exceeds agreed places, with an end of year reconciliation to ensure no overall overpayment.</p> <p>Both Elements 1 and 2 are retained by the institution.</p>	<p>Uses the Banded Model (see appendix 2). Typically values are funded at 60% for most placements. Higher cost placements (low incidence high need) are typically funded on an actual cost basis.</p>		
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.	Teacher Pensions Grant (for EHCPs)

Appendix 2

The Banded Model for Funding Pupil-Led Need Top Up 2021/22

Introduction

1.1 Top-up funding (also known as Element 3 or ‘Plus’ funding) 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 is expected to reflect the cost of additional support an institution incurs related to the individual needs of the child or young person.

1.2 As with many authorities, Bradford allocates top up funding using a band system. This model is used to assign EHCPs into bands of need for funding purposes. Each band has an applicable level of funding and every EHCP assigned to a band is allocated a set value of funding.

1.3 We would like to remind providers that, for the current 2020/21 financial year, we introduced a new Banded Model. This model replaced our previous ‘Ranges Model’ and quite significantly uplifted the funding of EHCPs in all settings, both mainstream and specialist. This new model includes protections, which have ensured, and will continue to ensure, that no EHCP in place on 1 April 2020 reduces in value as a result of funding model change.

1.4 A band system is more responsive to the needs of an individual child or young person than a blanket lump sum style approach but is not quite as sensitive as an approach where the cost of the needs of a child or young person is calculated on an exact basis. Blanket, band, and individually-costed systems all have pros and cons. The main positive features of band models, and of our Banded Model, are that these help promote consistency and transparency, reduce complication, support the quick assessment and release of funds, whilst also enabling the SEND Panel to find a ‘close fit’ for funding the needs of an individual child or young person with an EHCP.

1.5 In continuing to use our Banded Model in 2021/22, the Council’s intention is still to retain a uniform framework for calculating top-up funding for EHCPs. The Council’s expectation continues to be that this framework will enable a close fit to be found for the funding of the vast majority of EHCPs and will ensure consistency of approach in the funding of high needs across 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 banded framework, most of whom will be placed in specialist independent provisions.

1.6 We are not proposing technical changes to our Banded Model in 2021/22. We do propose however, to uplift rates of top up funding that this model allocates. Please see section 6 for explanation of this. Below is a summary of how the Banded Model operates.

The Banded Model 2021/22

2.1 The Banded Model uses at its base the [Bradford Matrix of Need](#), which outlines waves of intervention:

- Band 1 (Quality First Teaching)
- Band 2 (SEND Support)
- Band 3 (EHCP) – typically mainstream - this is the band at which Element 3 EHCP funding begins
- Band 4 (EHCP Plus) – typically specialist provision

This Matrix identifies the responsibilities of schools and providers in their use of already delegated funds in meeting the cost of support up to Band 3. It then identifies the point at which top up funding will begin in our model, which is EHCP Band 3.

2.2 The Banded Model has 6 bands and 6 funding steps, with values for 1 April 2021 proposed as set out in the table below. This table shows the proposed value of top up by band and the value of Element 2

contributions, which schools and providers will add to the top up from their budgets to produce the total value of funding available for supporting the costs of an EHCP.

In all steps within the model the school / provider, with the exception of EHCPs for 2, 3 and 4 year olds (in pre-reception) in mainstream not specialist provision, is expected to contribute Element 2 funding, currently at a value of £6,000 per 1 FTE, to the cost of the additional needs set out in the EHCP. For EHCPs for 2, 3 and 4 year olds (in pre-reception) in mainstream not specialist provision, that are only funded through the Early Years Single Funding Formula (EYSFF), because the EYSFF does not allocate Element 2 funding, Element 2 is allocated on an FTE basis in addition to the top up value for these EHCPs until these children enter reception year. This addition does not apply to early years children that are placed in special schools or in resourced provisions as these provisions are funded on a place-led basis, which includes Element 2.

	Proposed Indicative Top Up Value at April 2021	Element 2 Value FTE the school / provider adds	Total Value of Funding to support the EHCP
Band 3 Low (3L)	£1,900	£6,000	£7,900
Band 3 Medium (3M)	£3,626	£6,000	£9,626
Band 3 High (3H)	£5,302	£6,000	£11,302
Band 4 Low (4L)	£8,435	£6,000	£14,435
Band 4 Medium (4M)	£12,235	£6,000	£18,235
Band 4 High (4H)	£16,148	£6,000	£22,148
Protected 7	£26,534	£6,000	£32,534

The model is calculated on a provision-mapping approach. The additional educational needs of a child with an EHCP typically will be met through additional adult contact time. Typically this will be delivered in a combination of individual time and time in smaller groups. The overall volume of time will increase as needs increase and the proportion of this time that is delivered on a more bespoke basis will also increase as needs increase. The values of the bands have been built up on ‘notional assumptions’ about the proportion of additional support given to an EHCP, with this support split between bespoke time and time in smaller groups. This is a model for the SEND Panel to use to determine the volume and type of support required to then closely meet the needs of an individual EHCP.

2.3 Band 3 (EHCP) typically will support the cost of EHCPs placed in mainstream provisions. Band 4 (EHCP plus) typically will support the cost of EHCPs placed in specialist provisions. However, this is not an absolute position and the SEND Panel will use the model flexibly to closely meet need.

The Band 3 values are calculated on assumptions on additional ‘support assistant’ time (where bespoke means 1:1 and group time is in groups of 1:3). The cost per hour assumption within the indicative 2021/22 financial year model, on a term time only basis and incorporating assumptions about on-costs, is £16.10. This represents a 3% increase on the £15.63 that was used in the 2020/21 model.

The Band 4 values are calculated on assumptions on both support assistant time (where bespoke means 1:1 and group time is in groups of 1:2) and teacher time in group sizes of 1:12, 1:8 and 1:6. The cost per hour assumption for support assistant time within the indicative 2021/22 financial year model is £16.10 as in Band 3. The indicative cost per hour assumption for teacher time in the model is £45.03. This represents a 9.35% increase on the £41.18 that was used in the 2020/21 model.

2.4 Each EHCP will be funded at the band value that provides the closest fit for meeting the cost of the needs of the child or young person. In the model, the closest fit may also be found by combining ('stacking') more than one band value. The facility to combine values means that the SEND Panel can use the model in a flexible way to find a very close fit for the funding especially of children and young people with significant secondary needs as well as those that require additional functional support both within and outside of the standard taught school day where this is not already funded within a single band value.

2.5 It is helpful to continue to highlight the main differences between the Banded Model and the previous Ranges Model that was used up to 31 March 2020:

- The Banded Model does not have a 7th step (the equivalent of the previous Range 7). It is expected that stacking will deliver a level of support higher than the single band 4H where this is necessary. Specific transition arrangements are in place for Range 7 EHCPs that existed at 1 April 2020.
- The Panel can 'stack' values (meaning an EHCP can be allocated more than one value) in order to find a close fit.
- The Banded Model does not use primary need as a marker for the placement of an EHCP into a band. Placement is based on assessed level of need.
- Whereas the previous Ranges Model defined need in terms of 1:1 hours of support, the Banded Model uses a notional provision mapping approach and a combination of bespoke time and time in smaller groups.
- The values allocated by the Banded Model are significantly increased on those allocated by the Ranges Model. These increases are the result of two main adjustments; a) refreshing the assumptions about the salaries of support assistants and teachers - the Banded Model uses estimates of salaries and on-costs for 2021/22; b) allowing the top up model now to compensate for the fixed £6,000 Element 2. Because the £6,000 Element 2 has not increased since the implementation of the national model in 2013/14, and has not increased in 2021/22 vs. 2020/21, the annual increase in the costs of support from increased salaries must be met solely by the top up element otherwise there is an annual erosion of funding in real terms. This is the reason why the % increases in top up funding on their own are significantly higher than inflation / pay award. However, when top up funding is added to the fixed £6,000 Element 2, the true total % increases in funding available to meet need are reduced. Please see section 6 for explanation of this. Previously, under the Ranges Model, there was not sufficient funding in the High Needs Block to adjust for this erosion.
- The Banded Model works alongside a clarified / amended approach to the sharing of the cost of specialist equipment.

2.6 To highlight how the Banded Model continues to be the same or similar to the previous Ranges Model:

- Decisions on the application of the Banded Model – which of the 6 bands an EHCP is placed in and whether an EHCP is given more than one band value - continue to be taken by Bradford Council's SEND Panel with reference to the evidence submitted through the EHCP assessment process. Appeals and disputes also continue to be resolved through the Panel process.
- In all steps within the model, the school / provider, with the exception of EHCPs for 2, 3 and 4 years olds (pre-reception) in mainstream not specialist provision, is expected to contribute Element 2 funding currently at a value of £6,000 to the cost of additional needs.
- The bottom 'threshold' for the 1st step of Band 3 (3 Low) is the same as the Ranges Model. The Banded Model itself has not changed the threshold at which EHCP funding can initiate nor has it changed the

points of access to an EHCP. It simply has changed the options that are available to the SEND Panel to use to ensure that an EHCP is appropriately and accurately funded.

- For the top-up funding of post 16 high needs students with EHCPs in the Further Education sector, it has been agreed previously 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 Banded 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 formalise this funding element. This approach is continued in the application Banded Model.
- The ‘technical framework’ is the same for the operation of the Banded Model during the year e.g. the monthly re-calculation of EHCP funding from the census of EHCPs on roll on 10th of each month.
- An assessment place (which was Range 4D) has become Band 4L. This funds EHCPs placed in specialist provisions until a final determination of band from the Panel is received. Funding is changed at this point if this is different from 4L. Band 4L also continues to be used to permanently fund all placements in the Early Years ESPs that are attached to maintained nursery schools.

A reminder of the transition from the previous Ranges Model

3.1 It is helpful to remind providers of how we moved from the Ranges Model to the now established Banded Model at 1 April 2020 and what protections continue to be in place.

3.2 All EHCPs in place at 1 April 2020 were automatically transferred on to the new Banded Model system at 1 April 2020 as follows:

Range		Band
Range 4A	became	Band 3L
Range 4B	became	Band 3M
Range 4C	became	Band 3H
Range 4D	became	Band 4L
Range 5	became	Band 4M
Range 6	became	Band 4H
Range 7	became	Protected 7

3.3 Most existing EHCPs on an on-going basis will remain within the band they were transferred to. The SEND Panel will continue to review, through the annual review process, individual EHCPs where the banding may be disputed, where there are obvious existing inaccuracies or where the needs of the child or young person have changed.

3.4 The Banded Model operates under the guarantee that, for EHCPs in place at 1 April 2020, the EHCP will not ever drop to a lower valued band unless the SEND Panel agrees that the needs of the child or young person are reduced when compared against the needs presented to the Panel in the original EHCP determination. This guarantee remains in place until the pupil reaches the end of year 11. This guarantee does not extend to assessment places that were funded at 1 April 2020 (as these pupils did not yet have EHCPs).

3.5 The Banded Model retains a transitional ‘Protected 7’ band, which will continue to fund EHCPs that were graded at Range 7 under the old model. These Range 7 pupils will stay funded by the Protected 7 band unless an annual review gives them a higher level of funding using the new model (via stacking), when the pupil would be transferred onto the new model at this point, or where the pupil’s needs are agreed to have reduced when compared against the needs presented to the Panel in the original EHCP Range 7

determination. This guarantee remains in place until the pupil reaches the end of year 11. The value of Protected 7 will be uplifted each year by the same % that is applied to Band 4H.

Appendix 3 – Technical Annex

This appendix contains more technical detail on the definitions and calculations of factors that are contained within Bradford Council's EHCP high needs funding model.

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). How Bradford 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)

Please see section 10 for an explanation of the current SEND Funding Floor and our proposals for 2021/22.

Setting-Led Needs Factors – Maintained Special Schools & Special School Academies

- New Services Delegation – an additional amount per pupil to reflect that stand alone special schools and special school academies cannot access de-delegated and centrally managed services without charge – indicatively to be set at a flat £425.13 per pupil in 2021/22. So a setting with 100 pupils receives $100 \times £425.13 = £42,513$ 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 is:

$$\begin{aligned} A &= (75 \times £10,000 \times 20\%) \\ B &= (\text{setting's place funding} \times 20\%) \\ &= \text{top up to the value of A where B is less than A} \end{aligned}$$

As all special schools and special school academies are now larger than 75, this is not a factor that is currently needed.

- Split Sites – an additional sum for special schools and special school academies that operate across split / satellite sites. The full year value of this lump sum is proposed at £214,265 in 2021/22.
- Post 16 Places – an additional sum per Post 16 place, to allocate an additional £1,200 per place. This ensures that special schools with post 16 places receive the nationally set DfE value of element 1 for post 16 pupils, which is £5,200 in 2021/22.
- 3% Cash Budget Protection – an additional total cash budget safety net protection, which ensures that at no point during 2021/22 will the total 'Place Plus' calculated budget for an individual special school be more than 3% lower than the 2020/21 total level of funding. As most special schools are / have been increasing places, together with the uplifted Banded Model funding rates, this is not a factor that was needed in 2020/21, but remains in place to ensure a safety net.

Setting-Led Needs Factors – School-Led Resourced Provisions Mainstream Primary & Secondary Schools and Academies

- Small Setting Protection – an additional sum for provisions with fewer than 24 FTE places, to ensure a minimum level of funding for fixed costs. The formula is:

A $(24 \text{ FTE} \times £10,000 \times 20\%)$
B (setting's place funding (where each place is worth £10,000) $\times 20\%)$
= 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 – Early Years Enhanced Specialist Provisions

- Small Setting Protection – as School-Led Resourced Provisions above.

Appendix 4 – 2021/22 Planned Commissioned Places

Please see the separate Excel file.

Appendix 5 – Proposed SEND Funding Floor Modelling

Please see the separate Excel file.

Appendix 6 - RESPONSES FORM

Consultation on Funding High Needs Provision 2021/22

Name _____ Setting Name _____

THE DEADLINE FOR RESPONSES TO THIS CONSULTATION IS TUESDAY 1 DECEMBER 2020

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 approach that is proposed for uplifting the values of the Banded Model in 2021/22? If not, please can you explain why not.

Strongly Agree On Balance Agree (some reservations) Strongly Disagree

If not, please provide further explanation here:

Question 2 – Do you have any comments (including technical comments) on the Banded Model you would like the Authority to consider for 2021/22?

Question 3 – Do you agree with the amendments to the setting-led need factors that are proposed in paragraph 7.5? If not, please can you explain why not.

Strongly Agree

On Balance Agree (some reservations)

Strongly Disagree

If not, please provide further explanation here:

Question 4 – Do you have any comments (including technical comments) on the setting-led need factors you would like the Authority to consider for 2021/22?

Question 5 – Do you agree with the amended Day Rate mechanism that the Authority proposes to use to fund the PRU / AP academy in 2021/22? If not, please can you explain why not.

Strongly Agree

On Balance Agree (some reservations)

Strongly Disagree

If not, please provide further explanation here:

Question 6 – Do you have any comments (including technical comments) on the proposed Day-Rate mechanism you would like the Authority to consider for 2021/22?

Question 7 – Do you agree with the methodology that the Authority proposes to use to allocate the Teacher Pay Grant and Teacher Pensions Grant in 2021/22? If not, please can you explain why not.

Strongly Agree On Balance Agree (some reservations) Strongly Disagree

If not, please provide further explanation here:

Question 8 – Do you agree with proposal to adopt a new SEND Funding Floor approach for 2021/22, in trial for one year, as set out in section 10? If not, please can you explain why not.

Strongly Agree On Balance Agree (some reservations) Strongly Disagree

If not, please provide further explanation here:

Question 9 – Do you have any comments (including technical comments) on the proposed new SEND Funding Floor mechanism you would like the Authority to consider?

Question 10: Are there any changes that you would wish to see made to the funding models in 2021/22? Please give details.

Question 11 – Do you have any other comments on the funding models or on the proposals that you have not recorded elsewhere?